

Master's Thesis

Inclusive Policies in Western Europe and Northern Europe: a review of the literature

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Abstract

Inclusion of students with special educational needs has had an important influence on the educational system in Western and Northern Europe in recent years. This study aimed to provide a literature review of different inclusive policies implemented in primary schools in 10 Western-European and Northern-European countries: France, Germany, Denmark, Sweden, Norway, Finland, United Kingdom, Ireland, Netherlands, and Belgium. The literature review was conducted with a focus on two themes *policy approaches in inclusion* and *training of educators to prepare them for inclusion* followed by an analysis of implementation stages and drivers in each country. A review of 33 texts resulted in the conclusion that all 10 countries have implemented inclusive measures to a different extent, but only a few of the countries have applied specific requirements for inclusion in teacher training programs. This literature review did not examine how these policies were processed in a practical setting or the results and consequences of the policies. Accordingly, an implication for future research is an in-depth study focusing on the execution as well as on the results and consequences of inclusive policy approaches across Western and Northern Europe.

Keywords: inclusive education, special needs students, policies, teacher training, Western Europe, primary school

Introduction

Special educational needs is a more recent concept in the educational field, dating back to the beginning of the last century (Alkahtani, 2016). While in the 18th century, the focus of French and American researchers was on physical disabilities, a shift happened in the 19th century to include mental disabilities. In the beginning, the help provided to these children was for protective purposes that excluded them from the communities around them. After the French and American revolution, the focus shifted to educating these children in schools or institutions of their own. The modern understanding of special education originates from the nineteenth century when associations focusing on special education were founded and specific programs for special education were implemented to ensure that the students received a minimum level of education.

In recent years, inclusive education has become a common approach to the education of children with special (educational) needs. In the European Union, the European Pillar of Social Rights (European Commission, 2021) was implemented in 2017. The Pillar states that:

“Everyone has the right to quality and inclusive education, training and life-long learning in order to maintain and acquire skills that enable them to participate fully in society and manage successfully transitions in the labour market.”

(European Commission, 2017).

In the paragraph above, inclusive education is mentioned as a right. Additionally, The Pillar further specifies guidance on how to make Europe strong, fair, inclusive, and how to provide all Europeans with good welfare systems and opportunities in the labour market. The Pillar, and thereby inclusive education, is to be delivered by the EU institutions such as the national governments.

However, one should not forget that the idea of inclusion is much older than The European Pillar of Social Rights. The Salamanca Statement from 1994 (United Nations, 1994) stated that children with special needs have the right to receive education and have access to regular schools which should accommodate all students no matter their needs. Additionally, the Universal Declaration of Human Rights, the Convention on the Rights of the Child, and the Convention on the Rights of Persons with Disabilities state that every child has the right to quality education (Schuelka et al., 2019), and since the core of inclusion is to accommodate all children, this seeks to ensure that they receive quality education adapted to their personal needs which is in line with the aforementioned declarations. These international UNESCO declarations, however, only state goals and visions of inclusion and do neither provide an underlying theoretical framework, nor theoretical underpinnings on how to reach these goals.

Countries like Australia and the United States of America started with basic inclusive concepts even earlier – already in the 1970s (Graham, 2019). At the same time, other countries are just getting started with inclusion. Nonetheless, inclusion is a phenomenon that has changed the approach to education in a major part of western countries, and it seems to continue to do so in the future. UNESCO, UNICEF, the World Bank, UNFPA, UNDP, UN Women, and UNHCR have already written Education 2030 (UNESCO, 2018) which aims to ensure inclusive and equitable quality education and promote lifelong learning opportunities up until 2030. The future is never set, and lots of changes can happen in the educational system, but this report indicates that inclusive education has come to stay.

As can be seen from the interest in inclusive education by global organizations, it is not only in the European Union that inclusive education has been an important topic of discussion in recent years. As a result, this paper will provide a literature review that will not only focus on countries in the European Union but rather on Western European countries. Especially since Brexit (Casey, 2018), it is not only interesting to look at countries in the European Union since this would now exclude the United Kingdom, though it is still a Western European country.

Not only countries have been interested in the vision of inclusion, but also individuals such as researchers and psychologists have discussed the topic. Oliver (1990) argued that:

“As far as disability is concerned, if it is seen as a tragedy, then disabled people will be treated as if they are the victims of some tragic happening or circumstance.” (p. 22)

Oliver (1990) also states that:

“If disability is defined as social oppression, then disabled people will be seen as the collective victims of an uncaring or unknowing society rather than as individual victims of circumstance.” (p. 22)

This indicates that the way disabled people are seen or treated is a product of how disability is defined. Inclusive education is a new way of defining disability that seeks to view students with special educational needs as individuals who can engage in a common school setting with support from teachers, authorities, parents, and fellow students.

Inspection of the UNESCO documents on inclusion reveals that there is no conclusive definition, nor a smooth progress in the implementation of inclusion (Nilholm, 2021), just as there is no conclusive definition of what inclusion is. To mention an example of a definition, UNICEF defines inclusion as:

Inclusive education means all children in the same classrooms, in the same schools. It means real learning opportunities for groups who have traditionally been excluded – not only children with disabilities, but speakers of minority languages too.

(UNICEF, n.d.).

Additionally, there is another example of a definition of inclusion from the 48th session of the International Conference on Education:

Inclusive education is an on-going process aimed at offering quality education for all while respecting diversity and the different needs and abilities, characteristics and learning expectations of the students and communities, eliminating all forms of discrimination.

(UNESCO, 2008, cited by The European Agency for Special Needs and Inclusive Education, n.d.).

Since there is no final approach to inclusion, it is interesting to look at how different countries proceed when implementing inclusion and making inclusion a part of their educational system and how they prepare their educators for the challenges they might face in the classroom when they are required to accommodate all children no matter their abilities or

disabilities. Despite the UNESCO declarations signed by so many countries (also within Western and Northern Europe), various stages in the implementation process are to be found, as well as an updated and expanded version of the Salamanca declaration of 1994 by the Incheon declaration of 2015 (Nilholm, 2021). Since the international UNESCO declarations did not provide a theoretical framework for implementation of the goals and visions of inclusion, Fixsen (2005) can be used to analyse the implementation process. In his work as the founder of implementation sciences, Fixsen (2005) describes three different stages of implementation:

1) Paper implementation refers to putting new policies and procedures in place on paper only.

2) Process implementation means putting operating procedures in place through training, supervision, reporting, etc. Whether these procedures are efficient depends on how they are carried out.

3) Performance implementation is when procedures are put into place with a focus on functional components of change that show good effect.

Above and beyond, Fixsen (2005) also argues that implementation drivers are crucial for successful implementation. The implementation drivers are divided into three categories:

1) Competency drivers refer to coaches who support and teach practitioners for them to develop competencies and new ways of working.

2) Organization drivers are administrators who support changes and innovation in organizational practices.

3) Leadership drivers are leaders who can help solve issues and identify problems.

Fixsen's framework of implementation sciences will be used to evaluate the implementation stages and drivers with respect to inclusive educational practices for each country involved. For reasons of mutual comparability and geographical proximity, we will focus on Western and Northern Europe. So, the following research questions are posed:

1. How do different Western and Northern European countries proceed in implementing inclusion a part of their educational system?
2. To what extent is teacher professionalization on inclusive educational practices addressed in the policy of Western and Northern European countries?

Method

This literature review of governmental sources and scientific literature aimed at presenting different policy approaches to inclusion and teacher training for inclusion in Western and Northern Europe and providing a comparison across countries. Below, the methodology regarding the selection of countries included in the study, search for literature and types of literature included, selection of literature, and analysis is explained.

Selection of countries

Since not all western countries in Europe are members of the European Union, the selected countries for the literature review consisted of countries in Western and Northern Europe. Eastern and Southern European countries were not included in the literature review since the number of articles and reports would then be too extensive for this thesis. In line with the primary focus of the aforementioned UNESCO declarations, this study was limited to primary schools. There might be differences in school systems and the age of primary students across countries, consequently, this study would focus on the age group 6-12 years. The following Western and Northern European countries were included in the literature review and were selected from the list of Western and Northern European countries in the UN Geoscheme Classification (United Nations Statistics Division, n.d.):

1. France
2. Germany
3. Denmark
4. Sweden
5. Norway
6. Finland
7. United Kingdom
8. Ireland
9. Netherlands
10. Belgium

Not every Western and Northern European country from the UN Geoscheme Classification was included in this literature review as it would be too extensive for this paper. As a rule of thumb, only countries with a population of above five million people were

included. For the German-speaking and French-speaking regions of Western Europe, Germany and France were chosen as the main countries to represent these regions, with the purpose of limiting the number of countries included. Since Belgium contains both a Dutch-Flemish and a French department, it was still included in this review. However, Switzerland, being partly French and partly German, was not included. Austria, belonging to the German-speaking part of Western Europe, was not selected either.

Literature search

The search for literature was conducted in November and December 2021 using two main sources of literature:

1. A search on governmental websites or the websites of Ministries of Education of each country was conducted to find relevant articles and reports about the policy on inclusion in the particular country. As for the countries Germany, United Kingdom, and Belgium which were divided into departments or federal states, only the official websites of the countries as a whole were included in the search for literature as it would be too extensive to search on the websites of all departments or federal states.
2. A search on EBSCOhost (EBSCOhost, n.d.) was performed to find additional relevant literature for the review.

