Developments of Special Education Policies of Various Countries: A Literature Review

Mulina Cabatay, Hermanto

Universitas Negri Yogyakarta, Indonesia
E-mail: ªmulinacabatay.2021@student.uny.ac.id

Abstract: Special education is defined as programs that cater to children with disabilities, giftedness, and talents separately from their same-age peers. Globally, there is an increasing awareness about social inclusion which led to promoting and aiming for inclusive education for all children. This study aims to review the literature regarding the progress of special education policies in countries from various regions. Also, it seeks to answer the question, "Where do countries from different regions' policies in special education are comparable?". This literature review used a qualitative approach and employed thematic analysis to analyze a qualitative dataset. There are four (4) themes that emerge from the data analysis namely 1) Progress on Special Education Policies; 2) Objectives in Achieving Inclusion; 3) Inclusion as a Solution and 4) Barriers to Inclusive Education. The study suggests that various countries are recognizing inclusive education as a better way to address the needs of children with disabilities.

Keywords: Special Education, Inclusive Education, Policy

INTRODUCTION

According to Armstrong (2003), special education is one of the more newly developed areas in education and psychology. Based on the origin, at the beginning of the last century, a systematic study of special education can be outlined. Whereas children with special needs have always lived, special education programs are comparatively new. Significant argument persists regarding its history and legal and ethical consequences (Alkhatani, 2016).

Custodio et. al (2021) mentioned that special education is explained as instructions intended for students with impairments, giftedness, and talents. Special Education Needs (SEN) is a term being used in some countries to denote children with disabilities that are perceived as needing further support (UNESCO, 2017, p.7)

Special Education requires the preparation, application, observation, monitoring, and evaluation of a specifically designed and synchronized set of services through an Individualized Education Plan/ Program (IEP) fitted to identify and meet the strength and limitations of their academic, social, emotional, and physical development.

The western education system was developed to cater to mass education. The disability was viewed as an impairment that needs special treatment in a separate environment. Special education was once irreversibly connected to the medical profession because they are responsible for diagnosing defects. Through the screening process, children with physical, sensory, behavioral, and learning disabilities are kept out of mainstream school.

Custodio et. al (2021) stated that in special education, a special curriculum is structured on the learner's disorder that is based on the regular curriculum.

In the past decades, the notion of special education was unfavorable as described by Oliver (1996:93) Special segregated education has been the main vehicle for educating disabled children throughout most of the industrialized world in the twentieth century. Over a hundred years, a special education system has failed to provide disabled children with the knowledge and skills to take their rightful place in the world, and it has failed to empower them.'

International Perspective

Globally, various efforts have been made to provide the rights of persons with disability. Education systems have a major role in reaching this social goal and most countries have invested in a wide range of approaches in the provision of equal and quality education for all.

According to Truscott et. al (2004), special education is recognized in most developed nations, however, in other parts of the world special education awareness is increasing and persons with disabilities are being accepted. Based on the data of the United Nations Education and Scientific Cultural Organization (UNESCO) 98% of children with disabilities in developing countries do not attend schools. Special education is not significant in countries that do not prioritize general public education for all their people.

Table 1. Establishing Trustworthiness During Each Phase of Thematic Analysis

Phases of Thematic Analysis	Means of Establishing Trustworthiness
Phase 1: Familiarizing yourself with your data	Prolong engagement with data Triangulate different data collection modes Document theoretical and reflective thoughts Document thoughts about potential codes/themes Store raw data in well-organized archives Keep records of all data field notes, transcripts, and reflexive journals
Phase 2: Generating initial codes	Peer debriefing Research Triangulation Reflexive journaling Use of a coding framework Audit trail of code generation Documentation of all team meetings and peer debriefings
Phase 3: Searching for themes	Research triangulation Diagramming to make sense of theme connections Keep detailed notes about the development and hierarchies of concepts and themes
Phase 4: Reviewing themes	Researcher Triangulation Themes and subthemes vetted by team members Test for referential adequacy by returning to raw data
Phase 5: Defining and Naming Themes	Researcher triangulation Peer debriefing Team consensus on themes Documentation of team meetings regarding themes Documentation of theme naming
Phase 6: Producing the report	Member checking Peer debriefing Describing the process of coding and analysis n sufficient details Think description of the audit trail Report on reasons for theoretical, methodological, and analytical choices throughout the entire study

