

Inclusive education policy in different contexts: A comparison between Bosnia and Herzegovina, Cameroon, Greece, India and Sweden.

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Abstract

Inclusive education has been at the forefront of education policy since the Salamanca declaration in 1994 and countries across the world have been putting-in place policies to support the implementation of an inclusive education system. This paper examines inclusive education policies in five selected countries in relation to how it is defined, what values and goals underpinned inclusive education and the framing of multisectoral involvement. The aim is to develop a deeper understanding on how the policy enactments in these different national contexts may converge and diverge in the construction of inclusive education. The results show that national policies on inclusive education are weak, lacking a clear-cut definition of inclusive education, while access, equity and equality are core values and goals that underpin inclusive education. The results also reveal the policies highlight the involvement of different stakeholders albeit in varying ways in the different countries.

Keywords: Inclusive education; Policy; Cross-country comparison.

Points of interest

This paper presents a cross-country analysis of inclusive education policy in Bosnia and Herzegovina, Cameroon, Greece, India and Sweden. This paper compares how inclusive education has been defined and what important values underpin inclusive education as well as the involvement of different agencies. The results show that:

- None of the countries has developed a clear policy on inclusive education
- None of the countries has defined inclusive education in their policy
- Values such as accessibility, fairness and equality are important when it concerns inclusive education
- The results also reveal it is important to include other services outside of education in realization of inclusive education but they differ somehow on how to do this.

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Introduction

Inclusive education has gained recognition the last decades within educational policy and is viewed as a pathway towards achieving an inclusive and democratic society (UNESCO, 1994; Ainscow & Sandill, 2010). At the international level, several international framework agreements such as the Salamanca Statement and the United Nations Convention on the Rights of Persons with Disabilities have been adopted to safeguard the participation in education for all children including those with disabilities.

The Salamanca declaration was a major watershed for inclusive education as it clearly articulated inclusive orientation is the most effective way to combat discrimination, creating welcoming communities and an inclusive society while also achieving education for all (UNESCO, 1994). Moreover, ensuring inclusive and equitable quality education is earmarked in the UN Sustainable Development Goal number 4 on education (United Nations, 2015). In this backdrop, countries across the world have been making strides at differential pace in implementing policy that support an inclusive education system (Ainscow, Slee, & Best, 2019; Meijer & Watkins, 2019). This paper examines inclusive education policies in a number of selected countries. Taken into consideration the complexity and contestation of the concept of inclusive education amongst researchers, policy makers and practitioners (Kefallinou, Symeonidou & Meijer, 2020) as well as the questions and contradictions as to what it means, (Finkelstein, Sharma & Furlonger, 2021; Göransson & Nilholm, 2014), this paper seeks to provide some insights into the policy enactments for inclusive education in a bid to identify and discuss policy commonalities and idiosyncrasies.

The paper specifically examines how inclusive education is defined, the goal and values formulated in the policies and provisions for the involvement of diverse stakeholders in its implementation. The countries included in this study are Bosnia and Herzegovina, Cameroon, Greece, India and Sweden. Countries were selected on the basis of convenience and difference. All the authors have close relationships to the countries but importantly too to enable an interesting comparison of inclusive education policy in very different contexts. This representation of countries allows for an understanding of the complexities, similarities and challenges in the inclusive education policy formulations in different contexts. Bearing in mind that contextual and situational factors influence policy formulation in the different national contexts, these countries present amongst others different socio-economic, political, cultural, social histories as well as demographic profiles which make for an interesting and insightful comparative analysis of their policies on inclusive education. The countries use different terminologies such as special needs or handicapped when referring to people living with disabilities. Our explicit aim is not to compare the countries enactment of inclusion to suggest performativity, rather to deepen the understanding on how the interplay between the countries' contextual factors and the existing international framework for inclusive education can construct the meaning of inclusion in different contexts. To enable and facilitate the comparison of the countries policies, the inclusive education policy of each of the five countries are presented. The description of the inclusive education policies in the different countries is based on a perusal of the literature on inclusive education as well as some policies texts relating to the education sector. The themes derived in the cross-country comparison are therefore based on the analysis of the countries policy descriptions. To inform and guide the cross-country policy comparison, inspiration is drawn from the European Agency for Special Needs and Inclusive Education's analysis framework on the mapping of inclusive education policies with particular focus on some parameters on legislation and policy. The parameters inspiring the analysis in this study are not intended as directives or obligatory standards for the countries represented. Rather, they were chosen because they align well with the specific aims and objectives of this article, serving as appropriate tools for exploring the nuanced interactions between international frameworks and national contexts in the formulation of inclusive education policies.

International Policy Framework

Inclusive education, as initially delineated by the Salamanca Statement (UNESCO, 1994), entails affording an educational milieu wherein all children, inclusive of those with disabilities, enjoy access to regular education with appropriate support. The declaration asserts that inclusive schools are: “the most effective means of combating discriminatory attitudes, building inclusive society and achieving education for all” (UNESCO, 1994, p. iv). This foundational principle orchestrated a reconfiguration of the traditional pedagogical framework designed for children deemed non-conforming to conventional norms. The Salamanca Statement urged states to develop policies and allocate resources to ensure education for all students in inclusive environments, except when “there are compelling reasons for doing otherwise” (UNESCO, 1994, p. iv).