The first part of the literature search was conducted on governmental websites or websites of Ministries of Education. Websites of ministries of education were preferred but when these were not available, the governmental websites were consulted. The second part of the literature search was carried out via EBSCOhost in order to check (i.e. to confirm or disconfirm) the literature found on the governmental websites and websites of ministries of education and to add information on the countries that was of added value on top of the information available via the aforementioned websites. In case the information in the chosen articles or reports was inconsistent, converging information across different sources was aimed for by re-reading the articles and reports and consulting additional articles and reports.

The search was conducted using the keywords “inclusion” and “inclusive” combined with the word “education”. Between two and four articles or reports were chosen for each country depending on certain criteria which will be accounted for below. The articles from the governmental websites or the websites of the ministries of education and the articles from EBSCOhost were selected to complement each other with the purpose of including as much information as possible. In total, 15 articles and reports were found on websites and 18

articles and reports were selected from EBSCOhost. This accumulates to a total number of 33 texts being included in this literature review.

The literature included in the study is in the languages that I, as the author and researcher in this matter, am able to read either completely or partially: English, Danish, German, Swedish, and French. The translation tool DeepL (*DeepL Translate: The world's most accurate translator*, n.d.) has also been used as an additional tool to understand certain information in French.

It can be useful to include literature in the native language of a country since this provides the opportunity to gather more information as some countries might have more relevant literature in their native languages than in English. However, in this study, it also created differences in the amount of available literature for each country since for some countries, literature in both English and the native language was included, while for other countries, only English literature was included. This was also an issue when conducting the literature search. Since I was able to understand the titles of articles and reports in some languages, these were not automatically excluded, but for countries such as the Netherlands and Finland, no literature in the native languages was considered because of language barriers.

Types of literature included

When searching the official websites, relevant information was found in both reports and articles written either directly on the governmental websites or downloadable as a PDF-file. Consequently, both reports and articles are included in this literature review. On the websites and on EBSCOhost, literature on racial and religious inclusion in schools was also identified. These articles were not included in this study as they did not discuss inclusion of students with special educational needs. As well as racial and religious topics being excluded, so was information involving implementation of policies. Many of the articles from EBSCOhost contained both official information about policies in the given country and research on practices and experiences. This literature review was limited to official policies implemented by governments. As a result, details on personal opinions, practices, and experiences were disregarded.

Selection of literature

The search on EBSCOhost resulted in more than one thousand results for each country. Combined with hundreds of results on several official websites, selection criteria

were needed to choose the most relevant articles and reports for the literature review. The criteria were as follows:

1. The article or report should explicitly be related to the policy of inclusive education and/or the training of teachers to promote inclusive education.
2. The article or report should deal with primary education.
3. The article or report must concern one of the Western European countries mentioned in the list above.
4. The article or report should be no older than January 2012 to avoid including outdated policies. The most recent articles and reports would be preferred.

In case the articles and reports identified in the literature search did not specify any age group for the inclusive policies or applied their policies to the whole educational system, these articles were to be included in this literature review because when dealing with all age groups and types of educational institutions, they also comprised primary education.

When selecting literature on EBSCOhost, some reports and articles that seemed useful came up with the online message: “We were unable to find direct full text links for this item”. As a result, these reports and articles could not be included in this review as the literature search was limited to official websites and EBSCOhost. A search beyond these sources fell beyond the scope of this thesis.

Some articles included in the literature review discussed several countries and were used to find information on more than one country.

Findings and analysis

The analysis focused on two different themes when reading the chosen articles and reports and sought to find information on these themes through official policies mentioned in the literature:

- 1) Policy approaches to inclusion.
- 2) Training of educators to prepare them for inclusion.

The findings in the literature of the selected countries have been analysed using the work of Fixsen (2005) to conclude which stage of implementation and which category of implementation drivers each country makes use of. Hence, the model of Fixsen (2005) on the

implementation stages and implementation drivers has been used to analyse the findings according to both aforementioned themes.

Finally, the findings according to these themes and to the model of Fixsen were used to make a comparison across countries on the different inclusive policies and how the countries prepared their educators for inclusion. Additionally, as a part of the comparison, information on which countries have signed the Salamanca Statement and the UN Convention on the Rights of People with Disabilities has been included.

Results

1. France

Three articles related to inclusive education were found on the French Government website (Ministère de l'Éducation Nationale de la Jeunesse et des Sports, n.d.). The articles all contained information on both themes studied in this thesis.

Policy approaches to inclusion:

In the article *École inclusive: comité national de suivi du 5 juillet 2021* (Ministère de l'Éducation Nationale de la Jeunesse et des Sports, 2021), it is mentioned that dialogues with families, personalized schooling paths, and the use of support staff (AESH) are strategies used to promote inclusion of children with special needs in the mainstream school system.

The article *École inclusive: comité national de suivi du 9 novembre 2020* (Ministère de l'Éducation Nationale de la Jeunesse et des Sports, 2021b) clarified that inclusion has been a priority since 2017 and significant progress in the numbers of children included in the mainstream educational system has also been made. In the future, the French government wishes to cooperate both with medical staff and parents as external partners as well as collaboration internally at the school to create appropriate responses in the classrooms. Several tools were also made available to promote inclusion in school. The Cap école inclusive platform was one of the tools provided and consisted of an online platform with materials to help plan the pedagogy for children with special needs. Another tool was a department where families could call and get information on inclusive education. In each French department, it was, as of November 9, 2020, also the responsibility of a committee to monitor, coordinate, and improve inclusive education.

Finally, in the article International perspectives on inclusive education (Ministère de l'Éducation Nationale de la Jeunesse et des Sports, 2020), which was the summary of a conference in 2018, additional inclusive policies were mentioned. The special scheme Paris Santé Réussite “Learning Difficulty Prevention” helped teachers assess pupils and identify learning difficulties in reading and arithmetic in grades 1 and 2 so the teachers could provide the support the students needed.

Training of educators to prepare them for inclusion:

In addition to the information mentioned above, in the article École inclusive: comité national de suivi du 5 juillet 2021 (Ministère de l'Éducation Nationale de la Jeunesse et des Sports, 2021), it is also mentioned that the government wished to strengthen the teacher training to achieve their goals for inclusive education. Policies for teacher training were not specified any further in this article. However, in the article École inclusive: comité national de suivi du 9 novembre 2020 (Ministère de l'Éducation Nationale de la Jeunesse et des Sports, 2021b), the teacher training was explained further. The AESH staff would now get more beneficial working contracts as well as 60 hours of compulsory training at the beginning of their contract and access to other training courses. The teacher students enrolled in a master's degree would also follow training focusing on inclusive education provided by the National Institutes for Higher Education (INSPE). Teachers who had not received this training might be required to complete a course on inclusive education. In the article International perspectives on inclusive education (Ministère de l'Éducation Nationale de la Jeunesse et des Sports, 2020), it was also mentioned that teacher training colleges were required to deliver inclusive education training, though in 2018, this training was not specified. The courses for teachers who had not been specialized in inclusive education yet also existed in 2018 and were typical modules between 25 and 50 hours of training.

When searching for articles and reports on EBSCOhost, the number of relevant articles was low. This could be due to the use of English as the language of the search. There might have been more articles available in French. Only one relevant article, Autism and the right to education in the EU: Policy mapping and scoping review of the United Kingdom, France, Poland and Spain (Roleska et al., 2018), was found. Even though the article focused on autism, general special educational needs were also mentioned. Additionally, this article

provided information on the United Kingdom which will be included later in this paper. The information about France in this article reported on the theme *policy approaches to inclusion*:

The Law on Equal Rights and Opportunities, Participation, and Citizenship was passed in 2005 and was seen as a milestone. It focused on the fact that the needs of people with disabilities should be met, also when it came to education. The law also stated that people with disabilities should be able to go to the school closest to their home and that teachers should receive special training. Since this training was not specified, this article cannot be included under the other theme relating to teacher training. No other acts focusing on special educational needs in general were mentioned in the article.

Applying Fixsen's model:

When looking at the theme *policy approaches to inclusion*, France had reached the stage of process implementation. Procedures to promote inclusion, such as cooperation and platform tools, had been put in place. It was the responsibility of a committee to promote inclusive education which means that France made use of organization drivers. France also makes use of paper implementation in The Law on Equal Rights and Opportunities, Participation, and Citizenship.

Regarding the theme *training of educators to prepare them for inclusion*, France had made a number of paper implementation laws and requirements. However, there was no specific information on how these laws should be carried out or who should be the implementation drivers doing it.

2. Germany

The report Nationaler Aktionsplan 2.0 der Bundesregierung (Bundesministerium für Arbeit und Soziales, 2016), found as a reference through the website of the German Ministry of Education and Research (Federal Ministry of Education and Research, n.d.), described to some extent the vision of inclusion in Germany. The main focus in this report was not on education and the primary school system, since this report was from the Federal Ministry of Labour and Social Affairs. However, a few sections in the report contained relevant information on inclusion in schools. Though there were no specific mentioning of age groups or primary or secondary education, it was stated that inclusion should apply to all areas of schooling. Especially the chapter Bildung, p. 51-64, contained relevant information. Thus, it was included in this report under the theme *policy approaches to inclusion*:

Germany has, among many other countries, committed to the 2030 Agenda by United Nations. This included, among others, goals for inclusive education. The Federal Government used specific measures to promote inclusive education, including training and education of educators and design of the learning environment. They also wished to improve the knowledge about how to make inclusion successful, including funding research projects which aimed to shed light on inclusion, for example, the “Raum und Inklusion” (space and inclusion) study. Financial and human resources were also recognized in the report as a way to promote successful inclusion. Even though the process of implementing an inclusive approach to education was the job of the Federal States in Germany, the Federal Government still wished to support the Federal States. Despite all of these visions for inclusion, it was also mentioned in the report that there was, at the time of writing, too little reliable information on how inclusive education could be implemented. This was also seen throughout the report as it only mentioned visions for new policies but no concrete examples of how these visions would be implemented. Consequently, the report focused on upcoming and ongoing research studies as only very few results were available.

