In-between Culture and Category – Cross-cultural Comparison as a Methodological Approach in Inclusive Education Research

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Abstract

CONTEXT*:* There are few thematizations of inclusive education in international comparative research that do not refer directly or indirectly to culture: be it society as a cultural entity, questions of inclusion in schools being embedded in cultural, political and social conditions, or culture being the explicit framing of an overarching regional context. There is a long tradition of raising cultural questions in the discourse on inclusive education. It is surprising, then, that in the discourse and practice of comparative research on inclusive education, culture as a comparative entity has so far rarely been explicitly picked up on as a methodological issue. Moreover, questions of using and dealing with categories (e.g. dis/ability) against the background of cultural differences and commonalities have received little attention.

METHODS: In this article, we take this as an opportunity to explore methodological challenges in cross-cultural comparison. By mapping different understandings of culture, we describe cross-cultural comparison as a methodological approach. This aims to elaborate on ambivalences in cross-cultural comparison in the field of inclusive education. To illustrate these, we present examples from an exploratory scoping review of how culture is articulated in inclusion-related journals, before offering considerations for methodological approaches in cross-cultural inclusion research.

RESULTS*:* Based on an analytical grid, certain formations of how culture is articulated in relation to inclusive education could be identified: *(a) culture as a national reference;* (b) *culture as a cultural-historical process and practice; (c) culture as a group; (d) culture as a system of production and representation.*

CONCLUSION*:* With regards to the presented formations, it is noticeable that national references remain an important and yet rather static entity of comparison, despite inclusion/exclusion being a complex and dynamic phenomenon. Furthermore, disabilities play a specific role within the discourse on inclusive education in cultural comparison. We furthermore conclude that in addition to the question of the object of comparison and its categorical setting, questions of positionality and translation should increasingly be raised.

Points of Interest

- In the research and literature on inclusive education, culture is often mentioned, especially when inclusion is compared across international contexts.
- We summarize how culture can be defined in different ways.
- We then assess papers on inclusive education to identify how culture is understood.
- Finally, we highlight what should be considered in cross-cultural comparisons of inclusive education.

Keywords: Cross-cultural comparison, inclusive education, culture, articulation

1 Introduction

Questions of inclusion and exclusion in the social world are inevitably linked to the practices of individuals. As Bourdieu (1982) emphasized over four decades ago, everything that the social world has produced can also be abolished by its own means. This implies not only social communication and relationships, but also the material, physical-spatial environment. If reference is made to certain ways

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of living, practices and social relationships, the term and concept of 'culture' is used. While a detailed historical development of the concept of 'culture' is beyond the scope of this paper (see e.g. Bauman, 1992), it can be stated that discourses on culture have developed in constant confrontation with and relation to 'nature'. Indeed, they continue to develop, as can be seen in posthumanist discourses (e.g. Braidotti, 2006).

Culture is characterized in particular by the fact that it expresses the symbolic dimension of things, actions, institutions and social relationships in the social world. Culturally, people are located and shaped by questions such as "who is he/she seen as", "who is he/she made to be", "what can he/she see and how". It is not surprising that demands for a change in the social world to realize more participation and inclusion are often articulated through the transformation of 'cultures' (Ainscow & Sandill, 2010; Kozleski et al., 2011). In education, the importance of cross-cultural perspectives is ever growing: multi- , inter- and/or transcultural perspectives help to reflect the other and one's own cultural being (e.g. Nieke, 2008). Therefore, inclusive education has an international perspective which almost always directly or indirectly refers to culture: be it for example society as a cultural entity, questions of inclusion and exclusion in schools and classroom teaching that are embedded in cultural, political and social conditions, culture as the explicit framing of an overarching regional context and so on (Powell, 2013). Looking at the Index for Inclusion (Booth & Ainscow, 2011) as an example, it becomes clear that culture is one of the central pillars for inclusive school development. Formulated normatively with Mitchell (2015) and with reference to Ainscow and Miles (2008): "[E]ducation systems and schools should articulate an inclusive culture in which 'there is some degree of consensus [...] around values of respect for difference and a commitment to offering all pupils access to learning opportunities'" (p. 27). Based on this internationally recognized nexus of inclusive education and inclusive culture, concepts and research have become widespread in educational discourses that seek to explore and further develop areas of inclusive cultures (e.g. relationships, support structures).