However, the Salamanca Declaration is not a straightforward policy. While the objective is to create similar inclusion mechanisms for all children in every country, it is up to each nation to adapt and implement the policy within its national context. Structural guidelines nonetheless provide opportunities for a nation-state's unique interpretation of the goal of inclusive education. This international declaration, like all others (Migliarini, 2018), allows national states to employ strategies to maintain sovereignty over defining local inclusion principles. The declaration, being a non-binding document, has predominantly been regarded as guidance for national education policymakers (Migliarini, 2018; Stinson & D'Alessio, 2019). Though particular emphasis is given to the Salamanca declaration here, other international framework agreements are in-place which talk to the establishment of an inclusive education system. These include and not limited to UN Convention of the rights of the Child, The UN Standard Rules for the Equalization of Opportunities for Persons with Disabilities as well as European Pillar of social rights at the EU level.

Implementing inclusive education has proven to be a significant challenge. Segregation in education has generally not decreased, or it has only decreased on a small scale (Saloviita, 2020; EADSNE, 2012). The declaration successfully elevated the importance of inclusive principles internationally, despite this, there are clear indications of a failure to translate the narrative into systemic reforms (Graham et al., 2023). The inadequate reform of inclusive education has prompted extensive research to examine barriers to inclusive education. Research, reports, and other reviews consistently highlight broad systemic failures in implementing genuine inclusive education (Graham et al. 2020; Slee, 2018a).

There are various reasons for the emergence of such structural deficiencies. For instance, challenges in defining inclusive education have resulted in an exaggerated heterogeneity in research (Moberg et al., 2020). It is also crucial not to overlook that inclusive education confronts the complexity of local contexts shaped by historical, cultural, political, and economic forces (Artiles, Harris-Murri, & Rostenberg, 2006; Moberg et al., 2020). In addressing this complexity, it is important to undertake more comparative research to examine how complex structures, where different educational initiatives, government strategies, and policies on one hand, and local contexts on the other, interact mutually and integrate with each other.

National Contexts

Bosnia and Herzegovina

The constitutional structure of Bosnia and Herzegovina (below: Bosnia) is a product of the Dayton Peace Agreement (United Nations, 1995), which brought an end to the war and established a new political system in the country's post-war era. The agreement regulated the central constitution of the state and also the constitutions of its two entities, which were granted significant autonomy in governing their respective administrative territories. The state's highly complex administrative apparatus is further reflected in the fact that one of the entities is comprised of ten regional units (referred to as cantons),

each with substantial authority to regulate various crucial policy areas. Bosnia has a so-called Council of Ministers, which serves as the country's government. The government consists of a chairman and nine ministers, none of whom have a mandate for education. However, there is also a state-level agency, APOSO (The Agency for Pre-Primary, Primary, and Secondary Education), with a mandate to establish learning standards, evaluate learning achievements, and develop common core curricula in education. Nevertheless, the legislation and implementation of educational policies still largely lie within the purview of lower levels of authority. Education-related matters are within the mandate of the entities, and even the cantons have education ministers with the ability to formulate local education policies.

Cameroon

An institutional legacy of the colonial occupation of Cameroon is a dual education system based on the Anglo-Saxon and French traditions. The English and French education systems run parallel, with each having a separate organization, structure curricula and national examinations (Cockburn et al., 2017). The education system comprises both public and private operated schools. The public schools are run by different education ministries and their local offices in all the administrative units and are to be free by law, however this is hardly enforceable (Tchombe et al., 2014). The striving private education system is mainly operated by private individuals and religious organisations. Students in the private schools pay varying tuition fees, set by the schools. Curricula for each of the systems are national, however, the schools are responsible for its implementation. Transitions from one school level to another are sanctioned by national examinations, for example, the First School Leaving Certificate and GCE ordinary Levels. When it comes to special education, children with special educational needs may attend the regular school system, as well as special schools (Cockburn et al. 2017). There is however, very limited data available on the education of students with disabilities in Cameroon, reports show these learners have significantly lower levels of participation in education (Cockburn, et al., 2011; 2017).