On EBSCOhost, two relevant articles were selected. The first article, *The idea of inclusion: Conceptual and empirical diversities in Germany* (Kruse & Dederling, 2017) provided information on the theme *policy approaches to inclusion*:

When Germany ratified the Convention on the Rights of Persons with Disabilities in 2009, it also agreed to secure inclusive education. Up until 2009, Germany had worked with other policies related to inclusion, e.g. integration and social participation. 2009 was the starting point on the path toward inclusive education.

The second article from EBSCOhost, *The Role of Teachers in the Organization of Inclusive Education of Primary School Pupils* (Shevchenko et al., 2020), provided information on both themes.

Policy approaches to inclusion:

The field of education was administered by each federal state in Germany. Before the ratification of the Convention on the Rights of Persons with Disabilities in 2009, some states would organize inclusive education, but after the ratification, all the Federal States were required to do it. However, since each state decided on its own approach to promoting inclusive education, it creates differences. For example, the level of inclusion was 82.2 % in Bremen and 26.3 % in Bavaria as of 2018. This inclusion rate showed the proportion of

students with special needs who have attended inclusive classes in mainstream schools. Despite the differences across the Federal States, the inclusion rate has increased as a national average.

Training of educators to prepare them for inclusion:

Training of teachers was mainly financed by the Federal States and was divided into two stages with an academic course and practical training. It was not mentioned how teachers are specifically trained for special education.

Applying Fixsen's model:

Regarding *policy approaches to inclusion*, the Federal Government made use of process implementation by promoting procedures such as training of educators and designing of learning environment. The Federal States were the organization drivers with the responsibility of promoting inclusive education. However, the Federal Government wished to work as a leadership driver by supporting the Federal States. It was also mentioned that the Federal Government wished to research more on how to promote successful inclusion that indicated a wish for performance implementation, though this stage was not reached yet. Germany also made use of paper implementation when ratifying the Convention on the Rights of Persons with Disabilities.

Only little information was *available on the theme training of educators to prepare them for inclusion*. It was inconclusive when looking at implementation stage and implementation drivers.

3. Denmark

On the website of the Danish Ministry of Education, Børne- og Undervisningsministeriet (Børne- og Undervisningsministeriet, n.d.), three relevant articles were selected. These articles applied to the whole public-school system before high school, called folkeskole, and related to the theme *policy approaches to inclusion*:

In the article Bag om Inklusion (Børne- og Undervisningsministeriet, 2021a) the laws behind the inclusive approach in Denmark were described. The Danish approach to inclusion was based on both national and international statements and laws. The budget for the municipalities in 2013 included, but was not limited to, the following inclusive goals which were based on a new inclusion law from 2012:

- 96 % of the students in public school must receive education in ordinary school classes and not in classes or schools for children with special needs.

- The students' well-being was to be maintained as the inclusion increased.

These goals and the inclusion law from 2012 were based on international conventions about inclusion such as the Salamanca Statement from 1994 and the UN Convention on the Rights of Persons with Disabilities which Denmark agreed to follow in 2009.

In the article *Inklusionseftersyn: 96 procents målsætningen droppes* (Børne- og Undervisningsministeriet, 2016), it was clarified that the goal to include 96 % of the students in the public mainstream school was dropped due to a review report on inclusion. The report recommended replacing the 96 %-goal with a stronger focus on how to promote the academic learning and well-being of the students. The government has agreed to follow these recommendations.

The last article from the Danish Ministry of Education, *Regler om Inklusion* (Børne- og Undervisningsministeriet, 2021b), explained the regulations on inclusion in Denmark and what the students were entitled to. The teaching in public school must be planned in such a way that it supported inclusion. This was suggested to be done through the creation of smaller groups, differentiated instruction, extra teaching as a supplement to the normal classes, two teachers in a classroom, or the use of teaching assistants. Personal support and IT tools should also be made available to the students. It was the responsibility of the principals at the schools to make sure that the school could offer students with special needs the help they were entitled to. Only if a student needed support in more than 9 hours in school per week was the student entitled to special needs education outside the mainstream school.

One relevant article, *Is there something rotten in the state of Denmark? The paradoxical policies of inclusive education – lessons from Denmark* (Engsig & Johnstone, 2014) was found during the search on EBSCOhost. Like the articles from the Danish Ministry of Education, this article described the whole public school, *folkeskole*, and provided information on the theme *policy approaches to inclusion*:

The article confirmed the facts from the Danish Ministry of Education as to the initial goal in the Inclusion Law about including 96 % of the students in the mainstream classroom setting. However, this article included additional information about the policies in Denmark. The Inclusion Law also contained the goal that at least 80 % of the students should be proficient in reading and mathematics in the national tests. At the same time, the expenses per student in the public school in Denmark have decreased by 12 %, despite that the money for

special education was supposed to follow the students included in the public mainstream school.

Applying Fixsen's model:

The articles and reports about Denmark only contained information on the theme *policy approaches to inclusion*. Despite giving recommendations as to how to promote inclusive education, the implementation stage of inclusive education in Denmark only reached paper implementation as no specific procedures are carried out yet. The principals at the schools were the organization drivers who had the responsibility of promoting inclusive education.

4. Sweden

On the Swedish Government website (Government Offices of Sweden, n.d.), a reference to a report on inclusive education and how to shape the school according to the students, *Att Forma Skolan Efter Eleverna* (ifous, 2015), was identified. This report contained both an overall look at Sweden as a whole country and the different municipalities in Sweden. As this literature review focused on the countries as a whole and not municipalities, the relevant information about Sweden as a country has been selected. The report was relevant according to the theme *policy approaches to inclusion*:

In Sweden, the word “integration” was used when talking about students with disabilities in the 1980s and 1990s. From the late 1990s, the word “inclusion” was starting to be used by scientists. However, the term “inclusion” was not used in legal texts or curricula, but instead, the three words equality, accessibility, and participation were used in governing documents and described what inclusion was about. According to the report, the role of the state was to make clear what inclusion involved. It was also suggested that working toward inclusion should happen in three steps: at the SPSM, at the regional workgroups, and at the school level. The SPSM was a special pedagogical school authority that has supported the school with, among other, economic support, advisory, and coordination.

In Sweden, the goal was, as far as possible, to include all children in the mainstream school. To promote inclusion in schools, there has been a focus on several factors such as changing the environment to fit the students' needs and creating open-mindedness and flexibility among teachers and other staff members. The FoU-program in focus in the report has resulted in a cooperative strategy to inclusion where schools, teachers, school leaders, and administrative leaders work together.

The article, *The Role of Teachers in the Organization of Inclusive Education of Primary School Pupils* (Shevchenko et al., 2020), from EBSCOhost also provided additional information on the theme *policy approaches to inclusion*:

Since 2010, the legal framework on inclusion has been updated in Sweden. In 2020, Sweden adopted the United Nation's Convention of the Rights of the Child as a part of the law. Local authorities should now ensure that educators promote inclusion. Teachers could find support at resource centres, and 15 % of the municipality budgets was spent on inclusion. However, it was not specified which of the budgets within the municipality the 15% was taken from. It can be assumed that it was a budget related to education or schooling.

A second article found on EBSCOhost, *Complexities of preparing teachers for inclusive education: case-study of a university in Sweden* (Miškolci et al., 2020), reported on the theme *training of educators to prepare them for inclusion*:

The article mentioned that the government required special education as one of the areas to be included in every teacher education program. Despite this, there was no specified guideline as to how to include special education in teacher training. This can result in big differences across courses and universities.

Applying Fixsen's model:

Under the theme *policy approaches to inclusion*, different measures had been taken to promote inclusive education, among other the FoU-program. This shows that Sweden was at the implementation stage of process implementation. Sweden also made use of both organization drivers and leadership drivers through their suggestion that inclusion should happen in three steps. Here, the school could be seen as an organizational driver while the SPSM could be seen as a leadership driver. The regional level can either be viewed as an organizational driver or a leadership driver depending on its role. This is not profoundly clarified.

Sweden also made use of paper implementation when they adopted the United Nation's Convention of the Rights of the Child.

Only little information is available on the theme *training of educators to prepare them for inclusion*. It is only mentioned that training of educators is at the paper implementation

stage since no specific processes are put in place. There is no mentioning of implementation drivers.

5. Norway

In the article Meld. St. 6 (2019–2020) Early intervention and inclusive education in kindergartens, schools and out-of-school-hours care (Ministry of Education and Research, n.d.) from the Norwegian Government website (Government.no, n.d.), the following results were found.

Policy approaches to inclusion:

In Norway, inclusion played an important role in shaping future citizens and was described as follows:

“Inclusion in kindergartens and schools means that all children and pupils should feel that they belong. They should feel safe and discover that they are valuable and that they are able to help shape their own learning. An inclusive environment welcomes all children and pupils.”

