Dilemmas of difference and the identification of special educational needs/disability: international perspectives

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This article reports findings from an international study about dilemmas of difference in relation to special educational needs and disability in education. It was part of a larger study of the perspectives of 132 education practitioners and policy makers in England, the USA and the Netherlands to a range of dilemmas of difference. It also compares these current perspectives with ones from similar groups in England and the USA from the early 1990s. Participants were interviewed about their perspectives on a presented dilemma about the consequences of identifying children as having a disability or a special educational need. The data are presented in quantitative terms (degrees of recognition and resolution of dilemma) and qualitative terms (reasons, justifications and suggested resolutions). The findings show variations in responses to the dilemma that relate to national differences, but also commonalities in the recognition of this dilemma, reasons for recognising and ways of resolving the dilemma.

Introduction and theoretical background

Education systems have come to be guided by explicit policies to raise educational standards, on one hand, and by policies to promote inclusion, on the other. For example, government education policies in England prioritise the raising of standards through a mixture of accountability and market-style systems, while also pursuing some degree of social inclusion and inclusive schooling. These policy priorities, which are also evident in other countries such as the USA and other European countries, like the Netherlands, represent different and sometimes conflicting discourses about values, concepts and approaches to education, its purposes and organisation. Central to these international moves has been the specific thrust to include more students with disabilities/special educational needs (SEN) into ordinary schools and classroom settings and away from specialist

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separate special schools and classes. This study is set within this international policy context.

An earlier study, conducted by the author in the early 1990s (Norwich, 1993), examined the perspectives of teachers in the USA and UK, on a set of possible dilemmas including the dilemmas of difference. The assumed basic dilemma was whether to recognise or not to recognise differences, as either option has some negative implications or risks associated with stigma, devaluation, rejection or denial of opportunities. The dilemmas of difference relevant to students with disabilities were about identification (whether to identify and how or not), curriculum (how much of a common curriculum was relevant to them) and placement (to what extent they learn in regular or ordinary classes or not). In the 1993 study most participants saw dilemmas associated with these three areas, and their resolutions showed a similar set of contrasting perspectives in both the UK and the USA. The findings were interpreted as showing the balancing required in trying to combine ways of meeting individual needs in inclusive ways, while trying to minimise negative implications and consequences.

The 1993 study was conducted in terms of 'ideological dilemmas' (Billig *et al.*, 1988) and examined dilemmas associated with difference and control. Notions of dilemmas associated with difference have also arisen from US legal studies (Minow, 1985, 1990). As Minow explains:

> When does treating people differently emphasize their differences and stigmatise or hinder them on that basis? And when does treating people the same become insensitive to their difference and likely to stigmatise or hinder them on that basis? (Minow, 1990, p. 20)

From this perspective, dilemmas of difference are relevant to legislation in different areas of social policy including education and special education. As Billig *et al.* (1988) explain, dilemmas arise from a 'culture which produces more than one possible ideal world' (p. 163), and that dealing with dilemmas is a condition of our humanity. We would expect, therefore, to find dilemmatic ideas arising in political philosophy about the clash of social values, such as equality and individuality, as we do in the work of political theorists, such as Dahl (1982) in the USA and Berlin (1990) in the UK. Dahl's analysis focuses on what he calls the dilemmas of pluralist democracy. Though Dahl and Berlin's analyses stem from twentieth-century politics, their analyses continue to have relevance to this century.

Dilemmas have been recognised in the UK more recently as 'progressive dilemmas' with particular focus on the possible tensions between diversity and solidarity in multicultural societies (Goodhart, 2004). Dilemmas about control and difference have found some expression in past approaches to general education from UK and US educationalists (Judge, 1981; Berlak & Berlak, 1981) as well as in special education (Artiles, 1998; Dyson, 2001; Terzi, 2007). Judge made a point that continues to be relevant, that the term dilemma can sometimes be used as a way of talking about a difficulty or an issue. He meant something more specific than this, as is done in this study, that it refers to a situation when there is a choice between alternatives when neither is favourable.

The dilemma of difference confronted in the identification and labelling of children with disabilities/SEN is illustrated in Ho's analysis of the identification of children as having a learning disability (the US term broadly corresponding to what is called specific learning difficulties in the UK) (Ho, 2004). This analysis also shows that resolving dilemmas of difference can involve a range of options. Some mainly emphasise what is different between those with difficulties in learning and those without difficulties (differentiation options) or what is similar (commonality options). Some resolutions involve some combination of commonality and differentiation aspects. It is interesting that in her recognition of the risks associated with identification, Ho does not refer to dilemmas of difference. Nevertheless, her analysis of US and UK policies and practices exemplifies a dilemma: identification establishes eligibility to accommodations and to civil rights protections of these adaptations, but also can have negative aspects associated with stigma and devaluation that can lead to lower expectations for identified children. Her proposed resolution to the dilemma is first to adopt the assumption that all children learn in unique ways and to apply this to how we design and manage the whole educational system. Secondly, while acknowledging that there may be neurological differences in some contexts, she argues against pathologising these differences as much as possible (p. 80). This resolution of the identification dilemma veers strongly towards the commonality option, playing down differences and working for a general system that implements 'flexible and customisable measures' for all children (p. 91). However, this is an incomplete resolution, as she does not say to what extent identifying difficulties and disorders can be avoided (using elements of differentiation options). She ignores the extent to which some children, even if far less than those currently designated as 'learning disabled' in the USA, might need some flexibility and customised provision that is not relevant for other children. Nor does she apply her theoretical analysis to other areas of difficulties and disabilities. The research reported in this article reflects directly on the position adopted by Ho.

