International Perspectives on SEN and Inclusive Education

This chapter seeks to provide an international comparative analysis of the world of SEN, whilst identifying key trends and themes that have emerged and how they impact upon the quality of educational experience that children with SEN receive.

In Part A of this chapter you will be introduced to a range of international policies related to SEN. In contrast Part B examines the policies and practices of specific countries, including the USA, parts of Asia, Uganda, Australia and Israel. The chapter also looks at the development, organisation and philosophical underpinnings of SEN and inclusion across a number of countries, and outlines the current educational practices, legislation and key trends that govern these provisions. Consequently, it is envisaged that after reading this chapter you will have a comprehensive grasp of international policy related to SEN, alongside an appreciation of how different countries interpret this in practice.

Introduction

According to the World Education Forum (2000) inclusion is high on the reform agenda in many countries and is rooted within the context of the United Nations (UN) promotion of ‘Education for All’. Specifically in relation to SEN, the intention of the UN is to foster strategies to increase the participation and learning of children who are perceived to be vulnerable to marginalisation and/or exclusion within their existing educational arrangements. Indeed, the World Education Forum (2000) assumes the aim of inclusive education is to eliminate social exclusion and promote a diversity of opportunity for children worldwide, with a particular focus upon such issues as race, social class, ethnicity, religion, gender and ability (Vitello and Mithaug, 1998).
Reader Reflection

The UN is an international organisation that aims to facilitate co-operation in international law, international security, economic development, social progress and human rights issues. The UN was founded in 1945 to replace the League of Nations, which had been established to stop wars between nations and to provide a platform for dialogue. There are presently 192 member states which recognise every independent country of the world (see www.un.org/english/ for more details).

Internationally, many educational authorities are embracing a philosophy of inclusion in order to address their social and moral obligations to educate all children. The competing needs of different types of disabilities and special educational needs (SEN) expressed through various lobby groups have, however, led to a wide range of different philosophies and practices for promoting inclusion across the world. As a consequence, this chapter identifies the similarities and differences within inclusive education specifically related to children with SEN, whilst also noting the relative strengths and limitations of the different models presented herein.

Smith and Thomas (2006) suggest the international inclusion debate has, for too long, focused on whether children with SEN should be educated in special or mainstream schools, rather than focusing upon the quality of education and support that they receive. Baroness Warnock (who chaired an enquiry into ‘handicapped children’ within the UK in the 1970s (see Chapters 1 and 2) reinforced this view further in 2005 by suggesting that to persist with inclusion without any thought as to what is an appropriate educational placement for each child would be foolish. She continued by suggesting the idea of inclusiveness springs from the ‘heart being in the right place’, and thus inclusion should not solely revolve around a shift from special to mainstream schooling, but more importantly should take as its primary focus the quality of educational experience a child with SEN receives.

Warnock (2005) has therefore advocated a U-turn in educational policy within England in which rather than teaching all children in mainstream schools she suggested more special schools should be established. This viewpoint has caused considerable consternation in many agencies representing SEN who have accused Warnock of betraying the principles of promoting tolerance through teaching all pupils together. Indeed, as noted in previous chapters, within England the 1981 Education Act guaranteed that every child had the right to a place in a mainstream school and thereby introduced the ‘statementing’ of pupils to identify any specific learning needs they might have.

Furthermore, Warnock (2005) has suggested that the concept of inclusion has become muddled due to inclusive ideology meaning that not only did
Statemented children have the right to special provision they also had the right to be ‘included’ in mainstream schools, provided that they did not adversely affect the learning of others. This last proviso has however, according to Armitage (2005), been highly problematic to determine since adverse effects on learning are hard to prove.

Consequently, whilst Kalambouka et al. (2007) have suggested that internationally there is a shift towards inclusion within mainstream settings, it is important to acknowledge that children with SEN are all very different and any reluctance to address genuine differences may undermine attempts to meet this diversity within children’s needs. Given that there is a developing trend towards including children with SEN within mainstream settings within the UK and internationally, its delivery in practice is, according to Farrell (2000), rather fraught with the complex issues and challenges of policy and practice. As a result, Part A of this chapter sets out to provide an overview of the range of UN legislation and policies that have been established to support children with SEN internationally over the last thirty years, while Part B will in turn critique several countries’ specific approaches to the implementation of inclusive education.

Reader Reflection

According to Smith (2006), the international inclusion debate has for too long focused on whether children with SEN should be educated in special or mainstream schools, rather than addressing the quality of education and support that they receive. Warnock (2005) reinforced this view by suggesting that to persist with inclusion without any thought of what is an appropriate educational placement for each child would be foolish.

Reflect upon these views of Smith and Warnock. Having done so do you feel that it is the quality of the teaching and opportunities offered to a child with SEN that are important rather than where they are taught?

PART A: A Review of UN Developments and Policies


In December 2006 the UN Convention on the Rights of Persons with Disabilities launched its most recent citation in which it noted only 45 of its 192 member states had specific legislation protecting the rights of disabled people. This first convention of the new millennium had set out to encourage the enactment of laws and policies upon all its member states in favour of disabled people with the
aim of including them in everyday life, and at the same time providing equal access to educational services for everyone. Indeed, the treaty was created to have a concrete effect on the lives of disabled people by ensuring the enacted laws were not only put into policy but more importantly were implemented in practice, thus reiterating the trend towards inclusivity within the international community (Fisher and Goodley, 2007).