The proximity of inclusive education and culture can certainly be traced back to the genesis of the discourse on inclusive education, which was closely linked to a changing perspective on dis/ability. The significance of cultural values was tackled early on in the development of systematized cultural comparison: "The significance of an impairment depends on the values and assumptions people have about the nature, functioning, and goals of persons. What are the ideals and expectations against which people measure themselves? How are persons understood in relation to cosmological patterns and forces? What is human and what is inhuman?" (Ingstad & Whyte, 1995, p. 23). In our case, this refers to how disability and ability are understood in terms of socio-cultural perceptions, sets of beliefs, political structures and so on, and how they are made relevant in a certain period of time and in a certain place.

Social-constructivist perspectives on disability, which view disability not as a medically identifiable person-related deficit but rather in terms of barriers to activity in a person's social environment, inevitably shift the focus to constructed conditions of the social world. This has been increasingly perceived in the International Classification of Functioning, Disability and Health (WHO 2001), its aim being to create a globally referenceable model of functioning. Associated pre-studies focused on comparing the meaning of disability in different languages but also dug deeper in terms of understanding cultural perceptions, such as what the broader public associated with the meaning of disability (Cultural Applicability Research; Üstün et al., 2001). It has also been programmatically researched in the emerging discipline/area of Disability Studies since the late 1990s. Inclusion and exclusion are – in this sense – understood as a social category rather than as a personal category of disability (Weisser, 2017). At the same time, a cultural understanding of disability has also emerged in the American discourse (e.g. Snyder & Mitchell, 2006) that focuses decidedly on processes of creating difference through social norms and patterns of interpretation in the majority society. This understanding assumes that the identity of (non-)disabled people is culturally shaped and determined by patterns of interpretation of the self and the other – in other words, they are relational to one another. Without outlining their genesis and international character in detail at this point (see e.g. Biermann & Powell, 2024; Waldschmidt, 2005 among others), it is therefore clear that relations of inclusion and exclusion are often associated with

culturally embedded disadvantages and dis-abilities of marginalized and vulnerable groups (Köpfer et al., 2021).

Looking at international comparative inclusion research and its epistemological and methodological development – in line with the aim of this special issue – it becomes clear that while cross-cultural comparisons have been carried out in many studies, the use of culture as a methodological and conceptual framework has received only limited attention. Although Bürli (2006) has come up with an overall framework of international and comparative research in special education, it serves more as a systematic approach to describing approaches rather than a conceptual or theoretical one. His method provides an example, however, for others aiming to tackle the actual matter of comparison when it comes to a complex issue such as inclusive education. Following this tradition, we aim to further systematize and underline the importance of comparison in inclusive education.

Prompted by a study by Neubert and Cloerkes (1987) in the late 1980s and early 1990s, similar takes on research into comparative approaches to disability emerged. These, too, aimed to systematize references to disability in anthropological studies in the German-language discourse. The role of education in the context of disability, however, only slowly found its way into this academic discourse.

This omission – of how culture can be perceived as a conceptual and methodological framework – is surprising in two respects. Firstly, there is a strong focus on the concept of culture in the discourse on inclusive education and disability, as outlined in the introduction to this paper. Secondly, cultural comparison has been emerging in qualitative social research as a possible comparative empirical approach to social practices. Furthermore, as mentioned above, the discourse on inclusive education traditionally raises cultural questions (Barton & Armstrong, 2001, 2007; Alur & Timmons, 2009). Recently, cross-cultural studies have also become interconnected with post-/decolonial and transcultural topics (Elias & Mansouri, 2023). So far, however, there has been little discussion on what an empirical approach which addresses cross-cultural inclusion (covering categorization, comparison and cultural concepts) might look like.

