

Legal Analysis of the Surakarta City Government's Tourism Policy in Realizing Inclusive Tourism

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Abstrak

Penelitian ini bertujuan menganalisis konsistensi kerangka hukum Kota Surakarta dalam mendukung pariwisata inklusif, dengan fokus operasional pada aksesibilitas bagi penyandang disabilitas sebagai dimensi inklusi yang memiliki kewajiban hukum paling eksplisit. Penelitian yuridis normatif ini menggunakan pendekatan perundang-undangan, konseptual, dan perbandingan terbatas. Bahan hukum utama meliputi Undang-Undang Nomor 10 Tahun 2009 tentang Kepariwisata, Undang-Undang Nomor 8 Tahun 2016 tentang Penyandang Disabilitas, Peraturan Daerah Kota Surakarta Nomor 13 Tahun 2016, Peraturan Daerah Kota Surakarta Nomor 5 Tahun 2017, Peraturan Daerah Kota Surakarta Nomor 9 Tahun 2020, serta Peraturan Wali Kota Surakarta Nomor 26 dan Nomor 27 Tahun 2024. Hasil analisis menunjukkan bahwa Surakarta tidak mengalami kekosongan regulasi secara total; regulasi pariwisata, hak penyandang disabilitas, standar pelayanan kawasan wisata, dan mekanisme sanksi umum telah tersedia. Persoalan normatif utamanya adalah fragmentasi dan belum jelasnya integrasi standar aksesibilitas dengan kewajiban usaha pariwisata, indikator pelayanan, pengawasan, perizinan, dan mekanisme koordinasi lintas perangkat daerah. Teori sistem hukum Friedman digunakan untuk menilai desain normatif substansi dan struktur hukum, sedangkan budaya hukum ditempatkan sebagai agenda penelitian empiris yang tidak diukur dalam penelitian ini. Artikel merekomendasikan harmonisasi instrumen yang sudah ada, penyusunan indikator dan prosedur aksesibilitas yang terukur, serta penguatan koordinasi melalui mekanisme yang tidak menduplikasi kelembagaan disabilitas yang telah dibentuk.

Kata kunci: pariwisata inklusif; aksesibilitas; pemerintah daerah; sistem hukum; kebijakan pariwisata.

Abstract

This study analyses the coherence of Surakarta City's legal framework for inclusive tourism, with an operational focus on accessibility for persons with disabilities because this dimension is supported by the clearest enforceable legal duties. The research is normative legal research using statutory, conceptual, and limited comparative approaches. The principal legal materials include Law Number 10 of 2009 on Tourism, Law Number 8 of 2016 on Persons with Disabilities, Surakarta City Regulation Number 13 of 2016, Surakarta City Regulation Number 5 of 2017, Surakarta City Regulation Number 9 of 2020, and Surakarta Mayor Regulations Number 26 and Number 27 of 2024. The analysis shows that Surakarta does not face a complete regulatory vacuum:

tourism regulations, disability-rights rules, tourism-area service standards, and general sanctioning mechanisms already exist. The central normative problem is fragmentation and the incomplete integration of accessibility standards with tourism-business obligations, service indicators, supervision, licensing, and cross-agency coordination. Friedman's legal-system theory is used to assess the normative design of legal substance and legal structure, while legal culture is treated as an empirical research agenda that is not measured by this study. The article recommends harmonising existing instruments, developing measurable accessibility indicators and procedures, and strengthening coordination through a mechanism that does not duplicate the disability institutions already established.

Keywords: *inclusive tourism; accessibility; local government; legal system; tourism policy.*

INTRODUCTION

Inclusive tourism is a broad development paradigm concerned with equal access, participation, and benefit across physical, social, and economic differences.¹ Because Indonesian positive law provides especially explicit duties concerning persons with disabilities, this article operationalises inclusive tourism primarily through disability accessibility.² Other dimensions of inclusion, such as economic participation, gender, age, and community empowerment, remain important but are not empirically assessed here.³ Law Number 10 of 2009 on Tourism provides a general equality-of-opportunity principle, while Article 28H(2) of the 1945 Constitution supplies a broader constitutional basis for facilities and special treatment necessary to achieve equality and justice.

Law Number 8 of 2016 on Persons with Disabilities then provides more concrete accessibility duties in public life. These provisions should be read as different levels of normativity: the Constitution provides the general equality principle, whereas legislation and local regulations translate that principle into more specific obligations. The legal issue for Surakarta is therefore not whether inclusiveness is recognised in the abstract, but how accessibility duties are connected to tourism planning, business obligations, public services, monitoring, and coordination.⁴ As contextual tourism data, BPS-Statistics of Surakarta Municipality reported a star-hotel room occupancy rate of 57.15 percent in July 2024 and 72,470 arriving commercial air passengers at Adi Soemarmo Airport in the same month, an increase of 34.98 percent from June 2024.⁵ These indicators

¹ Simon Darcy and Dimitrios Buhalis, "Introduction: From Disabled Tourists to Accessible Tourism," in *Accessible Tourism: Concepts and Issues*, ed. Dimitrios Buhalis and Simon Darcy (Bristol: Channel View Publications, 2010), 1–20, <https://doi.org/10.21832/9781845411626-004>.

² R. Scheyvens and R. Biddulph, "Inclusive Tourism Development," *Tourism Geographies* 20, no. 4 (2018): 589–609, <https://doi.org/10.1080/14616688.2017.1381985>.

³ K. Korbiel, K. Gmyrek, and Z. Kruczek, "A Review of Research on Inclusive Tourism: Clusters of Thematic Links and Research Gaps," *Sustainability* 17, no. 14 (2025): 6521, <https://doi.org/10.3390/su17146521>.

