

DIFFERENT STRATEGIES FOR EMBRACING INCLUSIVE EDUCATION: A SNAP SHOT OF INDIVIDUAL CASES FROM THREE COUNTRIES

Lee Lay Wah

Universiti Sains Malaysia

This paper provides a snapshot into how three individual schools from three different countries practice inclusive education. In the case of the UK primary school, inclusive practices are focused on the provision of external resources and expertise to supplement instruction in the classroom. In the Netherlands, the focus is on teacher change through change of attitude and in-service development of skills. The third case, a Malaysian case, highlights the discrete relationship between special educators and regular teachers in providing inclusive education in their school. The research evidence shows that strategies to promote inclusive education is dependent on the current strengths and needs of organizations. Each of these organizations embraces inclusive education by capitalizing on their own strengths. It is proposed that inclusive education be interpreted based on situational contexts and should be broad enough to encompass a continuum of needs. The implication of this is that inclusion is an ongoing developmental process whereby all organizations can continue to develop towards greater inclusion whatever is its present state.

Inclusive education finds its philosophical roots in ideas about human rights, social justice and equity. Based on these sound human values, it is inevitable that the movement towards inclusive education has been gaining ground in educational systems throughout the world that have traditionally been responding to special educational needs based on segregated special education systems. The aim of inclusive education is to enable students with special educational needs (SEN) to benefit from the upbringing and socialization processes at regular mainstream schools (Lo, 2007). The movement towards inclusive education is embraced internationally and has been enshrined and articulated into international legislations, notably policy documents from the United Nations that include The UNESCO Salamanca Statement (UNESCO, 1994). This statement has been viewed as something of a watershed with respect to enhancing inclusive education throughout the world. It was unequivocal in asking the international community to endorse inclusive education and to give it the highest priority. The signatories of this statement include representatives from 92 countries and 25 international organizations. However, despite the apparent convergence of the philosophical roots of inclusive education, there has been much divergence in practice.

Concepts of Inclusion

Inclusion has now come to mean a philosophy of acceptance where diversity among all people is welcomed, valued and respected (Carrington & Robinson, 2004). Within this broad view of inclusion, inclusion in schools or inclusive education is increasingly seen as a school reform whereby all children regardless of their physical, intellectual, social, emotional, linguistic, ethnic, cultural or economic conditions are supported and accommodated in order for them to achieve their true potential. In other words, inclusive education has now come to mean the provision of equal educational and social opportunities to *all* children in schools. However, in reality, as highlighted by Florian (1998), there is a gap between policy and implementation, which must be acknowledged and addressed. Debates continue and concerns remain about the ability of schools to be adequately prepared and to adapt towards the movement of inclusive education.

The concept of inclusive education is still interpreted and understood in many ways. When Sebba and Ainscow (1996) first defined inclusive school as one which *works from the principle that all communities should learn together* (p. 7), they found a diverse interpretation of that definition, which ranged from schools with special units attached thereto to schools with link arrangements between

special and ordinary schools. Inclusive education is still thought of as an approach to serving children with disabilities within the general education setting. It is most associated with the physical settings where students with SEN receive their education. However, physical location is but one dimension of inclusiveness. According to Friend (2006), inclusion is a belief system of a school being a learning community, which educates all their children to reach their potential. Inclusion in schools is also viewed as an ongoing developmental process rather than as a static state. This implies that all schools can continue to develop towards greater inclusion whatever its current state, in order to respond to diversity. Thus, according to Sebba and Ainscow (1996), inclusion is better defined as *a process by which a school attempts to respond to all students as individuals by reconsidering its curricular organization and provision and through this process, the school builds its capacity to accept all students from the local community who wish to attend and, in so doing, reduces the need to exclude pupils* (p. 9). A definition of inclusion as a process of responding to diversity would be more relevant and applicable for all schools and would be differentiated from integration, which is seen as focusing on helping a particular category of students fit into the mainstream (Sebba & Ainscow, 1996).

Integration was the main issue of discussion in the provision of appropriate education for children with disabilities until the end of the 1980s when inclusion captured the field during the 1990s (Vislie, 2003). Integration is based on the deficit model, and is primarily concerned with the physical placement of learners from special schools to mainstream school. It is linked to the notion of readiness, which implies that students need to become *ready for* accommodation by the mainstream (Blamires, 1999). In the integration model, the main issue was of students having the necessary skills and attributes to literally *fit into* the mainstream school. Inclusion, by contrast is based on the social model, which is about the child's right to participate and the school's duty to accept. It is the school's duty to provide the necessary supports and modifications to meet the child's needs.