However, intergovernmental organizations such as UNESCO led a global movement, Educational For All (EFA) aiming to meet the learning needs of all children, youth, and adults. In 1994, the Salamanca Statement and Framework for Action on Special Needs Education was signed by delegates from 92 governments and 25 international organizations. The statement acknowledged that children with disabilities should be included in regular schools and that schools should make changes to "accommodate [the children] within a child-centered pedagogy capable of meeting [their] needs." As compliance, there were various attempts worldwide to include children with disabilities in a regular classroom setting. Nevertheless, the provision of special education varies widely between and within nations.

Article 24 of the UN Convention on the Rights of Persons with Disabilities demands that countries must take steps to guarantee that persons with disabilities access an inclusive, quality, and free primary and secondary education on an equal basis with others in the communities where they live or stay.

Through a rights-based approach, UNESCO reassures the expansion and enactment of inclusive education policies, programs, and practices to ensure equal education opportunities for persons with disabilities. However, persons with disabilities are still, more likely to be out of school or to drop out of school before finishing primary or secondary education (UIS Fact sheet No 40, February 2017).

This study aims to review the literature regarding the progress of special education policies of countries from various regions – the United States of America, Australia, Finland Mexico, Japan, China, Malaysia, India, Turkey, and South American countries. It sought to answer the question, "Where do countries from different regions' policies in special education are comparable?"

METHOD

According to Hayes (1997) thematic analysis is a comprehensive process where researchers can identify numerous cross-references between the data and the research's evolving themes. Based on various research, the thematic analysis provides flexibility for approaching research patterns in two ways, i.e. inductive and deductive. This makes the process of thematic analysis more appropriate for analyzing the data when the research aims to extract information to determine the relationship between variables and to compare different sets of evidence that pertain to different situations in the same study (Ibrahim, 2012).

Thematic analysis is a method for classifying, analyzing, and reporting patterns (themes) within data. It slightly arranges and defines your data set in (rich) detail. However, Boyatzis (1998) explained that it also often goes further than this and interprets various aspects of the research topic. Thematic decomposition analysis according to Stenner (1993), and Ussher & Mooney-Somers (2000) is a specifically-named form of "thematic" discourse analysis which identifies patterns (themes, stories) within data, and theorizes language as constitutive of meaning and meaning as social (Braun & Clarke, 2006).

Nowell et.al (2017) mentioned that table 1 highlights how researchers may address criteria for trustworthiness during each phase of thematic analysis.

This study is qualitative research that will employ the thematic analysis method. The study will use the thematic analysis as documented by Braun and Clarke (2006), it will be presented here as a linear, six-phased method, it is an iterative and reflective process that develops over time and involves a constant moving back and forward between phases (Nowell et.al, 2017).

This study reviews ten (10) articles regarding or related to special education in nine (9) countries and one (1) region.

RESULT AND DISCUSSION

There are four (4) themes that emerge during the analysis of the result and discussion of the articles that were reviewed.

Progress on Special Education Policies

The countries under this study were categorized as developed and developing based on their economic position. Both wealthy and developing countries established goals for inclusion. New policies are promoting and pursuant to more inclusive schooling for children with special needs.

Numerous types of research regarding special education in developed countries are focused mainly on strategies in an inclusive setting.

Polat (2011) mentioned that a substantial shift has been observed from special education to inclusive education all over the world. The integration of learners with disabilities into regular schools has become an alternative to the presence of special schools, especially in the west (Gulyani, 2017).