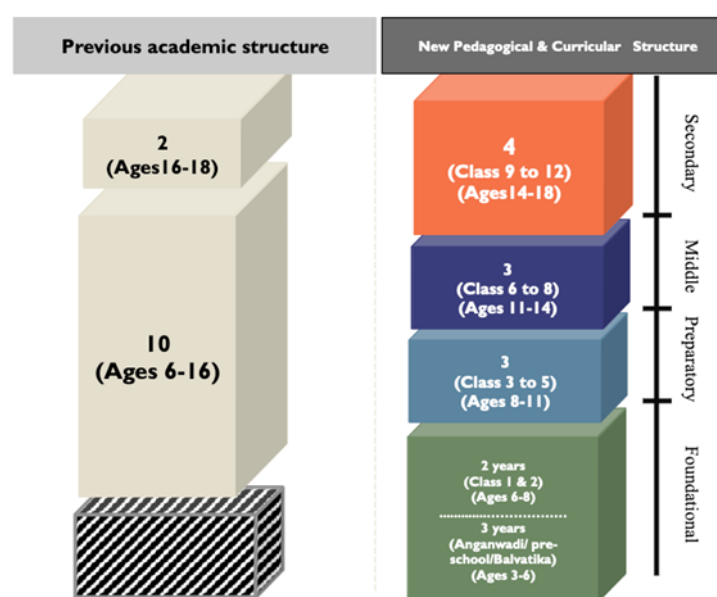
Greece

Greece has a centralized education system under the auspices of the Hellenic Ministry of Education, Religious Affairs and Sports. Offering free education at all levels, the Ministry manages curriculum, textbooks, teacher training, staffing, and finances. Education directorates in regions supervise administration and policy execution. The education system consists of three levels: primary education (including pre-schools and primary schools), secondary education, and tertiary education. It is predominantly public, with private primary and secondary schools making up approximately 9% of the total number of schools (Hellenic Statistical Authority, 2024; 2023). Compulsory education encompasses primary and lower secondary education and is mandatory for all children between the ages of 4 and 15. In recent years, the Greek education system has faced growing challenges due to various socio-political and economic factors (OECD, 2020). The economic crisis of 2008 led to a significant reduction in education funding, impacting the quality of facilities and resources, bringing it below the European Union's average of 4.6% (Mantzikos & Lappa, 2023; OECD, 2020). Since 2015, Greece has experienced a significant influx of immigrants, particularly refugees, with over one million arrivals recorded between 2015 and 2016 (Operational Data Portal, 2024; Angelopoulou & Manesis, 2017). The surge has presented considerable challenges for their inclusion (Panagiotis, 2023; Gropas & Triandafyllidou, 2011). These challenges have persisted and continue to impact the Greek education system today (Giavrimis & Dimitriadou, 2023; Mantzikos & Lappa, 2023). In the context of inclusive education in Greece, the focus is primarily placed on students with disabilities and/or special education needs (D/SEN), as well as on migrant/refugee students and Roma students; namely, special education and intercultural education.

India

India is the largest democracy in the world with a population of 1.4 billion. According to the World Bank Report (2024) India is one of the fastest growing economies of the world and is poised to continue on this path, with aspirations to reach high middle-income status by 2047. India has also made remarkable progress in reducing extreme poverty between 2011 and 2019. During this time the country is estimated to have halved the share of population living in abject poverty which is below \$2.15 per person per day. However, the pace of poverty reduction slowed down during the COVID-19 pandemic but since then has moderated in 2021-2022 (The World Bank, 2024). The literacy rate in India has witnessed an improvement between 2018-2021. Between 2018 to 2021, the literacy rate of India grew by 2.6 percent. On a year-on-year basis, the literacy rate increased by 0.8 percent in 2021 (Global Data, 2024). The National Education Policy 2020 deals with the unfinished agenda of the National Education Policy (NEP) 1986 modified in 1992 (NPE 1986/92). Since, the last policy of 1986/92 a major development has been the Right of Children to Free and Compulsory Education Act 2009 which laid down legal underpinnings for achieving universal primary education. This policy envisages that the 10+2 structure in school education will be modified with a new pedagogical and curricular restructuring of 5+3+3+4 covering ages 3-18 (Ministry of Human Resource Development, 2020) illustrated in the representative figure below:

Figure 1
School Education, Ministry of Human Resource Development, 2020



Sweden

The Swedish welfare state system remains crucial in understanding the Swedish education system and the inclusivity of the system. Social welfare services and social insurance are primarily organised and paid for by the state through taxation and are universal, based on citizenship and residency (deChenu et al., 2016). Welfare services such as education, are to be provided to all citizens and legal residents at little or no charge on the principles of equity and equality (Berhanu, 2012). These lay the groundwork for an educational system that seeks to promote the goals and values of inclusiveness. The Swedish education system is highly decentralised, however, goals and learning outcomes are formulated at the national level. The municipalities are responsible for the organisation of schools. As an outcome of the implementation of market-based reforms, private actors were introduced in the system as well as parental school choice (Tah, 2021). The school system is dualistic in the organisation and provision of education to students in need of special support (Tah, 2018). Education is generally provided to these

students with support in the regular education system. However, there is a parallel special education system that caters for learners with different disabilities and other special educational needs (see Tah, 2018).

Inclusive education Policy in the different countries

Inclusive education Policy in Bosnia

In the Bosnian education system, there is a lack of clear visions regarding the meaning of the inclusion concept. So far, educational reforms have mainly focused on producing positively charged declarations that promote inclusive education, in line with international conventions on inclusion (Memisevic et al. 2021; Somun Krupalija, 2017). The government and APPSE (2020) have defined recommendations for inclusive education that align with visions of quality and equity for all learners, but inclusive policy is not centrally defined as a part of the national education policy plan. Instead, there are different instances and laws at entity and regional levels that define how inclusive education can be understood and interpreted and what practices are recommended.

Various authorities with the mandate to establish educational policies in the country demonstrate varying understandings of inclusion and its target groups. Policies are expressed in terms ranging from a broad understanding of inclusion principles aimed at providing good educational conditions for all students, to more specific formulations where the target group is students who need special support. The latter, a more frequent perception, where inclusion policy focuses on students with disabilities, leads to the conclusion that inclusive education in the country is still primarily focused on placement-based approach, that is, the physical integration of students with disabilities, into regular education (Tahirovic, Kuka & Delic, 2022). There is also a clear inconsistency between different policy actors in defining the principles of inclusion, however, what is common is the primary focus on special education. An exception is policy regulation in the Sarajevo region, which defines inclusion in a broader understanding, with the focus on all learners (ibid.).