Inclusion was seen as an important tool for the children to learn about tolerance and differences between people. Also, it was widely accepted that children had individual needs which could be due to culture (e.g. the Sami people), learning disabilities, high intelligence, etc. Consequently, inclusion was not only a tool to help the weakest students. However, there was a major focus on students with special needs. For example, municipalities were required to offer students in primary school in years 1-4 intensive tuition if they were falling behind in reading, writing, or numeracy. The pupil-to-teacher ratio has also been lowered so there was a maximum of 15 pupils per teacher in years 1–4.

Additionally, Norway has committed to follow several international statements about children’s rights and inclusion, for example, the Salamanca Statement of 1994 and the United Nation’s Convention on the Rights of the Child. Norway also had its own constitution about children’s right to participation. All these statements and constitutions set some requirements for children’s rights and inclusive education which Norway sought to fulfil.

Training of educators to prepare them for inclusion:

Measures have been taken to make sure that educators are prepared for inclusion in Norway. To become a primary teacher, a 5-year master’s degree has become a requirement. Additionally, the UN Committee on the Rights of Persons with Disabilities reviewed Norway in 2019 and found it to be a point of concern that special needs provision was often carried

out by staff without appropriate training. Consequently, Norway is now implementing measures to improve this matter by 2023, though these measures were not specified in the article.

Through the search for literature on EBSCOhost, the article *Same vision – different approaches? Special needs education in light of inclusion in Finland and Norway* (Sundqvist & Hannås, 2020) was found. This article accounted for policies both in Finland and Norway and was included in the analysis of both countries. The article also included information on both themes used in this analysis. Relating to Norway, the article states as follows for the first theme, *policy approaches to inclusion*:

The Norwegian Education Act from 1998 stated that all public schools should adapt their approaches to the abilities of the students. If the students did not benefit from mainstream education, they were entitled to special education.

The information in the article according to the theme *policy approaches to inclusion* was limited, but a wider range of information was available relating to the theme *training of educators to prepare them for inclusion*:

In Norway, there was no official title or definition of a special education teacher. Teachers could become special educators but there were no specific requirements for the education or certificate needed. It was possible for teachers to do educational programs in special education to become more qualified, but as mentioned, it was not a requirement. In Norway, there was also an extensive use of teacher assistants when supporting students with special needs. Even though these were to be supervised by a qualified teacher, there was no requirement that this teacher needed to have qualifications in special education. It was estimated by The Norwegian Educational board that around 50 % of special needs education was carried out by teacher assistants. Statistics also show that the use of teacher assistants has increased more than 80 % from 2010 to 2017.

Applying Fixsen's model:

According to the theme *policy approaches to inclusion*, Norway focused on following different laws and statements on inclusion. However, no specific processes were put in place to reach these goals of inclusive education that shows that Norway made use of paper implementation. There was no explicit mentioning of implementation drivers, however, since municipalities were required to follow the laws about inclusive measures, they can be seen as the organization drivers.

When looking at the theme *training of educators to prepare them for inclusion*, Norway had no title or specific requirements to work with children with special needs. Norway was in the process of implementing new measures to improve this matter but since no processes were put in place yet and no law written on paper yet, it is not possible to make a conclusion about Norway. Accordingly, no implementation drivers are explicitly mentioned.

6. Finland

When looking at Finland, two relevant documents were selected from the search on the website of the Finnish Ministry of Education and Culture (The Ministry of Education and Culture, n.d.). A program on quality and equality for the period of 2020-2022, *The Right to learn - An equal start on the learning path* (Ministry of Education and Culture, 2019), reported on both the theme *policy approaches to inclusion* and *training of educators to prepare them for inclusion* through different goals.

Policy approaches to inclusion:

Goal 1 and 2: These goals were related to creating equal education for all, including inclusive education. This was done through the implementation of different policies, e.g., reducing group sizes and the goal to teach basic skills during the first years of primary school to reduce learning gaps. €120 million is planned be used to fund equal education for everyone and €50 million to fund inclusion. The goal for inclusion aimed to support both academic and social learning through an improvement in special needs support. The effectiveness of educational policies and the use of resources should also be evaluated to create improvement.

Training of educators to prepare them for inclusion:

Goal 3: The goal was to improve the knowledge and skills of teachers and other school staff and promote continuous learning to prepare the teachers for equality and inclusion.

The second document found on the website of the Finnish Ministry of Education and Culture, *Projects to develop teacher education* (Ministry of Education and Culture, 2018), reported specifically on the theme *Training of educators to prepare them for inclusion*:

The Ministry of Education in Finland awarded almost €15 million to projects aiming to develop teacher education in 2017. Two of the projects were related to inclusive education. The first program aimed to prepare vocational teachers to identify exclusionary factors in schools and help the students overcome these barriers. The second inclusive project, which

received a financial grant, aimed to prepare teacher education students and teachers to take on an inclusive pedagogical leadership role. This could be at a school or another educational institution.

On EBSCOhost, one article considered relevant for this paper was identified. The article, *Same vision – different approaches? Special needs education in light of inclusion in Finland and Norway* (Sundqvist & Hannås, 2020), accounted for inclusive policies both in Norway and in Finland and was included in the analysis of both countries. Additionally, the article related to both themes researched in this paper. The article accounted for the following information when looking at Finland and the first theme, *policy approaches to inclusion*:

Finland signed the Salamanca Statement in 1994, but the term “inclusion” was not explicitly used in Finnish policies until the Finnish National Agency of Education mentioned it in 2016. It was stated that students should receive support in mainstream classrooms.

The following information applied to the second theme *training of educators to prepare them for inclusion*:

Teachers in Finland must all obtain a master’s degree, and special education teachers were considered to belong to their own profession. There were academic requirements, such as a master’s degree or postgraduate program, to reach this profession. When teacher assistants were used in Finnish schools, it was always under the supervision of a qualified teacher. The teacher assistants could not take educational responsibility for the students.

Applying Fixsen’s model:

When looking at *policy approaches to inclusion*, Finland is both at the stage of process implementation and performance implementation. Finland had a specific plan, with financial support, running from 2020 to 2022. This plan is the process implementation stage, but Finland also takes it to the next stage of performance by mentioning that the process should be evaluated to create improvement. However, there is no explicit mentioning of implementation drivers. Additionally, Finland used paper implementation when signing the Salamanca Statement.

According to the theme *training of educators to prepare them for inclusion*, Finland had started a couple of projects to develop teacher education. This can be regarded as process implementation. The Ministry of Education awarded the money for the projects and thereby making themselves the leadership driver aiming to solve an issue through these projects.

Paper implementation is also used in Finland when looking at the training of educators since there are specific requirements as to how to become a special needs educator.

7. United Kingdom

No relevant articles or reports were found on the British Government website (GOV.UK, n.d.). On EBSCOhost, four relevant articles were found. The article Educational inclusion in England: origins, perspectives and current directions: Inclusive Education in England (Lauchlan & Greig, 2015) was mainly focused on different theoretical perspectives about inclusion but also contained information about England which was relevant according to the theme *policy approaches to inclusion*:

The idea of inclusion in England went back to the Warnock Report from 1979 and the 1981 Act. These policies started the shift in attitudes toward inclusion. Other acts have since then shaped how inclusion is viewed in England. The most noticeable act was the Code of Practice. It was originally published in 1994 and revised in 2001 and 2014. The interesting part of the Code of Practice was that apart from focusing on supporting students with SEN, the act also stated the parents' rights to choose a school for children with special needs if they found it more appropriate for their children. As a result, this act did not focus on inclusion as the only way to educate students with special educational needs or presented it as preferable over special education.

The article Autism and the right to education in the EU: Policy mapping and scoping review of the United Kingdom, France, Poland and Spain (Roleska et al., 2018) mainly focused on the inclusion of people with autism and policies relating to autism, but information on general inclusive policies was also included in the article. As for the United Kingdom, different policies were included for the different departments of the United Kingdom, relating to the theme *policy approaches to inclusion*:

When looking at England, the idea that every human had the right to education came from the Human Rights Act in 1998. More focus on children with special needs came with the Equality Act in 2010 and the Statutory Framework for Early Years Foundation Stage from 2014. Especially the policy from 2014 focused on how special needs should be recognized and addressed. A support system for education was also implemented through the Children and Families Act in 2014. Finally, in the Statutory Guidance-Special Educational Needs and Disability Code of Practice: 0 to 25 years from 2015, the right to equal education for children with special needs was stated.

There is less information included on the other departments in the article. However, the 10-year strategy, Together Mental Health, in Welsh stated that education should be a good experience and provide the support needed. In Scotland, the 2009 Act clarified the importance of identifying and acting on special needs and providing the children with support. Finally, in Northern Ireland, they followed a similar act as in England to secure the rights of people with disabilities to not be discriminated against related to school admissions.

The third article, Changing policy and legislation in special and inclusive education: a perspective from Northern Ireland (Smith, 2014), provided information on policies in Northern Ireland under the theme *policy approaches to inclusion*:

The most interesting inclusive policy in Northern Ireland was the consultation from 2009 on the policy text Every School a Good School: the way forward for special educational needs and inclusion. The consultation document, also called the Fundamental Review, aimed to create a stronger and more robust inclusive framework with, among other initiatives, earlier identification of special needs, improving the learning of all students, and replacing the term “special educational needs” with “additional educational needs”. Additional educational needs themes in the consultation document included children with special educational needs, learning environment, family circumstances, and social and emotional states of mind of the children.

