



Research on Trends in Vocational Rehabilitation Systems and Services in Other Countries

(Research Report No. 169) Summary

[Key word]

Human rights model and human rights approach Inclusive employment

Cooperation between welfare and employment Disability prevention and comprehensive rehabilitation

Diversity and Inclusion

[Abstract]

In the past, vocational rehabilitation in other countries has often been difficult to apply as a reference for Japan due to significant historical and cultural differences. The purpose of this research was to clarify trends in advanced vocational rehabilitation in other countries that can be used as a reference for Japan by focusing on comprehensive initiatives to resolve new issues requested by the Convention on the Rights of Persons with Disabilities. We collected and analyzed relevant information from the U.S., Germany, France, the U.K., and other countries to verify the comprehensive development of vocational rehabilitation in the perception of disability, work, and support. Trends that could be used as a reference in Japan included the understanding of discrimination and support needs faced by persons with disabilities and effective support, specialized support for corporate management and workplace creation where everyone can play an active role, and comprehensive rehabilitation through cooperation between related fields that are integrated with disability prevention.

1 Authors (in order of authorship)

HARUNA Yuichiro (Assistant Research Manager, Social Support Division, National Institute of Vocational Rehabilitation)

2 Research Period

FY2020 - FY2022

3 Composition of the Research Report

Introduction Diverse Development and Integration of Vocational Rehabilitation in Other Countries

Part I Integration of Different Perceptions of Disability

Part II Integration of Different Perceptions of Work

Part III Integration of Different Perceptions of Support

Final Part Overall Discussion

4 Background and Purposes of the Research

In the past, surveys of initiatives in other countries have mainly focused on legal systems and services, as well as comparative studies. With regard to vocational rehabilitation in other countries, international sharing of its contents has not necessarily been active, as the relevant legal systems and historical backgrounds in each country differ greatly. However, the Convention on the Rights of Persons with Disabilities, which entered into force in 2008, calls for international sharing and integration of good practices, expertise, etc. (disability human rights model, the right to decent work for persons with disabilities, comprehensive rehabilitation, etc.) that transcends differences in various principles and approaches that have developed in other countries, and provides an opportunity to develop vocational rehabilitation as universal expertise to address support issues common to Japan as well.

The purpose of this research study was to clarify trends in the development of legal systems and services related to vocational rehabilitation that contribute to solving issues, focusing on western countries that are responding to new issues requested by the Convention on the Rights of Persons with Disabilities from a variety of perspectives in an advanced manner.

Specifically, the following three aspects were determined to identify trends in the development of vocational rehabilitation that will contribute to solving new issues, which will understand the work support needs of persons with disabilities of various types and degrees of disabilities, realize the significance of work from the perspective of both workers and companies, and support vocational life through multidisciplinary cooperation of the entire society.

- Different perceptions of disability and its development: integrating the European model of medicine and the American model of society into a view of disability as an interactive and evolving concept.
- Differences and developments in the perception of work: development towards an inclusive perception of work that does not separate welfare workshop from general work, but rather realizes decent work for all persons with disabilities
- Differences and developments in the perception of support: development in perceptions of support as comprehensive rehabilitation that can respond to the support needs of each person, rather than being

divided vertically between specialized support in related fields such as medicine, welfare, and education, and work support.

5 Method

In other countries, vocational rehabilitation has developed from diverse historical, cultural, and legal backgrounds, and it is not necessarily considered that all contents of vocational rehabilitation in other countries will contribute to solving issues in Japan. On the other hand, if new and universal expertise for problem-solving can be identified for issues that are difficult to solve with conventional knowledge, as requested by the Convention on the Rights of Persons with Disabilities, there is a possibility to utilize this knowledge in Japan. From this perspective, we collected and analyzed the minimum necessary information as comprehensively as possible by clarifying and narrowing down the countries and survey content targeted by the survey.

(1) Target Countries of the Survey and Survey Contents

Based on the hypothesis that the development of vocational rehabilitation in other countries is characterized by differences in the perception of disability, work, and support, the survey focused not only on the initiatives of representative countries that have led the traditional perception in Japan internationally but also on the initiatives of representative countries that have led a perception that is opposed to the traditional perception in Japan. The survey focused on the United States, Germany, France, the United Kingdom, and other countries that have been international leaders in various perceptions of disability, work, and support. The content of the survey then included characteristic initiatives that reflect the differences and developments in how disability, work, and support are perceived in each country.