Studies on inclusive education have revealed that the interaction of certain key factors determined the success of inclusion (Avramidis & Norwich, 2002; Fox, Farrell & Davis, 2004; Lipsky & Gartner, 1998). From the administrative perspective, a clear and well-defined single set of policies that support communities, schools and education systems in reaching out and responding to the full diversity of learners is fundamentally important for supporting the implementation of inclusion (Booth, 1999). Separate policies for special education and general education are said to perpetuate exclusion of students with special needs from the mainstream as they foster the notion that a separate special intervention system is required to look after the needs of students with SEN (Booth, 1999). In addition to a cohesive policy on inclusive education for all, appropriate quality support and resources, which are managed and organized effectively, are fundamentally important for the successful implementation of inclusion (Fox et al., 2004; Lo, 2007). Support refers to extra resources such as suitable funding, facilities, equipment, and teaching materials (Lo, 2007). However, the most important resource is still adult resource, which consists of teachers with knowledge, and expertise to handle the pedagogical challenges rose by inclusive education, and according to Farrell (2001), trained supportive personnel. In addition to adequate support and resources, attitudes of stakeholders have much to do with success (Avramidis & Norwich, 2004; Lo, 2007). Collaboration between general and special education teachers as well other stakeholders is identified as the main factor for successful implementation of inclusive education (Lipsky & Gartner, 1998). Certain factors such as the nature and severity of the disabling condition, and the teachers' experience in resolving problems related to special education have also been found to influence teachers' attitude towards inclusion (Avramidis & Norwich, 2002). The efforts to support inclusion are quite significant; hence some special educationists such as Hallahan (2002) have raised concerns about the ability of schools to implement effective inclusion programmes.

Purpose of Research

The purpose of this research is to provide a descriptive snapshot into how individual cases from three different countries: the UK, the Netherlands and Malaysia are currently embracing inclusive education. This research is very small-scale and limited in scope; hence no attempt is made to compare the cases across the three different countries. Instead this paper attempts to describe the different strategies of practising inclusive education based on individual cases from the three different countries. In order to achieve this purpose, a brief outline is given of recent inclusive education policy developments in these three countries, and subsequent individual cases of inclusive practices in primary schools in the three countries are illustrated.

According to Reynolds and Ainscow (1994) the development of special education provisions in western countries has followed a certain pattern, that from separate special schools to increasing

emphasis on integration and now to the emergence of inclusive schooling (Sebba & Ainscow, 1996). It would be ideal for the less developed and economically poorer countries in the other parts of the world whose primary concern is still to provide education for all to leapfrog straight into inclusive schooling, thereby bypassing the developmental pattern as experienced by the west. However, the reality is that even in less developed countries, segregated special education provisions are already in place and once a separate system exists, there is no other choice but to follow the developmental progression towards inclusive education as is seen in the west. It is hoped that by looking into examples of inclusive practices in different countries, insights into how different educational organizations adapt themselves to the movement of inclusive education will be better understood.

Method

A small-scale multiple case studies methodology is employed. The author, a researcher from Malaysia, was given a fellowship to study inclusive practices in the UK and the Netherlands for a brief period of time. Due to practical constraints of time and language, the host universities in the UK and the Netherlands prearranged the school visits. The initial plan was to visit a school from each of the different countries. However, due to the constraints of language (the researcher does not know Dutch), another method of data collection was employed in the Netherlands. In the Netherlands, the author tracked a bilingual itinerant specialist special education teacher for two days as she visited schools under her jurisdiction. The difference in the data collection methods means that comparison across cases is not possible and –a limitation of this small-scale research study, which the author readily acknowledges.

In the UK, the host university identified a primary school with a history of inclusive practices. The school in UK is a primary mainstream school in southern London which is well-known locally for promoting inclusive practices. The school has a population of about 350 students. The majority, largely from lower economic backgrounds, consists of students with English as an additional language. In Malaysia, the school identified is a primary mainstream school in northern Malaysia which has an integrated programme for students with cognitive disabilities. The school has a population of about one thousand students, including about 30 students with SEN in a special class. The school was chosen based on the fact that there was a student with special needs who is currently fully included in the mainstream. The number of schools practising full inclusion is still very much limited in Malaysia. The principal method of data collection in the UK and the Malaysian case study schools was through semi-structured interviews with a sample of teachers and support staffs. As more personnel are involved in the provision of special needs in the UK, the interviews spanned three days whereas those in Malaysia were completed in one day. All interviews were individually carried out. Generally, each interview lasted around 40 minutes. Data was also collected through informal non-participant observations. In both the UK and in the Malaysian schools, the author observed the class for 80 minutes. Table 1 summarizes the respondents in the UK and the Malaysian case study schools.