⁴ United Nations World Tourism Organization (UNWTO), *Inclusive Recovery Guide: Sociocultural Impacts of COVID-19 on Tourism* (Madrid: UNWTO, 2021).

⁵ BPS-Statistics of Surakarta Municipality, "Tourism and Air Transportation Developments July 2024," Official Statistics Release, September 2, 2024.

show active tourism activity but do not, by themselves, measure accessibility or policy effectiveness. The corrected data are presented in Table 1.

Table 1. Tourism Development Indicators for Surakarta City in 2024

Indicator	Unit	Value	Description
Star-hotel room occupancy rate (TPK)	%	57.15	July 2024
Arriving commercial passengers at Adi Soemarmo Airport	people	72,470	July 2024
Month-to-month change in arriving passengers	%	+34.98	June-July 2024

Source: BPS-Statistics of Surakarta Municipality, Official Statistics Release, "Tourism and Air Transportation Developments July 2024," 2 September 2024.

Accessibility in tourism is best understood as a chain rather than as a characteristic of a single attraction. A visitor may encounter barriers at the stage of information and booking, on the journey to the destination, in local transport, at accommodation and food-service facilities, in the attraction itself, and in complaint or assistance mechanisms. A failure at one point can make otherwise accessible facilities practically unusable. This chain perspective is important for legal analysis because it shifts attention from isolated physical modifications to the allocation of obligations across a destination system.⁶

A rights-based approach also changes the legal significance of accessibility. The issue is not limited to whether tourism businesses can attract a larger market segment; it concerns whether persons with disabilities can exercise autonomy, participate in social life, and enjoy public-facing services on an equal basis. Scholarship on inclusive tourism therefore places participation and the transformation of exclusionary structures alongside physical access. In the Indonesian context, that perspective is consistent with the constitutional commitment to equality and with the disability-rights framework that requires access to facilities and services without discrimination.⁷

Inclusive tourism is broader than disability accessibility, but analytical precision requires the present study to distinguish the two. Inclusive-tourism scholarship addresses distribution of benefits, participation in decision-making, representation, and the position of groups that may be excluded from tourism development. Disability accessibility is one legally concrete dimension of that broader agenda. Focusing on it allows the analysis to test whether a general commitment to inclusion has been translated into identifiable duties, responsible institutions, and enforceable administrative processes, without implying that gender, age, poverty, community ownership, or other inclusion concerns are unimportant.⁸

⁶ Simon Darcy and Dimitrios Buhalis, "Introduction: From Disabled Tourists to Accessible Tourism," in *Accessible Tourism: Concepts and Issues*, ed. Dimitrios Buhalis and Simon Darcy (Bristol: Channel View Publications, 2010), 1–20, <https://doi.org/10.21832/9781845411626-004>.

⁷ Brielle Gillovic and Alison McIntosh, "Accessibility and Inclusive Tourism Development: Current State and Future Agenda," *Sustainability* 12, no. 22 (2020): 9722, <https://doi.org/10.3390/su12229722>.

⁸ Regina Scheyvens and Robin Biddulph, "Inclusive Tourism Development," *Tourism Geographies* 20, no. 4 (2018): 589–609, <https://doi.org/10.1080/14616688.2017.1381985>.

The destination perspective further shows why fragmented regulation can produce practical uncertainty even when each individual rule is valid. Tourism accessibility depends on actors whose legal mandates are dispersed across tourism administration, public works, transportation, social affairs, licensing, and private service provision. Research on accessible destinations emphasises that coordination among these actors is not an ancillary managerial question; it is part of the institutional conditions needed for an accessible service ecosystem. For a normative legal study, the relevant inquiry is therefore whether the applicable instruments create sufficiently clear interfaces among those mandates.⁹

A second difficulty concerns the level of specificity at which accessibility obligations become administratively usable. Broad statements of equality and accessibility are indispensable, but inspectors, licensing officers, tourism operators, and rights-holders also need criteria that can be documented and reviewed. International guidance built around ISO 21902 illustrates the importance of translating accessibility into operational requirements across information, customer service, transport, accommodation, and destination management. Such guidance is not binding Indonesian law, yet it is useful as a comparative benchmark for asking whether local norms are sufficiently measurable to support consistent supervision.¹⁰

Against that background, the central problem is not simply whether Surakarta possesses rules related to tourism and disability. The more demanding question is whether those rules form a legally intelligible pathway from a recognised right, to an administrative responsibility, to a service or inspection standard, and ultimately to a remedy or consequence where non-compliance occurs. Recent mapping of accessible-tourism research likewise shows a growing connection between accessibility, management, and sustainable destination governance. The analysis developed here therefore concentrates on regulatory coherence and institutional linkage rather than treating the number of regulations as a proxy for inclusiveness.¹¹

Previous studies show that sustainable and inclusive tourism requires coordination across planning, transport, public facilities, and community participation.¹² Surakarta's normative commitment is reflected not only in Local Regulation Number 13 of 2016 concerning RIPPARDA 2016–2026 and Local Regulation Number 5 of 2017 concerning the Implementation of Tourism Businesses, but also in the later disability-rights framework under Local Regulation

⁹ Paola Castellani and Alfonso Vargas-Sánchez, "Accessible Tourism from the Destination Perspective: Coordination Among Actors and Digital Ecosystems," in *Accessible Tourism in the Digital Ecosystem*, ed. Fabio Cassia, Paola Castellani, and Chiara Rossato (Cham: Springer, 2023), 45–55, https://doi.org/10.1007/978-3-031-38782-1_4.