The main idea of this paper is therefore to methodologically explore cross-cultural comparison in the field of inclusion. Hence, based on (1) sketching different articulations of culture, we will (2) describe cross-cultural comparison as a methodological approach in order to elaborate on (3) ambivalences of cross-cultural comparison in the field of inclusive education. To illustrate this, we will (4) discuss the importance of rigorous comparative methodology, by (5) presenting findings from a scoping review of studies from relevant inclusion-related journals. These illustrate what is a rather patchy methodological field. Finally, after (6) presenting and discussing formations which map the field, we will (7) derive some considerations for cross-cultural inclusion research as a methodological approach.

2 Articulations of culture – a relational and contested process

Against the backdrop of these initial considerations, we think it is worth taking a closer look at culture, which is far from easy to define. From an etymological point of view, the term culture (derived from the Latin "colere" = to cultivate, to care for) was initially employed as an image for the care and shaping of people. As Perpeet (1984) puts it in reference to Samuel von Pufendorf: "Culture [is now the] jointly developed and guarded sense of dignity of a community which, due to its togetherness, knows what is proper, worthy of imitation and decent" (p. 24, transl. by authors). At the same time, it becomes clear how normative the concept of culture was and how strongly a distinction between culture and non-culture (barbary) was postulated – solidifying social norms and standards to be adhered to. Just as Herder did with the culturally specific and historical forms of life of a collective, culture was then not a way of life to be described, but one to be fulfilled beyond the standards of pure civilization and barbaric nature. In this context, the concept of culture became *en vogue* in the 19th century, which Reckwitz (2000) described as holistic. This can be expressed, for example, with the well-known definition of culture from Tylor (1903, p. 1): "Culture or civilization, taken in its wide ethnographic sense, is that complex whole which includes knowledge, belief, art, morals, law, custom, and any other capabilities and habits acquired by man as a member of society". It is therefore holistic in the sense that culture encompasses

all characteristics of human existence and being as well as the artifacts, works of art, etc. created by them – everything that goes beyond the pure nature of people. On the one hand, this concept of culture opens the possibility of grasping culture – also empirically – along the rites, habits and practices of people and of understanding social forms of life as cultural practices, linking to the later Cultural Studies.

However – and this has been rightly pointed out by postcolonial studies in recent decades – societies and cultures are predominantly understood as homogeneous entities. This is problematic insofar as culture is then closely associated with national borders and boundaries, which structure and shape social practices precisely through formal, legal frameworks. Furthermore, the holistic perspective of culture makes differences or heterologies within cultures invisible and instead dramatizes differences between cultures. These standardized forms of culturalizations can lead to universalizations that are static in their form (and, potentially naturalizing) and cover up hybridizations (Bhabha, 2004). Taking this criticism into account, in the 20th century, accompanied by the increasing recognition of globalizing multicultural processes, a new concept of culture is increasingly being brought into the field. Reckwitz (2000) describes this as "differentiation-theoretical" – defining culture along the lines of the characteristics of subsystems and (milieu-specific) fields. According to this new concept, culture is not a holistic entity but is shaped and practiced differently according to certain cultural fields.

From the previous historical sketches on the development of different understandings and approaches to culture, it becomes clear that culture and cultural comparison is a multi-layered phenomenon and can take on different faces depending on what determines the perspective. It becomes clear that the understandings arise primarily as a juxtaposition of a normative and an analytical understanding of culture. Further differentiation (cf. Moebius, 2020) results in nuances of a normative or analytical understanding of culture. This can for example be seen with regard to an absolute or an inductive-empirical praxeological understanding gained from the data. That is to say, a view of factual/positivist reality or an assumption of the world and reality based on (constructed) symbolism. Or – in relation to the use of categories to capture cultural groups – the approach of (essentialist) attribution of categories to persons or the assumption that culture primarily results from a community-based socialization process.