This article only reports the findings about the identification dilemma as there is not enough space to report on the other two areas, curriculum and location. A full account of the study is available in Norwich (2007). The aim of the overall study was to examine the perspectives of education practitioners and policy makers in specific school systems in the UK (England), USA and the Netherlands about recognising and resolving the three dilemmas of difference in relation to special and inclusive education. A secondary aim was to compare these perspectives with those from similar groups in the UK and USA from the early 1990s.

Methods

Settings and participants

The participants were 50 English, 50 US and 32 Dutch professionals and administrators (total of 132) working in the special needs/inclusive education field. Given the nature of the study and the research resources involved, it was decided to focus on one part or region of each country. This was a state on the east coast of the

USA, the north of the Netherlands and the south-west of England, these decisions being based on opportunity and access.

The countries were chosen to represent similarities (USA and England) and differences (England and Netherlands) in policy and practice terms. Through its civil rights traditions the USA has been one of the countries that first developed legislation to assure education provision for children with difficulties and disabilities. Pijl and Meijer (1991) distinguished between three types of systems—(i) two-track oriented (separate special education and general education systems); (ii) one-track oriented (strong efforts to avoid separate segregated systems); and (iii) continuum of provision oriented (range of separate and inclusive systems). They identified the USA and UK as having continuum-oriented systems compared to the Netherlands which had a two-track system. The US and UK systems continue to be continuum oriented. The Netherlands was chosen in this study to represent a European country which has been historically two-track, though there have been recent political moves towards greater inclusion.

Two local authorities in each country were selected, a city urban and a rural authority, involving six areas across the three countries. Overall there were 51 visits to schools, centres and administrative offices.

Participants in each of these areas worked in ordinary schools, special schools and support services, in primary and secondary schools, and were class, resource/support and senior teachers. In each of the three countries, between four and eight senior national government administrators/advisers also participated in the study (see Table 1 for breakdown of participants' roles). The selected special schools specialised in severe/profound learning difficulties and emotional and behaviour difficulties, as these SEN areas are often seen as more challenging for inclusion.

Table 1. Breakdown of participants by role across the USA, Netherlands and England

Roles	USA		Netherlands		England		Total	
	n	%	*n*	%	*n*	%	*n*	%
SE resource teacher/SE supervisor in regular school/SEN Coordinator	9	18	4	12.5	8	16	21	15.9
Senior teacher regular school	2	4	3	9.4	4	8	9	6.8
Class teacher regular school	5	10	2	6.3	3	6	10	7.6
Senior teacher special school/centre	5	10	4	12.5	7	14	16	12.1
Class teacher special school	7	14	5	15.5	7	14	19	14.4
Resource teacher special school/centre	4	8	3	9.4	2	4	9	6.8
Counsellor/psychologist/therapist	7	14	3	9.4	6	12	16	12.1
Teaching assistant	1	2	—	—	3	6	4	3.0
School district/LEA/Board administrator	2	4	4	12.5	3	6	9	6.8
Administrators/advisers in state/national SE department	8	16	4	12.5	7	14	19	14.4
Totals	50	100	32	100	50	100	132	100

Methods

Though various approaches to exploring beliefs about dilemmas were considered (see Norwich [2007] for details), it was decided to use an exploratory semi-structured interview method to generate the data for several reasons. This approach had been used successfully in the 1993 study, so assisting the comparison of findings. All participants were interviewed about their perspectives on and judgements about the presented identification dilemma (see Figure 1).

Interviews aimed to explore participants' views and their justifications for holding these views. Participants were shown a booklet with the dilemma in a written form. In the Netherlands, where all the interviews were conducted in English, participants were provided with Dutch and English versions. The interview was in two phases, first exploring recognition of the dilemma and second, how they would resolve it (if they recognised it). Two rating scales were presented for them to give a rating of their degree of recognition of the dilemma and degree of resolution (the 4-point scale included the descriptors: not at all, marginal significant, considerable and cannot decide). Participants gave ratings at different points in each phase of the interviews: some at the start followed by explanations and justifications of their positions, while others explained their positions and then finally gave a rating. An argumentative style of interviewing was used to examine perspectives and positions in depth. Participants were encouraged to consider various perspectives that differed from their own perspectives and asked for reasons for not accepting different arguments and positions. This active interviewing style made it possible to check the consistency of participants' perspectives. Interviews, which were conducted on an individual basis, were recorded and transcribed in full and analysed quantitatively and qualitatively.

All participants consented to the interviews on the basis of an explanation of the purposes of the study and what would happen to the interviews. Confidentiality and anonymity were assured. It was explained that this meant that there would be no reference to themselves as individuals, their service or school or their authority/district. All participants were also sent a summary of the findings.
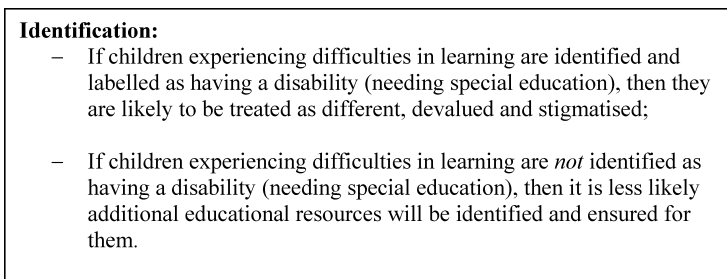

Identification:
  –   If children experiencing difficulties in learning are identified and labelled as having a disability (needing special education), then they are likely to be treated as different, devalued and stigmatised;

  –   If children experiencing difficulties in learning are *not* identified as having a disability (needing special education), then it is less likely additional educational resources will be identified and ensured for them.