The challenge of reaching a consensus on what inclusive education could entail lies in the absence of a unified strategy and clear guidelines for schools to follow, leading to uneven application of the reforms. Additionally, teachers and other school staff do not receive necessary preparation or training to implement inclusive methods (Tahirovic, Kuka & Delic, 2022). A further challenge involves facilitating the participation of families in educational processes. There is no defined strategy for family and community involvement in the implementation of inclusive policy (APPSE, 2020). There are only recommendations from the National Agency for Education which have no regulatory effect.

The goals and purposes of inclusive education in Bosnia are thus not clearly and explicitly integrated into all areas of general educational policy. However, even if inclusive education goals are not expressly and clearly stated in the general educational policy, they are still indirectly or implicitly included. In other words, even if there is no direct and open reference to inclusive education goals, there are elements or aspects of these goals that are somehow incorporated into the overall educational policy. This suggests that the purpose of this implicit introduction of inclusive education goals into general educational policy is to address deficiencies or challenges that specifically affect vulnerable groups. In fact, it predominantly involves including students with disabilities within the educational system.

Cross-sectoral collaboration within the Bosnian context has more to do with administrative division than of institutional collaboration. An exception consists of children who have "greater motor difficulties" (APPSE, 2020, p. 21) or are hospitalized for longer periods so that the education is not conducted in school, requiring cooperation between educational and health institutions.

Inclusive education Policy in Cameroon

There is no clearly formulated policy on inclusive education in Cameroon. Rather inclusive education is implicitly promoted in different legislations and strategic policy texts. The government of Cameroon is a signatory to key international agreements that ascertain the education and inclusion of persons with disabilities in education such as the UN Convention on the rights of the Child which was ratified in 1993, the UN Convention of the rights of persons with disabilities and the Salamanca Declaration

(Tchombe & Shey, 2017). The government of Cameroon adopts a right-based approach when it comes to the promotion of inclusive education. The 1996 Constitution and the National Action Plan for the Promotion and Protection of Human rights 2015-2019, protect the right to basic education for all including students with disabilities and other special educational needs. In the same vein, the policy ensures equal access and non-discrimination in education for all. This is clearly stipulated in The Education Framework Act No. 98/004 of 14 April 1998; “the State shall ensure that everyone has equal opportunities for access to education without discrimination on grounds of sex, political, philosophical and religious views, or social, cultural, linguistic or geographical origin” (Tchombe & Shey, 2017). An even clearer intention to establish an inclusive education system is expressed in decree number No 90/1516 of 26 November 1990, which stipulate that "education of children and young adults with disabilities must be ensured in mainstream and special schools. Where necessary, mainstream schools accommodating children with disabilities will be provided with special teachers and teaching materials that are tailored to children's needs" (UNESCO, 2021). The policy intentions to implement an inclusive education is further pronounced in The Education Sector Plan 2013-2020:

Government will continue working closely with all stakeholders involved in the detection, care or treatment of disabilities (health; social affairs; associations; NGOs; etc.) in order to study the response and adaptation options for the school environment (institutions; equipment; educational tools; teaching aids; specific training; teaching practices) for an inclusive approach and/or to develop special education if it is more appropriate for certain disabilities (UNESCO, 2021).

This strategic paper highlights inter-sectoral collaboration in the realization of inclusive education. Identifying a number of stakeholders to be involved in different ways in the implementation of inclusive and special education. Furthermore, and within the perspective of collaboration outside of the school, the legislation enunciates the role of families in ensuring that their children gain access to mainstream schools with support from the state (see, Act No. 83/13, Act No. 2010/002, Act No. 90/1516). Regarding teacher competency and the provision of special educational and educational support, Act No. 83/13, Act No. 2010/002 and Act No. 90/1516 specify the development of teacher competence for inclusive education and necessary special educational support.

Whilst there is no explicit inclusive education policy and definition of inclusive education in the policy framework, different legislative acts and the education strategic papers promote the establishment of an inclusive education system. There is however a policy ambiguity, while it emphasises the inclusion of students with disabilities in regular schools, at the same time, it advocates for special educational solutions for these students as well.

Inclusive Education Policy in Greece

In Greece, inclusive education primarily targets students with disabilities and/or special education needs (D/SEN), as well as migrant/refugee students and Roma students, encompassing special and intercultural education.

Special education aims to support the development of abilities and skills in students with special education needs, facilitating their inclusion into general education and society (Law N3699/2008). Almost 90% of students with disabilities and/or special educational needs attend general education schools (E.S.A.meA. – Observatory of Disability Issues [Ε.Σ.Α.μεΑ. – Παρατηρητήριο Θεμάτων Αναπηρίας], 2021). Special education is supported through “parallel support” and “integration classes”. According to Law N3699/2008, a student with special educational needs or disabilities may attend all teaching hours in the regular class, with differentiated teaching provided by the class teacher and the parallel support teacher. However, appointments of parallel support teachers are insufficient, leading to one teacher supporting multiple students in different classes or even schools (Tsagkalidis, 2016). “Integration classes” are part of general compulsory education, allowing students with special needs to participate for a few hours daily, with the rest of their day in regular classes. Despite progress in special

education over the last two decades, challenges persist, leading to a policy that tends to segregate children with specific learning challenges (Pappas et al., 2018; Fyssa et al., 2015).