Finally, the fourth article identified on EBSCOhost, Teacher education for inclusive practice – responding to policy (Alexiadou & Essex, 2015) provided some, though minimal, information on the theme *training of educators to prepare them for inclusion*:

In England, teacher programs were meant to prepare teachers for inclusive practice and diversity. However, no specific guidelines for preparing teachers for inclusion were mentioned in the article. It was only mentioned that there were two ways to become a teacher in England: through a university-led and a school-led course. The most common educational choice was the university-led course.

Applying Fixsen's model:

The information relevant to the theme *policy approaches to inclusion* states that the United Kingdom had implemented many acts only on paper, thereby making use of paper implementation. There was no explicit mentioning of implementation drivers. The same use

of paper implementation and no implementation drivers applies to the theme *training of educators to prepare them for inclusion*.

8. Ireland

Two articles about inclusive education were found on the Irish Government website (Government of Ireland, n.d.). Both articles were related to the theme *policy approaches to inclusion*:

The first article, Inclusive Education (Government of Ireland, 2019), stated that the government wished to use education to break the cycle of disadvantage, and disadvantaged students should receive the support they needed at the right time. The article also explained the structure of the Irish school system. Most children with special educational needs were included in mainstream classes with additional support. Other students with more complex needs attended a special class in their local school, and finally, students with very complex needs went to special schools.

The second article, Ministers Foley and Madigan announce details of €9.2 billion education funding in Budget 2022, including measures to tackle disadvantaged and support children with special educational needs (Government of Ireland, 2021), explained the €9.2 billion budget for 2022 which aimed at investing in the primary and post-primary educational system, including the investment in a quality inclusive school. Additionally, €18 million would be used as funding for the Delivering Equality of Opportunity in Schools (DEIS) program to provide schools tackling disadvantaged students with extra teaching and more resources. These additional finances would provide the schools with more teachers and reduce the teacher-student ratio by one point in primary schools. The new teacher-student ratio would then be 1:24 and historically low in Ireland. Extra special education teachers and assistants would also be provided to work both in special classes and special schools as well as mainstream classes.

On EBSCOhost, two articles relevant to this literature review were identified. Both articles related to the theme *policy approaches to inclusion*:

The first article, Special education reforms in Ireland: changing systems, changing schools (Kenny et al., 2020), explained that the most significant change to inclusive education was made with The Education for Persons with Special Educational Needs act (EPSEN) in 2004. Inclusive education then became mandatory, including the right to education in mainstream settings, unless it was not in the best interest of the child. However, certain aspects of EPSEN were yet to be implemented at the time of writing of the article.

This also showed in the delay of the ratification of the UN Convention on the Rights of Persons with Disabilities. It was signed in 2007 but not ratified in Ireland until 2018, making Ireland the last of the EU member states to do so.

The second article, Teacher education for inclusive education: a framework for developing collaboration for the inclusion of students with support plans (Ní Bhroin & King, 2019), despite its name, did not provide information on official requirements for teacher education. However, it added additional information on inclusive policies. In 2017, new a policy development focused on including students with special educational needs in mainstream schools and promoted support plans with clear and measurable targets for the students. Learning plans should be developed in collaboration between teachers, parents, and students. A three-level pyramid of support was also implemented along with a student support file with a support plan. The three support levels consisted, from bottom to top, of whole school and classroom support for all, school support for some, and school support plus for few. This pointed out that all students should receive support while extra support should be available to certain students.

Applying Fixsen's model:

Regarding the theme *policy approaches to inclusion*, Ireland made use of both paper implementation through laws and acts and process implementation through budget funding with a focus on inclusive education and the process of implementation of learning and support plans. It was not clearly mentioned who the implementation drivers were. However, when looking at the creation of learning plans, it was mentioned that teachers were partly responsible for this. Therefore, the teachers can be seen as organization drivers in this project.

There is, however, no information on the theme *training of educators to prepare them for inclusion*.

9. Netherlands

In the report Working in education 2012 (Ministerie van Onderwijs, Cultuur en Wetenschap, 2013) from the Dutch Government Website (Ministerie van Algemene Zaken, n.d.), a desirable approach to teacher training was described. Even though these initiatives were not directly related to inclusion, changes in teacher training could still affect the inclusion process and were interesting to analyse. This related to the theme *training of educators to prepare them for inclusion*:

In 2012, several steps were taken to ensure the supply of qualified teachers. This plan was running until 2020 and included the following:

- Training and PhD grants to build the teachers' academic skills.
- Tightening the rules for the unqualified teachers so they could only be used if no qualified teachers were available.
- Creating teacher competency documents for each teacher (in force since 2006) and creating a professional register of qualified teachers.
- Teachers should preferably have a master's degree, and schools should strive to hire highly qualified teachers.
- New teacher training programs would be developed to ensure more qualified teachers and get more people to choose the teaching profession from different kinds of study paths, e.g., in-school teacher training, academic teacher training programs, and higher professional education top-up courses (introduced in 2006).
- Dividing teacher training into younger and older students to help the teachers specialize themselves.

One thing mentioned in the report related to special educational needs was that nearly half of the teachers in primary school (47 %) had received some kind of training on special educational needs. The government aimed to invest more in training teachers for special educational needs. At the same time, the number of students enrolling in a master's degree in special needs education had declined significantly from 4,160 in 2005 to 2,500 in 2010. This had negative consequences for the teachers' abilities to work with inclusion.

Another article from the Dutch Government website, the National Action Plan for Human Rights 2020 (Ministerie van Algemene Zaken, 2020) reported on how the Netherlands planned to act according to the Human Rights and how they wished to implement human rights policies. The National Action Plan for Human Rights 2020 contained a chapter on inclusion (part 1, chapter 2) which was relevant for the theme *policy approaches to inclusion*:

In 2016, the Netherlands agreed to follow the UN Convention on the Rights of People with Disabilities, which includes access to inclusive education. This was sought to be done through different actions in 2020 such as more dialogue on inclusive education, raising

awareness on the UN Convention on the Rights of People with Disabilities, reviewing the Appropriate Education Act of 2014 with a focus on inclusion, promoting partnerships between schools, and erasing boundaries between mainstream and special education. The Netherlands also wished to use the findings in the Country Policy Review and Analysis of The European Agency for Special Needs and Inclusive Education, published in 2020, to get inspiration on how to promote more inclusive education because the division between mainstream and special education is – despite all efforts in the past and in the Appropriate Education Act (known as “Wet Passend Onderwijs”) of 2014 – still present.

When searching for articles on EBSCOhost, only a few articles on inclusive education in the Netherlands were found, and of those articles, only one was relevant for this literature review. The relevant article, Inclusive education in the Netherlands: how funding arrangements and demographic trends relate to dropout and participation rates (Gubbels et al., 2017), provided information on the theme *policy approaches to inclusion*:

A new policy was introduced in the Netherlands in 2014 which influenced both approaches to inclusion and funding of inclusive education. The new policy, the Education Act for Students with Special Needs, aimed to include students with special needs in mainstream schools and prevent dropout through regional partnerships. The regional partnerships were the cooperation and communication between schools within regions of the country to make sure that every child was offered appropriate education. This also changed the funding of schooling since the funding system depended on the total number of students within each regional partnership. The regional partnerships then divided the resources between the schools, but this also meant that partnerships with a higher rate of special or inclusive education did not get extra resources compared to partnerships with a lower rate.

Applying Fixsen's model:

The Netherlands used both process and performance implementation when looking at the theme *policy approaches to inclusion*. The process implementation consisted of different actions performed in 2020 and also the regional partnerships. The performance implementation was carried out when The Netherlands used the findings in the Country Policy Review and Analysis of The European Agency for Special Needs and Inclusive Education to improve their practices. There was no mentioning of implementation drivers regarding the projects in 2020. However, the regions can be seen as organization drivers in the regional partnerships.

Regarding *training of educators to prepare them for inclusion*, a list of paper implementation steps was mentioned. However, there was no information on how these acts were put in place or who the actual implementation drivers were.

10. Belgium

When searching on the Belgian government website (The federal government, n.d.), no results were found using the keywords “inclusion” and “inclusive” combined with “education”.

Two relevant articles were identified on EBSCOhost, and these two articles related to the theme *policy approaches to inclusion*. The only literature from EBSCOhost related to the theme *training of educators to prepare them for inclusion* applied to secondary education and was not included in this literature review.

Policy approaches to inclusion:

The first article from EBSCOhost, *Autism and family involvement in the right to education in the EU: policy mapping in the Netherlands, Belgium and Germany* (van Kessel et al., 2019), included information on both the Netherlands, Germany, and Belgium. The information in this article was only included in the section about Belgium since the information about the Netherlands and Germany did not provide a new perspective. Even though the article had a focus on autism, general special education policies were also accounted for, and inclusion was mentioned as a service provided for students with special educational needs. In the article, Belgium was divided into four different areas: Flanders, Wallonia, the German-speaking community, and the Brussels-Capital Region. Only the policies in Flanders, Wallonia, and the German-speaking community were accounted for since the schools in the Brussels-Capital region followed the policies in either Flanders or Wallonia, with the Flemish-Dutch-speaking schools following Flanders and the French-speaking schools following Wallonia. Belgium’s first act on inclusive education was the Act on Special and Inclusive Education from 1970. Later, in 1988, the responsibility of education was given to the different regions in Belgium, resulting in different policies in Flanders, Wallonia, and the German-Speaking community. It was also decided, nationwide, that parents should have the ability to decide on the education of their children. In Flanders, The Decree on Primary Education from 1997 stated that students who could not be guaranteed development through mainstream education would receive special education. It was not until the Decree for Scholars with Special Education Needs in 2014 that measures were taken to provide an inclusive approach to education in primary schools, but the division between

mainstream and special education still remained. It was a different case when looking at Wallonia. Here the Decree on Primary Education was implemented already in 2004 which allowed children to switch from special education to mainstream school based on the decision of the parents and the special education school. This act was followed by a ratification of the Decree on the Inclusion of People with Disability in 2014 which added the responsibility to support students with disabilities throughout their educational process. More children were also included in mainstream school with the Decree on Inclusive Education for Social Promotion from 2016. The most noticeable reform related to inclusive education for the German-speaking community in Belgium was the Decree on the Establishment of a Centre for Education of Children with Special Needs from 2009 which aimed to improve education for children with special needs, give them support in mainstream schools, and promote inclusion.