Figure 1. Formulation of identification dilemma

Data analysis

Dilemma recognition and resolution ratings were analysed using SPSS, while qualitative data, (about 500 pages of transcriptions overall) were analysed at two levels using the NVIVO programme:

1. first-level emergent themes: 37–49 recognition themes (e.g. 'tensions experienced', 'special educational label as negative', 'stigma has reduced') and 30–39 resolution explanations for each group (e.g. 'national and local developments', 'improve general education', 'need more disability in community');
2. second-level themes: these more general themes subsumed the first-level themes into nine recognition and eight resolution themes. These higher level themes reflected their stance towards the dilemmas and their resolutions—see Table 2.

Transcriptions were analysed in six blocks: recognition and resolution responses for each of the three countries separately. The text was analysed for first-level themes to identify distinct themes that applied across responses in one country. This used an

Table 2. Breakdown of second-level recognition and resolution themes and their meaning for identification dilemma across the USA, Netherlands and England

Recognition themes	*Resolution themes*
Tensions (tensions and issues perceived)	*Continuing issue* (persistence of issues despite some resolutions)
Resolved tensions (a decision has been made but some tension/issue persists)	*Reduce special education identification* (find other way of resourcing additional need without special education identification)
Other positive consequences (identification leads to positive consequences other than resources availability)	*Change attitude to disability/SEN* (find ways of promoting positive images of disability)
Other negative consequences (identification leads to negative consequences other than devaluation/stigma)	*National/local developments* (policy and practice approaches to enhance inclusion at different levels in system)
Negative consequences by other means (there is devaluation /stigma without identification)	*Go beyond negative labels* (focus on individual needs; avoiding negative language)
Moderate or deny devaluation consequences (question/doubt the link between the identification option and devaluation consequences)	*Choice* (enable more choice by parents/students)
Moderate or deny resources consequences (question/doubt link between non-identification option and resources consequences)	*Communication* (enhanced communication between professionals and parents/students)
Depends (whether there are tensions/stigma depend on various factors)	*Comments* (comments about resolution but not directly relevant to it)
Comments (comments arising from dilemma but not directly relevant to it)	

editing approach that emphasised the interpretation of meanings in the text in a grounded theory style (Drisko, 2000). The other country sets of interviews were then analysed, using the previous themes as relevant, otherwise new themes were formulated. Second-level thematic analysis was done to identify commonalities across the first-level themes and to relate these to a conceptual model of the kinds of responses expected for these dilemmas. The second level of thematic analysis used a *template approach*, where themes derive from top-down (conceptual analysis) and bottom-up influences (emergent first-level themes) (Drisko, 2000).

The conceptual analysis used in the second-level of analysis involved four broad alternative recognition responses to a dilemma in the form used in this study:

1. A hard choice is recognised and experienced, called 'tension';
2. There is still some tension, but a choice has been made through some balancing, called 'resolved tension';
3. This questions the validity of the dilemma by questioning the link between the option and negative outcome for one or both options;
4. This presents other outcomes for either option, which could be negative outcomes or positive ones, called 'other outcomes'.

The derivation of the second-level themes for resolving the dilemmas also followed from dilemmatic assumptions. First, it was assumed that there would be some recognition of the persistence of issues in the resolutions, 'continuing issues'. Second, it was assumed that some resolutions would take the form of giving priority to certain options, 'prioritising'.

An independent coder checked the reliability of first and second level coding. First-level coding was repeated for interview excerpts across three of the six areas of data. For all 18 excerpts there was 100% agreement with the original first-level sorting. Checks on the second-level sorting of the first-level themes were done by comparing the original sorting with an independent sorting by another researcher, after a full briefing about the meaning of these first-level and second-level themes. Initial sorting of two blocks of first-level themes (US recognition of the identification dilemma and Netherlands resolution of identification dilemma) showed between 80 and 89% agreement levels.

Results

There is not enough space to give a detailed overview of the findings from this part of the study in this article. Full details are available in a research monograph (Norwich, 2007).

Identification dilemma: recognition ratings

Table 3 shows that the most frequent recognition rating by US participants was marginal (34%) compared to significant for the Netherlands group (38%). English participants had two ratings as most frequent, not at all and significant, both at 26%. However, these differences just missed statistical significance at the .05 level, using a

Table 3. Breakdown of the recognition ratings of identification dilemma across the USA, Netherlands and England (italic represents most frequent ratings)

	USA		Netherlands		England	
Not at all (not)	10 (20%)		5 (16%)		*13 (26%)*	
Marginal	*17 (34%)*		2 (6%)		7 (14%)	
Marginal/significant	0		0		2 (4%)	*13 (26%)*
Significant	11 (22%)		*12 (38%)*		11 (22%)	
Significant/considerable	2 (4%)	6 (12%)	1 (3%)	9 (28%)	0	
Considerable	4 (8%)		8 (25%)		8 (16%)	
Uncertain	1 (2%)		0		0	
Split responses	5 (10%)		4 (13%)		9 (18%)	
Breakdown of pairs of ratings	Not-sig	1	Not-marg	1	Not-marg	1
	Not-con	1	Not-sig	2	Not-sig	6
	Not-marg	1	Marg-con	1	Marg-sig	2
	Marg-sig	2				
Totals	50 (100%)		32 (100%)		50 (100%)	
Some recognition	39 (78%)		85% (27)		74% (37)	

chi-square test (chi-square=17.6, df=10, p=.06). In the analysis of recognition ratings by role, it was found that administrators and support professionals mostly recognised a significant dilemma, while regular and special school professionals mostly did not.