It has been estimated that the worldwide number of children under the age of eighteen with a disability varies between 120 and 150 million (UNESCO, 2004). This, along with the fact that 90 per cent of children with disabilities do not attend school at present, shows that discrimination leads to a loss of opportunities and chances for entire societies. Moreover, two thirds of people worldwide with disabilities live in developing countries and these poor countries in particular suffer from the resultant waste of potential which goes hand in hand with the exclusion of people solely due to their disability (Timmons, 2002). A key feature of the UN convention emphasises the need for international co-operation, and that all phases of the new international development programmes should include a disability dimension. As such, developing countries will receive support from a range of international agencies to implement the 2006 UN Convention on the Rights of Persons with Disabilities, with the aim here being to raise the aspirations and achievements of those children with SEN. To date, 101 out of the 192 member states of the UN have signed up to implementing these objectives.

In summary, this convention is centred upon the instigation of a significant ‘paradigm shift’ from medical models (seeing the causation and location of disability with the person) to a social model approach (seeing the problem with society and the barriers it creates for disabled people) (see Chapter 2). Thus, the UN is seeking to promote the notion of educational inclusion, alongside a recognition that countries worldwide need to be proactive in identifying what they can and should do to adapt their services to accommodate the needs of children with SEN. Central to future international developments in SEN is the need for a commitment that no child is discriminated against on the basis of their disability and that all should have access to a high quality educational experience. However, whether this is located within mainstream or segregated school settings is subject to much international debate as countries’ differing cultures and financial situations determine the quality and nature of education provided for children with SEN (Farrell, 2000; Smith 2006; Warnock, 2005).

Prior to the UN Convention developed in 2006 and discussed above, a Convention on the Rights of the Child was established in 1989 and this instigated the first legally binding international agreement to address the full range of human rights, including civil, cultural, economic, political, and social rights for young people. The reason for implementing this convention was that world leaders had decided that children needed a special convention just for themselves because people under eighteen years of age are often in need of special care and protection that adults do
not require. The convention set out these rights in 54 articles and identified the basic human rights that children everywhere should have, which include:

- the right to survival
- an opportunity to develop to the fullest
- protection from harmful influences, abuse and exploitation
- full participation in family, cultural and social life.

Alongside these were four core principles:

- non-discrimination
- a devotion to the best interests of the child
- the right to life, survival and development
- respect for the views of the child.

Reader Reflection

Review the four core principles of the UN Convention on the Rights of the Child and consider how international governments and SEN agencies can work towards achieving these aspirations.

The core principles identified above support the notion of equality of opportunity discussed in more detail in Chapter 1 (see Finkelstein, 1980; Johnstone, 2001) and suggest what countries should be doing to tackle those barriers to the participation of children (including those with SEN) within society. The articles noted below specifically relate to this development of international inclusive SEN policies and practices.

- **Article 2**: All human rights applying to children without discrimination on any ground particularly.
- **Article 12**: The right of the child to express an opinion and to have that opinion taken into account, in any matter or procedure affecting the child. This emphasises the notion of empowerment and the self-advocacy of children to have a voice in decisions which impact upon them.
- **Article 23**: The right of disabled children to enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance, and facilitate the child’s active participation in the community. It also advocates the right of the disabled child to special care, education, health care, training, rehabilitation, employment and recreation opportunities. Moreover, all of these are to be designed with the intention of fostering the child to achieve the fullest possible levels of social integration and individual development.
- **Article 28**: This states the child’s right to an education, and that it shall be provided on the basis of equal opportunity.
Historically, the UN Convention on the Rights of the Child (1989) was not the first to address children, as its instigation marked the thirtieth anniversary of an earlier declaration of the rights of the child in 1959 and the tenth anniversary of the International Year of the Child in 1979. But since its adoption in 1989, and after more than sixty years of advocacy on children’s rights, what was significant about the 1989 UN convention was that it was ratified more quickly and by more governments (except Somalia and the USA) than any other previous human rights instrument while additionally and specifically addressing those children with SEN. Indeed Nind et al. (2003) suggest that pivotal to the successful implementation of the 1989 convention was that it was at the time the only international human rights treaty that expressly gave non-governmental organisations (NGOs) a role in monitoring its implementation under Article 45a. The uniqueness of enabling NGOs to have a role in supporting the UN convention lay in the fact that for the first time this gave organisations (excluding government representatives) a central opportunity to influence and shape the policies and practices of international child development, including those with SEN.

In summary, the 1989 Convention brought about a paradigm shift in UN policy direction through which children with SEN were considered as being integral to any successful young people’s international strategy development (Thomas and Loxley, 2007). Therefore as disability movement perspectives sought to assert their human rights to be included within society (Slee, 1998), this convention supported a developing trend of including children with SEN as an integral component of children’s development activities.

**Reader Reflection**

Article 12 of the UN Convention on the Rights of the Child gave the right to any child of expressing an opinion and to have that opinion taken into account in any matter or procedure affecting them. Furthermore, the convention gave NGOs a pivotal role in implementing its implementation.

Reflect upon the statement from this article and consider how the voice of children with SEN can be heard, and how this can have the potential to shape inclusive education policies and practices in the future.
International Action to Date and Future Policy Directions

During the last thirty years there has been an increasing pattern of UN conventions setting out the expectations of international member states as related to disability and SEN. In 1993, for example, the UN Standard Rules on the Equalisation of Opportunities for Persons with Disabilities noted that the rights of disabled people had been the subject of significant attention within the UN over the previous three decades. For example, it highlighted that the most important outcome of the International Year of Disabled People (1981) was the introduction of the World Programme of Action for Disabled People. This programme emphasised the right of disabled people to the same opportunities as other citizens (Davis, 2000). A further significant development was that disability was to be considered a function of the relationship between disabled people and their environment. This programme then highlighted the importance of countries’ interaction with disabled people and the agencies that supported them. It stated that societal and cultural responses to accommodate and include or contrasting to observe that disability was located solely within the person were of crucial importance to the establishment and development of disability policies and practices (see Chapters 3 and 4).

