A Comparative Analysis of Access to Education for Students with Disabilities in Brazil, Canada, and South Africa

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Abstract

Access to education for children with disabilities remains a significant challenge in many countries despite international agreement of its importance. This paper describes results from a comparative analysis of education for students with disabilities in Brazil, Canada, and South Africa with a focus on how differences in disability policies, pedagogy, professional development for teachers, and sociocultural factors shape access to schooling in these three countries. The paper also reviews relevant literature to discuss how structural and cultural barriers can exacerbate exclusionary practices. The analysis highlights ways that these countries and others can increase participation in society and enhance quality of life for individuals with disabilities.

Key Words: Access to Education, Disability, Brazil, Canada, South Africa

The Salamanca Statement declares that every child has a basic right to education and recognizes their unique characteristics, interests, abilities, and learning needs (UNESCO, 1994). This declaration challenges governments to invest in early intervention strategies and develop inclusive education principles in legislation and in policy implementation. In a similar vein, the Convention on the Rights of Persons with Disabilities (CRPD)(UN, 2006) is presented as a non-discriminatory agreement among signatories to provide transformative changes in inclusive education and improve educational practices for individuals with disabilities (Winzer & Mazurek, 2014). In Article 26 of the Universal Declaration of Human Rights (UN, 1948), the United Nations emphasizes that all individuals have the right to education. Despite these international agreements over the last 60 years, access to education for students with disabilities across the world continues to be an area fraught with challenges and little progress.

As countries continue to grapple with the realities of inclusive education, challenges may vary across the different education levels (e.g., students, classrooms, schools), teaching areas (e.g., curriculum, pedagogy), and for demographic groups (e.g., ethnic minorities versus majority and female versus male). A multidimensional comparative analysis framework is needed for a comprehensive examination of possible micro and macro factors that are inherently complex in education systems (see Bray & Thomas, 1995). This framework can lead to the development of heuristics situated in local contexts that are organically developed to answer questions that directly impact students with disabilities in specific settings. These questions include how to improve access to schools, what type of disability legislation is effective, which funding formulas are optimal, and how to improve accountability.

In light of these tensions and challenges around improving education for all, this paper examines access to education for students with disabilities in Brazil, Canada, and South Africa. This comparative analysis focuses on (a) disability legislation and policies, (b) pedagogy, (c) access to services and resources, (d) professional development for teachers, (e) perceptions on disability, and (f) sociocultural challenges. In addition, this comparative analysis identifies initiatives and strategies that exist in the three countries to

increase access to education for students with disabilities. Such initiatives can benefit policy makers and various stakeholders (e.g., school leaders) tasked with the implementation and attainment of Education for All (EFA) (UNESCO, 2000) or the Millennium Development Goals (Millennium Project, 2006). To summarize, this comparative analysis seeks to answer the following questions:

1. What is the current status of access to education for students with disabilities in Brazil, Canada, and South Africa?
2. What barriers impact the realization of access to education for students with disabilities in these three countries?

Lastly, the paper discusses possible transferrable lessons regarding access to education for students with disabilities from the three countries.

Rationale for Comparing Brazil, Canada, and South Africa

On the surface, Brazil, Canada, and South Africa may seem to have little in common in terms of education systems. However, the three countries share similarities that can provide insight into existing challenges and potential solutions in improving access to education for students with disabilities. At the same time, due to clear contextual and cultural differences, there are caveats when making any comparisons. One shared attribute among the countries is their involvement in international agreements to provide education for all students. To this end, the three countries are signatories of the CRPD in 2008, 2010, and 2007, respectively. Second, Canada is a member of the Organization for Economic Cooperation Development (OECD), while Brazil and South Africa are termed as non-member countries (OECD, 2017). The criteria for membership in the OECD include: an open economy, a pluralist democracy, and respect for human rights. Although the criteria for participating in the OECD are not without controversy, the direct participation by Canada and indirect participation in OECD projects by Brazil and South Africa reflects the acknowledgement by international bodies of these countries' efforts to provide quality education and long-term economic development. Third, while there are cultural and linguistic differences across the three countries, there is significant diversity within each country that provides an opportunity to examine how marginalized groups in different contexts interact with exclusionary policies and practices. Fourth, Brazil, Canada and South Africa share decentralized education systems that may impact decision-making and policy implementation in education. Lastly, the contrast in resources among the three countries can provide insight into how governments provide quality special education services for children with disabilities.