Some participants in each country split their recognition responses to distinguish between some aspect (such as, severe disabilities or special schools) where they saw no or a marginal dilemma and another aspect where they usually saw a significant dilemma (such as, moderate disabilities or ordinary schools). Overall a majority of participants in each country recognised the identification dilemma to some extent (marginal, significant or considerable ratings including split responses): 78% for the USA, 85% for Netherlands and 74% for the English participants. The corresponding figures indicate that a minority of the country participants recognised no identification dilemma—20% in the USA, 16% in Netherlands and 26% in English groups.

Identification dilemma: resolution ratings

Table 4 shows the extent to which participants considered that the identification dilemma could be resolved. The most frequent resolution rating was significant across all three participants groups—38% for the USA, 48% for the Netherlands and 32% for the English participants. This consistency is reflected in the non-significant association between resolution ratings across the three countries, using a chi-squared analysis (chi-squared=8.3, df=10, p=.60). Overall Table 5 shows that with the exception of three US participants all believed that there could be some degree of resolution (marginal, significant or considerable). It is also notable that there were more English than US or Netherlands participants who were uncertain about their resolution or who split their resolution responses.

Table 4. Breakdown of resolution ratings for identification dilemma across the USA, Netherlands and England (% in brackets—1st % out of all participants; 2nd % out of those who recognised the dilemma) (*italic* represents most frequent ratings)

	USA		Netherlands		England	
Not at all (not)	3 (6–8%)		0		0	
Marginal (marg)	11 (22–28%)		9 (28–33%)		4 (8–11%)	
Marginal/significant	2 (4%)	*15 (30–*	1 (3%)	*13 (41–*	2 (4%)	*12 (24–32%)*
Significant (sig)	13 (26%)	*38%)*	12 (38%)	*48%)*	10 (20%)	
Significant/consider-able	1 (2%)	3 (6–8%)	0	1 (3–4%)	2 (4%)	5 (10–19%)
Considerable (con)	2 (4%)		1 (3%)		3 (6%)	
Uncertain (unc)	3 (6–8%)		0		5 (10–14%)	
Split responses	5 (10–13%)		4 (13–15%)		11 (22–30%)	
Breakdown of pairs of ratings	N/a–marg	1	N/a–marg	1	N/a–no	1
	Con–unc	1	Sig–sig	1	N/a–marg	1
	Sig–unc	1	*N/a–sig*	*2*	*N/a–sig*	*4*
	Marg–sig	1			N/a–unc	1
					Marg–sig	2
					Sig–sig	2
Those recognising dilemma	40 (80%)		27 (84%)		37 (74%)	
Those not recognis-ing dilemma	10 (20%)		5 (16%)		13 (26%)	
Totals	50 (100%)		32 (100%)		50 (100%)	

Themes to explain recognition and resolution positions

Analysis of the three most frequent second-level themes used to explain recognition positions shows a similar mix of these themes in each country; references to tensions and a questioning of the devaluation consequence (see Table 5). For the US group, which had the lowest modal recognition level (marginal), one of the most frequent second-level themes also questioned the resource consequence. For the Netherlands group with the highest modal recognition level, one of the most frequent second-level themes was about other positive consequences of identification ('identification required for positive outcomes'). For the English group with the modal level divided between non-significant and significant recognition, one of the most frequent second-level themes was about having resolved a tension ('need outweighs stigma') and another expressing an 'it depends' view. Analysis also showed a moderate level of commonality across the country groups: about half of the first-level themes (49–59%) making up these most frequent second-level themes were shared with one or both country groups.

Further analysis showed the expected relationships between different recognition levels and kinds of explanations used in each country group (see Table 5: cell sizes were too small for statistical analysis). Those with higher recognition levels tended to use themes relating to tensions in the Netherlands and England, while those with lower or no recognition of the dilemma tended to use the themes which questioned the negative

Table 5. Summary of recognition and resolution themes for the identification dilemma across the USA, Netherlands and England

Identification dilemma	USA	Netherlands	England
1. Three most frequent 2nd-level explanations of recognition levels (in rank)	*Moderate/deny devaluation consequences *Tensions Moderate/deny resource consequence	*Tensions *Moderate/deny devaluation consequences Other positive consequences	*Tensions *Moderate/deny devaluation consequences Resolved tensions Depends
% of 1st-level themes in three most frequent 2nd-level themes shared with other countries	49	59	53
2. Differential use of 2nd-level themes by recognition level	More lower ratings with moderate/deny themes	More lower ratings with resolved tensions; more higher ratings with tension themes	More lower ratings with moderate/deny themes; more higher ratings with tension themes
3. Three most frequent 2nd-level explanations of resolution positions (in rank order)	*National/local developments *Change attitude to SEN/disability *Continuing issues	*Change attitude to SEN/disability *National/local developments Communication *Continuing issues	*National/local developments *Change attitude to SEN/disability Go beyond negative labels
% of 1st-level themes in three most frequent 2nd-level themes shared with other countries	63	45	56
4. Differential use of 2nd-level themes by resolution level	More higher ratings with 'go beyond negative labels' theme	More lower ratings with 'continuing issues' theme	More higher ratings with 'reduce SE identification' theme

* means shared across countries.

consequences in the presented dilemma ('moderate/deny negative consequences') and/or which saw some resolution to an assumed tension ('resolved tensions').