Reader Reflection

The UN Standard Rules on the Equalisation of Opportunities for Persons with Disabilities (1989) suggests that the ‘causes and consequences’ of disability vary throughout the world. They also further suggest that those variations are the result of different socio-economic circumstances and of the different provisions that various member states make for the well-being of their citizens.

As part of the developing shift towards social models of disability (Barnes, 1992) a global meeting of experts to review the implementation of the World Programme of Action was held in Stockholm in 1987. It suggested that guiding philosophies should be developed to highlight the priorities for action in the years ahead, and that the basis of these should be a recognition of the rights of disabled people. Consequently, the meeting recommended that the UN General Assembly convene a special conference to draft an international convention on the elimination of all forms of discrimination against persons with disabilities to be ratified subsequently by member states by the end of the decade. As such this resulted in the implementation of the 2006 UN Convention noted earlier.
Reader Reflection

The world Programme of Action meeting held in Stockholm put forward the idea that a ‘guiding philosophy’ should be established to highlight the priorities for inclusive education for children with SEN. Furthermore, this should embrace the social model of disability and the fundamental rights of disabled people to have equal access to society.

Reflect upon this statement and then construct your own model of what this philosophy should consist/look like, and how it could be implemented.

Un Standard Rules

Following substantial debate and discussion by international member states with the UN, a total of 22 standard rules were eventually established in order to provide a benchmark for policy making and action covering the entitlement and accessibility of disabled people to society. In relation to education and disability Rule 6 is of most significance, in that it states that countries should recognise the principle of equal educational opportunities for children with disabilities within integrated settings, and that they should ensure these are an integral part of the educational system. This reinforces the encouragement of the social model of disability and the new orthodoxy of a drive towards inclusive education.

Indeed, in order to implement inclusive education, the UN suggested member states should have a clear policy that is understood at school as well as wider community levels which allows for a flexible curriculum plus any adaptations to the school curriculum alongside on-going teacher training and support (Rose, 2001). Moreover the UN argued that where ‘ordinary schools’ cannot as yet adequately make inclusive provision, special school education could be considered. However, this should be aimed at preparing the student for inclusion within the mainstream eventually. Thus, these UN rules constituted the first articulated drive towards inclusive schooling for children with SEN, by recognising the need for schools and teachers to adapt and modify their curriculum, teaching styles and practices to accommodate individual needs.

Reader Reflection

Review how the UN view of special schools being used to only prepare children with SEN for the mainstream fits with the view of the Warnock (2005) discussed earlier within this chapter.
Central to the international drive for schools to become more inclusive was the responsibility of schools, teachers and policy makers to change their existing structures to accommodate the diversity of all children with SEN (Avissar, 2003; Vickerman, 2007). This supports the challenges of the 1960s and 1970s on the orthodoxy of segregation within the UK (Wearmouth, 2001), and the development and emergence of inclusive environments in the 1990s and into the twenty-first century (Gibson and Blandford, 2005). As such, individuals and agencies supporting children with SEN have had to respond to what has become a significant policy and practice shift of isolated and segregated schooling through to an acknowledgement of equal rights and the entitlement to mainstream education.

**Reader Reflection**

A significant development of the UN Standard Rules on the Equalisation of Opportunities for Persons with Disabilities (1993) was a recognition that disability was to be considered to be a function of the relationship between disabled people and their environment, which is commonly referred to as the ‘social model of disability’. Furthermore the rules acknowledged the drive towards the provision of integrated settings for the education of children with SEN as opposed to previously segregated approaches.

In reviewing the statement above, reflect upon what issues you think schools and teachers would have to adopt in implementing the ‘social model of disability’ which involves organisations being proactive in meeting and accommodating the needs of children with SEN, rather than children having to fit into existing and sometimes ‘restrictive’ structures.

**The UNESCO Salamanca Statement (1994)**

In drawing the various UN conventions to a close we will now turn to an examination of the Salamanca Statement which was a significant international directive in that it called upon the international community to endorse the approach of working towards inclusive schools by implementing practical and strategic changes across the world. In June 1994, representatives from 92 governments and 25 international organisations attended the World Conference on Special Needs Education in Salamanca, Spain, and agreed upon a dynamic statement on the education of all disabled children which called for inclusion to be internationally considered as the norm rather than the exception (O’Hanlon, 1995).

The conference also adopted a new framework for action of which the guiding principle advocated that ‘ordinary schools’ should accommodate all children, regardless of their physical, intellectual, social, emotional, linguistic
or other needs. The framework for action stipulated disabled children should attend their neighbourhood school which should make appropriate provision to accommodate their individual needs. The statement argued that ‘regular schools’ with this inclusive orientation were the most effective means of overcoming discriminatory attitudes; creating welcoming communities; building inclusive societies; and achieving education for all (Mittler and Daunt, 1995).

The World Conference (Salamanca Statement, 1994) Called Upon All International Governments To:

- give the highest policy and budgetary priority to improve education services so that all children can be included, regardless of their differences or difficulties
- adopt as a matter of law or policy the principle of inclusive education and seek to enrol all children in ‘ordinary schools’ unless there are compelling reasons for doing otherwise
- develop demonstration projects and encourage international exchanges with countries with more progressive inclusive policies and practices
- ensure that organisations of disabled people, along with parents and community bodies, are involved in the planning and decision making of policies and practices for children with SEN
- place greater effort into pre-school strategies to promote inclusive practices
- ensure that both initial and in service teacher training addresses the provision of inclusive education.