¹⁰ UN Tourism, ONCE Foundation, and UNE, *How to Apply ISO Standard 21902: Accessible Tourism for All—Recommendations for Tour Operators, Travel Agencies and Travel Agents* (Madrid: UN Tourism, 2024), <https://doi.org/10.18111/9789284425860>.

¹¹ Lola Hernández-Sales and José Antonio López Sánchez, "Accessible Tourism: A Bibliometric Analysis from 2000 to 2021," *International Journal of Sustainable Development and Planning* 18, no. 7 (2023): 2197–2207, <https://doi.org/10.18280/ijstdp.180719>.

¹² Y. Liu, S. Shen, and C. M. Hall, "Cultural Heritage Tourism and Sustainable Urban Development in Asian Medium Cities," *Journal of Sustainable Tourism* 30, no. 9 (2022): 1975–1993, <https://doi.org/10.1080/09669582.2021.1887875>.

Number 9 of 2020 and implementing instruments adopted in 2024.¹³ The research problem is therefore revised from an assumed absence of regulation to a question of regulatory coherence: to what extent do these separate tourism, disability, service, and administrative instruments form an integrated accessibility framework?¹⁴ This formulation permits legal analysis of normative and structural design without claiming, in the absence of field data, that actual implementation, institutional coordination, or public awareness is empirically weak.¹⁵

RESEARCH METHOD

The object of this normative study is the body of national and local legal and policy instruments applicable to tourism accessibility in Surakarta City, Central Java. Surakarta is therefore treated as the jurisdictional focus of the legal analysis rather than as a field-research location. The study did not conduct interviews, surveys, observations, or accessibility audits, and it does not use the existence of tourism activity as empirical proof of regulatory effectiveness.

This research is normative legal research that analyses law as a system of norms.¹⁶ Its purpose is to evaluate the internal coherence, hierarchy, and functional connection of legal rules governing tourism, disability accessibility, local government, tourism services, and administrative supervision.¹⁷ Consequently, statements about implementation are limited to what can be inferred from the design of legal and official policy instruments; actual compliance, institutional behaviour, stakeholder awareness, and user experience are not treated as findings unless supported by empirical evidence.¹⁸

Three approaches are used. The statutory approach examines the hierarchy and horizontal relationship among national and Surakarta regulations. The conceptual approach clarifies inclusive tourism, accessibility, equality, non-discrimination, and legal effectiveness. A limited comparative-law approach is used to place Surakarta's framework alongside official legal or policy instruments from Thailand and Malaysia.¹⁹ Thailand and Malaysia were selected as neighbouring ASEAN jurisdictions that have publicly documented tourism-for-all or inclusive-tourism policies.²⁰ The comparison is functional and limited to the type of

¹³ Surakarta City Culture and Tourism Office, *Profile and Strategic Plan of the Surakarta City Culture and Tourism Office 2024–2026* (Surakarta: Surakarta City Government, 2024).

¹⁴ I. K. A. M. Yasa, "Memperkuat Regulasi Pariwisata Daerah di Bali: Menuju Pembangunan yang Berkelanjutan dan Inklusif," *Jurnal Pacta Sunt Servanda* 4, no. 1 (2023).

¹⁵ A. Nurdin, F. Rahmawati, and I. Idris, "Local Tourism Governance and Inclusivity: Legal and Institutional Perspectives from Southeast Asia," *Tourism Economics* 29, no. 6 (2023): 1421–1440, <https://doi.org/10.1177/13548166221118427>.

¹⁶ Terry Hutchinson, *Legal Research and Writing* (Cambridge: Cambridge University Press, 2018).

¹⁷ P. M. Marzuki, *Legal Research* (Jakarta: Kencana Prenada Media Group, 2017).

¹⁸ H. Salim and E. Nurbani, *Application of Legal Theory in Thesis and Dissertation Research* (Jakarta: Rajawali Pers, 2019).

¹⁹ W. Sirirak and S. Athithan, "Implementing 'Tourism for All' in Thailand: Policy Lessons for Inclusive Destination Management," *Asia Pacific Journal of Tourism Research* 25, no. 8 (2020): 905–921, <https://doi.org/10.1080/10941665.2020.1769695>.

²⁰ A. Hassan and Z. A. Rahman, "Policy Frameworks for Accessible Tourism in Malaysia: Integrating Inclusion into National Tourism Planning," *Current Issues in Tourism* 24, no. 22 (2021): 3221–3239, <https://doi.org/10.1080/13683500.2020.1865284>.

instrument, the accessibility focus, and the governance arrangement; it does not rank actual implementation outcomes.²¹

The study relies on documentary legal materials and published secondary sources, classified as follows:

1. Primary legal materials include the 1945 Constitution, Law Number 10 of 2009 on Tourism, Law Number 19 of 2011 ratifying the CRPD, Law Number 23 of 2014 on Regional Government, Law Number 8 of 2016 on Persons with Disabilities, Surakarta City Regulation Number 13 of 2016, Surakarta City Regulation Number 5 of 2017, Surakarta City Regulation Number 9 of 2020, Surakarta Mayor Regulation Number 26 of 2024, and Surakarta Mayor Regulation Number 27 of 2024.
2. Secondary materials include scholarly literature on inclusive and accessible tourism, legal-system theory, local governance, and official statistical or policy publications. For the limited comparative component, official tourism and disability-policy materials from Thailand and Malaysia are prioritised over unsupported secondary descriptions of foreign law.
3. Tertiary materials include legal dictionaries, encyclopaedias, and other reference works used only to clarify terminology.