Table 1
Respondents in the UK, Malaysia and the Netherlands

Country	Respondents
UK	Headmistress, Year 1 class teacher, a nursery teacher, a teaching assistant, a special educational needs coordinator, a learning mentor program coordinator, gifted and talented program teacher
Malaysia	Deputy headmistress, Head special education teacher, Year 2 class teacher
The Netherlands	Itinerant specialist special education teacher

In the Netherlands, a different data collection procedure was implemented. Data was collected by tracking a bilingual itinerant specialist special education teacher from Den Haag for two days as she visited schools under her jurisdiction. The itinerant special education teacher was chosen by the host university because of her vast experience in supporting mainstream schoolteachers in inclusive practices and also because of her fluency in English. Data was collected through her narration and mostly confined to her job functions in the schools visited during those two days. Itinerant specialist special education teachers are experienced and trained special education teachers who are attached to special education regional centres in the Netherlands. Their job function is to provide support to regular schools having students with special needs. The itinerant specialist special education teacher in this case study is hereupon known as Diane. Diane is attached to a regional center that serves students with learning disabilities.

Detailed field notes were taken during interviews and observations in all the three countries. As was described by Gay, Mills and Airasan (2006), the field notes in this study contained both descriptive information of what the researcher had seen or heard on-site as well as reflective information that captured the researcher's personal reactions and thoughts during the recording process. Data collected was analyzed according to the 'three levels' model advocated by Miles and Huberman (1994). Data was coded, patterns were identified, and finally propositions were developed.

According to Tellis (1997), construct validity is especially problematic in case study research. In this study, some of the strategies used to counteract this problem include the use of multiple sources of evidence and the review of draft reports by key informants. A lecturer from the host university in the Netherlands read the draft report for the Netherlands schools as later attempts to contact the itinerant special education teacher were unsuccessful.

The Case of the UK

A Brief Outline of Recent Inclusive Policy Developments in the UK

In the UK, the principle of integration into mainstream school as beneficial for students with SEN was firmly established in the 1981 Education Act (Lloyd, 2000). More recently, the UK government's stance on inclusion was endorsed in the Green Paper, *Excellence for All Children: Meeting Special Educational Needs* (DfEE, 1997). In addition to that, the policy on inclusion has been strengthened further in the subsequent *Programme for Action* (DfEE, 1998). The Green Paper covered an impressive framework for gradual change, including sections on policy, parents, support, inclusion, planning, development of skills, and inter-agency cooperation (Thomas & Vaughan, 2004). The Green Paper supports the UNESCO's 1994 *Salamanca Statement and Framework for Action* and it offers a number of practical steps to promote greater inclusion in regular schools for students with SEN. With the *Special Educational Needs and Disability Act 2001* (DfES, 2001a), there is an emphasis on stronger rights for children with SEN to be educated at mainstream schools. The Act seeks to enable more students with SEN to be included successfully within mainstream education. The *Special Educational Needs Code of Practice* (DfES, 2001b) was developed to provide practical guidance on policies and procedures to all stakeholders. This Code of Practice provides a clear framework for identifying, assessing and meeting students' needs. A statutory guidance on inclusive schooling has also been developed to provide practical advice on the operation of the new inclusion framework. In 2004, the government's strategy for SEN, *Removing Barriers to Achievement*, was developed to drive the inclusion agenda (DfES, 2004). This strategy provides sustained action and review in four key areas: early intervention, removing barriers to learning, raising expectations and achievement, and delivering improvements in partnership.

Given the legislation and policies enacted, there can be no doubt about the commitment of the UK government towards the promotion of inclusion and participation of students with SEN in mainstream education. However, the above policies have been severely criticized (Lloyd, 2000; 2008). In critiquing the Green Paper, Lloyd (2000) pointed out that inclusion is still presented in the Green Paper as a simplistic matter of relocation, resourcing and minor adjustments to current curriculum and does not adequately address the wide range of issues in inclusion such as social justice, equity and responding to diversity. Inclusion is still seen as a process of achieving to the same level of curriculum in mainstream rather than having a curriculum that is able to respond to diversity. According to Lloyd (2008), the government's strategy for SEN still fails to recognise the complex and controversial nature of inclusion as it is still founded on notions of normalization, compensation and deficit approaches.

