



China and Europe

A Glance at Different Approaches to Inclusive Education

EIAS European Institute
for Asian Studies

Briefing Paper

JUNE 2017

This paper expresses the views of the authors and not the views of the European Institute for Asian Studies. The report was researched, drafted and prepared by an EIAS team comprising Hannes Dekeyser, Programme Coordinator; Jan Renders, Associate Researcher and Julia Ahrens, Associate Researcher.

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1 Introduction

When discussing disability rights it is imperative to tackle areas in which substantial advancements can be made. The discussion of inclusive education for people with disabilities is an important one with ripple effects all throughout society. Both China and the European Union (EU) have taken on the topic of disability rights and accelerated their engagement on this topic both internally as well as through global governance efforts. For both entities, education has been an integral part of their disability rights programs. As education is an emancipator and an economic propellant, it makes sense that it would be at the heart of societal and economic progress for both China and the EU. For the EU, inclusive education is a means of furthering its normative framework as well as shaping a better post-crisis Europe. For China, the inclusion of vulnerable groups within its mainstream education system is an important milestone in its development to a more egalitarian society and towards sustainable growth.

Within the first part of this paper we aim to give an overview of the political and institutional factors that play a part in the shaping of the EU's and China's disability rights and inclusive education regimes. Secondly, we discuss a variety of approaches that have been implemented on a countrywide level within the EU and in China. Here, we explore the opportunities and challenges to these models and how best practices can continue to be shared to further China and the EU's development in this field.

2 Institutional frameworks for disability rights

2.1 Europe

While education policies in the European Union are largely a competency of the member states, the EU is an important influencer in the debate about disability rights and its continued harmonisation. As the Union has no central human rights institution, its disability rights regime is built upon a diverse body of legislation and is implemented through a plethora of stakeholders, internal actors and non-governmental organisations. All EU institutions with a specific interest in disability rights work in tandem to establish and execute the common framework. The most important of these are the European Commission, the European Parliament, the European Ombudsman, the European Agency for Special Needs and Inclusive Education (EASNE), the EU Agency for Fundamental Rights (FRA), and the European Disability Forum (EDF). These institutions publish their own policy papers and continue to be stakeholders in the general framework. The EU considers disability rights as an inherent part of its identity building and harmonizing efforts. Parallel to this, the EU's social rights debate has a strong connection to its common market policies. This is due to the EU's unique history rooted in a purely economic engagement that later on started to include more and more social issues.

The treaty of Amsterdam established non-discrimination firmly into the EU legal framework. In 1996, the European Agency for Special Needs and Inclusive Education (EASNE) was founded to support the European states in pursuing inclusive education in policy and practice through maintaining public discourse and exchange of knowledge within and among EU and EEA states. The EASNE also helps these countries to overcome obstacles and analysing and reviewing their progress. The agency is upholding these goals, whilst being aware that countries within the Union will have different approaches in policies and programs to achieve them.¹ Non-discrimination became an important priority within the 2000 Charter of Fundamental Rights of the Union and later on was reaffirmed in the UN Convention on the Right of Persons with Disabilities. In addition, the Convention added equal opportunity as a leading policy for disability rights. Different from purely internal EU policies, the UN Convention created an international dimension where there is room to advance global governance standards and share common experiences and best practices

In February 2016, the European Agency for Special Needs and Inclusive Education published a report on the progress of mainstreaming disability rights within the EU countries and institutions in accordance with the UN Convention on the Rights of the Persons with Disabilities (CRPD). From the beginning, the report makes clear that the main responsibility for implementing the goals falls under the competencies of the member states that are called upon to comply with Article 33 of the CRPD. This article requires countries to dedicate resources to the project and set up a focal point, putting in place a coordination program within governments and between private and public sector agencies and an independent network to monitor and control the process.² Whereas governments

¹ European Agency for Special Needs and Inclusive Education. (2016). *About us*. Retrieved from <https://www.european-agency.org/about-us/what-we-do>.