Custodio et. al (2021) identified three kinds of pressures that pushed the shift from a tradition of segregation to inclusion. Ethics and moral pressure is the primary agent reinforced by associations, laws, and increased awareness. It is followed by the conceptual pressure, which emerges from the necessity to treat individuals as normal as possible (normalization); to educate children with disabilities alongside their non-disabled peers; to encourage social engagement with their peers (social validation); to permit them to adapt only when required and to increase their participation and success (principles of participation) and to allow them to integrate physically, socially, and pedagogically. Finally, economic pressure puts scrutiny on the effectiveness and cost of special education entails. It led to the move toward inclusion, which provides support services to the child instead of bringing the child to the support services.

Objectives in Achieving Inclusion

Based on the pieces of literature which are analyzed in this study, the most developed countries identified and recognized main objectives to ensure that the established goals for inclusion will be obtained. This study has identified four (4) main objectives that wealthy countries set to address the gap in the implementation of inclusive education and ensure that all children are provided an equal and quality education. (1) To improve collaborative actions in the implementation of inclusive education including planning, legislation, and policies. (2) To encourage assessment requirements including parents' participation. (3) To develop a strategy related to the aspect of shared responsibility of all learners and stakeholders. (4) To capacitate regular classroom teachers in inclusive practices.

The guarantee of all civil rights to individuals regardless of their disabilities is also a focus in policy debates and applied practice in the United States of America (USA). Thus, it is expected that inclusion continues to thrive and perhaps be more directly legislatively supported in developed countries like the USA (Hossain, 2012).

Inclusion as Solution

In the field of special education, the Salamanca Statement is possibly the most significant international document, it contends that regular schools with an inclusive orientation are 'the most effective means of combating prejudiced attitudes, building an inclusive society, and achieving education for all. Additionally, it suggests that the entire education system can offer an effective, efficient, and cost-effective education for most children through such inclusive schools (Ainscow, 2014).

Once a policy is initiated inclusion can be seen as a way to better meet the needs of all students, both those with disabilities and those without (Worrell and Taber, 2009).

UNESCO (2008) stated in the policy guidelines that inclusive education of decent quality is the greatest means to address future learning deficiencies among youth and adults. In today's situation, however, special efforts shall be made to guarantee appropriate education and training programs using different modalities for those youth and adults who have so far been deprived.

Barriers to Inclusive Education

This review yielded a theme that implies several barriers associated with the implementation of inclusive education. In most developing countries including Malaysia, Egypt, and Mexico research focused on challenges or gaps in the implementation of inclusive education. This study identifies four (4) major concerns which need to be addressed to assure the success of the implementation of inclusive education. 1) Gender discrimination; 2) Funding/ Cost; 3) Human Capital (Trained Teachers); 4) Parents' Participation.

In most developing countries gender discrimination remains a challenge not only in the education sector but in almost all sectors. In South Asia, even in the twenty-first century, women are extremely discriminated against in both education levels and economic participation. In the Middle East and North Africa, the gender gap in education has been reduced greatly, but gender gaps in employment remain pervasive (Klasen, 2008).

In this study, human capital is defined as the capacity, qualifications, and proficiency of teachers in the management of students with special needs. There is a lack of infrastructure, and trained teachers because of insufficient funding. These inadequate accommodations affect the implementation of inclusion in providing quality education for all.

Inclusive education programs need parental support for their success. Parental support is minimal and irregular in most instances which makes integration into learning difficult. Moreover, program implementation is hindered by limited support among poor communities (Hussin et.al, 2008).

CONCLUSSION

Most of countries have moved from the tradition of segregation to inclusion. Recent special education policies in most countries worldwide have been promoting and focusing on more inclusive schooling. Developed countries focused mainly on their objectives to improve and pursue more inclusive education policies. However, developing countries are still facing challenges and gaps which hinder them from implementing more inclusive education for all. Nevertheless, quality inclusive education is perceived as a solution to provide equal education for all children with or without special needs.

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