DEMOGRAPHIC BACKGROUND

The three countries vary widely in terms of geography, ethnic diversity, economic development, and inequality. Brazil is the world's fifth largest country geographically, while Canada is second and South Africa ranks 25th (World Bank, 2016). Economically, Brazil is currently faced with some instability and high inflation rates, but experienced economic growth from 2003-2013, as shown in Table 1. The country also has a high level of income inequality as indicated by the Gini coefficient. In contrast, Canada has one of the largest economies and has experienced solid economic growth and low levels of income inequality. South Africa is an upper middle-income country and has a Gini coefficient showing high inequalities in the country.

A BRIEF HISTORY OF SPECIAL EDUCATION IN BRAZIL, CANADA, AND SOUTH AFRICA

Special education in Brazil has evolved since 1600 when the first school for the individuals with physical impairment was established. This was followed with the establishment of the first school for children who are blind in Rio de Janeiro in 1854 and the first institution for the deaf in 1856 (Lin, 1987). More than a century later, a rethinking of the special education field emerged in the 1980s following a call to democratize the teaching and learning process (Glat & Ferreira, n.d). In the late 1950s and early 1960s, special education services were provided in institutions. These were followed with the establishment of special schools, which preserved the status quo because the schools were not required to undergo any profound modifications (Lin, 1987). In 1989, Brazil implemented an inclusion policy in its new constitution that changed the nature of services for students with disabilities and emphasized their social integration into schools (Santos, 2001).

In contrast, special education in Canada started in mid-1800s with specialized schools for individuals with visual impairments (Dworet & Bennett 2002). Currently, educational decisions are under provincial jurisdiction, which means a student's right to educational services is acknowledged by a province, as opposed to explicit guarantee in Canadian legislation (Shah, 2010; Towle, 2015). The Charter of Rights and Freedoms mandates the provision of equal treatment under the law without discrimination based on disability (Disability Rights Education and Defense Fund, 1982). In particular, much attention has focused on the education of First Nations students. First Nations are the original inhabitants of Canada, often referred to as *Indians* (Government of Canada, 2014). Prior to 1980, First Nations students with special needs attending First Nations schools were not afforded any funding by the federal government. They also received the least amount of money from the Indian and Northern Affairs of Canada, which left families with little choice but to move to private schools or the provincial schools away the reserves

Table 1

Demographic, Educational, Social and Economic Measures of Development on Brazil, Canada, and South Africa

	Brazil	Canada	South Africa
Former colony	Portugal	Britain	Britain
Area (sq. km)	8,515,767	9,984,670	1,221,037
Population (2016)	207,652,865	35,151,728	55,908,900
Ethnic groups	47.73% White	76.7% White	80.2% Black
	43.13% Multiracial	14.2 % Asian	8.8% Colored
	7.61% Black	4.3% Aboriginal	8.4% White
	1.09 % Asian	2.9% Black	2.5% Asian
	0.43% Amerindian	1.2% Latin America	
		0.5% Multiracial	
		0.3% Other	
Official languages	Portuguese	English and French	11 languages
Gini coefficient	51.48	33.68	63.38
Children with disabilities (5-14)	468,601	173,180	609,671
Percent of students with disabilities in school	0.71%	40%	7.6%
Locus of decision making	Decentralized	Decentralized	Decentralized

Note. Sources: Brazilian Institute of Geography and Statistics (2010; 2016); Statistics Canada (2013; 2016); Statistics South Africa (2016); World Bank (2016); World Health Organization (2011).

(Philips, 2010). The increased awareness of a need for a comprehensive special education program throughout Canada for First Nations students with special needs gained momentum in the 1990s (Philips, 2010). Despite these efforts, First Nations students do not have the luxury of a federal education law that mandates the provision of special education services and must depend on the provincial laws and policies. The government's responsibility in providing access to First Nations special education students in reserve or off-reserve schools is critical and underscores Philips' (2010) call for the explicitness of laws that acknowledge the First Nations students with special needs.