An additional article about Flanders was found on EBSCOhost. The article, *Mainstreaming disability in policies: the Flemish experience* (Meier et al., 2016), reported on the theme *policy approaches to inclusion*:

The article accounted for an approach to policy in Flanders described as disability mainstreaming. This meant that the needs of people with disabilities would be considered in all aspects of policies, including inclusive education and the provision of financial and human resources to support people with disabilities. Flanders had a policy cycle of disability mainstreaming from 2010 to 2014. The article also confirmed, as did the article accounted for above, that Flanders was a region with considerable inequality and competition in school and that inclusive education was an ambitious project in this region.

Applying Fixsen's model:

When looking at the theme *policy approaches to inclusion*, the literature listed different policies implemented in Belgium. These only refer to paper implementation and there is no information on implementation drivers.

There was no information located on the theme *training of educators to prepare them for inclusion*.

Integration and comparison of all information on inclusion

Below in Table 1 an overview of the policy approaches to inclusion is to be found for each country according to the themes. An overview of how teachers are prepared for

inclusive education across the Western-European and Northern-European countries involved is to be found in Table 2.

Table 1: Policy approaches to inclusion:

	Important or recent national or international policy related to inclusion	Year of the policy	Is inclusive education a goal in the country?	Fixsen: stages of implementation	Fixsen: implementation drivers
France	The Law on Equal Rights and Opportunities, Participation, and Citizenship	2005	Yes	Paper and process implementation	Organization drivers
Germany	Convention on the Rights of Persons with Disabilities	Ratified in 2009	Yes	Paper and process implementation	Organization and leadership drivers
Denmark	The Inclusion Law	2012	Yes	Paper implementation	Organization drivers
Sweden	United Nation's Convention of the Rights of the Child	Adopted as a part of the Swedish law in 2020	Yes	Paper and process implementation	Organization and leadership drivers
Norway	The Norwegian Education Act	1998	Yes	Paper implementation	Organization drivers
Finland	Policies by the Finnish National Agency of Education	2016	Yes	Process and performance implementation	N/A
United Kingdom	The Code of Practice	Published in 1994 and revised in 2001 and 2014	Yes	Paper implementation	N/A
Ireland	The Education for Persons with Special Educational Needs act (EPSEN)	2004	Yes	Paper and process implementation	Organization drivers
Netherlands	The Education Act for Students with Special Needs	2014	Yes	Process and performance implementation	Organization drivers
Belgium	The Act on Special and Inclusive Education	1970	Yes	Paper implementation	N/A

Table 2: Training of educators to prepare them for inclusion:

	Recognizes inclusive teacher training as important	Has a plan for inclusive teacher training	No information available	Fixsen: stages of implementation	Fixsen: implementation drivers
France	x	x		Paper implementation	N/A
Germany	x			N/A	N/A
Denmark			x	N/A	N/A
Sweden	x			Paper implementation	N/A
Norway	x	x		N/A	N/A
Finland	x	x		Paper and process implementation	Leadership drivers
United Kingdom	x			Paper implementation	N/A
Ireland			x	N/A	N/A
Netherlands	x			Paper implementation	N/A
Belgium			x	N/A	N/A

All of the countries had one thing in common: they all had an inclusive policy approach to education. It was then interesting to find out whether or not they were all following important international conventions like the Salamanca Statement and the UN Convention on the Rights of People with Disabilities. All European countries, and thereby all the countries in this literature review, had signed the Salamanca Statement (Watkins et al., 2009). Additionally, all the countries in this literature review had either signed or ratified the UN Convention on the Rights of People with Disabilities (United Nations, 2016). Even though all the countries had committed to inclusive education through international conventions and national policies, their most noticeable policies, as listed above, were quite widespread according to years. This was only an overview of interesting policies implemented in the countries, and it did not provide the starting point of inclusion in each country since it was a process happening over time.

Belgium, Germany, and United Kingdom were interesting cases since they consisted of different departments or federal states which all needed to take responsibility for inclusive education individually. This also made it harder to find policies that applied to the whole country and not only certain regions, and it set them apart from the other countries in this

study since these countries followed a national policy. Other noticeable differences between the countries were whether the countries had a goal to include as many students as possible in mainstream education or whether that was not specified in their inclusion plan. Denmark used to have the 96 % inclusion goal until it was dropped in 2016, and Sweden also followed a policy to include as many students in mainstream education as possible. Germany, on the other hand, had very different inclusion rates as a result of its policies being decided by the Federal States. This implied that some states aimed to include more students than others. In Ireland, most of the children with special needs were claimed to attend mainstream schooling, though no inclusion rate was available, and inclusive education was mandatory unless it was not in the best interest of the child. Finally, in England (part of the United Kingdom), inclusion was not preferred over special education in their Code of Practice. As for the rest of the countries, it was not implied in the literature whether they aimed to include as many students as possible.

Another important difference between the countries was how they financed inclusive education. Some countries might have had a strong financial plan for their educational goals while other countries might have been less specific about it. Not so much information has been found on this topic. However, it was noticeable that while countries such as Ireland and Finland invested more money in inclusive education, the spending per student in the schools in Denmark had decreased. Finally, the methods through which the countries wished to achieve inclusive education also varied. France wished to cooperate with parents and medical staff. Sweden aimed to reach more inclusion through changing the school environment to fit the students' needs, creating open-mindedness and flexibility among teachers and other staff members, and through cooperation between schools, teachers, school leaders, and administrative leaders. Germany wished to adapt learning environments and to conduct research on inclusive education. Denmark suggested, among other things, smaller groups, differentiated instruction, two teachers in a classroom, or the use of teaching assistants and IT tools. Norway offered intensive tuition in reading, writing, or numeracy in years 1-4, and the pupil-to-teacher ratio had also been lowered. Like Norway, Ireland also lowered the teacher-student ratio as well as implementing a three-level support system and providing more special education teachers and assistants. In Finland, reducing group sizes and the goal to teach basic skills during the first years of primary school to reduce learning gaps were measures taken to promote inclusion. The United Kingdom implemented a support system for education in England and focused on earlier identification of special needs in Northern Ireland. The Netherlands wished to promote inclusion through political actions such as dialogue on

inclusive education, raise awareness on the UN Convention on the Rights of People with Disabilities, review the Appropriate Education Act with focus on inclusion, and promote partnerships between schools and erase boundaries between mainstream and special education, e.g. regional partnerships. In Flanders (i.e. the northern part of Belgium), disability mainstreaming has been used to promote inclusive education.

Finally, when looking at teacher training for inclusion, the countries also varied. While it had not been possible to obtain information on inclusive teacher training in Denmark, Ireland, and Belgium, it was also clear that several of the countries did not have explicit requirements for how to prepare teachers or teacher students for inclusion. In Germany, Sweden, the United Kingdom, and the Netherlands, there were no requirements for how to become a special needs teacher or how to prepare teachers for inclusion. According to the literature of this study, only France, Norway, and Finland had taken such measures. In France, inclusive education was a part of master's degree programs in education, and it was also a requirement for the teacher students to learn at teacher training colleges. Norway had been criticized by the UN Committee on the Rights of Persons with Disabilities because not enough teachers had special needs training. As a result, Norway would implement measures to improve this matter by 2023. However, these measures were not accounted for in the literature included in this thesis. Despite this, it was still concluded that Norway had a plan, or was soon about to have a plan, for inclusion in teacher training. Finland had already invested money in improving teacher education to focus on inclusion and special needs and being a special needs educator was also its own profession in Finland. This required teacher students to do a master's degree or post-graduate program in special education to become a special education teacher.

It could be seen as worrying that most of the countries recognized inclusion in teacher training as important but still no information on specific plans for inclusion in teacher training had been obtained from the majority of the countries. If the countries in fact did not have a specific plan, this could result in difficulties realizing their inclusive policies and goals in practice

When looking at Fixsen's implementation theory, there are also some noticeable differences between the countries. While most countries made use of paper implementation for policy approaches, except for the Netherlands which had a follow-up process on all the laws and acts implemented, only a few countries – the Netherlands and Finland – used a performance implementation approach. This could be explained by that there was only little available research on the outcomes of inclusive practices as inclusive education was still a

new field of research. Additionally, Finland, the United Kingdom, and Belgium provided no explicit information on implementation drivers. This is a matter of concern since it is a challenge for these countries to carry out their policies and projects without implementation drivers. Through Fixsen's implementation theories, it was also discovered that little information was available on the implementation of training of educators and none of the countries were using competency drivers. This is concerning since training of educators is where coaching is needed the most to prepare the educators for inclusive education. When looking at training of educators, Finland is the only country that goes beyond paper implementation and is also making use of leadership drivers.