The Salamanca Statement (UNESCO, 1994) called upon international communities to endorse an inclusive approach to schooling and to support the development of SEN as an integral aspect of all education programmes. In working towards these ideals the World Conference called upon agencies such as UNESCO, the United Nations Children’s Fund, the United Nations Development Fund and the World Bank for their endorsement and support in meeting these inclusive education ideals. This also reinforces the importance of multi-disciplinary and multi-agency approaches (Watson et al., 2002) to the successful adoption of inclusive educational practices (see Chapter 8 for a further analysis). Additionally, the World Conference asked the UN and its associated agencies to strengthen their inputs whilst improving their networking to foster the more efficient support of integrated SEN provision. As such, non-governmental organisations were asked to strengthen their collaboration with official national bodies and to become more involved in all aspects of inclusive education. UNESCO was asked to:
• ensure that SEN formed part of every discussion dealing with ‘Education for All’
• enhance teacher education related to SEN and inclusion and gain support from teaching unions and related professional associations
• stimulate the academic community to do more research into inclusive education and disseminate the findings and reports across international boundaries in order to share practice and work towards advancing educational attainment and accessibility for children with SEN
• use its funds over the five year period from 1996 to 2001 to create an expanded programme for inclusive schools and community support projects which would enable the launch of international pilot projects in which those countries with less advanced education systems could work towards more inclusive ideals.

The framework for action within the Salamanca Statement (UNESCO, 1994: 11) states ‘inclusion and participation are essential to human dignity and to the enjoyment and exercise of human rights. Within the field of education this is reflected in bringing about a genuine equalisation of opportunity’. Thus SEN provision must embody proven methods of teaching and learning in which all children can benefit, but at the same time must recognise that human differences are normal and that learning must be modified to meet the needs of the individual child, rather than the child fitting into existing processes. As such, the fundamental principle of the inclusive school is premised upon the notion that all children should learn together, where possible, and that ‘ordinary schools’ must recognise and respond to the diverse needs of their students, whilst also having a continuum of support and services to match these needs.

Reader Reflection

Reflect upon your views and perspectives in relation to the Salamanca Statement which argues that ‘... “regular schools” with an inclusive orientation are the most effective means of combating discriminatory attitudes; creating welcoming communities; building inclusive societies; and achieving education for all’.

As part of your reflection and justification or opposition to the statement above you should identify some key points based on the chapter so far to justify your comments.

PART B: A Review of Contrasting International Perspectives

Part A of this chapter offered an international context to the various UN declarations and ideologies being promoted to support children with SEN. However,
as discussed earlier the countries involved adopted different approaches and interpretations to these directives. The second half of this chapter seeks to provide an overview of various countries’ approaches to the inclusion of children with SEN.

Provision for Children with Special Educational Needs in Asia

The World Bank was one of several organisations identified by the UN that could facilitate and encourage international member states to work towards fulfilling the various directives related to children with SEN. As such, the World Bank now works in conjunction with the UN to provide loans to developing countries alongside commissioning papers on a wide range of issues. In relation to improving children’s access to education (including those with SEN), in 1994 the World Bank’s ‘Asian Technical Paper Number 261’ identified countries such as Bangladesh, Brunei, China, Hong Kong, India, Indonesia, Japan, Korea, Malaysia, Nepal, Pakistan, Philippines, Singapore, Sri Lanka and Thailand as being in need of support. Within the technical paper, disabled children were considered to be at the centre of a movement to improve primary education in Asia, with the UN and World Bank establishing the aim that all children would attend school by the year 2000. According to this report, the development of inclusive primary education was the best option for achieving education for all within the continent, where school enrolment rates at the time were lower than 70 per cent in some countries and where most disabled children received no schooling at all.

Forming the backdrop to the 1994 World Bank Report were 15 international countries’ case studies. The report argued that universal primary education could be achieved without the inclusion of children with SEN. It suggested that these children could be successfully and less expensively accommodated in integrated rather than fully segregated settings. Indeed, if segregated special education were to be provided for all children with SEN, the cost would potentially be enormous and prohibitive for many developing countries. The report also suggested integrated ‘in class provision’ with a support teacher would prove effective for the majority of children with SEN and thus additional costs would be marginal if not negligible.

This strategy of encouraging children with SEN to be integrated into mainstream schooling presents an interesting point for debate. On the one hand, it supports the UN directive of working towards children with SEN being accepted as equal citizens and accessing mainstream schooling. On the other hand, it does not acknowledge the need to promote the best educational placement for children with SEN. Therefore we can see two competing ideologies at work here and can observe the extent to which the World Bank’s motives are constrained by financial considerations.

One example of this tension is to be found in India, which has had significant experience of absorbing children with SEN into ‘ordinary classrooms’ and providing appropriate training for teachers. The 1994 World Bank Report noted that the unit cost for children with SEN in mainstream education was
six US dollars compared to five for non-disabled children. In contrast, the unit cost for SEN children in segregated settings was 33 US dollars which is five times higher than the figure in the mainstream. So for some developing countries providing access for children with SEN in mainstream settings may be a financial compromise which, while fulfilling the UN directives, will not necessarily prove to be the best option for all children.

**Reader Reflection**

The 1994 World Bank Report noted the significant cost differential in supporting children with SEN within either segregated or mainstream settings. Reflect upon the extent to which you consider that governments should consider costs as the primary determinant of educational policy and practice.

While financially the location of children with SEN may be more cost efficient within the mainstream sector, the other key consideration here is the need to train teachers to ensure they are adequately prepared to challenge children sufficiently. The World Bank Report suggested Asian schools would need to be provided with the full range of resources to deliver a sound curriculum for all children and this would be achieved via a combination of the class teacher and additional specialist support staff. Furthermore, the report added that if primary education was to be more effective for a greater diversity of children then schools would need to be more responsive to children’s needs and teachers would require a larger more differentiated repertoire of teaching strategies, as well as the capacity to improve and adjust the curriculum to deliver educational programmes which were appropriate for all children.