(2) Collection and Analysis of Documents

The target of this research study was the contents of the various ways of perceiving disability, work, and support and their respective fundamental developments in other countries in recent years, and it was assumed that documentation is essential for the common recognition and common initiatives of the persons concerned in each country. Therefore, we collected and analyzed information released in recent years in each country on the survey contents that we considered worthy of attention in the developed countries assumed in (1) above.

A Integration of different perceptions of disability

Because of the differences in perceptions of disability between the medical model and the social model, there were significant differences in basic principles and specific initiatives in other countries regarding the vocational abilities of persons with disabilities, work difficulties, support needs, and the ways in which support should be provided. However, based on the premise that the medical model and the social model are being integrated internationally, we proceeded to gather information on the challenges and developments in the two models.

B Integration of different perceptions of work

Because of the differences in perceptions of work from the perspectives of persons with disabilities and companies, there were significant differences in basic principles and specific initiatives in other countries in terms of welfare workshop and employment of persons with disabilities, inclusive labor markets, etc. However, based on the premise that, internationally, the integration of the perspectives of persons with disabilities and companies is progressing, we proceeded to gather information on the challenges and developments in each of these fields.

C Integration of different perceptions of support

While a high level of expertise is required for persons in charge of work support staff for persons with

disabilities, it is also important to collaborate with specialized organizations and professionals in related fields such as medical care, welfare, and education to support employment and continuous vocational life after employment for a diverse range of persons with disabilities. Based on the premise that initiatives to develop human resources related to work support for persons with disabilities are indivisible from issues such as cross-sectoral social system reforms and coordination of various systems and services of related organizations, we proceeded to gather information on challenges and developments in each of these fields.

6 Summarized Results of the Study

As a result of collecting and analyzing relevant information from other countries, it became clear that the various conventional initiatives largely varied due to differences in perceptions of disability, work, and support in other countries have been integrated into a synthesis that can be easily used as a reference for Japan.

(1) Integration of Different Perceptions of Disability

In other countries, the understanding of disabilities in occupational settings due to the complicated interaction between the individual's diverse disabilities and the environment and society has increased, and a wide range of discrimination and support needs, including those that are difficult for the individual to disclose, have become clearer and expertise in effective support has been accumulated. Currently, the essence of the issue is seen as the improvement of the quality of expertise and professional support to accurately identify the support needs of various persons with disabilities, who are the subjects of human rights and can play an active role in their professions, through a comprehensive understanding of disability.

A Dissemination of comprehensive awareness of the vocational abilities and support needs of persons with disabilities

In the understanding of disabilities due to the interaction between the individual and the environment, experience in other countries with reasonable accommodation and professional support has accumulated scientific evidence that disabilities can be eliminated in occupational settings. However, there are still many people who do not understand that "persons with disabilities cannot work and are a burden," or that "if they can work, they are not disabled and do not need support," etc. It is important to increase awareness of the overall vocational abilities and support needs of persons with disabilities. The following initiatives in other countries may provide a useful reference for Japan.

- Systematic information on effective reasonable accommodation and work support that has been accumulated in the U.S., Germany, and other countries in a variety of occupational situations with various types of disabilities, and summarized for corporate personnel, persons with disabilities, and support staff.
- Results of a project in the U.S. to demonstrate the possibility of employment for persons with intellectual disabilities, mental disabilities, and persons with multiple disabilities, who have traditionally been seen as having the greatest difficulty in obtaining general employment.
- Methods in the U.S. and Germany to raise awareness of the fact that persons with disabilities can work and have support needs in a balanced and easy-to-understand manner.
- Measures taken in other countries that do not attribute the responsibility for solving work issues of persons with disabilities to the persons with disabilities themselves, but rather to their support needs, the employment issues of companies, and the support issues of support providers.

B Understanding and supporting the work support needs of persons with a wide range of disabilities

Experience in other countries in meeting the work support needs of persons with diverse disabilities has revealed that many persons with disabilities, including those due to mental illness and chronic illness, have work support needs that are difficult to see from the outside but are not eligible for reasonable accommodation and support. The role of companies and professional support in understanding and supporting such a wide range of persons with disabilities is becoming increasingly important. The following initiatives of other countries may provide a useful reference for Japan.