Conclusion and discussion

This literature review aimed to provide an overview of policy approaches to inclusion and training of educators to prepare them for inclusion related to primary education, including a comparison of the policies and an analysis of the implementation stages and drivers, in 10 Western-European and Northern-European countries: France, Germany, Denmark, Sweden, Norway, Finland, United Kingdom, Ireland, Netherlands, and Belgium. Through a literature search on official governmental websites and on EBSCOhost using the keywords "inclusion" and "inclusive" combined with the word "education", a total of 33 relevant articles and reports were selected and included in this literature review.

From the analysis and comparison of the articles and the reports, it was found that all 10 countries involved had implemented inclusive measures to a different extent, but only a few of these countries explicitly applied specific requirements for inclusion in teacher training programs. Though, the majority of the countries recognized teacher training as an important tool for inclusive education. Consequently, it could be of concern that, according to the literature of this study, only half of the countries had implemented inclusion in teacher education, and most of the implementation was "carried out" only through paper implementation with no specified processes put in place. Most of the countries were also missing implementation drives for their teacher training implementation.

There were also differences in the policy approaches used to achieve inclusive education in the countries. These measures included cooperation with parents, medical staff, or other schools across regions as well as intensive courses for students who needed extra help, changing school environments, reducing class sizes, and taking political action. The

measures varied across countries, but the 10 countries did have the one thing in common that they had all agreed to follow the 1994 Salamanca Statement and the UN Convention on the Rights of People with Disabilities. Thereby, they had all agreed to make inclusive education a part of their educational systems. There was far more information available on the implementation stages of the policy approaches to inclusion compared to the implementation drivers. The latter is a remarkable finding and not in line with the implementation model of Fixsen (2005), stressing the crucial power of the drivers for successful implementation. All in all, most of the countries were making use of paper and process implementation and organizational drivers only. This might be a plausible reason why we are still working on more inclusive educational practices after all these years since the Salamanca declaration of 1994 and no smooth progress in the implementation of inclusion is still to be found (Nilholm, 2021).

Strengths and weaknesses

The strength of this literature review was that it combined what had already been researched across the chosen Western-European and Northern European countries. It provided an idea of the current status of inclusion of students with special educational needs in the Western-European and Northern-European countries and how inclusive education had developed in these countries over time.

Nevertheless, this also leads toward a weakness of the study. The literature was chosen depending on one person's judgment of what was considered relevant. There was a risk that articles or reports with other important information had not been selected as a part of the study because the choice of literature was depending on the judgment of one person alone. Additionally, other articles or reports might have been found through other academic search engines other than EBSCOhost. As well as additional information on teacher training programs could possibly have been identified through research on university websites and their teacher training courses. However, this was out of scope for this literature review.

When searching for relevant literature on EBSCOhost, several countries came up with limited relevant results. This could be due to the search being carried out in English and not in the native language of the country. Even though the translation tool DeepL was used for translation of certain selected articles and reports, it still narrowed down the number of results available if the researcher did not understand all search results or only did the search in English. This could cause certain valuable articles or reports to be overlooked.

The conclusions of the study were drawn according to the abovementioned literature alone, and more information was available for some countries than for others. This might provide an inaccurate picture of some of the countries and was a significant limitation of the study. Even though information on policy approaches to inclusion and teacher training might have been missing in the literature, either because it had not been researched yet or because the appropriate literature was to be found elsewhere, it did not necessarily mean that these countries did not have other inclusive policies or inclusive teacher training programs.

The literature review focused on countries and their national policies and did not include local or regional policies unless these were mentioned in the literature included in this review. Consequently, no literature search was conducted with a focus on regional policies. Several of the countries, e.g., Germany and Belgium, were divided into regions that could have their own policies with valuable information which was not included in this literature review.

A final important limitation of this study was that research on practices was excluded. This literature review only focused on what was decided by the governments. Whether these decisions were actually put into practice and whether the practices showed positive or negative results were not a part of this study. This also affects the outcome of the implementation analysis in line with Fixsen's model. If there had been a focus on practices, more countries might have used other implementation stages than paper implementation or other implementation drivers since a different kind of literature with a different focus would have been selected. A way to solve the abovementioned weaknesses and limitations will be addressed below.

Implications for future research

To address the weaknesses of the study regarding the judgment of one person, sources of literature, amount of literature available, language of literature, and regional policies, as mentioned above, it is then to be concluded that through more extensive research conducted by a linguistic and culturally diversified team of researchers, it is possible to find additional information on the 10 countries. The extensive research could benefit from including information from other sources such as The European Agency for Special Needs and Inclusive Education. Additionally, limited sources in English and within-country differences (federal states, different cultures) urge for a more in-depth approach by a linguistic and culturally diversified team of researchers which also takes a regional approach to policies. In

that way, an interscorer reliability analysis on the coding of all sources could be conducted as well.

Another interesting point of view for future research is to look at how the policies were executed in practical contexts, whether the outcomes were positive or negative, and how this applies to Fixsen's implementation stages and drivers. This will require more extensive research by a larger team of researchers. The research will likely have to go beyond a literature review and include different data collections.

Many of the articles and reports included did not fully qualify when looking at the selection criteria regarding primary school because they applied to all educational institutions in general, and thus, also to primary school. An implication to improve further research could be to either narrow down the search to only include literature that is related to primary school or to expand the project to a larger part of the educational system.

Finally, the parents' roles and engagement in inclusive education were mentioned for a couple of the countries (United Kingdom, Ireland, and Belgium). Looking at how each country views and encourages parental engagement could be a relevant topic for further research.

References

- Alexiadou, N., & Essex, J. (2015). Teacher education for inclusive practice – responding to policy. *European Journal of Teacher Education*, 39(1), 5–19.
<https://doi.org/10.1080/02619768.2015.1031338>
- Alkahtani, M. A. (2016). Review of the literature on children with special educational Needs. *Journal of Education and Practice*, 7(35), 70–83.
- Bundesministerium für Arbeit und Soziales. (2016, June 28). *Nationaler Aktionsplan 2.0*.
<https://www.bmas.de/DE/Soziales/Teilhabe-und-Inklusion/Nationaler-Aktionsplan/nationaler-aktionsplan-2-0.html>
- Børne- og Undervisningsministeriet. (2016). *Inklusionseftersyn: 96 procents målsætningen droppes*. UVM.
<https://www.uvm.dk/aktuelt/nyheder/uvm/udd/folke/2016/maj/160511%20inklusionseftersyn%2096%20procents%20maalsætningen%20droppes>
- Børne- og Undervisningsministeriet. (2021a). *Bag om inklusion*. UVM.
<https://www.uvm.dk/folkeskolen/laering-og-laeringsmiljoe/inklusion/bag-om-inklusion>
- Børne- og Undervisningsministeriet. (2021b). *Regler om inklusion*. UVM.
<https://www.uvm.dk/folkeskolen/laering-og-laeringsmiljoe/inklusion/regler-om-inklusion>
- Casey, T. (2018). Brexit: Why Britain voted to leave the European Union. *The Forum*, 16(3), 461–465. <https://doi.org/10.1515/for-2018-0025>
- DeepL Translate: The world's most accurate translator*. (n.d.). DeepL Translator.
<https://www.deepl.com/translator>
- Engsig, T. T., & Johnstone, C. J. (2014). Is there something rotten in the state of Denmark? The paradoxical policies of inclusive education – lessons from Denmark.

International Journal of Inclusive Education, 19(5), 469–486.

<https://doi.org/10.1080/13603116.2014.940068>

European Commission. (2017, April 4). *The European Pillar of Social Rights in 20 principles*. https://ec.europa.eu/info/strategy/priorities-2019-2024/economy-works-people/jobs-growth-and-investment/european-pillar-social-rights/european-pillar-social-rights-20-principles_en

European Commission. (2021, August 3). *European Pillar of Social Rights*. https://ec.europa.eu/info/strategy/priorities-2019-2024/economy-works-people/jobs-growth-and-investment/european-pillar-social-rights_en

Fixsen, D. L., Naoom, S. F., Blase, K. A., Friedman, R. M., & Wallace, F. (2005, January). *Implementation research: A synthesis of the literature*. University of South Florida.