An Example of Inclusive Education in the UK - A Primary School in Southern London

Seventy-seven students are identified as having SEN in this school. However, only five of these students have SEN statements. A statement is prepared only in cases where a student's needs cannot be adequately provided within the resources normally available in schools. With an SEN statement, the students will have access to government funding and resources. The five students' special needs are in speech and communication, specific learning, social and emotional, hearing impairment and visual impairment.

From the data gathered at the school, awareness of school staffs on policies that support inclusion and the guidelines in the *Special Educational Needs Code of Practice* (DfES, 2001b) are strong. The school staff is accepting of inclusive practices and the school's inclusive ethos is echoed by many of the staff. The sentiments of most teachers are reflected in the statement made by the Year 1 teacher: *We don't*

want to fail and will do the best we can to include the child. Another respondent expressed thus: *we teachers don't want to give up*. Generally, there is an open attitude towards learning of new strategies to respond to inclusion in the school. However, there is evidence from the data to suggest that inclusion is still seen as child-specific rather than as a norm. According to all the respondents, the success of inclusion is based on a *case-by-case* basis and is dependent on *each individual child*. Even though the teachers and support staff showed willingness to do their best to include students with special needs, they still express reservations about full inclusion because of the wide spectrum of disabilities. Based on their previous experiences, they are concerned that the needs of some students with SEN, especially students with emotional and behavioral disorders might not be met in school. The Year I teacher described the case of an autistic child who was not successfully included in her class despite effort and support from many sources. However, as stressed by the headmistress, the success of inclusion is *child-specific* rather than *disability-based*. It can be said that even though there was a supportive inclusive culture in the school, the respondents interviewed are of the opinion that special schools still have a role to play.

As recommended in the *Special Educational Needs Code of Practice* (DfES, 2001b), the school adopted a graduated approach towards provision of students with SEN. Students with SEN are supported by the school under the School Action and School Action Plus Programmes. The school responds to diversity by having in-house programmes such as the Reading Recovery Programme to support students with additional literacy needs, a gifted and talented programme which specializes in helping students with English as an additional language and a Learning Mentor Programme to support students with behavioral needs. The students identified with SEN in the school receive support from these programmes, which are actually set up to respond to the needs of the whole school. Furthermore, additional resources are also provided by external agencies such as the Local Education Authority and the Child and Adolescent Mental Health Services. However, the long waiting periods for such services from these external government agencies have prompted the school to be proactive in sourcing expertise from the private sector. According to the headmistress, the school is buying into additional specialist services in literacy. Specialists from the private sector will teach students with SEN on an individual basis, and these skills are also taught to the school staff that supports the students with SEN in their classes. As expressed by the nursery teacher, this support has a trickling effect as skills learnt from specialists to help the students with SEN have also benefited the other students in the class.

One of the primary concerns of the school is to have the students statement as early as possible as the process of getting a student statement is seen as long and tedious, and involving a lot of paperwork. According to the SEN coordinator, a statement of SEN will bring in the required funding to buy into additional resources and support for the student concerned. This process is described by the SEN coordinator as akin to that of *selling a product* to the local education authorities as it involves a lot of negotiation and takes approximately a year before it can be finalized. The school staff collaborates to collect as much supporting data to present their case to the Local Education Authority. The special education coordinator sees her major work as one of bringing in funding and resources to support the child. Most have the respondents view funding and resources as of primary importance for successful inclusion. According to the learning mentor, *unless you have all the resources, it is not going to succeed*. Another respondent, the gifted and talented program coordinator, feels that the resources and funding currently provided for special schools which are being closed down should be channeled back into the mainstream schools to support inclusive practices. The nursery teacher also echoes the importance of resources: *Teachers are willing to try but will need support*. Most respondents view adult support in the classroom provided by learning support assistants as the most important resource. In addition to learning support assistants, other resources rated as important in promoting inclusive practices in the school include the availability of physical resources and specialist services. Examples of physical resources include visual aids and a special accommodation desk obtained through external agencies for the student with visual impairment. The classroom for the student with hearing problems has also been specially renovated to reduce echo effect.

The Case of the Netherlands

A Brief Outline of Recent Inclusive Policy in the Netherlands

Until about 15 years ago, special needs education in The Netherlands was a highly differentiated system consisting of 14 separate school systems (Andrews, 2002). However in the 1980s, there was great concern that this highly differentiated system had gone too far. Since then policies have been introduced to try to streamline this highly differentiated special needs school system towards a more inclusive system of education. Development towards inclusion in the Netherlands has been largely