In South Africa, Muthukrishna and Schoeman (2000) note that, historically, education for a large population of learners was marked with extreme neglect where existing legislation and policy reified racial segregation and inequality. Education and support services were provided along racial lines, widening the inequalities between the African learners and White and Indian learners. Students with disabilities were offered a second system of education, separated from peers without disabilities. With the founding of a new government in 1994, initiatives were implemented to combat these discriminatory practices. Education policies focused on education as a basic human right, quality of education for all, equity, curriculum access, and rights of parents—all of which were included in The Constitution of the Republic of South Africa Department of Justice (1996). Currently, education for students with special needs is provided in special schools, full-service schools, and regular schools (Nel & Grosser, 2016).

It is important to emphasize that all three countries share a past enmeshed in discriminatory practices. In South Africa, the apartheid era came to an end in 1994 after a half century of segregation between non-White and White South Africans (Pather, 2011). In Brazil, policies were characterized by income and class segregation where children from low-income families and children with disabilities were unable to access similar educational opportunities as the wealthy. In Canada, the movement towards integration of students with disabilities into regular schools came to the fore in 1985 (Porter, 2008). In addition to a continued call for appropriate access to education for students with disabilities, students with special education needs enrolled in Canadian French immersion program seldom had access to special education programs and services available to their peers in regular English programs, forcing these students to transfer to different schools (Wise, 2011). Similarly, First Nations students had access to schools in the reserves but did not have access to special education services available in the provincial school systems (Philips, 2010).

Given the different historical developments in special education policies in Brazil, Canada, and South Africa, the countries provide an opportunity for a comparative analysis of their progress in providing access to education for students with disabilities. In South Africa, 70% of the student population with disabilities is not enrolled in school and the remaining percentage receives their education in special schools, which can be considered segregated settings (Donahue & Bornman, 2014). In Brazil,

census reports show 448,601 pupils (0.8% of the total of more than 50 million pupils) with special needs were enrolled in the basic education (i.e., mainstream) system in 2002 (World Health Organization, 2011). In Canada, 40% of students with disabilities have access to education, the highest of the three countries (see Table 1).

CURRENT CHALLENGES

In seeking to answer the research questions and provide a comparative analysis of access to education for children with disabilities, the paper will focus on current challenges in the following areas: disability legislation and policies, pedagogy, teacher professional development, access to resources and services, and sociocultural challenges.

Disability Legislation and Policies

South Africa is a signatory of the CRPD and is required to adhere to the mandates of the treaty that includes the protection of the rights of persons with disabilities through provision of equal access to education. Specifically, Article 24 mandates signatory countries to ensure opportunities for appropriate and inclusive education. The apartheid era (1948-1991) in South Africa was characterized by years of segregated education practices and lack of provision of special education services to students, particularly Blacks. In 1994, following the democratization of South Africa, the Department of Education made attempts to overhaul educational policies in an effort to combat discriminatory practices (Donohue & Bornman, 2014). In addition to eliminating segregated education, the White Paper 6 policy document on inclusive education in South Africa outlined that the provision of educational services for children with disabilities may occur in (a) mainstream schools for moderately disabled learners, (b) full-service schools which are adapted mainstream schools, and (c) special schools which are exclusive for learners with severe disabilities (Department of Education, 2001). The White Paper 6 seeks to yield long-term economic benefits for the society as students with disabilities become economically and socially empowered through an inclusive education (Murungi, 2015).

South Africa's enactment of policies for inclusive education is a significant step towards providing equitable access to education to students with disabilities. However, the implementation of these policies has faced challenges that have diminished their impact. According to Donohue and Bornman (2014), there is a lack of consensus on the definition of disability, making it difficult for stakeholders to articulate effective action. This ambiguity in discourse may lead to a lack of commitment in the provision of services. The lack of clarity with policy mandates leaves room for inefficiency, ambivalence, and accountability challenges.