Gobierno de España. (2020). *La Moncloa*. 03/03/2020. *Government presents education reform based on excellence and equality [Government/Council of Ministers]*. <https://www.lamoncloa.gob.es/lang/en/gobierno/councilministers/paginas/2020/20200303council.aspx>

Government of Ireland. (2019, July 17). *Inclusive education*. <https://www.gov.ie/en/policy-information/9bf5d3-inclusive-education/>

Government of Ireland. (2021, October 13). *Ministers Foley and Madigan announce details of €9.2 billion education funding in Budget 2022, including measures to tackle disadvantage and support children with special educational needs*. <https://www.gov.ie/en/press-release/9679f-ministers-foley-and-madigan-announce-details-of-92-billion-education-funding-in-budget-2022-including-measures-to-tackle-disadvantage-and-support-children-with-special-educational-needs/>

- Graham, L. (2019). *Inclusive education for the 21st Century: Theory, policy and practice* (1st ed.). Routledge.
- Gubbels, J., Coppens, K. M., & de Wolf, I. (2017). Inclusive education in the Netherlands: how funding arrangements and demographic trends relate to dropout and participation rates. *International Journal of Inclusive Education*, 22(11), 1137–1153.
<https://doi.org/10.1080/13603116.2017.1416684>
- ifous. (2015). *att forma skolan efter eleverna Vägar till inkluderande lärmiljöer i tolv svenska kommuner*. ifous.se. <https://www.ifous.se/app/uploads/2013/02/201509-Ifous-2015-1-slutversionf%C3%B6rwebb.pdf>
- Kenny, N., McCoy, S., & Mihut, G. (2020). Special education reforms in Ireland: changing systems, changing schools. *International Journal of Inclusive Education*, 1–20.
<https://doi.org/10.1080/13603116.2020.1821447>
- Kruse, S., & Dederig, K. (2017). The idea of inclusion: Conceptual and empirical diversities in Germany. *Improving Schools*, 21(1), 19–31.
<https://doi.org/10.1177/1365480217707835>
- Lauchlan, F., & Greig, S. (2015). Educational inclusion in England: origins, perspectives and current directions. *Support for Learning*, 30(1), 69–82. <https://doi.org/10.1111/1467-9604.12075>
- Meier, P., Celis, K., & Huysentruyt, H. (2016). Mainstreaming disability in policies: the Flemish experience. *Disability & Society*, 31(9), 1190–1204.
<https://doi.org/10.1080/09687599.2016.1244043>
- Ministère de l'Éducation Nationale de la Jeunesse et des Sports. (2020). *International perspectives on inclusive education*. <https://www.education.gouv.fr/international-perspectives-inclusive-education-9734>

Ministère de l'Éducation Nationale de la Jeunesse et des Sports. (2021a). *École inclusive : comité national de suivi du 5 juillet 2021*. <https://www.education.gouv.fr/ecole-inclusive-comite-national-de-suivi-du-5-juillet-2021-324062>

Ministère de l'Éducation Nationale de la Jeunesse et des Sports. (2021b). *École inclusive : comité national de suivi du 9 novembre 2020*. <https://www.education.gouv.fr/ecole-inclusive-comite-national-de-suivi-du-9-novembre-2020-307119>

Ministerie van Algemene Zaken. (2020, August 11). *National action plan on human rights 2020*. Government.NL.
<https://www.government.nl/documents/publications/2020/05/31/national-action-plan-on-human-rights-2020>

Ministerie van Onderwijs, Cultuur en Wetenschap. (2013, February 27). *Working in Education 2012*. Government of the Netherlands.
<https://www.government.nl/documents/reports/2013/02/27/working-in-education-2012>

Ministry of Education and Culture. (2018). *Projects to develop teacher education*.
<https://okm.fi/documents/1410845/4183002/Teacher+Education+Development+Projects+2017.pdf>

Ministry of Education and Culture. (2019). *The right to learn - an equal start on the learning path*.
<https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/161950/Comprehensive%20school%20education%20programme%20-%20Brochure.pdf>

Ministry of Education and Research. (n.d.). *Meld. St. 6 (2019–2020) Early intervention and inclusive education in kindergartens, schools and out-of-school-hours care*. Government.No. <https://www.regjeringen.no/en/dokumenter/meld.-st.-6-20192020/id2677025/>

- Miškolci, J., Magnússon, G., & Nilholm, C. (2020). Complexities of preparing teachers for inclusive education: case-study of a university in Sweden. *European Journal of Special Needs Education, 36*(4), 562–576.
<https://doi.org/10.1080/08856257.2020.1776983>
- Ní Bhroin, R., & King, F. (2019). Teacher education for inclusive education: a framework for developing collaboration for the inclusion of students with support plans. *European Journal of Teacher Education, 43*(1), 38–63.
<https://doi.org/10.1080/02619768.2019.1691993>
- Nilholm, C. (2021). Research about inclusive education in 2020 – How can we improve our theories in order to change practice?, *European Journal of Special Needs Education, 36*(3), 358-370, DOI: 10.1080/08856257.2020.1754547
- Oliver, M. (1990). *The politics of disablement: A sociological approach (Critical Texts in Social Work & the Welfare State)*. Macmillian Education.
- Roleska, M., Roman-Urrestarazu, A., Griffiths, S., Ruigrok, A. N. V., Holt, R., van Kessel, R., McColl, K., Sherlaw, W., Brayne, C., & Czabanowska, K. (2018). Autism and the right to education in the EU: Policy mapping and scoping review of the United Kingdom, France, Poland and Spain. *PLOS ONE, 13*(8), e0202336.
<https://doi.org/10.1371/journal.pone.0202336>
- Schuelka, M. J., Johnstone, C. J., Thomas, G., & Artiles, A. J. (2019). *The SAGE handbook of inclusion and diversity in education* (1st ed.). SAGE Publications Ltd.
- Sermier Dessemontet, R., & Bless, G. (2013). The impact of including children with intellectual disability in general education classrooms on the academic achievement of their low-, average-, and high-achieving peers. *Journal of Intellectual & Developmental Disability, 38*(1), 23–30.
<https://doi.org/10.3109/13668250.2012.757589>

Shevchenko, Y. M., Dubiaha, S. M., Melash, V. D., Fefilova, T. V., & Saenko, Y. (2020).

The role of teachers in the organization of inclusive education of primary school pupils. *International Journal of Higher Education*, 9(7), 207.

<https://doi.org/10.5430/ijhe.v9n7p207>

Smith, R. (2014). Changing policy and legislation in special and inclusive education: a perspective from Northern Ireland. *British Journal of Special Education*, 41(4), 382–

402. <https://doi.org/10.1111/1467-8578.12081>

Sundqvist, C., & Hannås, B. M. (2020). Same vision – different approaches? Special needs education in light of inclusion in Finland and Norway. *European Journal of Special*

Needs Education, 36(5), 686–699. <https://doi.org/10.1080/08856257.2020.1786911>

The European Agency for Special Needs and Inclusive Education. (n.d.). Raising achievement for all learners – quality in inclusive education (*RA4AL*). European-Agency.Org. <https://www.european-agency.org/sites/default/files/RA4AL-position-paper.pdf>

UNESCO. (2018, March 13). *Education 2030: Incheon declaration and framework for action towards inclusive and equitable quality education and lifelong learning for all –*

<https://iite.unesco.org/publications/education-2030-incheon-declaration-framework-action-towards-inclusive-equitable-quality-education-lifelong-learning/>

UNICEF. (n.d.). *Inclusive education*. <https://www.unicef.org/education/inclusive-education>

United Nations. (1994). *The Salamanca statement and framework for action on special needs*

education. European-Agency.Org. <https://www.european-agency.org/sites/default/files/salamanca-statement-and-framework.pdf>

United Nations. (2016). *CRPD and optional protocol signatures and ratifications*. Un.Org.

https://www.un.org/disabilities/documents/2016/Map/DESA-Enable_4496R6_May16.jpg

United Nations Statistics Division. (n.d.). *UNSD — methodology*. United Nations. Retrieved March 2, 2022, from <https://unstats.un.org/unsd/methodology/m49/>

van Kessel, R., Roman-Urrestarazu, A., Ruigrok, A., Holt, R., Commers, M., Hoekstra, R. A., Czabanowska, K., Brayne, C., & Baron-Cohen, S. (2019). Autism and family involvement in the right to education in the EU: policy mapping in the Netherlands, Belgium and Germany. *Molecular Autism, 10*(1). <https://doi.org/10.1186/s13229-019-0297-x>

Watkins, A., D'Alessio, S., & Kyriazopoulou, M. (2009). Inclusive education. *Research in Comparative and International Education, 4*(3), 229–232.
<https://doi.org/10.2304/rcie.2009.4.3.229>

Websites consulted

Børne- og Undervisningsministeriet. (n.d.). *Børne- og Undervisningsministeriet*. UVM. Retrieved December 12, 2021, from <https://www.uvm.dk/>

EBSCOhost. (n.d.). *RUG library off-campus access*. Retrieved January 5, 2022, from <https://login.proxy-ub.rug.nl/login?qurl=https://web.p.ebscohost.com%2fehost%2fsearch%2fbasic%3fvid%3d0%26sid%3d1b3b738d-45c5-43e1-89be-dbd7e581c4c%2540redis>

Federal Ministry of Education and Research. (n.d.). *Federal Ministry of Education and Research*. Retrieved November 30, 2021, from https://www.bmbf.de/bmbf/en/home/home_node.html

Government Offices of Sweden. (n.d.). *Startpage*. Regeringskansliet. Retrieved November 29, 2021, from <https://www.government.se/>

Government of Ireland. (n.d.). *Search for services or information*. Retrieved December 19, 2021, from <https://www.gov.ie/en/>

Government.no. (n.d.). *Search the whole site*. Retrieved December 21, 2021, from <https://www.regjeringen.no/en/id4/>

GOV.UK. (n.d.). *Welcome to GOV.UK*. Retrieved December 26, 2021, from <https://www.gov.uk/>

Ministère de l'Éducation Nationale de la Jeunesse et des Sports. (n.d.). *Pour l'école de la confiance*. Retrieved December 23, 2022, from <https://www.education.gouv.fr/>

Ministerie van Algemene Zaken. (n.d.). *Information from the Government of The Netherlands - Government.nl*. Government of the Netherlands. Retrieved December 9, 2021, from <https://www.government.nl/>

The federal government. (n.d.). *The federal government | Belgium.be*. Retrieved December 3, 2021, from https://www.belgium.be/en/about_belgium/government/federal_authorities/federal_government

The Ministry of Education and Culture. (n.d.). *The Ministry of Education and Culture, Finland - OKM - Ministry of Education and Culture, Finland*. Opetus- Ja Kulttuuriministeriö. Retrieved December 5, 2021, from <https://okm.fi/en/frontpage>