Figure 1: *Characteristics and distinctions of the concept of culture: an analytical grid (authors' own illustration)*

normative	analytical
person-oriented	community-oriented
holistic/absolutistic	praxeologic/differentiation-theoretical
factual	symbolic

Even if the boundaries are sometimes fuzzy, these varied understandings can be translated into a heuristic analytical grid (see Fig. 1) to serve as a basis and search strategy for examining cross-cultural discourse on inclusive education. It can also be employed to work out different formations, as we have done in this paper using explorative literature reviews (see chapter 4).

Furthermore, the field of research – in our case, inclusion research and those involved in it – can also be seen as a cultural practice. We therefore deal with culture on two levels – as an object of analysis and as a form of scientific practice. Hence, we undertake a cultural-theoretical analysis of articulations of culture and thereby position ourselves within an understanding of culture as analytical, community-oriented, differentiation-theoretical and symbolic.

In what follows, we refer to Stuart Hall's concept of articulation and ask how culture is articulated in the international context of cross-cultural inclusion research. The concept of "articulation" (Hall, 2000) focuses on the connection between social formation and conditions within social connections which can arise and continue to exist. As Hall (2000) stated: "By the term 'articulation' I mean a connection or linkage which is not necessarily given in all cases as a law or fact of life, but which requires certain conditions of existence in order to occur at all; a linkage which must be actively maintained by certain processes, which is not 'eternal' but must be constantly renewed, [...]" (p. 65). Articulation as a theoretical approach in social and cultural science is therefore "simultaneously a way of understanding how ideological elements combine in a discourse under certain conditions and a way of asking how they

are articulated or not articulated with political subjects in certain conjunctures." (ibid.). Significant for this approach is the strategy of not examining totalities or closed units, but – and this expresses the differentiation-theoretical understanding of culture – to focus on complex social formations that can be mapped in their complexity and placed in relation to each other, i.e. as "social formations in articulated structures" (Clarke, 2015, p. 276).

3 Cross-cultural comparison – culture as the subject of comparison

The methodological aim of making culture(s) the subject of research and comparing them with one another is an endeavor that was primarily pursued anthropologically and ethnographically – with the goal of discovering patterns and traits shared between cultures and to generate universal ideas about culture. In the late 19th century, cultural comparisons were primarily undertaken – in the sense of cultural evolutionism – to classify the development of civilizations (cf. Tylor's distinctions between savagery, barbarism and civilization, among others). While these predominantly ethnocentric studies have fortunately been largely superseded in their understanding of culture today, they have nevertheless laid the foundation for the development of cross-cultural comparison as an approach to universalistic ideas of human culture.

Along different, mainly ethnographic approaches and methods of data collection (e.g. observations, surveys), successively more data on specific characteristics of cultures and societies have been collected and cross-cultural comparisons have developed into an established approach. These comparisons were and are used with the aim of seeing through one's own culture, i.e. to obtain a transcendent and reflective perspective on the characteristics of one's own culture (cf. Fuchs & Berg, 1993). Albeit, at the same time, especially in an increasingly global and transcultural world, comparisons aiming to obtain indications of values and traits of universal culture in world society. Comparison as a genuine method of gaining knowledge can therefore make differences, similarities and missing links visible. The ambivalences that have often been highlighted are that social structures and practices, which are characterized by language, religion, political systems, traditionally established values and much more, are difficult to grasp in their complexity. Thus, they become an almost unmanageable collection of comparative aspects when comparing different cultures, which tends to lead towards epistemological distortions without a clear *tertium comparationis*. Related to this, cross-cultural comparisons are often criticized for ignoring variability within a single culture and variation across cultures, because neglecting these allows for easier, more uniform coding (Badstieber et al., 2021). Additionally, the one-sidedness of cultural concepts – often being limited to nationality and language – mean that there has been little reference to the intersectionalities of cultural backgrounds (e.g. Aldridge et al., 2014).