² European Parliamentary Research Service. (2016). *EU Implementation of the UN Convention on the Right of Persons With Disabilities*, p.8.

have their own focal points, the EU Commission is acting in this position to coordinate efforts between itself, all EU bodies, and the member states.³

According to the Commission's 2010 report on the European Social Fund and Disability, there is an increasing "need for specific actions/programmes which foster the development of disability specific expertise and solutions to address the concern that some people with severe impairments [...] will be unable to access the services they need in the mainstream, and that public authorities might abuse the concept of mainstreaming to reduce resources to the disability sector."⁴ In the 2010-2020 strategy, the EU acknowledges that the member states' competencies in determining the content and the organisation of education, but also promotes initiatives such as Youth on the Move (terminated in 2014) or Lifelong Learning Programme, which ended in 2013 and was transferred into the Erasmus+ programme.⁵ The EU also promises to support progress in its member states through the strategic framework for European cooperation in education and training (ET 2020).⁶ This framework identifies "personal, social and professional fulfilment of all citizens" and "sustainable economic prosperity and employability [...]" with a focus on lifelong learning.⁷ The EU therefore encourages the Open Method of Coordination (OMC) which calls for, amongst others, the exchange of good practices, benchmarking, monitoring and the drawing on the four strategic objectives: Making lifelong learning and mobility a reality, improving the quality and efficiency of education and training, promoting equity, social cohesion and citizenship as well as enhancing creativity and innovation, including entrepreneurship at all levels of education and training.⁸

The most recent development comes in the form of the Europe 2020 Strategy for smart, sustainable and inclusive growth. Inclusive development has for a long time been one of the EU's most important values within the context of social rights. It stems from non-discrimination but carries this further to incorporate inclusive education and the mainstreaming of disabilities. At the EU level these plans get given shape primarily at a judicial level. Since the court mostly shapes its interpretation of the law in the context of an active case and the population needs to first bring these issues to court, this approach requires a higher level of vigilance and mostly provides post-hoc protection. A more proactive approach is expressed at the national level where every member state uses its own competencies in this field to execute the EU guidelines. As a consequence, the European approach to inclusive education is quite pluralistic. Whilst some countries still have a dual-system of separate mainstream education and special education, others have highly integrated schools where special schools function as resource centres or only take care of the most exceptional cases. Within the framework of the UN Charter and EU guidelines schools across the EU should strive to integrate classrooms. Education and training for persons with disabilities are part of the priority areas set by the European Commission in its European Disability Strategy 2010-2020. More specifically, the EU Commission wants

³ Ibid., p. 10.

⁴ Ibid., p. 28-29.

⁵ The "Youth on the move" programme offers multiple links with the EU Disability Strategy 2010-2020 by addressing inclusiveness and relevance of education systems, job placement schemes for young people with disabilities, promoting entrepreneurship, and fostering mobility. It was terminated in 2014. (see <http://pjp-eu.coe.int/en/web/youth-partnership/youth-and-disabilities>)

⁶ European Commission. (2010). *Communication from the Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of Regions*. Retrieved from <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0636:FIN:en:PDF>, p. 8.

⁷ Official Journal of the European Union. (2009). *Council conclusions of 12 May 2009 on a strategic framework for European cooperation in education and training ('ET 2020')*. Retrieved from [http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52009XG0528\(01\)](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52009XG0528(01)).

⁸ Ibid.

to raise labour market participation and push for inclusive education, which aims to provide equal access to schools.⁹ On the whole, the EU's long-term disability strategy is based on three pillars: anti-discrimination, elimination of barriers and mainstreaming of disability into all EU policies.¹⁰ Mainstreaming aims to promote equal opportunities and participation of persons with disabilities.