influenced by two policies (The European Agency for Development in Special Needs Education, 2005). The first, a policy document *Weer Samen Naar School* (WSNS) [Together to School Again] was enacted in 1990 to make a fresh start in integrating students with learning difficulties and students with mild mental disabilities into mainstream schools (The European Agency for Development in Special Needs Education, 2005). Under this WSNS policy, all primary schools and special schools for children with learning disabilities or mild mental disabilities have been grouped into regional clusters. A separate line of policy development has been developed for the education of students with other types of special needs. The different special school types have been re-organized into four expertise centers: those for students with visual impairment, those for students with hearing and communication disorders, those for students with physical and mental impairment and those for students with behavioral and emotional problems (The European Agency for Development in Special Needs Education, 2005). Second, the *back-pack* policy was enacted in 1996 to link the funding of special services to the students involved regardless of the type of schooling (The European Agency for Development in Special Needs Education, 2005). Under this *back-pack* policy, students take funding with them to the school of their choice. When a student has a statement of special needs, parents have a choice to place their child either in regular schools or in special schools. If the option of inclusive education is chosen, the *back-pack* follows the child (Koster, Pijl, van Houten & Nakken, 2007). The *back-pack* is determined based on the student's special needs. Generally, it consists of services provided by an itinerant specialist special education teacher (peripatetic teacher), about 700 Euros a year and about three hours of teaching assistant support per week.

The changes in the special educational structure of the Netherlands to spearhead inclusion were brought about within a short period and the outcome is a complex system of special needs provisions with different and overlapping pathways which can be quite confusing to both the parents and the teachers. A substantial number of mainstream and special education teachers as well as some parents whilst not rejecting in principle the push towards inclusion, still believe that students with SEN are better off in the highly differentiated system (The European Agency for Development in Special Needs Education, 2005). The Open Society Institute report (2005) revealed that a significant number of children with disabilities in the Netherlands remain in special schools. Data gathered by Houtveen and Van de Grift (2001) indicated that even though the frequency with which teachers used differentiated instruction, remedial teaching and resource classes increased with inclusion, the temptation was still to adhere to the old practice of pull-out service delivery systems. It appeared that a special education system was developing within the regular education schools. They concluded that although the Dutch inclusive education reform efforts showed good potential, the reforms were still not fully realised.

An Example of Inclusive Education in the Netherlands- Three primary schools in Den Haag

The job function of the itinerant specialist special education teacher is to support teachers having students with special needs in regular schools. In order to achieve this goal, the specialist special education teacher in this study, Diane, needs to play multiple roles. She may act as an advisor, trainer or coordinator as is deemed fit. The role she plays to support inclusive education is best illustrated by the support she gave to three of the schools under her jurisdiction. These schools were schools in her schedule during the two days that the author visited. Her roles during the school visits are described in the section below:

School with a curriculum geared for high ability students

In this school, Diane's client was a child with epilepsy who has learning problems. The parents of this child to help include the child in the high curriculum school approached her. As it was the first case of inclusion for this school, the school staff was generally apprehensive. Diane initiated meetings with the parents and the school staff in order to ease the apprehension of all concerned. The child was included into the school's nursery class on a trial basis. In order to support this child and the teachers in the school, Diane initiated Student Assistance Team Meetings once a month with the parents, teachers, teaching assistant, the head teacher and the child's private speech therapist. The purpose of these meetings was to discuss issues that arose and to seek solutions collaboratively. Diane encouraged open dialogue, shared decision-making and responsibility at these meetings. The researcher had the opportunity to attend the sixth meeting with the team and Diane anticipated that only one more meeting would be required as the teachers were now able to cope on their own. In this instance, it can be seen that Diane had played the leadership role. She provided the leadership that held all parties together to work towards a common goal, viz. the successful inclusion of this child. Her ability as a mediator and coordinator in this collaborative effort provided the teachers with the confidence and reassurance to play their roles effectively. Diane's resolve, guidance and conviction made this case a successful one.

She had the respect of the parents and the school to hold this team together for the child. Diane's goal was to provide support until the teachers were able to be independent. It was quite clear from this case that Diane had succeeded with this child, as the school is now receptive and more empowered to provide inclusive education for the child. Diane had hoped that the success of this case would pave the way for more inclusive cases in this school. However she was disappointed as the school still views inclusion on a case-by-case basis and is still resistant towards including other students with special needs.