Janney et al. (1995) suggested that a shift in philosophy was necessary in order to move away from a focus upon the deficits of a child with SEN towards an understanding that all children were capable of learning. Thus, rather than placing responsibility for failure either on the child or on the environment, the task becomes one of specifying the conditions under which diverse students could achieve optimal learning and success (Barnes, 1992). This provides a complex set of educational and financial tensions which are competing with each other to achieve the UN’s goal of disabled children not being left out of the development of primary education, while noting it is ‘vastly more expensive’ to segregate than integrate.

**A summary of the road towards inclusion for some Asian countries**

In 1994 Nepal was one of the poorest countries in the world and had set itself the goal of integrating children with mild to moderate disabilities into
mainstream primary education with the target of making special education provision an integral component of basic primary education. In contrast, in India, following the World Bank Report, a five-year plan increased the budget for children with SEN more than five-fold, with a particular focus on supporting a major national development programme for the integration of children into ‘ordinary schools’.

Furthermore, in the Philippines the ultimate goal of special education was the integration of learners with SEN into the ‘regular school system’ and eventually into the community. In relation to Sri Lanka, the government was considered to be an early pioneer of mainstreaming (Khandrake et al., 2005) whereby it regarded the integration of children with and without impairments as the most important contribution to community living. Indeed, families in Sri Lanka volunteered to assist teachers in the integrated programme, thereby motivating schools to work towards opening their doors to children with SEN.

Korea, Malaysia, Sri Lanka, China, Indonesia and Thailand were among some of the first Asian countries to introduce individual learning programmes to support children with SEN. In addition, Thailand accepted sign language as a legitimate language and produced one of the earliest sign language dictionaries. In China classes, mainly for slow learners, affiliated to ordinary schools were began alongside the first in-service teacher training programmes to provide support for children with mild learning difficulties.

In summary, there is no doubt that inclusive education is a contested area both nationally and internationally. It has been the focus of what Daniels (2000: 1) has called ‘extraordinary debates concerning definition and ownership’. However, encouragingly, in 1994 the World Bank Report highlighted the early indications of some Asian countries responding to the drive for inclusive schooling in which children with SEN were acknowledged as having the same rights as non-disabled pupils to access schooling.

Reader Reflection

Review what you see as the similarities and differences between the various Asian countries noted above. What do you think these countries could learn from those with more advanced inclusive educational policies?

The United States of America

While some developing international countries may be working towards ensuring all children have a basic right to education, in the USA around 96 per cent of children with disabilities are presently educated within mainstream schools, and almost half spend the majority of their school day in ‘general inclusive’ classrooms as opposed to being withdrawn for segregated lessons (United States Department of Education, 2005).
picture demonstrates a progressive increase in the number of children with SEN being included in mainstream settings over the past twenty years. Furthermore, ‘Public Law 108–446: Individuals with Disabilities Education Improvement Act of 2004’, continues to advocate the inclusion of children with SEN within mainstream education settings. This law not only advocates accessibility to a high quality education for children with SEN, it also promotes accountability for results; enhanced parental involvement; the use of proven practices and resources; greater flexibility; and reduced paperwork burdens for teachers, states and local school districts (Block and Obrusnikova, 2007).

The Individuals with Disabilities Education Act (IDEA) is the main federal programme within the USA that authorises state and local aid for special education and related services for children with disabilities, including those students with learning disabilities. On 3 December 2004, President Bush signed the Individuals with Disabilities Education Improvement Act (Public Law 108–446) which made significant changes including new provisions regarding how schools could determine whether a child had a specific learning disability and how they could receive special education services (see http://idea.ed.gov/).

As a result, the USA can be considered as one of the more progressive international countries that has actively promoted the full inclusion of children with SEN. Indeed, the country has had a long history of policy and practice developments in inclusive education, dating back to 1975 when President Gerald Ford advocated that every public school district in the country must provide all its students with disabilities, aged from three through twenty-one years of age, with an individualised, free and appropriate public education that was to take place within the ‘least restrictive environment’. President Ford’s desire to foster educational environments that were ‘least restrictive’ was initially introduced in 1975 through the ‘Public Law 94–142: Education of All Handicapped Children Act’, and this has since been regularly updated in 1983, 1990, 1997, and 2004.

The notion of ‘least restrictive environments’ is worth taking note of. According to Winnick (2005), the least restrictive environments for children with SEN are within mainstream education and so this should be used whenever and wherever possible. However, Warnock (2005) has argued that for many children with SEN segregated schooling may be the most appropriate environment for some to have the best access to education. This highlights the complexity of developing SEN provision within countries’ national laws as well as with regard to UN directives which promote full inclusion within the mainstream.
The Individuals with Disabilities Education Act (IDEA) (2004) has three main phases:

- Stage 1: ‘Get’em in’ – involving opening the doors of public schools to children with SEN
- Stage 2: ‘Get’em through’ – involving teacher educators, related support services, staff and parents working to keep children with SEN from dropping out

Reflect upon the three points from IDEA (2004) above and consider the strategies that need to be in place to ensure each of the stages are fulfilled for children with SEN.

According to Bender et al. (1995) and Block and Obrusnikova (2007), the US model of inclusion is rooted in the philosophy of educating children with SEN alongside their non-disabled peers while at the same time supporting them fully from initial entry and access to school, through modifications to schools and curricula, and then on into preparation for employment. This model exemplifies the notion of fostering the ‘least restrictive’ environments (Winnick, 2005), suggesting a child with SEN should have the opportunity to be educated with their non-disabled peers to the greatest extent possible while also having an entitlement to the same activities and programmes any other non-disabled person would be able to access.

American law does not clarify the nature of the least restrictive environment, however in a landmark case (Daniel V. the State Board of Education (1989), cited in Daniel, 1997) it was determined that children with SEN had a right to be included in both academic and extracurricular programmes of ‘general education’.