Intercultural education aims to eliminate inequalities and social exclusion among different cultural groups, promoting a discrimination-free learning environment (Law 4415/2016, Article 20 and 21). It is supported by "reception classes" or Priority Educational Zones (ZEP), established in 2010 and detailed in 2016 (Law 4415/2016). ZEP addresses the needs of students from diverse backgrounds, including immigrants, Muslims, repatriates, and Roma students. ZEP aims to ensure equal inclusion in primary and secondary education through supportive actions and consists of two cycles: ZEP I focuses on students with minimal Greek language knowledge, providing intensive language learning, and ZEP II supports students with moderate Greek proficiency in language and subjects. However, ZEP operates only in areas with low educational indicators, posing challenges in areas with smaller populations of diverse cultural backgrounds. As of 2023, schools are required to have a student population of at least 9 students to qualify for ZEP support (Φ1/114378/Δ1/2023), which poses challenges in areas with smaller student populations from diverse backgrounds.

While Greece's overarching education goal aligns with fostering the development of all children (Law 1566/1985), inclusive education policies face challenges, partly because the focus is placed upon two areas of inclusion and partly due to implementation guidelines' design. There's a lack of a comprehensive and explicit inclusion policy, with fragmented and non-cohesive policies targeting special and intercultural education (Androulakis et al., 2021). The centralized education system further challenges local school staff initiatives (Giavrimis & Dimitriadou, 2023). Delays in appointing special and ZEP teachers annually, coupled with frequent teacher reassignments, impede policy effectiveness and quality. Regarding families, special education policies emphasize parental involvement, while intercultural education lacks similar provisions. In ZEP classes, parental participation only requires a signed statement, lacking specific frameworks for further involvement. The lack of a comprehensive inclusion policy, coupled with fragmented approaches, hinders the full inclusion of all students.

Inclusive Education Policy in India

Inclusive education in India is characterized to address the learning requirements of children who are differently abled (Singh, 2016). Over the last five decades the Indian Government has strived to provide a broad range of services for the education of children with disabilities which resulted in the Integrated Education for Disabled Students (IEDS). This scheme established in 1974 gives equal opportunities for children with disabilities in mainstream schools as well as addressing their retention. The National Education Policy (NEP) in 1986 set a goal for integrating the handicapped as equal partners in all levels preparing them for normal growth and thereby enabling them to face life with courage and confidence. However, there is no definition of special education needs that is applicable nationally or at state level. The nearest term is 'person with benchmark disability' which means person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms by the certifying authority (Taneja, 2020).

The new National Education Policy 2020 (NEP 2020), which replaces the NEP 1986 is a comprehensive framework for elementary education to higher education as well as vocational training in both rural and urban India. The policy aims to transform India's education system by 2040. NEP 2020 attempts to address the growing inequality and inequity plaguing the country's education system today and recognizes the high dropout rates among socio-economic strata and vulnerable communities. The policy broadly aligns with the objectives of the Rights of Persons with Disabilities (RPWD) Act 2016 and also aims to recruit special educators in all school complexes to ensure that teaching is more inclusive and cognizant of the needs of children. Children with benchmark disabilities will be allowed to opt for home schooling. Furthermore, teachers will be trained to identify learning disabilities in children earlier which may help children with learning disabilities succeed in education simultaneously takes care of their mental health (Kumar, 2021). According to Kumar (2021), NEP 2020 appears to be overambitious and utopian as it fails to recognize that most teachers are poorly trained and that most of India's schools are grossly understaffed. In a recent evaluation undertaken by Delhi Child rights Commission as much as 60 percent of schools reported zero students with disabilities whereas another 28 percent stated less than

1 percent. It highlights the potential risk that people with disabilities are to experience adverse socio-economic outcomes in comparison with persons without disabilities.

Inclusive education Policy in Sweden

Sweden has gained a strong reputation as a highly inclusive society due to the solid foundations of the Swedish welfare state system built on inclusive ideals. To strengthen its legislation on minimizing exclusionary measures and promoting inclusion broadly speaking and especially in the education sector, Sweden is a signatory to many international agreements such as The United Nations Convention on the Rights of the Child (United Nations, 1989), the UN Standard Rules on the Equalisation of Opportunities for Persons with Disabilities (United Nations, 1993), and the Salamanca Declaration (UNESCO, 1994). The idea of “a school for all” has been commonly used as the sign post for inclusive education in Sweden. However, Sweden does not have a policy on inclusive education and there is no clear definition of what inclusive education is. The term inclusive education is not mentioned anywhere in the Swedish education policy (Göransson et al. 2011; Magnússon et al., 2019). This notwithstanding, goals, visions and objectives that are congenial with the ideologies of inclusive education are articulated in different policy documents.

The Anti-discrimination legislation (Discrimination Act 2008:567) prohibits discrimination on the basis of sex, sexual orientation, ethnicity, religion or other beliefs, disability, gender identity and age. This law is clearly reiterated in the Education Act (2010:800) in chapter 1, paragraph 8 on equity in Education. The Education act (2010:800) clearly ensures access to education for all children on equal basis and equal standards. Perhaps the strongest reference to the promotion of inclusive education in the legislation is the articulation that special educational support should primarily be provided to students within the regular educational settings and in their regular class and group (Education Act, 2010:800). More so, the fundamental values expressed in the Swedish curriculum are indicative of values and goals congruent with inclusive education ideologies. These include the promotion of democratic values, respect for each individual’s worth and equal worth of all humans, equality between men and women, individual freedom and integrity, solidarity with the weak and vulnerable and individual sense of justice (Göransson et al., 2011). Furthermore, student’s right to participation and influence are expressed in Chapter 4, paragraph 9 of the Education Act (2010:800).