Monitoring the progress of member states is observed and evaluated by the EU Framework. Through ratifying the European Disability Strategy 2010-2020, the EU committed to raising awareness, providing financial support, data collection and setting up mechanisms as demanded by the UN Convention in various areas.¹¹ In the area of education, programmes and their actual implementation is done by member states, which means that some practice inclusion, whilst in others children with disabilities remain mostly segregated.¹² The EU has adopted several programmatic initiatives to tackle inequalities, namely through provisions within the Erasmus+ programme and by making funding available to member states for projects that support inclusive education from the European Structural and Investment Fund (ESIF).¹³ The EU recognises that in particular persons with disabilities face additional challenges to trans-national mobility and has in response made extra funding available for this purpose. The Erasmus+ programme offers special needs support that can cover up to 100 percent of the costs for assistants, special equipment or additional medical care.¹⁴

2.2 China

The Chinese government sees education as a backbone to its continued development and modernisation. Enhancing the accessibility and inclusive nature of education is then a clear means to this end. Historically, China's inclusive education came as a solution to resource constraints existing in rural areas during the 1980s. These constraints were financial as well as a matter of experience and infrastructure. During this period, a push was being made to include more and more students with disabilities in the school system. In rural areas this development essentially had to be shouldered by the existing mainstream schools, leading to a tough and painful adaptation that nevertheless kicked off an earlier start to mainstreaming disability education. In fact, the first conference on special education in China was held in 1988 and formed the initial basis for the adoption of the 'Guideline for the Development of Special Education.' This integrated system of education then became known as 'special students learning in general schools.'

The Chinese government is quite de-centralised when it comes to educational policies. At the national level there is the Ministry of Education, with the Premier at its head. The Ministry is tasked with the long-term development of educational policy and the monitoring of its implementation nationwide. It is also in charge of the implementation of laws and the formulation of long-term goals. Its policies tend to be broadly applicable and leave room for diverse methods of implementation. As an incentive, the Ministry of Education is capable of allocating funds and administrative means. To guide its decision-making it has

⁹ European Commission. (2017). *Persons with Disabilities*. Retrieved from <http://ec.europa.eu/social/main.jsp?catId=1137>.

¹⁰ European Commission. (2010). *The European Social Fund and Disability*. http://ec.europa.eu/employment_social/esf/docs/br_disability_en.pdf, p.28.

¹¹ *Ibid.*, p.16.

¹² *Ibid.*, p.30.

¹³ European Parliament. (2016). *EU Implementation of the UN CRPD: European Implementation Assessment*, p. 24.

¹⁴ European Commission. (2014). *Erasmus+: Inclusion and Diversity Strategy*. http://ec.europa.eu/assets/eac/youth/library/reports/inclusion-diversity-strategy_en.pdf, p.11.

a rigorous research department that informs its own decisions and helps inform other branches of government.

The executive power to work out the national strategy is mainly in the hands of the county level for primary and secondary education. Higher education matters generally get handled at the provincial level, leading to a more centralised approach here. The counties create policy papers to document and report on the implementation of the national guidelines as well as to build comprehensive local strategies. On these local levels, plans usually get developed over a five-year period. As will be discussed later in this paper, a lot of the tangible headway is being made in practices cropping up from the local level.

The national strategy is at this point being driven by the National Long-term Educational Reform and Development Plan (2010-2020), which has four main priorities. Firstly, the plan focuses on the rural, remote, impoverished and minority areas as these have a substantial amount of catching up to do. The traditional rural-urban and socioeconomic divides existing within China amplify the Special Education Needs (SEN) challenges. Ensuring access to primary education in rural areas is linked to this issue. In addition, China strives to improve the provision of vocational education and pre-school education everywhere in the country as a second priority. Working in synergy with this, the third priority is the freeing up of additional subsidies for students from impoverished families. Capping these priorities, China aims to continuing the training and deployment of high-quality teachers. Teachers, as a precious link in the development of the country's human capital, are a consistent point of focus in China's SEN development program. China's National Plan for Medium-And-Long-Term Education Reform and Development (2010-2020) listed Special Education as one of the eight major objectives in the overall education reform. The reform also set the goal of providing special education schools for every 300,000 residents in every prefecture, prefecture level city and county by 2020.¹⁵