As part of this significant ruling case it was acknowledged that in determining what constituted a ‘least restrictive environment’ four fundamental factors should be considered. Namely:

- the educational benefits of integrated versus segregated settings
- the non-academic benefits of inclusion (primarily social interaction with non-disabled peers)

(Continued)
• the effect of a student with a SEN on their teacher and peers
• the costs of all supplementary services required for a child with SEN to stay within an inclusive setting.

Read the four fundamental factors noted above and then devise your own definition of the term ‘least restrictive environment’. Try to identify factors additional to those noted above that you would use to determine the most appropriate inclusive setting for children with SEN.

Israel

In contrast to extensive, well-established legislation within the USA, the mainstreaming of children with disabilities into ‘regular’ classrooms in Israel has been promoted on more of a voluntary, rather than a statutory, basis for the last forty years. However, legislation passed in the Equal Rights for Persons with Disabilities Law (1998) included as one of its key requirements the expectation that schools would seek to mainstream children with SEN into ‘regular classrooms’ to the ‘maximum extent’ wherever possible. The legislation not only supported ongoing voluntary practices but also reinforced the commitments and concerns of legislators and educators (Terzi, 2005) around the world, thus emphasising the need for a progressive shift internationally towards inclusive education for children with SEN.

The 1998 Equal Rights for Persons with Disabilities Law (State of Israel, 1998) set out a universal principle within the country that a disabled person should be able to exercise their rights to access existing institutions within society, and would not necessarily have to access purely segregated settings. This begins to mirror the more established policy and practice provisions within the USA. However, in Israel there are presently around 600,000 people who live with physical, mental, and/or emotional disabilities and are discriminated against in nearly every aspect of their lives. For example, unemployment rates amongst this group are exceedingly high, with most public places proving inaccessible and disabled people still being routinely sent to live in institutions in which they are isolated and removed from general society. Moreover, according to Avisssar (2003), children with SEN are sent to specialised schools with few of these being integrated into the general educational system or in receipt of any of the individualised services necessary for addressing their particular needs.

.Reader Reflection

The mainstreaming of children with disabilities into ‘regular’ classrooms in Israel has been promoted on more of a voluntary, rather than a statutory, basis for the last forty years. Analyse what you see as the advantages and limitations of such a model of inclusive educational policy.
In Israel, where inclusive educational provision is not as progressive as countries such as the USA or the UK, a more traditional medical rather than social model is practised, even though its equal rights legislation (1998) had established the principle of moving towards more integrated educational settings. Thus within Israel today commonly-held misconceptions – that disabled people are different, cannot learn with the rest of mainstream society, and are not able to work – may well go unchallenged (Reiter et al., 1998). Therefore, non-disabled people within Israel will not have the same opportunities to meet with disabled people socially, in work contexts and/or educationally, and this results in a distinct lack of opportunity to break down these stereotypes and stigmas.

Reader Reflection

Reflect upon what you consider to be the issues for a society that has a distinct lack of opportunities to break down social stereotypes and stigmas. How can these issues be addressed to promote equality of opportunity, mutual understanding and a respect for diversity?

As a result of the physical distance between these two sets of people, Rosenblatt et al. (1998) would contend that stereotypes and erroneous preconceptions are actually on the rise in Israel and this, alongside existing stereotypes, reinforces the legitimacy of the segregation of disabled and non-disabled people. In summary therefore, whilst mainstreaming and inclusion are identified within legislation within Israel dating back to the late 1990s, their implementation in practice is less well established.

Uganda

In recent years, the government of Uganda has made several attempts for education to be accessible to all learners through a process that started with a drive towards an inclusive school system that could meet each learner’s special and diverse needs. The main objective of the Ugandan education system is to provide quality education for all learners in order that they will be able to attain their full potential and meaningfully contribute to, and participate in, society throughout all of their lives. In doing so, the government of Uganda has progressed to a present-day position in which it regards education as a basic human right for all its citizens (Booth and Ainscow, 1998; Norwich, 2007a), including those with barriers to learning and development such as children with SEN.

Currently, however, special schools in Uganda are not meeting the minimum educational standards as set by the country’s Education Standards Agency which is part of the Ministry of Education and Sports (MOES). Indeed MOES (2001) suggests many of the children currently educated within special schools could benefit effectively from inclusive rather than segregated educational provision. Thus, while the Ugandan government recognises the rights of children with SEN through its 1995 Constitution (Government of Uganda, 1995), in which
Article 30 specifically states that all people have a right to education, there is still much work to be done in shifting this philosophy from policy rhetoric into practice within schools. This raises an interesting point of debate as to the extent to which Uganda as a country may want to shift from a philosophical position to one of policy implementation. DePauw and Doll-Tepper (2000) argue, for example, that many agencies get onto the ‘inclusion bandwagon’ as it can be seen as doing the right thing socially, and indeed whether people are on this bandwagon for the right reasons – in terms of following this through to implementation and a commitment to effect positive change for children with SEN – remains the subject of much conjecture.

Reader Reflection

Reflect upon why you think some international countries may, as DePauw and Doll-Tepper (2000) suggest, ‘get on the inclusion bandwagon’. As part of your consideration try to identify what you see as the main reasons for some countries then taking this a step further and actioning inclusion, whilst others do not move beyond the rhetoric and philosophical statements.

While recent Ugandan policy directives do spell out the government’s commitment to provide educational services to children with SEN, there is however further work to do in ensuring all children within the country have access to a basic education. In January 1997, for example, President Museveni of Uganda introduced the notion of universal primary education offering free education to four children per family (Government of Uganda, 1998). Selection was based upon gender and, if there was a child with a disability in the family, they would be given first priority. This policy has progressed since 2002 to offering free education to all children regardless of quotas, gender and/or disability, but much remains to be done (Tilstone and Rose, 2003) in determining the full range of educational needs that children present with and then providing suitable schooling on an individual basis.