Similar to South Africa, Brazil has put laws in place that focus on the provision of education services to students with disabilities. For instance, Public Law 1989 provided legal support and the National Policy of Special Education launched in 1994 promoted the protection and inclusion of students with disabilities in society (Santos, 2001). Mirroring the compliance concerns in South Africa, accountability to these disability laws and mandates is lacking in Brazil, which slows down the progress of inclusion and access to education for students with disabilities. Additionally, discrepancies abound regarding the law and the reality in the classroom. For instance, Chakraborti-Ghosh, Orellana, and Jones (2014) reported one teacher's remarks that the law states only three students with disabilities should be in a general education classroom, but usually there are more than three students. This contradiction is indicative of the confusion surrounding concepts and definitions that curtail needed commitment to inclusive education (Chakraborti-Ghosh, Orellana, & Jones, 2014; Santos, 2001). In addition, parental involvement in the education or decision making for students with disabilities is not legally mandated (Chakraborti-Ghosh et al., 2014). This lack of participation from families places the schools in a position to make sole decisions that impact a student's schooling life cycle and beyond.

Canadian provinces and territories develop their own education policies; therefore, exceptionality and special education may have different meanings across the provinces and territories, and so do the special education services (Oloo, 2006). Historically, students with disabilities were institutionalized and received special education services in segregated settings (Towle, 2015). In 1980, Bill 82 passed into law requiring school boards to develop special education services for students with special needs (Morgan, 2003). Towle (2015) notes that as recently as 2012, the Supreme Court of Canada, which has jurisdiction over each province and territory, required school programs to meet the needs for individual students based on appropriate assessment and programs. Moreover, Towle notes that access to special education services is offered in the general education classroom, in separate classrooms, or in pull out sessions. Depending on the province or territory, special education services and policies have different translations, including: most appropriate placement (Alberta), most enabling environment (Prince Edward Island) or regular classroom first (Ontario; Dworett & Bennett, 2002). These varied labels illustrate potential differences in the interpretations of terms that may negatively impact and reduce access to the provision of services for students with disabilities.

In both the Brazilian and South African contexts, the available policies on inclusion of students with disabilities provide inadequate frameworks for the provision of services to students with disabilities (Donohue & Born-

man, 2014; Murungi, 2015). For South Africa, the *White Paper 6* is not clear on whether the students must receive an education solely in mainstream settings or if the parents and students have a choice on the provision of part or total services in special schools depending on the needs of the students (Murungi, 2015). Similarly, in South Africa, policies on inclusion are ambiguous on the provision of services for students with disabilities. This lack of clarity is one of the reasons why students with disabilities mainly receive their education in special schools, as highlighted in Donohue and Bornman (2014).

Pedagogy

Pedagogy includes strategies that teachers incorporate in their teaching and learning contexts, albeit without always elaborating the historical, cultural or personal factors that shape these practices (Loveless, DeVoogd, & Bohlin, 2001). The Salamanca Statement (UNESCO, 1994) acknowledges that each student has unique characteristics, abilities, and interests. What does this mean for teachers of students with special needs? How does this affirmation influence pedagogy? Understanding pedagogies that inform teachers' epistemologies and learning theories is critical in furthering their reproduction or restructuring them to allow for transformative teaching and learning experiences. Educators in contexts where students have historically experienced practices that reified inaccurate stereotypes, devalued social and cultural capital, and perpetuated lack of access to educational opportunities can benefit from professional development geared towards developing and nurturing emancipatory pedagogy.

An example of a pedagogical overhaul is exemplified in South Africa. Curriculum in South Africa has two approaches, policy and knowledge. Curriculum-as-policy is marked by struggles of the opposing groups represented in the curriculum, whereas curriculum as knowledge revolves around knowledge construction (Chisholm, 2005). These two approaches were exemplified in the development of South Africa's revised national curriculum, *Curriculum 2005* (Department of Education, 2002b), a product of social contests among multiple stakeholders. Environmentalists, historians, lobbyists, bureaucrats, and religious activists were involved in the revision. The revision of the curriculum involved a rethinking of knowledge construction with the uncovering of the role of the school and the place of the student in teaching and learning. This revision ushered in a pedagogical shift away from education in the apartheid era that was more teacher-centered and overlooked students' cultural knowledge (Chisholm, 2005). *Curriculum 2005* also introduced notions of social justice and human rights, which are critical values towards a democratic society. Muthukrishna and Schoeman (2000) observe that although *Curriculum 2005* was controversial in its development as a national curriculum with a transformational outcome-based educa-

tion approach, it is learner-centered, driven by multidimensional assessments that monitor gains from previous performance—a new approach in the post-apartheid era.