Furthermore, China took a major step towards inclusive education by updating the regulations on education for people with disabilities in February 2017. As according to the update, people with disabilities are entitled to an education that accommodates their physical and mental needs. The severity and nature of a disability of a pupil is assessed through an Expert Committee on the Education of Persons with Disabilities. This, more recently, also includes individualised education plans. China emphasises mainstream education as central method, whereas special education would remain as the backbone.¹⁶ At the local level, the National Long-term Educational Reform and Development Plan (2010-2020) strives to ensure that by 2020 every prefecture or prefecture-level city and county of more than 300,000 residents will be provided with one or more special education schools. President Xi Jinping has promoted the rule of law as an important value pushing forward social rights within China. Whereas the judicial branch has a very dominant role in protecting social rights in the EU, the judicial action within China is as of yet not very developed and quite dependant on the enforcement, there might be important changes to its effectiveness coming from this.

¹⁵ Malinen, Olli-Pekka. Inclusive Education in China. In: CEREC WP (4:2013), p. 8.

¹⁶ The State Council of the People's Republic of China. (2016). *Revised regulations to promote education for disabled*. Retrieved from http://english.gov.cn/policies/latest_releases/2017/02/23/content_281475575969990.htm.

3 A Programmatic approach to disability rights

Programmatic approaches emphasise open-ended policies through which disability rights are expressed. An important difference from, for example, a judicial approach is that intervention and pro-activity are important staples of programmatic action, whereas a judicial approach emphasizes civil action and procedural change. Political actors and institutions on various levels agree to go along with these goals. However, in the area of education, they are mostly pursued on the national level, while EU can only provide guidelines and funding.¹⁷ The following sub sections will explore different programmatic approaches of the European Union and its member states and China in pursuing the rights of disabled people focusing on inclusive education. It aims to look at policies in different countries in Europe, as well as China and reveal eventual challenges they might encounter. Norway will also be considered in this paper, as it is closely connected with the EU through the European Economic Area (EEA) and is also part of the Erasmus+ scheme. The chapter will emphasise the potential to share knowledge and learn from each other whenever cultural frameworks allow for it.

3.1 Europe

3.1.1 Approaches to inclusive education in different EU member states

Within the member states, programmes to push forward inclusive education differ greatly in depth and scope due to different socio-economic, cultural and prior educational settings. This is reflected by strongly varying number of pupils with disabilities in mainstream schools. For example, while Italy educates 99 percent of its pupils with disabilities in ordinary schools, Luxembourg only teaches 44.5 percent in mainstream schools and Greece is only teaching 5 percent of its pupils in an inclusive setting according to data from 2012.¹⁸ Nowadays, three different main approaches to educating pupils with SENs can be identified:

3.1.1.1 Inclusive education in mainstream schools

The Swedish approach

According to the Swedish Education Act, pupils with SENs are not to be treated any differently than ordinary pupils. It is emphasised that schools should cater to the needs of everyone – this means that for pupils with special needs, action plans have to be developed that also emphasise individual learning needs. Teachers, special support teachers, parents and the pupil are involved in this process. For those with visual impairments and other additional disabilities, deafness or hearing impairment combined with learning disabilities or severe speech and language disorders, three national and five regional special schools are available. The curricula of these schools correspond with the ones of mainstream schools.¹⁹

¹⁷ Mabbett, D. (2005). The Development of Rights-based Social Policy in the European Union: The Example of Disability Rights, *JCMS* 43(1), p.98.

¹⁸ incluD-ed. (2012). *Quality factors of inclusive education in Europe: an exploration*, p. 6.

¹⁹ European Agency. *Sweden: Overview*. Retrieved from: <https://www.european-agency.org/country-information/sweden/national-overview/complete-national-overview>.

The Swedish government sets general goals, values and define responsibilities, but no specific guidelines on how to reach them. The implementation of strategies falls under the competency of local authorities. Furthermore, Sweden runs four national resource centres that focus on specialised knowledge in the areas of visual impairment, deafness or hearing impairment, congenital deaf blindness and severe language-speech disorders. These centres offer assessment of pupils, training programmes for educators and can provide in-class support.