Moreover, intentions to establish and strengthen collaboration between schools and external stakeholders such as parents and other public agencies and welfare services are also underlined in the education legislation. The realization of this project in schools is outlined in the Education Act (2010:800) through the students’ welfare teams, with the responsibility of attending to students with special educational needs as well as the welfare of all students in general. These teams are multi-professionals, which educational and health care expertise, such as teachers, special educators/special education teams, school nurse/ counsellors, etc, pointing to the broad-based perspective in responding to the diverse needs of students. Moreover, the Education Act (2010:800) also stipulates collaboration between schools and home, where schools are required to collaborate with the family in the identification and response to special educational needs.

While inclusive education is not explicitly mentioned in the policy infrastructure, the general education legislation does specify goals, visions, practices that align with the ideals of inclusive education.

Theoretical and Conceptual Framework

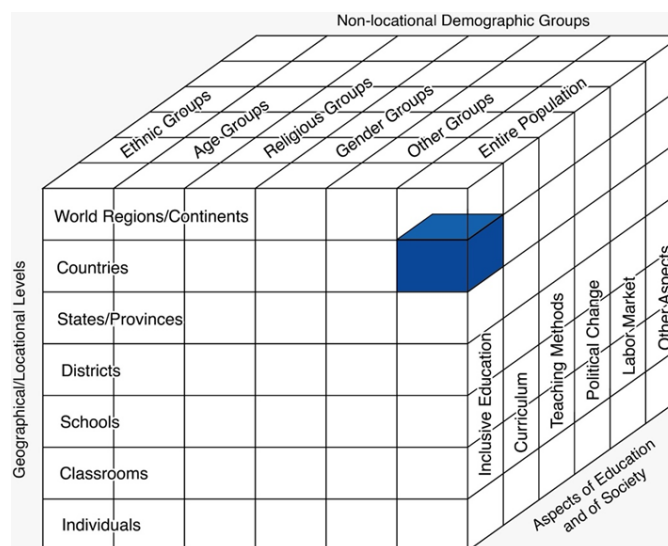
With its inherent focus on cross-national analyses, comparative education encourages a broader perspective on educational research. This paper employs a comparative approach to underscore the similarities and differences in the conceptualization of inclusive education within the education policies and legislations of five diverse countries—Bosnia, Cameroon, Greece, India, and Sweden.

In comparative education, the term "comparison" has evolved from a traditional focus on cross-national aspects to a contemporary, multifaceted perspective (Bartlett & Vavrus, 2017; Bray, Adamson & Mason, 2014). A theoretical framework that has aimed at creating stronger comparative relationships across various dimensions of educational research is the Bray and Thomas’ (1995) framework for comparative

education analysis. This framework allows for a comprehensive and nuanced analysis across the various dimensions of education, while maintaining a central focus. Drawing inspiration from the Bray and Thomas Cube, our focus in this paper is on the non-locational demographic of the entire population, the locational/geographic aspect of countries, and the educational aspect of inclusive education policy (see the adapted Bray and Thomas Cube, figure 1).

Figure 1

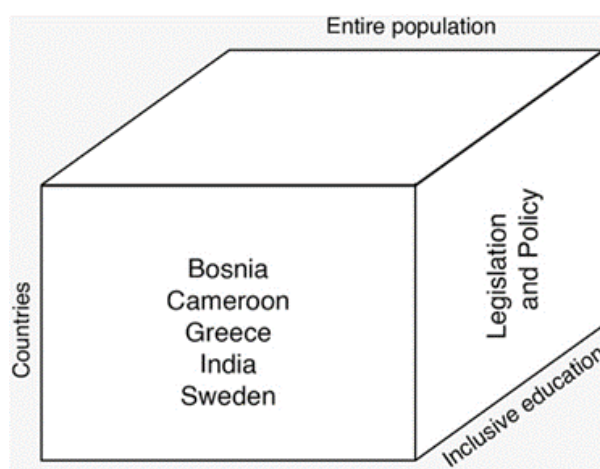
Framework for Comparative Education Analysis (adapted from Bray and Thomas, 1995)



To define the specific scope of inclusive education, the study draws inspiration from the European Agency for Special Needs and Inclusive Education's (2018) analysis framework on the mapping of inclusive education policies, specifically the initial section addressing legislation and policy for inclusive education systems. This framework identifies and proposes important components which can be used to analyse inclusive education polices including components such as legislation and policy, operational structure and processes. The paper is inspired primarily by the legislation and policy component which is deemed relevant to the aim of this paper and consists of a variety of items such as, whether a country's legislation commits to ensuring the right of every learner to inclusive and equitable education and if its policy articulates a distinct vision of inclusive education to enhance opportunities for all learners. To inspire the cross-country analysis particular inspired by the sub-section legislation and policy specifically relating to the parameters; definition of inclusive education, visions, goals and values in the legislation and policies. Thus, drawing inspiration from the Agency's grid for narrowing down the aspects of inclusive education, we compare inclusive education in policies in each country in relation to these parameters (see the Comparative Sub-cube, figure 2).

Figure 2

Comparative Subcube illustrating specific aspects of education and scope relevant to this study



By employing a comparative design, this paper acknowledges the intricate nature of inclusive education, underscoring the importance of studying systems to prevent oversimplification and overgeneralization while highlighting dynamic patterns of change (Bray & Jiang, 2014).