Christian Montessori School

In this school, Diane played a different role in promoting inclusive education. Her task in this school was to provide direct assistance to help the teacher develop a repertoire of skills that would enable the teacher to support a student with SEN in her class. The method used by Diane to achieve this is called Video Interaction Guidance (VIG). Harrie Biemans and his team developed VIG in the Netherlands in the early 1980s as a way of supporting family/child interactions (Brooks, 2002). In the VIG method, the video interaction guider takes the interaction of the participant. The video is then analysed by the guider to look for best examples of interaction. The guider and the participant then view the clips together and discuss them. The process is repeated until agreed success is achieved (Brooks, 2002). In this study, Diane did a video recording of the teacher in her natural classroom setting. The video was then analysed by Diane to identify positive and negative aspects of the teacher's classroom interaction that would help the teacher to support inclusion of the special needs student in her class. Diane then discussed her analysis of the video with a group of other specialist special education teachers who provided additional feedback. The video was then brought back to the teacher for discussion. In this particular case, Diane's analysis revealed that the teacher concerned needed to improve on her classroom management skills. Problems in the teacher's classroom, which had overwhelmed her, were generated by her lack of skills in creating a more structured and systematic classroom setting. Diane's task on that particular day was to discuss the results of her analysis with the teacher concerned. The intention was to make the teacher aware of the aspect in her teaching that required change and to empower the teacher to come up with her own solutions to the problems with guidance from Diane. This method would help increase the teacher's repertoire of skills to teach and manage an inclusive classroom. However, according to Diane, this particular teacher needed more video-interaction sessions, as she was still not that receptive to change. In her role as a trainer, Diane needed not only to have good communication skills but also to have the patience to exact change from a reluctant teacher.

A Muslim Primary School

On the second day of data collection, Diane visited a Muslim primary school to review cases of students with SEN. The Netherlands is known for its uniquely broad range of schools and educational systems and this school is an example of a school, which operates on the basis of the Muslim religion. The review process in this school was conducted with the school's special education coordinator, the class teachers and the private educational psychologist engaged by the school. Six cases were discussed on that day. The teachers presented cases of their student with SEN to the team and the team would suggest strategies that the teachers can use in their classroom to support their students with special needs. The cases of students with SEN are usually reviewed once every five weeks. According to Diane, generally there is still a lot of teacher resistance in accepting students with disabilities as teachers still hope that by presenting their cases, these students will be placed into the special school systems. In addition to playing the role of advisor in such meetings, Diane had also initiated a program to bring in related services. She had previously organized for speech and language services to be provided on site at the school during school hours. The speech and language services are provided by an institute and are paid through the parents' insurance policies. The teachers and the learning support assistants would sit in during the individual sessions and practise the skills with the child over the week. In this way, there is transference of skills from the specialist to the schoolteachers.

As seen above, the itinerant specialist special education teacher was instrumental in bringing about change to the schools under her jurisdiction through her ability to respond to the needs of the different schools. Her multiple roles include being an advisor, a trainer, an organizer as well as a collaborator.

The Case of Malaysia

A Brief Outline of Recent Inclusive Policy Developments in Malaysia

In Malaysia, the primary concern of the government is still at a fundamental level of providing compulsory primary education to all children (including children with SEN) rather than emphasizing inclusive education. Towards this end, one of the more recent legislation that has been enacted is

concerned with making primary education compulsory for all children including children with SEN under the *Compulsory Education Regulations, 2002*. Another current legislation worth mentioning is the *Persons with Disabilities Act*, which was enacted in 2008. Inclusive education was mentioned in this Act. However, there is no compulsion for schools to abide by the guidelines. Presently, special education in Malaysia is provided through three different institutions, namely the Ministry of Education, the Ministry of National Unity and Social Development [Department of Social Welfare] and various non-government organizations. The Ministry most concerned with inclusive education is the Ministry of Education. Special education in this Ministry is provided for under the *Malaysian Education Act (1996)*. Provisions of inclusive education under the Ministry of Education have progressed along disability categories. Students with learning difficulties such as dyslexia are educated in the mainstream with additional literacy support from pull-out programmes. Students with visual impairments especially in secondary school are educated in the mainstream with additional support from resource teachers. Students with intellectual and/or behavioral disabilities are educated in special education classes that are in normal mainstream schools (Integrated Programme for Learning Disabilities). Students in this programme include students with cognitive disabilities, students with autism, and students with attention deficit hyperactive disorders as well as students with other forms of disabilities, which require special education provisions. Generally, the practice of inclusive education in Malaysia refers to the selective placement of students with SEN from this Integrated Programme for Learning Disabilities into regular mainstream education classes. Even though, there is currently no legislation that focuses explicitly on inclusive education in Malaysia, it has been the policy of the government to encourage inclusive practices at the school level. Attempts have been made by the government to include students with cognitive disabilities into mainstream classrooms (Zalizan, 2000). In general it was also found that teachers have positive attitudes towards inclusive education (Manisah, Ramlee & Zalizan, 2006). Recently, there has also been collaborative effort between the Special Education Department, Ministry of Education and a non-government organization to include students with autism from the non-government organization into regular education schools.