On the upper-secondary level, the state provides adapted teaching materials and regional counties provide technological support for pupils with SENs. For pupils that are not eligible for upper-secondary programmes, five introductory programmes that are meant to prepare them for the labour market and continuing education are available.

Sweden's National Agency for Special Needs Education and Schools provides special needs support, adapted teaching materials and additional funding. Municipalities are furthermore free to spend resources on support systems and programmes when they consider it feasible. Pre-schools and schools contain forums of consultation to determine the needs of a pupil. As a result, parents can seek consultation with medical specialists and psychologists, if required. Furthermore, teachers are educated in six areas, namely language, writing and literacy development, math development, deafness or hearing impairment, visual impairment, language impairment and severe learning disabilities.²⁰ After completing a degree in education, teachers can obtain a Postgraduate Diploma in Special Needs Training within which they can focus on either previously mentioned speciality.

Educational integration in the EEA: The case of Norway

In Norway, educating pupils with SENs in segregated schools is a very uncommon practice. When the country ratified the Salamanca Statement²¹ in the 1990s, Norway already met the organisational requirements outlined. In 2012, 90.3 percent of pupils with SENs were educated in mainstream schools. Even though numbers of pupils with SENs in ordinary schools have decreased due to a stronger focus on competitiveness and a goal of achieving higher academic results after the poor performance of Norwegian pupils in the first round of the PISA test, it is still comparatively high in a European context. Norway views inclusive education and special education as incompatible with each other.²² This phenomenon is directly linked to Article 5 of the Norwegian education law, which states that pupils that do not benefit from mainstream education have the right to special education. This links to the assumption that today's mainstream education system is not good enough to accommodate pupils with SEN. To tackle this issue, Norway has turned to the concept of adaptable education, which is put into practice through two ways: the student-centred approach and the classroom approach. The first approach is focused on assessing every student's personal abilities and possibilities, which are then integrated in an individual education plan. However, this strategy brings its own obstacles, namely an over-individualisation of the learning environment and a reduction of teachers' responsibility for learning outcomes and mutual learning between pupils.²³ The classroom approach on the other hand sees the class as a whole and opens up possibilities for students to work

²⁰ Ibid.

²¹ The Salamanca Statement called for inclusive education and outlined guidelines on how to accommodate pupils with disabilities in ordinary classrooms.

²² R. Hausstatter and H.Thuen. (2014). Special Education Today in Norway. In *Special Education International Perspectives: Practices Across the Globe Advances in Special Education* (28: 2014), p.202.

²³ Ibid., p.202-203.

together and encourage learning from each other. In this setting the teacher acts as a facilitator helping students to communicate with each other. Student-centred teaching is, however, the most common practice in Norwegian classrooms. Hausstatter and Thuen see in this one of the reasons why special education numbers are increasing in Norway, as the student-centred approach and special education are both based on the idea that teaching should be tailored to the needs and capabilities of the individual.²⁴

On the whole, Norway's mainstream education system is still accommodating enough to most pupils with SENs, which is rooted in the long-term tradition of inclusion. Furthermore, kindergartens, schools and higher education institutions are supported by the Educational and Psychological Counselling Service, which provides education institutions with guidance, and counselling on how to organise learning for pupils that need support.²⁵ Norway also has 13 resource centres owned by the state in the framework of The National Support System for Special Education (Statped), which supports the development of measures to promote inclusive education. Statped is particularly committed to fighting the prejudice of having special needs served outside the regular classroom setting.²⁶