Indeed, while free schooling is now offered to all children, there are still examples of a lack of inclusion of children with severe disabilities, including those who are deaf, in Uganda. This, Warnock (2005) suggests, may be due to a lack of sufficient educational materials; the numbers of teachers trained in special needs education; high pupil/teacher ratios; and long distances between home and school for some learners. Thus, as Uganda attempts to progress to more inclusive education systems for children with SEN (Norwich, 2007), it can learn significantly from more advanced educational systems. The USA, for instance, is supporting the 2006 UN Convention on the Rights of Persons with Disabilities. This aims to foster collaboration across international boundaries in order to raise the opportunities for access.
Australia
In Australia there is both an implicit and explicit philosophy of ‘full inclusion’ whereby children with SEN should be educated in mainstream schools alongside their non-disabled peers. As a consequence, the Australian model of inclusion is that schools should be able to accommodate all children’s needs within mainstream settings, incorporating the modification of buildings, the curriculum, and learning and teaching activities. However, according to authors such as Lindsay (2004) and Carpenter (2006), these statements often ignore any reference to the sufficient and necessary specialised teaching skills and human and financial resources required to achieve all this. The oversight, therefore, results in a misconception that inclusion merely refers to a location and place, rather than a detailed analysis of the processes required to achieve inclusion for children with SEN within these inclusive settings (Warnock, 2005).

Lindsay (2004) argues that the current Australian view revolves around the concept of an inclusive school as a place where everyone belongs and where children with SEN are supported and cared for by both their peers and educational professionals. This Utopian view (Kugelmass and Ainscow, 2004), in which there are no considerations of the processes and learning environments needed to achieve genuine and high quality educational outcomes for children with SEN, has been subject to much debate. Indeed it is argued that given the view that inclusion can be seen as very politically attractive (DePauw and Doll-Tepper, 2000), and in keeping with UN international agreements, it is still mistakenly perceived to be less resource intensive, at the same time as being more palatable to the various strong lobby groups including bureaucrats and parents.

Thus, if Australia is claiming to be at the forefront of international policy development related to disability, this failure to translate the rhetoric into reality through a genuine examination of what the necessary processes to achieve inclusive education are should not be an issue of concern for authors such as Lindsay (2004) and Carpenter (2006). Lindsay (2004), for example, critiques the existing dichotomy between the legal regulation of disability discrimination in Australia and inclusion practices as espoused by public education authorities. Lindsay argues that Australian law and inclusion policy are aiming at different outcomes, and as such this undermines the human rights of children with SEN by restricting their access to mainstream education. As a result, it is vital that in moving towards any inclusive educational setting for children with SEN all organisations should work through collaborative partnerships not only to establish policies, but also to ensure the necessary resources and training are then put in place to have a positive impact in practice.

In summary, following the recent introduction of the Disability Standard for Education in Australia (Department of Education, Science and Training, 2005), the key challenge for the country is not going to be about meeting UN
international policy, as this is already comprehensive, but more importantly, it will be about examining how inclusion can be delivered in practice by schools and teachers. Indeed this is a key challenge for all countries, in that establishing inclusive policy is the easy part, but what is more of a challenge is the development of processes and procedures that will ensure children with SEN experience high quality educational experiences.

Reader Reflection
Imagine you are a government education minister who has been tasked with the responsibility for meeting UN international directives on promoting the inclusion of children with SEN within mainstream settings. Make a list of the ways in which you would tackle this complex challenge and what policy and practice directives you would be advocating. In addition, consider which key agencies you would need to engage with in order to ensure you have fully consulted and represented all stakeholders’ views.

This review of the four international perspectives from the USA, Uganda, Israel and Australia and how they contrast with developing countries in Asia on inclusive education for children with SEN demonstrates the complexities and variations of countries working towards establishing acceptable levels of schooling for all (Baker and Zigmond, 1995). Indeed, it demonstrates the unique role of the UN and the significant challenges it faces in working with its 192 member states to encourage international commitments towards not only inclusion but, for some countries, the commitment to a basic right to education. However, in noting these varying perspectives this chapter will now move towards an examination of four internationally significant initiatives established in the late 1980s and early 1990s (Kavale, 2000; Snyder et al., 2001) which have been instrumental in encouraging access and the entitlement of children with SEN to be educated within ordinary schools. A key factor will be the ability of international governments, policy makers, teachers and parents to work together to share and disseminate practices with the ultimate goal of raising aspirations and the entitlement to high quality, appropriate education for all who are marginalised and under-represented within society.

Reader Reflection
Make notes on what you see as the key issues, similarities and differences between the four international perspectives of SEN and inclusive schooling noted above. As part of your reflection, consider what you think different countries can learn from each other in relation to inclusive policy and practice and how this could be disseminated to improve access and the entitlement to high quality education for children with SEN.
Future International Directions in Inclusive Policy and Practice

As noted earlier in this chapter, the first UN convention of the new millennium, the Convention on the Rights of Persons with Disabilities (UNESCO, 2006), was adopted by the UN General Assembly on 13 December 2006 and has been signed by a total of 101 governments to date. Due to the diverse international views and stages of development that are encompassed by inclusive policies and practices, this was a challenging convention to agree. However, the negotiators succeeded in shifting the position on education from one of a choice between segregated or mainstream education to the right to attend inclusive primary and secondary schools.

The convention is based upon a ‘paradigm shift’ (Norwich, 2007a; Pijl et al., 1997) from a medical model to a social model approach. This movement in philosophy has been fundamental in moving international SEN developments forward to a position of society changing and responding to the needs of children with SEN, whilst at the same time recognising their fundamental right to an education that is inclusive. In addition, the convention also recognises the complexity of interpreting inclusive education (which is more than merely about location, and more importantly includes the context within which the schooling takes place).