An Example of Inclusive Education in Malaysia -A Primary School in Northern Malaysia

The school has three special education programs under one roof. They are the Integrated Programme for Learning Disabilities, the Dyslexia Programme and the Remedial Education Programme for students in mainstream education requiring additional support in literacy and numeracy. There are about 30 students in the Integrated Programme for Learning Disabilities and currently only one child from this program are fully included into a regular mainstream class. The student is hereupon named Ali. Ali is ten years old and has been diagnosed with autism.

As is reflective of practices throughout Malaysia, the regular education teachers and the special education teachers in the case study school currently see their roles as discrete with clear boundaries. There is a clear understanding that if a student is placed in mainstream classrooms, then the regular education teacher will take full responsibility for this particular student. The role of the special education teacher in terms of inclusion is to get the student *ready* to be placed in regular classes. This interpretation of inclusive practice is described in literature as integration, the more traditional form of including students with special needs. The special education teacher recommended inclusion based on two criteria: that the student is intellectually *ready* for academic learning in the classroom and that the student is behaviorally *ready* to follow the formal structure of classroom learning. Ali has been in the Integrated Program for three years before being included into a regular class of eight-year old students. At the time of data collection, Ali has been in the regular class for five months. The regular education teacher has assumed full responsibility for Ali's learning. Transition from the special class into the regular class has been smooth, aided by the fact that Ali is still in the same school environment. The school already has a policy of including students with SEN in their daily activities such as in school assemblies and class competitions. In addition to the regular education teacher taking full responsibility for Ali's learning in school, the cooperation of parents was also sought. According to the deputy headmistress, the school requires that the parents take responsibility for ensuring that Ali completes his homework.

According to the regular class teacher, Ali is coping very well in class. Academically, he is currently ahead of the other students in his class. This means that no additional accommodation strategies are required on the teachers' part. His academic success has prompted his teachers to recommend that Ali be promoted to a better class next term. Socially, Ali has also been coping well. Even though he does not initiate communication with his peers or with his teachers, and is mostly quiet, he will respond when prompted. When his classmates initiate conversation, he will reply but the interaction is short as

he is unable to engage in further conversation with them. Periodically, when his attention strays, his teacher will bring his attention back by calling out his name. It can be said that the success of Ali's inclusion has changed his teachers' attitude and perception of students with special needs.

Limitation of Research

The limitation of this research is that it is a very small-scale case study, which is very qualitative in nature and thus cannot provide sufficient evidence to make larger scale transferable or generalisable claims. As different data collection procedures were used in the different countries, direct comparison across cases has to be restricted. Finally, the cases from the different countries serve to illustrate snapshots of inclusive practices and do not claim to be representative of inclusive education in a particular country.

Discussion

It would appear that policy developments on inclusive education in the UK have gone through a longer maturation process, which is reflected in its clearer implementation pathway. Research has shown that a clearer and more cohesive legislation is more supportive of inclusion (Booth, 1999). The Netherlands, in its enthusiasm to push for an inclusive agenda has made drastic changes to its educational and inclusive policies within a short period of time, which has resulted in an imbalance between policy and actual practice. The cases in the Netherlands provide an insight into the global struggle between philosophical ideals and practical implementation. Both teachers and parents have yet to catch up with the inclusive educational policies after decades of segregated special educational provisions. In Malaysia, basic educational policies and special education policies are still supported by different government and non-government organizations as current resources and structure in the Ministry of Education is still not adequate to provide education for all students with disabilities in the mainstream. As a clear well-defined single set of policies is important for supporting the implementation of inclusion (Booth, 1999), it might be a while before inclusive education is a mainstay of education in Malaysia.

Based on the case study school in the UK, inclusive education is interpreted as supportive funding, resources, and specialized services. In fact, the UK teachers see funding and resources as critical for inclusive practices, without which inclusion is deemed to be unworkable. This overdependence on resources is reflective of the criticism raised by Lloyd (2000) in that inclusion is currently seen as a simplistic matter of relocation and resourcing rather than as a fundamental issue of responding to diversity based on social justice and equity. However, the effort taken by the UK school in this study to provide a myriad of specialized services, which caters for all students including students with disabilities, is a good example of responding to student diversity. The school has attempted to maximize available supports, resources and funding to accommodate diversity among students with different ability, ethnic, language and economic backgrounds. Despite such valiant efforts, the school acknowledges that they have not been successful with all students with disabilities.