In the discourse on cross-cultural comparison as a methodological approach, it is evident that cross-cultural comparison is a recognized approach to gaining knowledge across various scientific disciplines (including anthropology, psychology, social sciences, educational science) and that different quantitative and qualitative methods can be used for this purpose. While rather essentializing/positivist concepts and variables have been brought into the field, an interpretative/reconstructive social science perspective on cross-cultural comparison has been established as an additionally important counter narrative. In the latter, culture – in accordance with the differentiation-theoretical understanding of culture described above – is seen as a layering of collective practices in different cultural fields (e.g. Jørgensen, 2015; Nohl, 2019).

In the discourse on cross-cultural comparison, current trends can be identified that relate primarily to the use and application of categories of comparison, which will be briefly outlined below. There is a general consensus in qualitative social research that it is precisely through comparison that interpretations are sharpened and differences/commonalities can be identified and (re)presented (Rademacher, 2013; Badstieber et al. 2021). However, the question arises – not only for cross-cultural comparisons, but comparativist perspectives in general – of the boundaries of the *tertium comparationis* which enable comparison in the first place. Here, for example, Baur and colleagues (2021) offer a critique: "When discussing cross-cultural comparison, scholars often unthinkingly imply comparing social processes in different nation states. In other words, researchers often assume that 'cultures' can

be relatively clearly demarcated, spatially and that 'space' itself is a given entity" (p. 3). To put it bluntly: how can cross-cultural comparison define a *tertium comparationis* that does not fall back on predefined nation-state categories, and which can instead live up to inclusive interpretations (Hummrich & Rademacher, 2013)? Or going further: How can the production of culture(s) be empirically researched, especially with regard to inclusion and heterogeneity?

4 Categories of inclusive education and its ambivalences

The above mentioned implies a shift away from so-called holocultural studies towards the recognition of culture as an emerging and productive entity – spatially expressed as a transformative process in the sense of a *refiguration of space* (Baur et al., 2021 – referring to theories of Elias, Knoblauch and Löw). In this perspective, the emergence of cultures can no longer be understood as a unidirectional or linear process, but as a complex set of interdependences. Christmann and Baur (2021), for example, propose four dimensions for comparative cultural case analysis from which a *tertium comparationis* can be derived:

- "substantially (for example, the economy versus education or cultural production and consumption);
- temporally (for example, situations, events, interventions, social processes, innovations, or decision-making procedures);
- spatially (for example, neighborhoods, cities, regions, nation states, or world regions); and
- concerning the level of aggregation. Besides persons, cases can be entities of a higher levels of action, e.g., social groups such as families or circles of friends, organizations, networks, markets or commodity chains." (p. 21).

It is necessary to understand inclusion and exclusion as a discourse in research (e.g. Foucault, 2006). Hence, inclusion/exclusion are not only the subjects of research but are also produced and recognized at a symbolic level in the research by various actors. Hence, inclusion materializes – according to the guiding assumption of this article – in the interaction between a programmatic agenda of inclusive education, which results from a political and pedagogical discourse on education, the governance of education, and the practices of actors in research. In this way, accumulating articulations of inclusive education develop in and through research. For example, the question of the connection between the theoretical idea and the practical conceptualization or implementation of inclusion as an object in research can be raised and problematized. More specifically, we can ask: How is "inclusion" articulated in inclusion research? Does it mean the same everywhere? What does it connect to? What are the functions and contextual relations of the connections? Where do ruptures occur? It is surprising that in the discourse and practice of comparative research on inclusive education, culture as a comparative entity has so far rarely been explicitly raised as a methodological issue. Indeed, questions of using and dealing with categories against the background of cultural specificity and commonality have received only little attention.