Analysis of the most frequent second-level resolution themes showed a similar mix across each country group: the need for 'national and local developments' and for 'changed attitudes to SEN/disability', while still seeing 'continuing issues' about identification. Enhanced 'communication' with parents and students was one of the Netherlands' most frequent resolution themes, as was 'going beyond negative labelling' for English participants (see Table 5). Analysis also showed a moderate level of commonality across these country groups: about half of the first-level themes (45–63%) were shared with one or both of the other country groups.

Further analysis showed some expected relationships between different resolution levels and kinds of explanations used in each country group (see Table 5: cell sizes were too small for statistical analysis). Lower resolution ratings were justified more in terms of 'continuing issues' in only the Netherlands sample. Those with higher US resolution ratings tended to use the theme 'go beyond negative labels', while those with higher English ratings tended to use the theme 'reduce SE identification'.

Examples to illustrate recognition responses to the identification dilemma

There is only space to show single examples to illustrate several of the most frequently used themes in explaining dilemma recognition responses across the three countries.

'Tensions'. The second-level theme 'tensions' was one of the most frequently used themes. The shared first-level themes under this second-level theme included some of the more frequently used first-level themes, such as, 'tensions experienced', 'students try to avoid stigma' and 'over-identification problem'. One theme was used only by US and Netherlands participants—'double jeopardy'—while three first-level themes were common to the Netherlands and English groups—'SEN label as negative', 'label could lead to stigma' and 'some parents experience stigma'.

'Tensions experienced':

> where the students are receiving the services, you don't want them to experience emotional turmoil from their peers or educators because they're labelling them as different. However, if you don't identify them then they may not get the resources and the instructions they need to make the progress that they are capable of. (US class teacher, regular school, rural district)

'Students try to avoid stigma':

> Absolutely, you know there are certain children that are statemented [i.e. have a statement of special educational need] that would, despite the fact that they have a teaching assistant assigned to them full time, would insist that it was for the rest of the class, somebody for the whole class, and there are times when she would work with somebody else to avoid that so … So yes I mean there's a certain dilemma. (English teacher, special unit for emotional/behaviour difficulties, rural area)

'Over-identification problem':

> I mean I think that the difficulty is the diagnosis, if you actually say … I mean you know I've done the interviews a million times over, I teach lots of EBD [emotional and behavioural difficulties] kids and I think 'yeah but you actually don't, what you deal with is kids with slightly challenging behaviour,' I'm talking about, I think there's a difference between challenging behaviour and EBD, there's a mile of difference. (English head of behaviour unit, rural area)

There were three first-level themes which were used by Netherlands and English participants. Two were similar, 'SEN label as negative' and 'labels can lead to stigma'.

'SEN label as negative':

> he knows he's labelled and for him or her it could be a very big problem, and parents also have problems with putting a label on their child, so there you have a big tension … (Netherlands advisory teacher, special school)

'Label can lead to stigma'

> The possibility, if you label a child with a learning problem the possibility is that they get stigmatised. (Netherlands class teacher, primary school urban area)

The third first-level theme, used by both Netherlands and English participants, was 'some parents experience stigma':

> There's a stigma for parents, often parents are very reluctant for their children to be referred here and that's not to do with reputation, that's simply to do with wanting their kids to be normal and for parents normal means mainstream school. (English head of rural behaviour unit)

For the US participants, 10 of the 11 specific themes were about stigma and devaluation. The most frequently used (11) of these first-level themes was 'negative evaluation of additional provision'. For the Netherlands participants four of the six specific themes were also about stigma and devaluation, for example, 'students experience stigma in peer relationships'. For the English participants five of the six specific themes were about stigma and devaluation.

'Moderate/deny devaluation consequences'. The other most frequently used second-level theme, 'moderate/deny devaluation consequences', included six first-level themes in each of the three countries. Here are examples of two of these first-level themes:

'Disability has positive image':

> they're so welcome here and they feel so accepted here, it's just like any other child. (US counsellor in rural district high school)

'Stigma has reduced':

> I think the notion of stigma is less prevalent in schools really, I think most children, for example, are largely unaware that they've got a label and those labels are used discreetly. For example, there's a surprising number of students in secondary are unaware that they actually have a statement and their entitlement as a result of that. I guess that in my opinion it seems to have moved on. (English psychologist, urban area)

Of the other first-level themes under this second-level theme used across each country were two, 'parents want labels' and 'most students do not care about labels'. Here is one:

'Parents want a label':

> some parents are like 'I still want to keep the child on an IEP [individual educational plan] or labelled just so that it will help them get in to a college or it will help them get … I've already gone to a few … when I'm in a meeting and say 'your student no longer requires services, no longer qualifies for services,' the parent fights and says 'well I want them on.' (US special education teacher, regular high school, rural area)

Of the first-level themes, making up the 'moderate/deny devaluation conse-quences' theme, that were specific to the US participants, 'in-class support reduces

stigma' was used most frequently (10). There were fewer first-level themes specific to Netherlands participants, 'parents mostly positive about labelling' (2), 'reduce stigma by placing in regular schools' and 'less stigma in smaller groups' (each 1). The most frequent first-level theme specific to English participants was 'can identify without labelling' (11). Other specific English first-level themes focused on recognising individuality that does not require general labels.