- Identification of persons with mild disabilities in Germany and France whose support needs are difficult to identify from outward appearances without welfare disability certification, and provision of reasonable accommodation and specialized support.
- All-corporate initiatives to promote disability disclosure to the benefit of both persons with disabilities themselves and companies for positive discrimination remediation measures in the U.S., a leading country in the field of disability nondiscrimination legislation.
- Initiatives in the workplace in Germany as part of vocational rehabilitation to understand support needs at a stage when symptoms and functional impairment of mental illness and chronic illness do not appear, and to prevent and respond to these needs as early as possible.

C A human rights approach based on knowledge of the interaction between the individual and the environment

As scientific evidence of effective support for persons with diverse disabilities accumulates and technological innovations advance, the notion that an individual's disability affects his or her employment potential is itself problematic, and "improving the quality of work support according to individual vocational goals and strengths" in line with the human rights model of the Convention on the Rights of Persons with Disabilities is the central issue in a comprehensive approach to understanding disability. The following initiatives of other countries may provide a useful reference for Japan.

- The approach of the Committee on the Rights of Persons with Disabilities and others, which prioritizes the inclusion of all persons with disabilities in society as subjects of human rights, rather than emphasizing what they cannot do.
- Ethical guidelines and support contents for vocational rehabilitation professionals in the U.S. and other countries to provide work support based on each person's abilities, aptitudes, and desires.
- Measures to address risks related to the reproduction of discrimination against persons with disabilities based on data on past work difficulties of persons with disabilities, as a result of the diffusion of artificial intelligence-based hiring processes in companies in the U.S. and other countries.

(2) Integration of Different Perceptions of Work

In addition to the recognition of the labor and employment rights of all persons with disabilities, the creation of workplaces where diverse people can exercise their abilities and work comfortably has become an important issue for corporate management. Vocational rehabilitation in other countries has developed in response to these initiatives into comprehensive professional support for the creation of employment relationships between persons with disabilities and employers, including business management and workplace development, to enable persons with various disabilities and chronic illness to play an active role as human resources.

A Creating a workplace where everyone can exercise their abilities

The significance of occupations for persons with disabilities as well as the significance of management and employment management that make the most of diverse human resources, including persons with disabilities, for companies, is becoming increasingly recognized, and the synergy between the initiatives of companies to develop inclusive corporate cultures and workplaces as management and business processes and public support is becoming increasingly important. The following initiatives of other countries may provide a useful reference for Japan.

- The employment quota system for persons with disabilities as an affirmative action against discrimination in other countries, which is compatible with the prohibition of discrimination against persons with disabilities and promotes the employment of persons with disabilities in companies while ensuring the quality of employment of persons with disabilities.
- Establishment of indicators and levels in the U.S. and the U.K. for creating workplaces where persons with disabilities can work comfortably and contribute to the management, and promotion of corporate initiatives that utilize these indicators.
- Details of corporate responsibility as reasonable accommodation in other countries, and public technical and financial support to expand the scope of these initiatives.
- Initiatives in the U.S. and Germany to develop support systems and human resources in the workplace that promote the development of the workplace environment and enable persons with disabilities to consult and receive appropriate support at each company and workplace.

B Expansion of meaningful employment options for all persons with disabilities

Even persons with disabilities, who have traditionally been considered the most difficult to find general employment, are accumulating expertise and expertise in job content, workplace environment development, and ongoing local support systems to enable them to find rewarding and humane work in general employment.

- International discussions, centered on the Committee on the Rights of Persons with Disabilities, on specific problems and issues for improvement of welfare workshop in the right to work and employment of persons with disabilities under the Convention on the Rights of Persons with Disabilities
- Expert knowledge and expertise in other countries on how to create a workplace environment, develop individual workplaces, carve out jobs, and create non-discriminatory workplaces where persons with intellectual disabilities, mental disabilities, and developmental disabilities can work in general companies.
- New challenges and initiatives in recent years for the diverse development and inclusion of social enterprises in Germany, France, the United Kingdom, and other countries that aim at the welfare of persons with disabilities but focus on profitability.
- A system in Germany and France that supports the employment of persons with disabilities in general companies, which entails a continuous human resource burden and loss of productivity, through public subsidies after ensuring appropriate accommodations and confirming the quality of employment.