The Chair of the ad hoc committee which negotiated the convention applauded the role that disabled people and their organisations had played in the development process, with over 800 agencies taking part in the negotiations. This acknowledges the significant shift towards self-representation and the empowerment of both disabled people and the organisations that represent them to determine their futures. Article 24 requires signatories to ensure that all disabled children and young people ‘can access an inclusive, quality, free primary and secondary education on an equal basis with others in the communities in which they live’ (UNESCO, 2006: Article 24, 2b). It continues by stating ‘reasonable accommodation of the individual’s requirements’ (Article 24, 2c) should be made along with the support that is provided, ‘within the general education system, to facilitate their effective education’ (Article 24, 2d). What is particularly significant within the convention is that Article 24 allows for the possibility of segregated education for children with sensory impairments, thus ‘ensuring that the education of persons, and in particular children, who are blind, deaf and deafblind, is delivered in the most appropriate languages and modes and means of communication for the individual, and in environments which maximise academic and social development’ (Article 24, 3c).

In summary, Article 24 marks a significant step forward in the development of inclusive education for children with SEN, with its main features recognising that:

- all disabled children are entitled to an education in an ‘inclusive system’
- disabled people should not be excluded from the general education system on the grounds of their disability

(Continued)
**KEY ISSUES IN SPECIAL EDUCATIONAL NEEDS AND INCLUSION**

(Continued)

- a focus upon removing barriers to the development (to their fullest potential) of disabled people’s personality, talents and creativity, as well as their mental and physical abilities, is paramount
- all disabled people should receive the support they need within general education systems
- large classes make inclusive education more difficult and this should be challenged when implementing the convention
- every state will need to engage with disabled people’s organisations in implementing the articles and convention
- disabled people’s organisations need to develop their capacity to advocate for inclusive education
- all disabled children and learners need to be consulted.

**Reader Reflection**

Read the key points noted above from article 24 of the UN Convention on the Rights of Persons with Disabilities (2006) and compare how these have developed since the late 1980’s and early 1990’s directives. In doing so, try to summarise what you see as the central components of inclusive education for children with SEN in the twenty-first Century.

**Conclusion**

Governments, international agencies and organisations are all working with renewed vigour in this new millennium towards the goal of equality for children with SEN following the adoption of the UN Convention on the Rights of Persons with Disabilities at the end of December 2006. Indeed, according to the UN there are approximately 650 million people with disabilities in the world (of which 120–150 million are estimated to be children) who represent 10 per cent of the global population. An estimated 80 per cent of these disabled people live in developing countries, with many in conditions of poverty and deprivation (Kristensen, 2002). However, in both developed and developing countries, the evidence suggests that disabled people are disproportionately represented amongst the world’s poorest and tend to be worse off than their non-disabled peers.

While international inclusive education has progressed significantly in some countries, there is still much to be achieved in offering a fundamental right to a basic education for some children. The UN set eight goals for development, called the Millennium Development Goals, which established an ambitious agenda for improving the human condition by 2015 and included:
eradicating extreme poverty and hunger
achieving universal primary education
promoting gender equality and empowering women
reducing child mortality
improving maternal health
combating HIV/AIDS, malaria and other diseases
ensuring environmental sustainability
developing a global partnership for development.

Efforts to include disabled people into international development activities have been gaining momentum. For example, in 1997, the UN, in collaboration with the National Research and Development Centre for Welfare and Health in Finland, published a document entitled ‘Disability Dimension in Development Action: Manual on Inclusive Planning’. This set out to serve as a tool by which development theories could be translated into good practice. Various agencies have issued publications and strategic plans since that have addressed the inclusion of disabled people, and the adoption by international states of the UN Convention on the Rights of Persons with Disabilities (UNESCO, 2006) should provide a further impetus for the study and practice of this critical worldwide development work.

There is growing recognition among organisations engaged in development activities of the need to include children with SEN in educational activities; however, there remains much room for the expansion of such programmes, as well as for more documentation of good practices. Indeed, the World Bank found that during the fiscal years 2002–2006 only 5 per cent of new international lending commitments had a disability component. Therefore, in March 2007, the World Bank issued a guidance note to assist its projects in better incorporating the needs of disabled people, integrating a disability perspective into ongoing sector and thematic work programmes, and adopting an integrated and inclusive approach to disability. These developments represented a significant paradigm shift as they identified disability as an issue to be considered in all programming, rather than as a stand-alone thematic issue. Within this framework, there is still space for disability specific actions and programming, based on the needs of the particular international contexts of individual countries.

The UN convention obligates states to be proactive in taking appropriate measures to ensure that disabled people participate in all facets of society, on an equal basis with others. However, all such efforts should be guided by the overall goal to integrate and include disabled people in every aspect of programme development, although finding the appropriate methods of doing so will not be possible without the participation of disabled people at every stage of this process. Thus empowerment and the self-representation of disabled people, combined with an international commitment to acknowledge the rights of children with SEN to a high quality education, will be paramount if this new millennium is to see a major change in the policies and practices of inclusive education.
Student Activities

1. Discuss with a partner what you see as the strengths and limitations of the varying international models and perspectives highlighted within this chapter.

2. The UN Convention of 2006 noted in this chapter advocates that disabled people are actively involved in the decision-making process about their services. Reflect upon what strategies you could implement to ensure this goal is achieved when developing inclusive educational policies and practices.

Suggested Further Reading


This article will be of use in examining various international educational leadership practices related to inclusion.


This document is one of the most recent international publications related to disability and will help you to compare and contrast how issues have evolved over several years in different countries.


This document is worth reading as it had a significant influence on engaging an international commitment to inclusive education.