'Moderate/deny resources consequences'. A second-level theme used most frequently only by US participants was 'moderate/deny resources consequences', though it was also used in the other countries. Here are examples of two of the first-level themes making up this second-level:

'Alternatives to special education services':

> in the new authorisation you'll see early intervening services which are supposedly to get at those students who maybe don't need to be identified and can get resources other ways. (US State Education Department administrator)

'How alternatives to SE worked':

> we usually get resources, if we need help we can get resources anyway … on the Section 504 they can get resources … one parent might go for the 504 and say 'this is ok, I want this for my child but I do not want them labelled as special ed'. (US class teacher, regular school, rural district—see discussion for more on Section 504)

'Resolved tensions'. A second-level theme used mostly by English participants was 'resolved tensions', though it was also used fairly frequently by US and Netherlands participants. There was only one first-level theme, 'needs outweighs stigma', that was included in this English use of this second-level theme.

'Needs outweighs stigma':

> No, not particularly, it's a risk worth taking. It's a risk worth taking because of the way the world works, you know, if there is a need let's have it identified to try and get the resources because without identification you can forget it. (English senior teacher, secondary regular school, urban area)

'Other positive consequences'. A second-level theme used mostly by Netherlands participants, but also by English ones, was 'other positive consequences'. This theme picked out positive consequences of identification: the understanding and sensitivity arising from and the usefulness of identification and labels. Netherlands participants used these first-level themes—'identification is required for positive outcomes' (4), 'need for objective identification' (3), labels useful for pupils' (2) and 'labels useful for parents' (2). English participants mostly used the first-level theme 'identification required for positive outcomes' (10). Here is an example of the most frequently used first-level theme 'identification required for positive outcomes':

> I think that in most cases it's very important to identify a child because the teacher knows then what is the problem … they are different and you have to treat them differently and then you know how to handle these children. I work a lot with autistic children and I think it's very, very important for teachers to know, to identify, and that

really the problem is not the parents' fault or something like that, it's a disability. (Netherlands SEN advisory teacher, urban area).

Examples to illustrate resolution responses to the identification dilemma

'National/local developments'. The most frequent second-level theme to explain resolving the identification dilemma across the three countries was 'national/local developments'. Three first-level themes were used in each of the three country groups, 'training', 'develop an inclusive approach' and 'improve general education'. They were also amongst the more frequently used first-level themes under this second-level theme.

'Develop an inclusive approach':

> well for me it's a significant extent because I can see how some young people are being included in mainstream schools. Actually the young people with them in the classrooms actually ... an awful lot and ... my own children who have been in classes with children with considerable disabilities have a very tolerant attitude towards them and a greater understanding as well of the issues. I know that when I was at school disabled children went to a completely different school and I never really got to know them very well and therefore didn't understand the issues that they were facing. (English psychologist, urban area)

'Improve general education':

> I think you resolve it by making general education much, much, much better. (US Federal department administrator)

Two other first-level theme were used only by US and English participants, 'need more disability in community' and 'aware of tension re identification'.

'Need more disability in community':

> our communities need to be much more diverse in terms of disability and they don't seem to be. I mean I went many years, when I never worked with a person with a disability until about twelve years ago. (US Federal department administrator)

'Aware of tension over identification'/'become aware of tension':

> I think it's a significant dilemma that has an evolutionary solution, so it changes slowly but it will only change if you focus on it as a dilemma and the reasons why it's a dilemma and how you can make it less of a dilemma. (English national administrator)

The first-level themes, 'more teacher collaboration' and 'use of some mixed ability classes', under the second-level theme 'national/local developments', were specific to US participants. First-level themes that were specific to Netherlands participants reflected contrary resolutions, for example, having a 'national inclusive education system' and 'develop motivation for inclusion' versus 'special schools build confidence and relationships with peers'. The most frequent first-level themes that were specific to English participants were 'plan and resource holistically', 'flexible resource patterns' and 'additional help for SEN and others'.

'Change attitude to SEN/disability'. Another second-level theme used most frequently across each country was 'change attitude to SEN/disability'. The first-level

themes, 'show potential for progress' and 'develop positive image for disability', included in this second-level theme, were used in each country group.

'Show potential for progress':

> Mainly because, mainly if a child has a label, you have to see what are the options, not what they cannot do. Not what you cannot do with the children, but what you can do with the children. If you have a mark on a child you can more easily say 'this is what the child can do and this is what the child cannot do,' so it's ok for you as a teacher that the goals you set with other children, you cannot reach, because teachers are feeling guilty because they cannot reach the goals with that particular child. (Netherlands head teacher, regular primary school urban area)

'Develop positive image for disability':

> There's nothing wrong with being different, being different should not necessarily mean that someone is devalued, I need to wear glasses to drive but nobody devalues me because of that, that's a disability but I don't need to let it be a handicap, and there's a difference between having a disability and allowing it to negatively impact your life and I think it's up to those of us who are in education and in clinical positions to help students who are identified to not have a lessening of self esteem, not to be devalued by others.(US psychologist, secondary school urban area)

'Focus on positive strategies' was a first-level theme used by Netherlands and English participants, while 'mixing with regular students' and 'respect and acceptance from peers' were first-level themes used only by US and English participants.

'Continuing issues'. The second-level theme 'continuing issues' was also used across each country, indicating that between 20 and 30% of the participants recognised that despite their suggested resolutions, some of the tensions persisted. The most frequent US first-level theme was 'unsure of resolution' and this had links to the most frequently used Netherlands and English first-level theme—'residual tension, hard to resolve'.