In the Netherlands, there is a strong political will by the government to push for inclusive education. The struggle between policy and implementation as is highlighted by Florian (1998) is quite evident in the cases seen in the Netherlands. Instead of focusing on bringing in more funding and resources as in the case of the UK school, the case studies in the Netherlands reflect a greater emphasis on teacher change and belief systems. The use of VIG is a good way to positively reframe the classroom teachers' perceptions on inclusive education and in the process empower classroom teachers to handle the pedagogical challenges raised by inclusive education. There is no denying that the focus on attitude change among classroom teachers is more sustainable and effective in the long run. However the process of exacting change in attitude is inevitably a slow process. Change can be achieved if teachers experience enough successes with special needs students. The multiple roles played by the itinerant specialist special education teacher are to support classroom teachers in order to experience such successes. The highly differentiated special education system in the Netherlands has produced a pool of experienced special education experts that are now sought after to bring about teacher change in the regular schools. However, the case studies in the Netherlands reveal that the success of inclusive practices is too dependent on the effort by an individual, the itinerant specialist special education teacher.

In Malaysia, key factors identified from literature that are found to encourage inclusive education such as clear policy statements, availability of resources, multi-agency collaboration and specialized services are either non-existent or seriously lacking. In addition, teachers have to contend with big class sizes.

Hence it is inevitable that the approach is still one of integration, which implies that the child needs to become ready for accommodation into the mainstream. Currently, it will not be to the child's benefit to be included in a classroom, which is not supportive of the child's needs. With the lack of key factors identified in literature, other localised factors seem to play a part in the success of the Malaysian child. The transition into regular classes was much easier for the child because the child was already in the same school environment. In addition, the regular education teachers' openness to assume full responsibility for the included child is a plus factor. However, the laid-back way of responding to inclusion in Malaysia severely limits the quantity of success. In the case study school of about one thousand students, with about 30 students with cognitive and/or behavioral disabilities, only one student is currently fully included.

Implications

This study, even though very small-scale, illustrates that the movement towards inclusive education is one that is full of complexities without any easy answers (Farrell, 2000). As highlighted by Sebba and Ainscow (1996), there appears to be a wide interpretation as to what inclusive education is in the different schools. Each case highlights real difficulties and reservations about inclusive education. Each case also highlights different sets of factors that are in place to embrace inclusive education. It is quite obvious that what works for a certain case might not be applicable to another. Even though there is convergence in the philosophical roots of inclusive education, the practice of inclusive education has to be seen from within the context of each organization. This is because success depends on the ability to harness the current strengths of a particular organization to support inclusive practices. The strengths could be a set of key factors already identified in literature such as resources or a set of factors that is localised such as in the case of the Malaysian case study school.

The study also lends credence to the notion that inclusion is an ongoing developmental process rather than a state (Sebba & Ainscow, 1996). Looking at inclusive education as a process, it is one of identifying the strengths and the barriers to inclusive education in a particular context and developing the strengths in the system to overcome the barriers. In each of these cases certain barriers could be quite easily removed to encourage the inclusive process. In the Malaysian case, collaboration between the special education teacher and the regular education could be further encouraged. Currently, only students which are deemed *ready* are recommended for inclusion, but with collaboration, that *ready* line could be pushed lower so that more cases could be included. Research has identified collaboration between special education and regular education teachers as one of the key factors of inclusive education (Lipsky & Gartner, 1998). Recently, teaching assistants have been introduced into special education programs in Malaysia. This adult resource can be utilized to support more students with SEN in regular classes. In the UK case study, with less need to struggle for resources, the focus could shift to the more fundamental belief issues of social justice and equity. In the Netherlands case studies, factors other than the provision of itinerant specialists could be further explored to expedite the current gap between philosophical ideals and actual practice.

Even though this study refrains from attempting to compare across cases, there is still one common factor or thread seen among all the cases in the three countries. In all the cases illustrated, inclusion is still seen as *child-specific* and success measured on a case-by-case basis, regardless of the availability of resources or support. In other words, inclusive practice is still seen as a selective process, which is still more in line with the previously held notion of integration rather than of full inclusion. The ability of schools to implement inclusive programmes as one of responding to diversity of all students is still wrought with reservations and difficulties.

In conclusion, this study provides a snap shot into how different schools from different countries actually interpret and embrace inclusive education. The individual cases illustrate what works for one organization does not necessarily work for another and hence inclusive education should be interpreted as an ongoing developmental process based on adaptation of current situational contexts. However, awareness of how different organizations embrace inclusive education could serve as insightful examples for administrators, teachers and parents to reflect on ways to encourage greater inclusion within their own organizations.

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