C Inclusive workforce development connecting persons with disabilities and companies

In order to realize decent work that benefits both persons with disabilities and companies, where a wide range of persons with disabilities can play active roles as human resources that contribute to company management, it is important to provide professional support for vocational rehabilitation, including job placement services that link

local human resources with disabilities to the human resource needs of companies and employer support that promotes the productivity of persons with disabilities. The following initiatives of other countries may provide a useful reference for Japan.

- Transformation and nationwide expansion of vocational rehabilitation services in the U.S. to meet the human resource and management needs of companies.
- Expert knowledge and expertise to address both the recruitment and utilization of neuro-diverse human resources to address the shortage of human resources in information-related industries in the U.S. and Germany, and to address the unemployment of persons with developmental disabilities.
- Results of discussions among persons with disabilities, technology developers, companies, and governments in the U.S. and other countries on how to utilize the results of breakthrough technological innovations to promote the employment of persons with disabilities and how to prevent these innovations from becoming new social barriers.

(3) Integration of Different Perceptions of Support

As the highly comprehensive expertise of vocational rehabilitation that can radically expand the employment possibilities of persons with disabilities into general employment becomes clearer, the importance and role of comprehensive rehabilitation in not only transforming the welfare of persons with disabilities but also improving the quality of health, life, and work of the general public, including persons with diverse disabilities and chronic illness, is becoming apparent. Initiatives are being made at the national, regional, and field levels to develop regional support systems and to reeducate and train professionals in a wide range of fields, as well as to continuously develop human resources.

A Establishment of expertise and human resource development in vocational rehabilitation

While vocational rehabilitation is a comprehensive initiative involving a wide variety of persons concerned and specialized fields, the expert knowledge and expertise to achieve the work and employment rights of persons with disabilities, who have traditionally been considered difficult to obtain general employment, have been clarified in the United States as core professional expertise. Based on the specific content and competency standards, professional training, certification, and continuing education opportunities have been provided. The following initiatives of other countries may provide a useful reference for Japan.

- Clarification of the level of knowledge, skills, and abilities required for work support for persons with disabilities, reflecting the latest science-based principles and processes of vocational rehabilitation in the U.S.
- Certified employment support specialists in the U.S. who certify the professionalism and support skills for persons concerned with work support for persons with disabilities in the community, and training for those in charge that clarifies the necessary knowledge and skills.
- Free online training courses that enable supporters to improve their knowledge and skills in a timely manner, such as rapidly developing systems and services in the U.S., Germany, etc., and the increasing use of telework in the coronavirus pandemic.

B Reforming systems and services for persons with disabilities to work

The systems and services in related fields such as medical care, welfare, and education, which were established at the time when persons with disabilities were considered as subjects of protection and lacked work support expertise, are being restructured at the national, regional, and field levels into ones that can achieve results in

promoting social participation that demonstrates the abilities of persons with various disabilities and chronic illness. The following initiatives of other countries may provide a useful reference for Japan.

- Discussion and organization by various persons concerned, including persons with disabilities, welfare professionals, educators, and government officials, for policy change at the national level in other countries that assume that persons with disabilities can work.
- Developing a regional consultative process and memorandum of understanding (MOU) for fundamental reform of systems, services, etc. in the U.S. and Germany, where relevant regional sectors transcend vertical boundaries.
- Work manuals, etc. for institutional and service reform in the U.S. and Germany based on effective collaboration with work support in psychiatry, education, welfare for persons with disabilities, etc.
- Large-scale institutional and service transformation involving many persons concerned based on social experimentation and validation with data in the U.S.

C Toward multidisciplinary collaboration to meet individual support needs

Various initiatives are being made to develop a system that enables multidisciplinary case management, in which specialized organizations and professionals from various fields can respond comprehensively to individual and diverse support needs to enable vocational life for persons with disabilities, who have traditionally been regarded as particularly difficult to find general employment. The following initiatives of other countries may provide a useful reference for Japan.