'Residual tension, hard to resolve':

> … you don't get away from the tension, but you can help them understand why you do this and ease it. (Netherlands resource, advisory teacher, special school)

'Communication' and 'go beyond negative labels'. Netherlands participants used the second-level theme 'communication' more frequently than English and US participants. The first-level theme 'open positive communication with parents' was used in each country group, though more frequently by Netherlands and English participants.

'Open positive communication with parents':

> When I have a conversation with the parents I try to explain what's the benefit for the child, what is it that the child needs and how can we give it to him or her. (Netherlands class teacher, regular primary school).

English participants used the second-level theme 'go beyond negative labels' most frequently, with US or Netherlands participants doing so less. The only first-level

theme which was used in each country group, 'treat as individuals', was one of the more frequently used themes.

'Treat as individuals'

> you say 'well all children are different,' and you look at them as individuals and they might be very gifted and highly talented and need stretching and that's, so you adjust what you do to account for that and that's no different or it's part of adjusting for a disability or a special educational need. I would think so and it's a trendy, well it's certainly in the policy of personalisation and so on. You expect that to be a product of that if we were truly personalising education, learning for each individual child. (English national administrator)

The first-level themes 'focus on provision needed not labels' and 'use the language of need' were used only by Netherlands and English participants, while the first-level theme 'show sensitivity about labelling' was used only by US and English participants. There were no US-specific first-level themes under this second-level theme. There were two Netherlands-specific first-level themes, 'analyse in terms of processes, not diagnostic labels' and 'more accurate diagnosis'. There were three first-level themes specific to English participants, 'avoid language of disability', 'minimal labelling approach' and promote more positive meaning of labels'.

Comparison of US and English findings from 1993 and 2005 studies

Table 6 shows that the most frequent US and English recognition levels for the identification dilemma in 1993 were significant, but changed in 2005 to marginal for the US participants and bimodal for English participants—mostly significant for those outside schools (administrators and support professionals), and mostly not at all for those inside schools (special and regular school professionals).

The 1993 qualitative data were mostly about resolutions and less about the recognition of the dilemma, so differences in recognition explanations could not be compared. But, the 2005 themes used to explain the US marginal and English dual significant/not at all recognition levels show some questioning of the negative consequences of disability identification. For example, first-level themes, such as, 'stigma has reduced', 'disability has positive image' and 'labels do not lead to devaluation' were frequently used. These findings are consistent with the development of more positive social and educational images of disability in the USA and England over the last decade. This is reflected in the reduced US modal rating and the emergence of no recognition amongst some English participants. The split in the English 2005 modal ratings between those inside (not at all) and those outside schools (significant) might be related to their frame of reference. School insiders tended to question the validity of the dilemma in terms of the decrease in devaluation inside schools, while outsiders tended to recognise tensions about the wider negative consequences of labels. The use of the other second-level theme, 'moderate/deny resource consequences', by about 20% of US participants can also help explain the mostly marginal level of the US recognition of the identification dilemma in 2005. These participants were indicating that there were alternative forms of additional provision without special education identification.

Table 6. Most frequent ratings for US and English recognition and resolution levels and most frequent second-level resolution themes: 1993 and 2005 studies

	USA		England	
Recognition	1993 study (*n*=38)	2005 study (*n*=50)	1993 study (*n*=43)	2005 study (*n*=50)
Modal rating	Significant	Marginal	Significant	Significant and Not at all
2nd-level themes (three most frequent)		Moderate/deny devaluation consequences Tensions Moderate/deny resource consequence		Tensions Moderate/deny devaluation consequences Resolved tensions Depends
Resolution				
Modal rating	Significant	Significant	Significant	Significant
2nd-level themes (three most frequent)	*National/local developments *Change attitude to SEN/disability Go beyond negative labels	*National/local developments *Change attitude to SEN/disability Continuing issues	+National/local developments Go beyond negative labels	+National/local developments Change attitude to SEN/disability Continuing issues

* shared 2nd-level themes between 1993 and 2005 US studies; + shared between 1993 and 2005 English studies.

The most frequent resolution level was significant in both countries from the 1993 to 2005 study. There were also similarities in the kinds of second-level themes to explain the resolutions between 1993 and 2005. Two of the three most frequent US resolutions of the identification dilemmas in 1993 were also found in 2005, 'national/local developments' and 'change attitude to SEN/disability'. The third 1993 second-level theme was about 'going beyond negative labels', while the third 2005 one was about 'continuing issues'. One of the most frequent English resolution themes also did not change from 1993 to 2005, 'national/local developments'.

Discussion and conclusions

The dilemmatic framework

Analysis of the modal recognition ratings of the identification dilemma for 2005 showed that a majority in the three countries recognised it to some degree. Though a quarter of English participants questioned the validity of the dilemma, over half of the English participants recognised it to some extent. This indicates that there is continued recognition of an identification dilemma, despite doubts about whether it is possible to test the assumption that there are dilemmas of difference (Clough, 2006). The extent to which the first-level themes fitted the theoretically informed second-level themes is also consistent with the dilemmatic framework. This was

evident in the relevance of the second-level themes 'tensions', 'resolved tensions' and 'moderate/deny consequences' to analysing first-level emergent themes. Other second-level themes were also generated that related to other negative and positive aspects and consequences of the options under consideration. These were expected because the presented dilemmas were framed in terms of single and not multiple consequences. There was also the expected differential use of second-level explanations by those with lower versus higher recognition levels across the three countries (see Table 5). It was also consistent with the dilemmatic framework that suggested resolutions would include reference to 'continuing issues'. For each country it was found that 'continuing issues' was amongst the more frequent second-level resolution themes.