The research was conducted through five analytical steps:

1. Inventory and classification of national and local legal instruments governing tourism, disability rights, local government, service standards, supervision, and sanctions.
2. Vertical and horizontal harmonisation analysis to identify how general equality and accessibility duties are translated into Surakarta's tourism and disability regulations.
3. Functional analysis of whether accessibility duties are connected to tourism-business obligations, service indicators, monitoring, licensing, and institutional coordination.
4. Limited comparative analysis of official Thai and Malaysian instruments, followed by a distinction between normative regulatory gaps and matters that require empirical implementation data.
5. Application of Lawrence M. Friedman's framework to legal substance and legal structure, while treating legal culture as a question for subsequent empirical research rather than as a finding of this normative study.²²

Legal materials were analysed through systematic interpretation, hierarchy-of-norms reasoning, and comparison of the functions assigned to different instruments. Where rules overlap, the analysis applies the principles of *lex superior derogat legi inferiori* and, where appropriate, *lex specialis derogat legi generali* while also examining whether the instruments can operate cumulatively. The phrase "legal source triangulation" is replaced by legal-source cross-checking: statutory propositions are checked against official legal texts and official databases, while scholarly views are used as secondary interpretation rather than as

²¹ J. Park and S. H. Kim, "Regulatory Innovations for Accessible Tourism in East Asia: Comparative Insights from Korea and Japan," *Journal of Policy Development Studies* 18, no. 2 (2022): 87–104, <https://doi.org/10.1080/27692455.2022.1849063>.

²² Lawrence M. Friedman, *The Legal System: A Social Science Perspective* (New York: Russell Sage Foundation, 1975).

substitutes for positive law. No expert interviews were conducted. The regulatory inventory used for the revision was checked against publicly available official materials through 23 August 2026. Friedman's framework is used as an organising analytical model: legal substance concerns the content and integration of norms; legal structure concerns the formal allocation and coordination of institutional functions; legal culture is not empirically measured in this study.

1. Substance (legal substance) includes legal norms, rules, and principles that form the basis of regulation.
2. Structure (legal structure) includes institutions that play a role in the formation, implementation, and supervision of law.
3. Legal culture reflects the awareness, attitudes, and behavior of society towards the law.

Within this normative design, Friedman's framework does not authorise conclusions about how the law actually operates in daily social practice. The study assesses legal substance through the content and integration of formal norms and legal structure through the formal allocation of governmental functions. Legal culture is identified only as a category for future empirical investigation. Source validity is strengthened by cross-checking statutory propositions against official legal texts and by distinguishing primary law from secondary scholarly interpretation. Accordingly, the analysis evaluates vertical and horizontal coherence without claiming to measure actual implementation, institutional performance, or stakeholder awareness.

RESULTS AND DISCUSSION

National Legal Framework on Inclusive Tourism

The national legal framework contains several layers. Law Number 10 of 2009 on Tourism establishes equality of opportunity as a principle of tourism development.²³ Article 28H(2) of the 1945 Constitution provides a broader constitutional guarantee of facilities and special treatment needed to achieve equality and justice.²⁴ Law Number 8 of 2016 on Persons with Disabilities creates more specific accessibility obligations²⁵, while Indonesia's ratification of the CRPD through Law Number 19 of 2011 provides the relevant international-law context.²⁶ These instruments should not be collapsed into a single rule: constitutional equality supplies the general principle, whereas legislation specifies duties and rights. This article also does not claim that Indonesia lacks all derivative accessibility regulations at the national level. Its narrower question is whether the relevant accessibility duties are translated into a coherent tourism-specific compliance framework at the local level in Surakarta.

Read together, the constitutional, tourism, and disability instruments create cumulative rather than mutually exclusive obligations. The equality guarantee supplies the constitutional orientation; tourism legislation governs the sector in which services are provided; and disability legislation specifies the position of

²³ Law Number 10 of 2009 concerning Tourism.

²⁴ The 1945 Constitution of the Republic of Indonesia, art. 28H(2).

²⁵ Law Number 8 of 2016 concerning Persons with Disabilities.

²⁶ Law Number 19 of 2011 concerning the Ratification of the Convention on the Rights of Persons with Disabilities (CRPD).

persons who may require accessibility measures. The legal task is therefore not to choose one regime as the exclusive source of obligation, but to identify how each contributes to the same regulatory relationship. This cumulative reading is especially important where a tourism rule is broadly framed while disability law supplies a more specific standard of equal access.²⁷

The same approach applies to the CRPD as incorporated into Indonesian law. Ratification does not by itself resolve the content of every local tourism obligation, but it strengthens the interpretive direction of domestic law toward accessibility, participation, and the removal of barriers. In a decentralised administrative setting, national and international commitments require translation through legally competent regional instruments and sectoral administration. The analytical focus should consequently remain on the chain of legal implementation: recognition of the right, assignment of authority, specification of the standard, supervision, and an available response when the standard is not met.²⁸

This layered construction also provides a clearer criterion for identifying a genuine regulatory gap. A gap should not be inferred merely because a detailed technical requirement is absent from a statute. Technical specifications may properly be placed in subordinate regulations, service standards, building requirements, or administrative instruments, provided that they have a sufficient legal basis and are connected to supervision. International accessibility standards are relevant here as technical reference points, but their use in Surakarta would require an explicit domestic administrative pathway. The contribution of this reading is to separate the existence of a legal mandate from the adequacy of its operational instruments.²⁹

Surakarta City Government Legal Policy on The Implementation of Inclusive Tourism

Surakarta's legal architecture is broader than the two tourism regulations originally identified. Local Regulation Number 13 of 2016 governs the Regional Tourism Development Master Plan³⁰, while Local Regulation Number 5 of 2017 regulates tourism businesses and includes general supervision and administrative-sanction mechanisms.³¹ Local Regulation Number 9 of 2020 adds a specific local framework for the protection and fulfilment of the rights of persons with disabilities.³² In 2024, Mayor Regulation Number 26 established minimum service

²⁷ The 1945 Constitution of the Republic of Indonesia, art. 28H(2); Law Number 10 of 2009 concerning Tourism; Law Number 8 of 2016 concerning Persons with Disabilities.