In response, this article aims to initiate a methodological discussion which addresses challenges in cross-cultural comparison of inclusion. This discussion will be elaborated further in the special issue "Trends and Gaps in Methodological Approaches to Comparing Inclusive Education" (in prep.), to be published in the International Journal of Qualitative Methods. In order to underpin theoretical considerations, we conducted a scoping review (Arksey & O'Malley, 2005) to map literature which explicitly addresses cross-cultural comparison in the context of inclusive education – as well as its fuzzy use as a *tertium comparationis*. Research literature from selected, relevant journals in the international educational science field was skimmed to identify articulations of culture and practices regarding inclusive education. Our search strategies involved identifying cross-cultural comparison as a methodological approach to analyzing notions of inclusive education. As a first step, we searched for key terms in specific educational science journals and via relevant portals such as Google Scholar. While "inclusive education" was a fixed component of the search, the methodological approach was varied (e.g. "cultural comparison", "cross-cultural comparison", "intercultural comparison") in order to reflect the breadth of possible country-specific designations of the methodology. We then narrowed down the corpus by

focusing on English-language literature – meaning that specific national discourses remain under-examined, but the central reference discourse becomes visible. As the subject of the review is not comprehensively included in the (methodological) discourse on inclusive education, we did not select any specific journals for the corpus, but conducted a broad search. However, key journals did emerge (e.g. "International Journal of Inclusive Education", "Pedagogy, Culture & Society", "International Journal of Disability, Development and Education" and "Compare: A Journal of Comparative and International Education" as well as the book series "Inclusive Education: Cross Cultural Perspectives" by Springer). Thus, a total of 34 articles were included as a basis for the analysis, which represents a breadth of inclusion-related discourses of the global North and South – as well as Eastern and Western discourses.

In a second step, and in line with the above-mentioned complexities related to cross-cultural comparison (see chapters 3 and 4), the following questions acted as a guideline: Which *tertium comparationis* are selected for the cross-cultural comparison of inclusive education? Which categories are brought into the field and how are they conceptualized? Is culture addressed as a normative or analytical entity? We referred to the heuristic depicted in chapter 3 (see Fig. 1) to conceptualize culture as a phenomenon of comparison.

The aim of this review was not to provide a complete survey of the existing body of literature in the field, but – based on a selective body of literature – rather to perform an explorative analysis of the main trends of articulation of culture and cultural comparison in inclusion-related literature.

Before proceeding to our findings, it is important to note that the research literature reviewed and analyzed – although explicitly committed to the approach of cultural comparison – used very different qualitative and quantitative research approaches and methods. No specific methodological preferences or trends could be identified. Based on the analytical grid outlined above (see chapter 2), some certain formations of culture could be identified, as it relates to inclusive education. These are elaborated below.

Culture as a national reference (normative, factual, holistic)
 The first formation shows that *the national* often plays a prominent role in cross-cultural comparisons (e.g. Lassila et al., 2023; Douglas et al., 2016; Hyunjeong et al., 2014; Mu et al. 2010; Tan et al. 2021). Whether already indicated in the title or explained further on, the level of the nation-state border is identified as a central characteristic of (inclusive) culture. Particularly in studies concerning schools, it becomes clear that cross-cultural comparisons mainly take national school systems into consideration. Thus, an existing culture is predominantly considered to be normatively anchored and present and the studies consist, as D'Alessio and Watkins (2009) state in reference to Meijer, "normally of a number of country descriptions in which legislation, regulations, organization and practice of inclusion are described" (p. 233). While the emphasis is put on the comparative presentation of the (school) systems, culture is not specified or explicated further. At this stage the question can be raised: are we talking about the same thing? Bürli and colleagues (2009) convincingly point out that questions of inclusion and inclusive education (and e.g. categories of disability) are shaped based on the social, political and/or policy-related and historical framework conditions of the respective countries. So, it can be stated that there is a broad body of literature and research in which the nation-state reference is used as a proxy for culture and thus a holistic, static and normative understanding of culture is perpetuated. Although there are sometimes indications that cultures are heterologous within nation-state borders and that diverse cultural practices exist, this perception is seldomly addressed empirically (Florian et al., 2006).