It is important to note that teachers develop pedagogical practices over time (Bourdieu, 1977). Hence, it is fair to argue that in a context with a historical past where discriminatory and oppressive practices existed in the education system, teachers will benefit from a change of pedagogy that fosters equitable learning experiences for all students. Donohue and Bornman's (2014) argument that teachers need revised cultures of practice can serve an important role in making inclusive policies a reality. *White Paper 6*, the South African inclusive policy document, embraces the notion that reforming teaching practices, behavior, and curriculum is vital in meeting the learning needs of all learners (Maher, 2009).

In Brazil, in contrast, there is dearth of literature that focuses on pedagogy for students with disabilities in inclusive education settings. Inadequate teacher training undermines access to quality education for students with disabilities. In addition, teachers in Brazil have noted that students identified with mild/moderate disabilities are more likely to access the general education curriculum in a regular classroom compared to students identified with severe disabilities (Chakraborti-Ghosh et al., 2014).

Professional Development

Bourdieu (1977) explains that people have dispositions developed over time as a result of a person's background, family, environment, and beliefs that form an individual's unique *habitus*. Belland (2009) posits that teachers also possess habitus that impact their teaching beliefs and practices. With rapid developments in policy and legislation, teacher professional development plays a significant role in empowering teachers with skills that can increase their confidence in deploying relevant pedagogies and ameliorating teaching practices that reify discriminatory beliefs. High quality professional development can alleviate possible frustrations experienced by teachers that may arise due to feelings of inadequacy with the tasks at hand.

Professional development for teachers continues to be a challenge in Brazil, Canada, and South Africa. Chakraborti-Ghosh et al. (2014) notes that teachers in Brazil feel ill-equipped and less confident about teaching students with disabilities. Although the Brazilian government has passed federal laws on inclusion services for students with disabilities, the financial investment in teacher training has been minimal. Similarly, in South Africa, low job satisfaction rates among teachers who teach in special schools is a challenge and inadequate funding curtails progress for an inclusive education (Strydom, Nortjé, Beukes, Esterhuyse, & Der Westhuizen, 2012). In Canada, all teachers must be certified and, depending on the

province or territory, teachers may need to complete further training to teach special education classes. Dworet and Bennett (2002) highlight the need for continued teacher training in meeting the needs of ethnically diverse students in Canada, particularly First Nations students and students who speak English as a second language.

Inadequate teacher training is also a challenge in South Africa. In Greyling's (2009) study of teachers, many expressed a lack of confidence in meeting the needs of students with disabilities. The teachers preferred focused training in this area instead of general curriculum training. In addition to this preparation gap, Pather (2011) argues that since specialist services such as occupational therapists and remedial educators are in short supply, the international model of providing special education services to students with disabilities may not fit with the infrastructure available in South Africa. This lack of contextual fit highlights the need to structure the education model depending on available resources in the specific contexts.

Access to Services and Resources

Unequal wealth distributions and economic situations in South Africa and Brazil fuel poverty conditions that impact students' access to educational services. Students in rural areas are mostly affected by the lack of proper infrastructure, such as inaccessibility to public transport and subsequently access to schools (Glat & Ferreira, n.d). Teachers in rural areas in South Africa are faced with unreliable electricity, limited school supplies, and a shortage of specialists, including psychologists, occupational therapists, and speech therapists (Pather, 2011). Another compounding factor that limits access to special education services in South Africa is entrance fees in the special schools, especially at the high school level. On a positive note, Pather's (2011) qualitative study in a Black rural secondary school documented positive strides in providing access to education for students with special needs. These improvements have been made through peer and community support; for instance, a student without disabilities may offer to push a peer's wheelchair, or unemployed local artisans volunteer to complete a ramp. Although the sustainability of this approach is unclear, these collaborative efforts demonstrate ways in which schools and communities can improve access for students with disabilities.