- Practical methods in the U.S. to combine and utilize multidisciplinary systems and services in a legally appropriate manner to meet the diverse and individualized support needs of persons with disabilities, including medical and lifestyle needs.
- Comprehensive assessment of the multidisciplinary life support needs of persons with disabilities in France and Germany, and study to enable multidisciplinary organizations to smoothly share roles and collaborate smoothly

(4) Overall Discussion

A Diversity of initiatives in other countries and universality of professional support

Traditionally, differences in the basic principles and legal systems of vocational rehabilitation in other countries have often been viewed from a cultural and historical perspective. However, by viewing it as a multifaceted aspect of the developing expertise on disability factors, inclusive employment, and comprehensive rehabilitation, we were able to obtain a great deal of comprehensive and universal information that can be used as a reference for Japan.

B Effective vocational rehabilitation methods and support tools by disability type, etc.

It has become important to perceive the work difficulty and work availability of persons with disabilities not as fixed due to individual characteristics, job content, workplace, and other environments, but as a dynamic that changes with effective reasonable accommodations and professional support. In other countries, it was confirmed that scientific evidence and expertise on the content of effective measures such as elimination of discrimination, reasonable accommodation, individual workplace development, and continuous support systems have been accumulated for various types and degrees of disabilities, and that comprehensive expertise and support tools on disabilities have become internationally sharable.

C Vocational rehabilitation professionalism as a prerequisite for legal systems and services

It has become clear that the legal systems and services of other countries are predicated on a high level of expert knowledge and skills in vocational rehabilitation, based on the accumulated experience of each country. The human rights approach to disability requires the promotion of disability disclosure that does not expose anyone to discrimination or social marginalization due to disability, and effective reasonable accommodation and support according to individual circumstances. Creating a workplace where everyone can thrive requires even more accumulation of new expert knowledge and expertise at the interface between diverse disabilities and companies' human resource recruitment and employment management. In addition, knowledge and individual coordination skills that enable the utilization of multidisciplinary systems and services that expand the employment possibilities of persons with disabilities are essential for comprehensive rehabilitation.

D Systems, services, etc. beneficial to effective vocational rehabilitation practices

A number of useful systems, services, etc. were also recognized to support the assurance and further improvement of the quality of vocational rehabilitation as a profession. For example, A central consultation and support organization that can accumulate reasonable accommodation not only individual expertise in the field, but also at the corporate and national levels, and can provide support in combination with costs, and a system that integrates professional advice and support such as support equipment, human support, and environmental improvement for persons with disabilities and companies with the provision of public financial support. The system should also include the following: legislation such as the creation of a formal institutional collaboration agreement for the collaboration of relevant organizations in the region, as well as a national supervisory structure, the consolidation of work support content based on scientific evidence, training and professional certification based on that evidence, and a public system for the immediate provision of data on various indicators of employment of persons with disabilities in each region.

(5) Conclusion

This research study revealed that the accumulation of experience in reasonable accommodation and professional support in other countries that have led to the systems and services of work support for persons with disabilities, the high demands of the Convention on the Rights of Persons with Disabilities, and the momentum for international information sharing have combined to develop universal expert knowledge of vocational rehabilitation and systems and services based on this knowledge, many of which can also be used as a reference in Japan. Specific trends that can be used as a reference in Japan include: accurate understanding of discrimination and support needs of persons with disabilities in their diverse and individual circumstances in their professional lives; reasonable accommodation and professional support that makes it easier for everyone to work and exercise their abilities; professional support for corporate management and workplace creation that makes it easier for everyone to play an active role, including improved recognition of corporate management; coordination of professional support and work support in related fields such as medical care, welfare, and education that naturally support the professional lives of persons with disabilities and illnesses; comprehensive rehabilitation integrated with disability prevention, including a fundamental review of related welfare for persons with disabilities and the development of professional human resources.

7 Related Research Deliverables

- Research on the current situation and issues of human resource development and accumulation of support expertise in employment support providers, Research Report No. 167, 2023
- Research on specific practical situations in other countries concerning the recognition of disability and determination of work difficulties: initiatives in France and Germany, Research Report No. 154, 2020
- Study on the role and collaboration in supporting employment and workplace settlement of persons with disabilities by regional related organizations and occupations, Research Report No, 147, 2019
- Study on regional support to promote vocational preparation and work transition, etc. for persons with disabilities in the health, welfare, and education fields, Research Report №134, 2017
- Effectiveness of customized employment in the U.S. and possibility of introduction in Japan, Research Report No. 80, 2007