²⁸ Law Number 19 of 2011 concerning the Ratification of the Convention on the Rights of Persons with Disabilities (CRPD); Convention on the Rights of Persons with Disabilities, arts. 9 and 30.

²⁹ UN Tourism, ONCE Foundation, and UNE, *How to Apply ISO Standard 21902: Accessible Tourism for All—Recommendations for Tour Operators, Travel Agencies and Travel Agents* (Madrid: UN Tourism, 2024), <https://doi.org/10.18111/9789284425860>.

³⁰ Surakarta City Regulation Number 13 of 2016 concerning the Regional Tourism Development Master Plan (RIPPARDA) for 2016–2026.

³¹ Surakarta City Regulation Number 5 of 2017 concerning the Implementation of Tourism Businesses.

³² Surakarta City Regulation Number 9 of 2020 concerning the Protection and Fulfilment of the Rights of Persons with Disabilities.

standards for the tourism-area technical implementation unit³³, and Mayor Regulation Number 27 implemented aspects of the 2020 disability-rights regulation.³⁴ The existence of these instruments means that the legal problem cannot accurately be described as a complete absence of implementing regulation. The more precise normative concern is fragmentation: accessibility, tourism-business obligations, service standards, disability-rights coordination, and enforcement are regulated in separate instruments, and their operational connection within tourism supervision and licensing is not always explicit. This article therefore evaluates integration rather than assuming regulatory absence. For comparative context, Table 2 uses only an illustrative comparison of official legal or policy instruments in Thailand and Malaysia; it does not infer implementation performance from the mere existence of those instruments.

Functionally, the Surakarta instruments perform different legal tasks. RIPPARDA provides planning direction; the tourism-business regulation governs the conduct and supervision of business actors; the disability-rights regulation establishes a rights-based local framework; and the 2024 mayoral regulations add service and implementation detail. Treating these instruments as interchangeable obscures the real issue. Their effectiveness as a legal architecture depends on whether the planning instrument points to implementable obligations, whether business supervision can test those obligations, and whether disability-rights standards can trigger an administrative response within the tourism sector.³⁵

The institutional question is therefore one of interface rules. Distributed authority is ordinary in local government and does not, by itself, establish fragmentation. Fragmentation becomes legally significant when an officer or regulated business cannot determine which agency verifies a standard, where inspection findings are recorded, how a complaint is transmitted, or which existing sanctioning mechanism may be used. The destination-governance literature supports this concern by showing that accessible tourism depends on coordinated action across a service ecosystem rather than on a single tourism authority acting alone.³⁶

This interpretation also limits the comparative use of Thailand and Malaysia. Foreign instruments are not presented as templates to be transplanted mechanically. Their value lies in demonstrating different ways in which accessibility can be connected to tourism administration: through a dedicated administrative programme, through disability legislation operating alongside national tourism

³³ Surakarta Mayor Regulation Number 26 of 2024 concerning Minimum Service Standards for the Tourism Area Technical Implementation Unit.

³⁴ Surakarta Mayor Regulation Number 27 of 2024 concerning Implementation of Surakarta City Regulation Number 9 of 2020 on the Protection and Fulfilment of the Rights of Persons with Disabilities.

³⁵ Surakarta City Regulation Number 13 of 2016 concerning the Regional Tourism Development Master Plan (RIPPARDA) for 2016–2026; Surakarta City Regulation Number 5 of 2017 concerning the Implementation of Tourism Businesses; Surakarta City Regulation Number 9 of 2020 concerning the Protection and Fulfilment of the Rights of Persons with Disabilities; Surakarta Mayor Regulations Numbers 26 and 27 of 2024.

³⁶ Paola Castellani and Alfonso Vargas-Sánchez, “Accessible Tourism from the Destination Perspective: Coordination Among Actors and Digital Ecosystems,” in *Accessible Tourism in the Digital Ecosystem*, ed. Fabio Cassia, Paola Castellani, and Chiara Rossato (Cham: Springer, 2023), 45–55, https://doi.org/10.1007/978-3-031-38782-1_4.

policy, or through a combination of binding and policy instruments. Surakarta's legal response must remain anchored in Indonesian competence rules and the hierarchy of legislation, but comparison helps identify functions that local instruments should perform even when the institutional form differs.³⁷

Table 2. Illustrative Comparison of Legal and Policy Instruments Relevant to Accessible Tourism

Comparative Aspect	Surakarta City (Indonesia)	Thailand	Malaysia
Instrument / status	Perda 13/2016, 5/2017, 9/2020; Perwali 26/2024 and 27/2024 (binding local regulations)	Thailand Tourism for All ³⁸ (official administrative tourism programme/policy)	Persons with Disabilities Act 2008 ³⁹ (statute); National Tourism Policy 2020-2030 ⁴⁰ (national policy)
Accessibility focus	Tourism access, service standards and disability rights are spread across separate instruments	Friendly design and more accessible attractions, accommodation, transport and services	Disability-access rights plus an inclusive-tourism policy direction
Governance focus	Clarify the tourism-accessibility workflow across relevant local agencies and existing disability coordination	Tourism ministry/authorities coordinate the Tourism for All programme	Tourism policy operates alongside the statutory disability-rights framework
Use in this study	Normative-coherence assessment only	Illustrative policy comparison only	Illustrative legal-policy comparison only

Source: Compiled from the official legal and policy instruments identified in the research method; the comparison concerns instrument design, not implementation performance.