In Brazil there has been less investment in education that has impacted the quality of school services for general education students and particularly for students with special needs (Watson, 2013). Brazil has a parallel education system, one for students with special education needs and another for students without special education needs. In this segregated system, students with special education needs are marginalized and isolated from peers, reinforcing negative perceptions of this student population. Additionally, students with special needs from low-income

families are further marginalized by the lack of access to services.

Canada's investment in education is second after health care spending (World Bank, 2016). In 1997, Canada passed Bill 160 that put in place an education funding formula that restructured how monies were generated. Instead of local taxes, a provincial pooling of funds was proposed (Morgan, 2003). The budget cuts were followed by a recommitment to invest in education, and specifically special education. This call for action from various stakeholders demonstrates the effort required to ensure that students with disabilities remain at the center of resource allocation and funding. However, access to education may be compromised for students at the local level. In Prince Edward Island (PEI), a rural province with high unemployment rate and limited resources, success in providing special education services to students in their neighborhood schools has been attributed to community partnerships with schools (Timmons, 2006). These resources have fostered teacher-training, the development of programs for students with autism, and increased satisfaction from parents regarding services provided to their children. However, students may experience lengthy wait times before receiving diagnostic assessments, which delays special education services (Towle, 2015). Larger class sizes also make it difficult for teachers to meet the learning needs of all of the students in the classroom.

In South Africa, the Department of Basic Education (2011) reported that nearly 500,000 children with disabilities of school age are not attending school. According to the 2013 General Household Survey, of the children with disabilities who do not attend school, 67% report severe disabilities and would therefore require placement in special schools (Donohue & Bornman, 2014). Muthukrishna and Schoeman (2000) find that language limitations may hinder learning in South Africa. Students with disabilities who do not receive instruction in their first language are further marginalized and unable to access the curriculum.

Sociocultural Challenges

Bronfenbrenner's (1979) ecological framework makes the argument that learning at the micro level exists in larger historical, political, cultural, social, and economic contexts. The definitions of disability are often socially constructed and play out within these contexts. Subsequently, how disability is understood in society depends on the social contexts.

In Brazil, Watson (2013) describes how disability is associated with poverty and a deviance from the normal social order. The focus on deviance places disabilities and special education services in the hands of medical personnel instead of educators. Individuals who are able to contribute the most to the society are the most valued

and individuals with disabilities are relegated to inferior experiences (Watson, 2013). Similarly, in South Africa, negative attitudes and the rejection of students with disabilities from peers, the public, and schools contribute to parental resignations that keep children from accessing an education (Maher, 2009; Yssel, Engelbrecht, Oswald, Eloff, & Swart, 2007). Parents further perceive educating a student with a disability as expensive with little returns on the investment (Donohue & Bornman, 2014). Muthukrishna and Schoeman (2000) also highlight the existing deficit views of students with disabilities in South Africa whereby psychometric tests are routinely used for placement purposes without consideration of prior educational opportunities. This practice is against the South African Schools Act, yet it is inappropriately used for diagnostic purposes.

In Canada, individuals with disabilities are also stigmatized in society, alienated from peers, and face negative stereotypes. This is especially the case for students who attend special schools where there is little contact with peers without disabilities (Bunch & Valeo, 2004). Media representation plays a significant role in social perceptions of individuals with disabilities. Devotta, Wilton, and Yiannakoulias (2013) examined trends in media representations of disabilities in Canada over a ten-year period and reported encouraging changes. For instance, individuals with disabilities were represented as having an identity besides having a disability. The authors also highlighted a shift in terminology and language used for individuals with disabilities. In 1998, most reporting used language that focused on limitations (e.g., handicapped) but in 2008 the language used was more accepting of disabilities (e.g., person-first language). In addition, the content in 2008 addressed topics such as disability awareness, barriers, and social inclusion that emphasized supports for individuals with disabilities.