Caution is required in drawing conclusions from a comparison of the findings between the 1993 and the 2005 studies for English and US participants. Though similar materials were used across the 12 years, participants came from different areas in each country. The qualitative analyses were also more extensive and intensive in the 2005 study. Caution is also relevant overall in generalising the findings, given the balance struck between the depth of examining participants' perspectives and breadth in sampling a range of professionals and administrators.

Transcending dilemmas of difference

These findings have relevance to Ho's analysis of a dilemma of labelling in the USA and UK (Ho, 2004) and her suggested resolution of it. She assumed that all children learn in unique ways and that the school system should become flexible enough to reflect this and refrain from 'pathologising academic difficulties as much as possible' (p. 90). Participants in this study across the three country groups showed some similarities to her approach in their suggested resolutions: reducing special education identification, adopting national and local developments to improve the general education system to become more inclusive and finding ways to go beyond negative labels. These resolutions veer towards the commonality option. However, other resolutions diverged from her position, for example, that attitudes to SEN and disabilities needed to become more positive. This assumes that we are dealing with difficulties and disabilities that require identification for positive purposes related to rights and resources, veering towards a positive version of the differentiation option. The finding that most participants across the countries were optimistic about resolutions can be interpreted as reflecting an initial opting for commonality, but also an acknowledgement of the need for some differentiation. Some participants (between one in three and one in five, depending on the country) believed that despite these positive resolutions, there were continuing issues about identification.

National policy contexts

Despite the commonality in the themes that explain the recognition levels and resolutions of the identification dilemma, there were also differences that can be

related to the national contexts of policy and practice. There was an equal proportion of English participants who saw a significant dilemma, mainly outside (school) professionals, as no dilemma at all, mainly inside (school) professionals. The latter subgroup mainly questioned the devaluation consequence of identification in the presented dilemma. Nevertheless, more than half of the English participants recognised the identification to some degree. It was also notable that more English compared to US and Netherlands participants were uncertain about their resolution ratings for the identification dilemmas. This was also found for resolution ratings about the curriculum and location dilemmas, not reported in this article (Norwich, 2007). One can conjecture whether this finding and the greater use of split English modal recognition positions may reflect current divisions and uncertainties in England about policy directions in the special needs/inclusive education field (Warnock, 2005; House of Commons, 2006).

By contrast with the US and English participants, Netherlands participants mostly recognised a significant identification dilemma. Over half of the Netherlands participants recognised either a significant or considerable identification dilemma (see Table 4). This difference can be attributed to the historical system of separate provision in the Netherlands that has not been challenged and reformed to the extent found in England and the USA (Vislie, 2003). Though there have been some moves towards more inclusive education in the Netherlands over the last decade, these have not been in the context of the general disability rights established in the USA and UK (Van Houten & Bellemakers, 2002). The pattern of the recognition of the identification dilemma amongst the Netherlands participants in 2005 resembles that found in US and English participants in 1993. One interpretation of the change in US and English recognition of the identification dilemma is that it reflects changes to more positive social and education beliefs about disability/SEN over this period that are linked to greater general disability rights in these two countries.

US participants mostly recognised a marginal identification dilemma which was associated with some questioning of the devaluation consequences of special education identification. It was notable that it was US participants who mostly doubted this dilemma by also questioning the negative resource consequences of having no special education identification. This was done by indicating that additional provision could be available though alternative general systems and through the Section 504 of the 1973 Rehabilitation Act. This aims, with the Americans with Disability Act 1990, to protect civil rights by preventing discrimination against people with disabilities (Smith, 2000).

Concluding comments

Despite interesting country-specific variations and indications of some changes over the last decade, it is concluded that there is still evidence that professional beliefs fit this kind of framework. This raises questions about whether the continuing relative lack of interest in a dilemmatic approach may have deeper roots. As some political theorists have noted (Berlin, 1990), recognising value tensions—in the terms of this

study, adopting a dilemmatic position—involves accepting some crucial losses. As regards the identification dilemma there are potential tensions between having good quality provision for all, providing flexibly in common schools for the diversity of children and treating all with respect. In seeking to fulfil these ends the aim is to find ways of having it all ways as far as possible, as many participants indicated in this study. But, aiming to have it all ways can sometimes be hard and resolutions can leave residual tensions, as some participants also recognised. Acknowledging a dilemma about identification for this reason provides an authentic approach to an inclusive and humane education. It promotes a hope for the future that accepts plural values and recognises what this implies for being realistic but also creative about options and resolutions.

The identification of children who experience difficulties in learning as coming under a particular title (such as, having a disability, special educational needs or additional support needs) can be conceptualised as identifying needs or requirements that are specific to a *subgroup* of learners. However, it can be argued that the presumed needs of children in this *subgroup* do not cover all their needs/requirements. They also share some needs or requirements with *all other children*, on one hand, and they have *unique individual* needs or requirements distinct from others in the subgroup, on the other. So, the question about identification can be seen from the perspective of dilemmas of difference to imply a balancing of needs/requirements that are common/different in these three dimensions (i. common to all; ii. specific to subgroups; and iii. unique to individuals). It is proposed that this theoretical analysis can be a conceptual way of resolving the dilemma of difference as regards identification (Norwich, 1996; Lewis & Norwich, 2004).

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