The comparison is used only to show that jurisdictions can combine different types of instruments - statutes, local regulations, and administrative tourism policies - to address accessibility. It does not establish that Thailand or Malaysia performs better than Surakarta, because this study does not compare compliance data, accessibility audits, enforcement outcomes, or user experience across jurisdictions. The comparative value is functional: it highlights options for clarifying standards and governance while leaving questions of actual effectiveness to empirical research.

Harmonization and Legal Norm Gaps

A comparison of national and local rules shows substantial normative alignment on equality and accessibility, but alignment does not by itself establish a complete implementation chain. The legal question is whether obligations are translated into sufficiently identifiable standards, institutional responsibilities, monitoring tools, and consequences within the tourism sector. This distinction is important because a legal norm gap is different from an administrative indicator gap: not every performance indicator must be written in a statute or regional regulation, but the legal framework should provide a defensible basis for technical standards, service procedures, inspection instruments, and administrative action.

³⁷ Ministry of Tourism and Sports of Thailand, *Driving Thailand Tourism for All* (2018); Tourism Malaysia, *National Tourism Policy 2020–2030: Executive Summary* (2020); Malaysia, Persons with Disabilities Act 2008 (Act 685).

³⁸ Ministry of Tourism and Sports of Thailand, *Driving Thailand Tourism for All* (2018).

³⁹ Malaysia, Persons with Disabilities Act 2008 (Act 685).

⁴⁰ Tourism Malaysia, *National Tourism Policy 2020–2030: Executive Summary* (2020).

The revised analysis identifies an integration gap rather than a total normative vacuum. RIPPARDA 2016-2026 provides planning direction, Local Regulation Number 5 of 2017 contains tourism-business governance and general enforcement mechanisms, Local Regulation Number 9 of 2020 establishes the local disability-rights framework, and Mayor Regulations Numbers 26 and 27 of 2024 provide additional service and disability implementation rules. What remains less explicit is how tourism-specific accessibility requirements are converted into measurable service or inspection indicators and linked across these instruments. Such indicators may appropriately be placed in mayoral regulations, service standards, technical guidelines, or inspection instruments rather than necessarily in the regional regulation itself.

The earlier statement that Surakarta has no administrative-sanction provisions is corrected. Local Regulation Number 5 of 2017 contains general administrative enforcement and sanctioning mechanisms for tourism businesses. The narrower issue is whether accessibility-specific duties and measurable accessibility criteria are sufficiently connected to those mechanisms so that inspectors, licensing authorities, businesses, and rights-holders can identify the consequence of non-compliance. The regulatory design should therefore be evaluated for linkage and operational clarity, not described as if no enforcement architecture exists at all.

Accordingly, the principal normative weakness is regulatory fragmentation and incomplete operational linkage. A local legal framework can contain valid tourism, disability, service, and enforcement rules while still requiring clearer coordination among them. The appropriate legal response is therefore harmonisation: identify the specific accessibility standards relevant to tourism, assign the responsible administrative function, connect those standards to existing supervision and licensing processes, and establish a documented review mechanism. Whether these arrangements are actually followed in practice remains an empirical question outside the present research design.

For analytical purposes, three different deficiencies should be kept separate. A normative gap exists when no rule provides a sufficient legal basis for an obligation. An operational gap exists when the legal basis is present but the standard is not translated into an administratively usable procedure or indicator. A coordination gap exists when relevant responsibilities are distributed among institutions without a clear mechanism for referral, information sharing, or follow-up. These distinctions matter because they require different legal responses: legislation may be necessary for the first, subordinate regulation or technical standards for the second, and administrative coordination instruments for the third.⁴¹

The coherence of an accessibility requirement can therefore be tested through three linked questions. First, what legal norm authorises or requires the standard? Second, through which instrument is that standard made sufficiently specific for a tourism business, public service unit, or inspector to apply it? Third, what legally competent mechanism responds to non-compliance? A rule that answers only the first question remains programmatic; a procedure that answers only the second without a legal basis risks administrative overreach; and a sanction that is not

⁴¹ Terry Hutchinson, *Legal Research and Writing* (Cambridge: Cambridge University Press, 2018); P. M. Marzuki, *Legal Research* (Jakarta: Kencana Prenada Media Group, 2017).

connected to an identifiable obligation creates problems of legal certainty. This three-part test gives the harmonisation analysis a more precise doctrinal structure.⁴²

Harmonisation should consequently favour legal linkage before regulatory multiplication. Where an existing tourism-business regulation already provides supervision and administrative sanctions, the principal task may be to specify how accessibility criteria enter that existing process. Conversely, if the existing framework does not authorise a particular obligation or consequence, technical guidance alone cannot supply the missing legal basis. This approach protects both rights-holders and regulated businesses: persons with disabilities gain clearer pathways for enforcement, while businesses receive more predictable standards against which compliance will be assessed.⁴³

Analysis Based on Lawrence' Legal System Theory

Lawrence M. Friedman's Legal System Theory is used here as an analytical framework for regulatory design rather than as a basis for unsupported empirical conclusions about implementation. Legal substance is examined through the content and integration of the relevant rules; legal structure is examined through the formal allocation and coordination of institutional functions; and legal culture identifies issues of awareness, attitudes, and behaviour that would require separate empirical investigation.