DISCUSSION

The purpose of this paper was to examine access to education for children with disabilities in Brazil, Canada, and South Africa. This comparative analysis provides insights into the current challenges within each country. These include a range of cultural and structural issues that currently exacerbate educational equity for children with disabilities. We discuss potential policy implications and areas of priority moving forward.

Access to Education for Students with Disabilities

The data provided in this analysis show that large percentages of students with disabilities in Brazil and South Africa are not receiving basic education or special education services. This continues despite the legal frameworks in place stipulating education as a basic right for all individuals or the countries' participation in international agreements that support education for all

students. In comparison to Brazil and South Africa, Canada has the highest percentage of students with disabilities having access to special education services. This variability may be a result of different levels of financial resources among the three countries, as well as the different jurisdictions in charge of educational policies implementation. In Brazil and South Africa the government has a larger mandate to implement the education policies but appear less efficient, whereas in Canada the provinces and territories are responsible for designing and implementing education policies.

It is important to situate these findings in historical and cultural contexts to discern whether countries have made any progress, and to understand the influence of such contexts in their current challenges of access to education. This paper shows how Brazil and South Africa share similar historic pasts of segregation and discriminatory practices in providing students with disabilities access to education in an equitable and systematic manner. Similarly, certain groups in Canada have experienced marginalization and limited access to special education services, including First Nations students and French-speaking students in Canadian English Immersion schools who are forced to move to English-only schools to receive special education services. Although educational opportunities are available, the provision of special education is a continued struggle for certain student groups in these countries.

International agreements on access to education at the global level funnel through the structures of a country's education system. On the Bray and Thomas (1995) cube, comparativisits can examine different dimensions to explore intersectionalities of various policy related factors and gain a deeper understanding of the larger ecosystem. For instance, at the international level the role of agreements and treaties for students with disabilities pertain to the protection of their rights and commitments from governments to provide access to services. As seen in this paper, the implementation of these agreements at the country, school, or individual level is impacted by a myriad of complex variables that intersect and influence policy development, resource allocation, and eventually access to education.

Barriers to Education for Students with Disabilities

In Canada, special education services are provided in different settings depending on the policies in specific provinces and territories, meaning that a student with a disability may qualify for special education service in one province and fail to qualify for similar services in a different setting. This observation is present in Brazil and South Africa as well, a possible result of the varying definitions of the term *disability*. The distribution of resources determines the special education services available for students with disabilities and consequently access to education. For

instance, in Canada, funding allocation is dependent on the need, degree, and severity of the disability (Dworet & Bennett 2002). This is not the case for Brazil and South Africa. Though arguably certain disabilities may require more resources, funding allocation should be more flexible to allow for the provision of necessary services. In addition, the locus of control and decision-making directly impacts implementation of education policies. In Canada, the decision on the right to education is left to the jurisdiction of the provinces, which seems to empower the provinces with a powerful mandate to an individual's right to education. Brazil and South Africa provide a constitutional protection to all students to receive an education. Additional barriers include ambiguity in disability legislation and policies, traditional pedagogical views on disability based on deficit views, negative sociocultural attitudes, inadequate teacher professional development, and unequal and limited access to resources and services. It is clear that education policies, such as allocation of resources and the criterion for identification of special education needs, have a direct impact on the access to education for students with disabilities. The role of the government determines how the decisions are implemented and which priorities are addressed to ensure students with disabilities have access to special education services.

Effective Policies

The three countries have implemented strategies and initiatives to alleviate some of the existing barriers that limit access to education for students with special needs. One of these initiatives has been realized through changes in curriculum and pedagogy. Pedagogy provides an important vehicle through which students access the curriculum. *Curriculum 2005* (Department of Education, 2002b), a national curriculum based on transformation-based outcomes in South Africa, represents an intentional and radical approach towards the delivery of a revolutionary schooling experience in South Africa. The curriculum was developed in collaboration with various stakeholders with an eye towards the facilitation of social justice and equity. This can be argued as especially true for individuals who have been historically marginalized, including students with disabilities. An intentional focus on a national transformative curriculum can provide a critical space to influence teacher mindsets, inform cultures of practice, and systematically create transformative educational practices. Although South Africa continues to struggle to reap the benefits of *Curriculum 2005* (Department of Education, 2002b), especially in providing the teachers with the necessary support (Pillay, Smit, & Loock, 2013), there is documented evidence of initiatives towards overhauling pedagogical practices that promote equitable instruction (Maher, 2009). Also curricula changes are paramount in developing inclusionary practices and access to education for all students.