Culture as a cultural-historical process and practice (analytical, praxeologic)
The second formation captures culture as a form of life that has developed historically. The term 'cultural-historical' is used in a broad sense to identify historical analyses that take the mediating role of culture into account when examining the development of inclusive education in diverse contexts (Engelbrecht et al., 2017; Mitchell, 2005). This perspective materialized in preliminary work employing a cultural-historical conceptual framework (Artiles & Dyson, 2005; Peters, 2000, 2013). Culture, in this case, is regarded as a tradition (based on norms, values and beliefs which are embedded in habits and practices) which becomes empirically approachable through experience-based orientations (e.g. Hauwadhanasuk et al., 2018; Chan 2016; Mensah 2016, among others). Hereby, reconstructive and

interpretative methods of social research are primarily considered the most appropriate for comparative analysis (e.g. Sturm, 2021). Due to the historical dimension, these cultural processes and practices are often not directly recognized as structures of injustice, but require in-depth, empirical procedures with a view to deconstruction (Köpfer, 2024). This perspective implies a certain proximity to disability studies, as the focus on the analysis and reconstruction of practices contains a focus on (implicit and hidden) social barriers.

Culture as a group (community-oriented, symbolic)

Another formulation sees culture articulated as belonging to a distinct group, characterized by certain characteristics and lifestyles. These characteristics can be social, political, religious and so on (Subasi Singh et al., 2023). The dimensions for defining the cultural group can vary, from being a group formed within a country or a city to global cultural groups (e.g. Browning et al., 2011). In cross-cultural comparisons in inclusive education, these social, political and religious characteristics in particular can then be used as counter-horizons and moments of contrast (Nohl & Somel, 2016; Yssel et al. 2007). The affiliations to a cultural group are not necessarily determined by a formalized affiliation (to speak of membership), but by an empirically analyzable experience. As Mónico et al. (2020, p. 527) put it, "cross-cultural research refers to empirical studies that are carried out among members of various cultural groups who have had different experiences that have led to predictable and significant differences in behavior".

Culture as a system of production and representation (symbolic)

Given the fundamental idea that categories are cultural products, critical questions on classifications can be raised – and particularly in the context of inclusive education. For example, Florian et al. (2006, p. 44) claim that "discrete categories used in a given country are often idiosyncratic to the policies related to disability in that country; they therefore do not lend themselves to cross-national comparisons". Based on this reflection, studies focus on aspects of inclusive education and in particular categories of disability and emphasize their cultural production and representation - and thus position culture as a system of production and representation (e.g. Benomir et al., 2016; Hodkinson et al., 2018; Chakraborti-Gosh et al., 2010, 2014; Meng & Zhiyong 2007; Smyth 2014). Examples of the consideration of cultural emergence include Singh's comparative analyses of Attention Deficit Hyperactivity Disorder (ADHD) across cultures and Decoteau's (2021) analysis of autism as a Western disease. However, not only categories of disabilities (e.g. Devarakonda, 2022) but also roles and practices such as teachers/teaching (Kozleski & Waitoller, 2010), school support systems (Óskarsdóttir & Köpfer, 2019; Tan, 2021) or the development of curricula (Nasri et al., 2021) are included in the comparison as cultural products. It becomes clear, then, that not only the phenomena and objects of comparison are to be regarded as cultural propria, but also inclusive education in its programmatic and therefore cultural ambivalence. D'Alessio and Cowan (2013) highlighted this by pointing out the interwoven nature of inclusive education and special education in an international context and the different theoretical frameworks which are invoked. This indicates that inclusion research must also be seen as a cultural product, which sets culturally specific normativities which cannot be suspended – even in the process of cross-cultural comparison. As Badstieber et al. (2021) point out, the research perspective on scientific phenomena remains selective and in need of legitimation. Ultimately, the simultaneity of the invocation of cultural production and the cultural interweaving of research might – according to a problematizing interjection – lead to a perpetuation of essentialization and binary systems of observation (e.g. eastern/western, northern/southern, global/regional).