First, legal substance. Surakarta has multiple relevant instruments rather than an absence of derivative rules. The substantive issue is whether Local Regulations Numbers 13 of 2016, 5 of 2017, and 9 of 2020 and Mayor Regulations Numbers 26 and 27 of 2024 operate as an integrated accessibility framework for tourism. The analysis indicates a need for clearer cross-references, measurable tourism-accessibility indicators, and a defined connection between accessibility standards, service requirements, supervision, and existing administrative consequences.

Second, legal structure. Several agencies necessarily hold different statutory functions in tourism, public works and accessibility, social affairs, and business licensing.⁴⁴ The existence of distributed authority does not prove that actual coordination is weak. The normative concern is instead that the legal and policy instruments reviewed do not clearly present a single tourism-accessibility workflow showing which institution verifies standards, how findings are shared, how complaints are escalated, and how existing licensing or sanction mechanisms are engaged. This is a question of formal institutional design that can be examined normatively.

Third, legal culture. The present documentary method cannot determine the actual level of public awareness, business understanding, voluntary compliance, or the attitudes of persons with disabilities toward existing tourism services. Those matters require interviews, surveys, complaint data, accessibility audits, or observational research. Legal culture is therefore retained only as a future empirical

⁴² The 1945 Constitution of the Republic of Indonesia, art. 28D(1); Law Number 30 of 2014 concerning Government Administration.

⁴³ Surakarta City Regulation Number 5 of 2017 concerning the Implementation of Tourism Businesses, as applicable within Surakarta City's local regulatory framework; Law Number 23 of 2014 concerning Regional Government.

⁴⁴ Law Number 23 of 2014 concerning Regional Government.

dimension of Friedman's framework, not as a finding that awareness in Surakarta is low.

Taken together, Friedman's framework supports a more limited conclusion: the reviewed normative architecture contains substantial legal bases for accessibility but would benefit from stronger integration between rules and institutional functions. The study does not measure the effectiveness of implementation. Future empirical research should test whether the formal arrangements result in accessible facilities, coordinated enforcement, stakeholder awareness, and effective remedies in practice.

Applied carefully, Friedman's categories can be converted into a documentary assessment matrix. Legal substance can be examined by asking whether rights, duties, standards, and consequences are stated consistently across the relevant instruments. Legal structure can be examined by mapping the formal competences of the agencies involved and the procedures through which those competences interact. Legal culture, by contrast, concerns attitudes and behaviour that cannot be established from the text of regulations. The value of the framework in this study lies precisely in maintaining those evidentiary boundaries rather than using the theory as a basis for assumptions about implementation.⁴⁵

This distinction also prevents a common analytical shortcut in studies of local regulation: equating a dense body of rules with an effective legal system. A city may have extensive legal substance but weak institutional connection, or a clearly allocated institutional structure but insufficiently specific standards. Conversely, apparent gaps in a single regulation may be filled by another legally connected instrument. The analysis therefore evaluates the relationship among components rather than scoring each regulation in isolation. In this sense, Friedman's framework is used to organise evidence about regulatory design, not to generate empirical conclusions that the documentary record cannot sustain.⁴⁶

The separation of legal culture from the present findings also establishes a concrete agenda for subsequent research. Interviews with officials and tourism operators could test knowledge of accessibility obligations; accessibility audits could examine the physical and informational environment; complaint files could show whether rights-holders can activate remedies; and surveys with persons with disabilities could assess user experience. Those data would permit a later study to connect the normative architecture identified here with actual institutional behaviour. The present article thus provides the legal map against which future empirical evidence can be evaluated, rather than treating unobserved behaviour as an existing fact.⁴⁷

Legal Recommendations and Implementation Strengthening

The principal recommendation is to harmonise and operationalise the instruments already in force before creating duplicative regulation. Surakarta

⁴⁵ Lawrence M. Friedman, *The Legal System: A Social Science Perspective* (New York: Russell Sage Foundation, 1975).

⁴⁶ Lawrence M. Friedman, *The Legal System: A Social Science Perspective* (New York: Russell Sage Foundation, 1975).

⁴⁷ Brielle Gillovic and Alison McIntosh, "Accessibility and Inclusive Tourism Development: Current State and Future Agenda," *Sustainability* 12, no. 22 (2020): 9722, <https://doi.org/10.3390/su12229722>.

should map the accessibility obligations contained in tourism and disability regulations against the service standards in Mayor Regulation Number 26 of 2024 and the implementation framework in Mayor Regulation Number 27 of 2024. Where gaps remain, the Mayor may use an amendment, a specific technical regulation, a service standard, or binding administrative guidance - whichever is legally appropriate - to define measurable accessibility criteria, inspection procedures, documentation requirements, and the relationship between non-compliance and existing tourism-business supervision or sanctions.

Institutional strengthening should likewise build on, rather than duplicate, the disability-governance arrangements that already exist. A specialised tourism-accessibility working group may be established under the existing regional disability-coordination structure through an appropriate mayoral decision or administrative assignment. Its membership should include the Tourism Office, Public Works and Spatial Planning functions, Social Affairs, the investment and one-stop licensing service, organisations of persons with disabilities, and tourism-business representatives. The group should have an advisory and coordination role, should not displace statutory authority held by existing agencies, and should report its findings and recommendations to the Mayor or Regional Secretary through a defined reporting line.

Participation by organisations of persons with disabilities and tourism stakeholders should be built into the preparation of technical standards, accessibility checklists, complaint procedures, and periodic evaluation.⁴⁸ Such participation can improve the legitimacy and practical usability of standards. Whether participation subsequently changes legal awareness or compliance should be evaluated empirically rather than assumed from the existence of the participatory mechanism.