Results of the comparison of inclusive education policies in the selected countries

Based on the descriptions of the inclusive education policies in the five different countries, a cross-country analysis was conducted informed by the key parameters of; clear definition of inclusive education, visions, goals and values. The comparison examined, if there is a clear policy definition on inclusive education, how inclusive education is defined, what are the core values that underpin inclusive education in the countries policies and if and how multiagency involvement in the implementation of inclusive education is articulated. The cross-country comparison reveals a number of insights. These insights are presented in three key themes; a weak policy framework on inclusive education, the significance of the values and goals of access, equality, and equity in underpinning inclusive education and multi-stakeholders in inclusive education policy. These themes which may manifest in different guises are seen as explicative of the similarities and differences of the inclusive education policy in the selected contexts.

Weak policy framework on inclusive education

Weak policy framework is construed in terms of the lack of a clear-cut policy and definition of what inclusive education is. A commonality between the different countries is the lack of a clear-cut policy on inclusive education as well as a clearly formulated definition of what inclusive education is. None of the countries has a national policy on inclusive education. Rather, inclusive education is implicit in different national policy texts. Ideas, goals, visions and practices that are compatible with ideologies and practice of inclusive education are infused into the general education policy and other policies. However, in the decentralized educational system in Bosnia, specific regional policies on inclusive education are enacted, defining what it is and how it can be implemented.

Similarly, all countries lack a national policy definition of inclusive education. There is a nuanced yet pronounced emphasis on students with disabilities referring to inclusive education. All the countries reveal a strong emphasis on the inclusion of students with disabilities in the regular education system. For example, Cameroon's policy emphasises the inclusion of individuals with disabilities where support should be provided to them where necessary. In Greece, while the policy targets broader educational inequalities, it however, narrows to special needs and learners from diverse cultural backgrounds,

expressing the objective to eliminate inequalities and social exclusion based on cultural differences. In Sweden and in some regions in Bosnia and Herzegovina, a broader view of inclusive education that goes beyond students with disabilities and special educational needs to involving all learners within the general education system is observed. Synoptically, the policy landscape in all countries is weak when it comes to inclusive education in terms of no clear-cut policies on inclusive education at the national levels and no policy definitions of inclusive education. Nonetheless when reference is made to inclusive education there is a strong connection to special education. Slee (2018b) on the struggles of inclusive education alludes to a strong smell of special education in the misappropriation and subversion of inclusive education. This frequent and recurrent role of special education in inclusive education has been highlighted and discussed in the literature. For example, Slee (2018b), discusses the perverseness of inclusive education where ableism, individuals and their special needs are still dominant manifestations. While, Rix (2018) exhorts a shift from an approach based on a conglomeration of individualised needs to a conglomeration of collective needs in the inclusive education project.

Access, equity and equality as core values underpinning inclusive education

The analysis of the countries policies demonstrates a number of core values that underpin inclusive education. Three core values are discerned underlining the inclusive education in the policy formulations in the different countries. A common denominator in all the different countries is the idea that inclusive education is about creating access to mainstream education. This is situated in the references to creating accessible to regular educational settings for students with disabilities and other special educational needs or cultural backgrounds who have been traditionally excluded. This is the case in all the countries where there, there is the strive to create accessibility to regular education for these groups of students. This generally evident in policies that seek to facilitate the placement of these students in the regular education system and mainstream classes. However, in the case of Cameroon, while access can be viewed in terms of the placement of students in the regular school system, importantly it is perceived in enabling students with disability to access education irrespective of where that takes place. This is crucial in an educational context where children with disabilities experience significant levels of exclusion from any form of education.

Equity is another goal that is expressed in the policies in the different countries. All the countries in this study, one way or the other, articulate the idea of an educational system based on equity. Bosnia mentions the vision of quality and equity for learners while the Swedish policy also promotes equity in education for all. Related to this, is equality. All the countries clearly mention the goal to create an educational system on the foundations of equality. In Bosnia, reference is made to equality both in terms of the vision for all learners but also in the provision of good educational conditions for all students, especially students who are in need of special support. Meanwhile in Cameroon equality is primarily formulated in terms of equal opportunity to access education. Similarly, the education policy in Greece aims at expanding access to education and assurance of equal opportunities particularly for vulnerable groups which are susceptible to exclusion. India's policy texts express the goal to give equal opportunities for children with disabilities in mainstream schools and equal partnership in the education system. The policy in Sweden strongly promotes equality in education for all.

Multi-stakeholders in inclusive education policy

This pertains to policies relating to inclusive education ensuring the involvement of multiple stakeholders and here it is primarily premised on two things. First, the involvement of families in inclusive educational processes and, secondly, if policies on inclusive education take a cross-sectoral approach. Vis-à-vis the involvement of family in educational processes relating to inclusion, this was not very evident in the policies in all the countries. The analysis shows that some countries lack clear delineation of family involvement in their inclusive education policies. In instances where family involvement is mentioned, the extent and nature of such involvement vary across the countries. Not much is mentioned about the involvement of families in the cases of Bosnia and India, while the policy framework in Sweden clearly stresses parental involvement in all school activities and assigns the

responsibility to the schools to initiate and maintain parental involvement. In Cameroon, the policy expresses parental involvement when it comes to inclusive education. However, it places responsibility on parents in terms of ensuring access to mainstream schools for children with support from the state. This construes as a *responsibilisation* of parents in their involvement with inclusive education. Instead of the state assuming the responsibility to ensure these students are identified and included, it is incumbent on parents to do so. Meanwhile, Greece emphasizes parental involvement within the general education system, providing additional guidelines for parents' support and involvement in special education. However, there is a lack of clarity regarding parental involvement in intercultural education, with the exception that parents are required to give their permission for their children to participate in intercultural classes.