5 Implications for cross-cultural comparison as an approach to researching inclusive education

This paper aimed to address challenges in cross-cultural comparison as a methodological approach in the field of inclusive education. With regards to the formations of culture presented above, it is noticeable that national references remain an important, rather static entity of comparison as opposed to the complex and dynamic phenomenon of inclusion/exclusion. Furthermore, disabilities play a specific role within the discourse on inclusive education in cultural comparison. When cultural comparisons on

inclusive education are not negotiated and compared via the nation-state comparison of introduction and consolidation, but rather as a (symbolic) habitual practice which cultures produce and shape, forms of disabilities increasingly come to the fore. Without being able to elaborate on the ambivalent relationship between the discourses and traditions of inclusive education and disability, the fact that categories and labels of disabilities are (once again) finding their way into comparative research as *tertium comparationis* – especially in difference-theoretical approaches/typologies of culture – can be emphasized. This finding points to the remaining interrelation of inclusion as being seen as associated with disability (not dis/ability) and labeling practices, as well as the importance of diagnosis superseding cultural differences or the importance of considering disability-specific embeddings as referenced at the onset of research into disability in different country contexts (Ingstad & Whyte, 1995).

Drawing from an analysis of implicit cultural practices, an explicit 'marker' as a designated comparative dimension seems to be a prerequisite. This is where categories of disability come into play. Thus, cultural constructions and productions are empirically processed "post-hoc", so to speak, after the selection has fallen on a fixed, and thus ultimately difficult to deconstruct, disability category. This is to say: starting with a category and pointing out its construction. It is difficult to assess the extent to which the *'disability marker'* is used due to a lack of methodological approaches in the field of cultural comparison. This could be due to disciplinary, pragmatic and object-theoretical reasons or the rather banal assumption that the understanding of what inclusion is remains fuzzy. Also, the question remains whether complex, intersecting lifeworlds and expressions of inclusion can be grasped through traditional approaches of comparative research. Even more so, our analysis rather hints at a manifestation of essentializing readings of disability. What remains is the ambivalence of introducing forms of disability along formal policies and not as cultural phenomena.

Overall, a closer examination of culture in cross-cultural comparative studies reveals that definitions of the culture are either limited or nonexistent. They only reveal themselves in the design of the study and the way in which the *tertium comparationis* is positioned. While in the discourse of international comparative inclusion research, the objects and levels of comparison (e.g. Köpfer et al., 2021) are operationalized and made explicit, they remain diffuse in cross-cultural studies. Culture, therefore, as a *tertium comparationis*, needs specific explanation or specification. Otherwise, it is used empirically only as a formal (and partly normative), and less analytical, category.

In addition to the question of the object of comparison and its categorical setting, questions of positionality and translation are increasingly being raised. So next to exploring what is being used as the entity of translation, the question of who is conducting comparative work and with what intention remains widely unaddressed. Using the example of translation might be necessary if international researchers are not familiar with the languages being used in a research context. This implies that terminologies need more than plain translation into majority languages, but rather cross-referencing and embedding. Furthermore, this implies acknowledgement of the multifaceted layers of translation that do not remain limited to transfer processes into English but also include e.g. understanding and collaboration with different communities (see Subasi Singh et al., 2023, using the examples of data in Sign Language and the role of transcultural research teams). In this respect, an important project of de- and postcolonial approaches is a critique of theory and epistemology through European modernity, which is linked to a demand for a radical transformation of social and, in particular, scientific practice (Maldonado-Torre, 2016, p. 7). This is also connected to a plea for the development of a diversity of knowledge, i.e. on the one hand a replacement of an ethnocentric perspective and at the same time a recognition of hybrid cultures.

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