Accessibility should also be connected to tourism-business administration in a manner consistent with the existing national risk-based licensing framework. Rather than assuming that every accessibility requirement may simply be added as a new pre-licensing condition, Surakarta should identify which standards lawfully belong in licensing, which belong in service or building compliance, and which should be verified through post-licensing supervision. Standardised checklists, documentary records, inspection protocols, and transparent complaint handling can provide an auditable connection between accessibility obligations and the enforcement mechanisms that already exist.

These recommendations are consistent with the broader objective of inclusive and sustainable tourism reflected in international and comparative policy materials.⁴⁹ They are presented as a normative reform agenda, not as evidence that Surakarta has already achieved - or failed to achieve - a particular level of accessibility. The appropriate policy objective is to make the city's existing legal architecture more coherent, measurable, and accountable, so that future empirical

⁴⁸ N. P. P. Anjaswari, K. J. Mahadewi, D. K. Prasada, and D. A. P. Sukadana, "Tinjauan Yuridis Penerapan Partisipasi Masyarakat Adat Dalam Pengelolaan Pandawa Watersport di Tanjung Benoa Perspektif Hukum Pariwisata," 3, no. 5 (2025), <https://doi.org/10.61104/alz.v3i5.2236>.

⁴⁹ M. Liang, P. Lei, G. Luo, and Z. Han, "Exploring the Rise of Ecotourism, Rural Indigenous Tourism, and the Role of the Chinese Government," *GeoJournal* 90, no. 4 (2025): 189, <https://doi.org/10.1007/s10708-025-11440-3>.

evaluation can assess actual access, compliance, user experience, and institutional performance.

Implementation should proceed in a deliberate sequence. The first step is a regulatory crosswalk identifying each accessibility obligation, its legal source, the responsible agency, the applicable service or inspection instrument, and the available administrative response. The second is the preparation of measurable criteria for matters that can lawfully be specified at the technical level. The third is integration of those criteria into existing inspection, complaint, and licensing workflows. The final step is periodic review using documented findings. Sequencing reform in this way reduces the risk that new rules are enacted before the relationship among existing instruments has been clarified.⁵⁰

A practical institutional model would be an integrated accessibility-compliance pathway rather than a new stand-alone bureaucracy. A complaint or inspection finding should be capable of moving through a documented route from the tourism service unit to the agency holding the relevant technical or licensing competence, with responsibility for follow-up clearly recorded. Digital case tracking may support that process, but technology should not be mistaken for coordination itself; accessible-destination research shows that platforms are effective only when the participating actors have defined roles and working relationships. The legal instrument should therefore specify the workflow first and use technology as an enabling tool.⁵¹

Periodic review should also include organisations of persons with disabilities at the stage where standards and evaluation criteria are designed, not only after a complaint arises. The CRPD expressly emphasises consultation and active involvement of persons with disabilities through their representative organisations in decisions concerning them. In the tourism context, that principle can be operationalised through participation in accessibility checklists, review of complaint procedures, and scheduled evaluation of service standards. Publishing non-sensitive review results would further improve accountability and allow future empirical studies to distinguish formal compliance from accessibility as experienced by users.⁵²

CONCLUSION

The normative analysis shows that Surakarta already possesses a substantial legal foundation for accessible tourism. Law Number 10 of 2009 and Law Number 8 of 2016 establish national principles and duties, while Local Regulations Numbers 13 of 2016, 5 of 2017, and 9 of 2020 and Mayor Regulations Numbers 26 and 27 of 2024 provide local tourism, disability-rights, service, and implementation instruments. The principal finding is therefore not the absence of regulation but

⁵⁰ UN Tourism, ONCE Foundation, and UNE, *How to Apply ISO Standard 21902: Accessible Tourism for All—Recommendations for Tour Operators, Travel Agencies and Travel Agents* (Madrid: UN Tourism, 2024), <https://doi.org/10.18111/9789284425860>.

⁵¹ Paola Castellani and Alfonso Vargas-Sánchez, "Accessible Tourism from the Destination Perspective: Coordination Among Actors and Digital Ecosystems," in *Accessible Tourism in the Digital Ecosystem*, ed. Fabio Cassia, Paola Castellani, and Chiara Rossato (Cham: Springer, 2023), 45–55, https://doi.org/10.1007/978-3-031-38782-1_4.

⁵² Convention on the Rights of Persons with Disabilities, art. 4(3); Law Number 8 of 2016 concerning Persons with Disabilities.

fragmentation: the operational relationship among accessibility standards, tourism-business obligations, service indicators, supervision, licensing, and disability-rights mechanisms should be made more explicit.

Under Friedman's framework, the legal-substance issue concerns integration and operational clarity rather than a regulatory vacuum, while the legal-structure issue concerns the formal design of coordination across agencies rather than a proven failure of coordination in practice. Legal culture cannot be assessed from the documentary method used here and should be investigated empirically. Accordingly, this article does not conclude that implementation effectiveness or public awareness is low; it concludes only that the regulatory architecture can be made more coherent and evaluable.

Reform should prioritise harmonisation of existing regulations, measurable tourism-accessibility standards and inspection tools, a clearly documented inter-agency workflow, and a specialised tourism-accessibility working mechanism within the existing disability-governance structure. Accessibility requirements should be linked to licensing, service standards, and enforcement only through legally appropriate procedures. The study is limited by its normative design and does not measure physical accessibility, stakeholder awareness, business compliance, complaint resolution, or user experience. Those dimensions should be the subject of future empirical research before Surakarta is described as a model of inclusive-tourism implementation.

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