In respect to the policy being cross-sectoral, the countries again demonstrate varying degrees of cross-sectoral collaboration in inclusive education. The policy framework in Sweden provides for collaboration between different agencies and services when it comes to identifying and meeting the needs of all students. In Cameroon, the implementation of inclusive education is viewed in the prism of multiple stakeholders' involvement. As manifested in the Education Sector Plan 2013-2020, a cross-sectoral approach is charted involving actors from the health, social affairs, civil society organizations to detecting, caring and treating of disabilities in the goal to transforming school environments, providing resources and training to facilitate inclusion. Meanwhile in Bosnia and Greece, the policy as cross-sectoral is mainly around collaboration between schools and services outside of the educational sphere in the diagnosis of children with disabilities. Cross-sectoral collaboration in policies relating to inclusive education ranges therefore from a more comprehensive collaboration in Sweden and Cameroon, to administrative organization and diagnostic services in Bosnia and Greece.

Discussion and Conclusion

In our comparison of five countries—Bosnia, Cameroon, Greece, India, and Sweden—it became evident that the policy framework is rather weak. The lack of clear-cut policies on inclusion and the definition of inclusive education is common to all countries. Instead, inclusive education may be seen as a “policy phenomenon” (Magnússon et al., 2019), embodying political ideals and grappling with contextual subjectivities and circumstances. More so and crucially, the issue of a weak policy infrastructure invites the question; if inclusive education is a national policy priority? The short answer based on the findings of this study is more “no” than “yes”. Despite the immense attention inclusive education has received in policy spheres both internationally and nationally and in academic research, this has not necessarily translated to clear policy transformations that seek to establish and promote inclusive education.

The findings highlight a divergence in the interpretation of inclusive education across these countries, notwithstanding the overarching mandate from the Salamanca Declaration. Contextual factors usually play a pivotal role in shaping national policies, with socio-political, economic, and cultural subjectivities influencing each nation's approach have not been overbearing in the inclusive education policy formulations in this study. Rather there is convergence on the principal focus on specific groups of students, especially groups akin to special education. In spite of its good intentions' inclusive education priority of the national governments tends to focus more on students with special needs and vulnerable groups rather than a holistic understanding of inclusion or inclusivity as involving all learners. Moreover, there is convergence on some core values pertaining to inclusive education such as the promotion and/or enhancement of access, equity and equal opportunities though nuances in understanding may exist in the different contexts.

The existing international framework for inclusive education places emphasis on addressing the shortcomings or deficits of students in need of support, particularly on groups that deviate from perceived norms. This approach seeks solutions to rectify inadequacies rather than adopting a more comprehensive and strength-based perspective that recognizes and builds upon the diverse strengths and capabilities of all students. Although policies regarding inclusion may sometimes aim to focus on all learners, the attention often ends up being directed solely towards the students themselves. This can be explained as a *deficit-based* (Tajic & Bunar, 2023) paradigm that views students as the problem. Institutions are encouraged to focus either on students with disabilities or on all students, but the deficit-

oriented paradigm invariably marks the students as the problem. It shifts the focus away from the institutions and structural barriers as potential areas of concern. The dominant deficit-based paradigm demonstrated in the policy frameworks in the countries is inconsistent with the ideals of inclusive education (Graham et al., 2020). It may contribute to stigmatizing students in need of support by overly focusing on their deficiencies. Consequently, it has the potential to foster exclusion, reinforce stereotypes, and perpetuate inequalities towards vulnerable groups within educational contexts. This deficit-based paradigm lacks a comprehensive discussion of the structural and organizational barriers, calling for a nuanced redefinition of what inclusive education truly means. Conversely, a paradigm addressing the deficits of educational systems and their legislations could focus on identifying issues within the system, recognizing and addressing its shortcomings in providing for all students without stigmatizing groups of students. Alongside this, is a call for a nuanced shift from an individual-centred to a more comprehensive understanding. There is therefore a need for a discursive change or a *call for the redefinition of inclusive education*. There is recognition of the importance of considering individual needs but crucially an acknowledgement of the significance of addressing structural barriers within the systems. Clearly, there are substantial systemic challenges and structural gaps in the global conceptualization of inclusive education. The Salamanca Declaration's guidelines should serve more as a broad framework, allowing individual nations to tailor their definitions and actions on inclusion according to their unique circumstances. This adaptability grants each country flexibility in shaping its policymaking to address specific contextual needs, but it also prompts questions about the comprehensive understanding and potential of inclusive education. The focus should be on challenging states to critically examine and problematize their policies on inclusive education, emphasizing that both policymaking and policy enactment must be central to reforms aimed at achieving true inclusivity. This nuanced shift could foster a more inclusive and supportive educational environment for all students by addressing structural and organizational barriers, leading to more effective support systems and enhanced opportunities for diverse groups of students. It is crucial to highlight the inadequacies and deficiencies within educational systems rather than framing the discourse around the perceived inadequacies and deficits of children themselves. If countries truly quest to implement an inclusive education system which is also responsive to deficit-based critique, it is imperative to improve on the present state of policies and formulate clear policies on inclusive education and guidelines for implementation that take this into consideration. These policies and guidelines must however, be contextual and situated.

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