Community involvement is one approach that can pull together available resources and lead to small and steady progress towards increasing access to education for all students. For instance, in South Africa, parental advocacy is critical in the implementation of inclusive practices for students with disabilities. This grassroots movement can be a source of potential mobilization of people and ideas that lead to improvements in the quality of education services for students with disabilities. This grassroots movement is also documented in Brazil where advocacy groups have emerged and channeled much needed attention towards initiatives with an emancipatory lens on disability (Connor, Block, Calder, Rembis, & Watson, 2014). The approach taken by the advocacy groups in Brazil is transferrable to the South African context because of the groups' emphasis on reducing stigma of individuals with disabilities. Also, the advocacy groups work in conjunction with scholars, policy developers, and special education service providers to challenge traditional views of disability as deficiency, and empower individuals with disabilities through changed discourses and discursive practices.

In South Africa, like Canada and Brazil, there are varied understandings of the term *disability*, and *inclusion*, resulting in inaction and complacency in providing students with disabilities access to resources and services. Ultimately, this ambiguity denies students an optimal educational experience, as parents remain unaware of their rights and become less active in advocating for their children's rights. The Disabled Children's Action group in South Africa, formed in 1993, deserves to be mentioned as a local organization involving parents and the communities. The group takes the initiative to increase access to education by providing educational opportunities that tap into the potential for students with disabilities (DICAG, 2001). Ultimately, the lack of clarity of these terms impedes access to educational services, while the dominant sociocultural attitudes in the three countries reveal a need to destigmatize beliefs and attitudes towards individuals with disabilities.

These changes can arise from more sensitive terminology used in policy documents and in media presentations and broader discourses about disabilities. For instance, the International Classification of Functioning, Disability and Health (ICF) shift in conceptualizing disability on a continuum is a laudable move towards weakening the value-laden definition of disability as previously explained through non-environmental factors. This definition acknowledges the interplay between environmental and personal factors in the definition of disability (WHO, 2011). The ICF continuum allows practitioners, service providers, parents and policy makers to develop a richer, explicit understanding of the term *disability*. ICF outlines disabilities as categorized in three areas; (a) impairments related to body functions, (b) activity limitations due to difficulties engaging in activities,

and (c) participation in terms of social integration in employment or transportation access. Whether this change in meaning will result in significant change remains to be seen; however, it is a step towards an inclusive society by unpacking and better understanding *disability*.

CONCLUSION

In summary, numerous barriers exist that limit the access to education for students with disabilities in Brazil, Canada, and South Africa. This paper highlights possible ways that the barriers can be tackled to ensure access to education. Progress can be achieved through curricula and pedagogical changes, teacher training, increased funding, equitable distribution of resources, grassroots movements, and empowering messages about people with disabilities. There is a need for more critical analysis from researchers and stakeholders on the implementation of international treaties and global policies in local contexts through a closer examination of individual countries, their resources, strengths, and needs (Yang, 2014). While acknowledging the great strides and positive trends that Brazil, Canada, and South African have taken towards providing access to students with disabilities through inclusive education, we concur with Hougaard (2007) that "the process of inclusion requires great courage in a world that has not yet learned to value difference" (p. 4). Similarly, Muthuk-rishna and Schoeman's (2000) make a progressive call to policy makers, stakeholders, and school districts to depart from a focus on special needs, to an encompassing notion of *barriers to learning and development* for students with disabilities. This perspective would hopefully be another step towards dismantling the stereotypes associated with labeling students with disabilities and inequitable provision of instruction and services that deny many students with disabilities access to education.

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