3.1.1.2 Special needs schools being transformed into research centres

Portugal: mainstreaming through resource-centres

Since 2008, Portuguese special schools have increasingly taken up the role of resource centres. Resource centres are specialised institutions that work in synergy with mainstream schools to provide them with support to better integrate pupils with SENs. This is rooted in the fundamental right to education, equality inclusion in society. Furthermore, Portugal provides personalised pedagogical support, individual curriculum adjustment to the enrolment and assessment process and support technology. Individual monthly funding is also available for pupils with SENs and their families. These payments are coordinated and reviewed annually by co-operatives, education and special teaching associations, for-profit education and special teaching establishments.²⁷ Portugal also practices early intervention for children from the ages of 0 to 6, which particularly targets children with disabilities and their families. The Ministry of Education coordinates the allocation of human resources and also provides monthly operation funding for mainstream schools. In addition to that, Information and Communication Technology Resource Centres for Special Needs (ICTRCSN) were implemented to assess pupils' special needs in regards to technology, which are in turn partially funded through the Ministry of Education and Science. ICTRCSNs also train teachers, staff and families in using these technologies. At the moment, 25 ICTRCSNs operate in Portugal, are directly linked to schools and follow central guidelines as well as present annual activity plans. Special education staff can also be integrated in the classroom to provide differentiated pedagogy, tutoring programmes for study strategies, guidance and advice and the enhancement of activities at any point of the

²⁴ Ibid., p.

²⁵ European Agency. *Norway – Special needs education within the education system*. Retrieved from <https://www.european-agency.org/country-information/norway/national-overview/special-needs-education-within-the-education-system>.

²⁶ Statped. (2016). *To be included in school*. Retrieved from <http://www.statped.no/Spraksider/In-English/to-be-included-in-school/>.

²⁷ European Agency. *Portugal – Overview*. Retrieved from <https://www.european-agency.org/country-information/portugal/national-overview/complete-national-overview>.

academic year.²⁸ Today, 97.4 percent of pupils with SEN are educated in mainstream schools in Portugal.²⁹

3.1.1.3 Special schools as integral part of educational provision

Special education needs in Germany

In 2012, 21.3 percent of pupils with SENs were educated in mainstream schools in Germany.³⁰ While the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* in the Federal Republic of Germany has adapted several decisions on the harmonisation of the situation of pupils with SEN, the implementation and regulation of changes to educational strategies lies in the responsibility of each of the 16 German states. In most of these (except for example Bavaria), parents are free to choose a school for their children. This also applies to students with severe disabilities. Same as Sweden and Portugal, Germany has set up regional advice centres that also actively support schools in assessment, compensating disadvantage and preventive measures. However, each state still runs special needs schools that are particularly for students who are deaf, blind, have hearing impairments or intellectual disability. Once a child reaches school age and there is the assumption that a mainstream school will not be capable of assisting this child's needs, the school supervisory authority recognises these needs and a decision on whether to send the child to a mainstream school, which provides individual assistance, or to a special school.³¹

Pupils with learning difficulties or any other disabilities can be assessed and provided with individual plans, get personal assistance in the classroom and additional therapeutic measures, if required. These efforts are supported through, for example, the "Persoenliche Budget" (personal budget) that is provided by various service providers (eg. healthcare insurances or social welfare sponsors) and advertised by the federal Ministry of Employment and Social Affairs. Although this funding is not specifically aimed at fostering inclusive education, it follows the general guiding idea of "equal participation" for persons with disabilities. The amount of funding for a single person ranges between EUR 36 Euros to up to EUR 13,000 per month and can be invested, for example, in hiring a personal assistant to accompany a child during and after school hours. The funding is not simply given to anyone, but persons with disabilities or their legal guardians must make a request to obtain it. The amount of money granted is then determined and it is decided whether it will be an ongoing support.³²

3.1.2 Challenges to programmatic approaches in the Europe and the EU

As education lies exclusively within the competency of the states, the EU as an institution cannot impose policies on its members on how to go about implementing inclusive policies or how to compose curricula and tailored support for mainstream schools that take in pupils with disabilities. This lack of competency on the European level is rooted in the idea that countries that already complied with certain standards would face lower costs than those

²⁸ Ibid.

²⁹ incluD-ed.(2012). *Quality factors of inclusive education in Europe: an exploration*, p. 6.

³⁰ Ibid.

³¹ European Agency. *German: Special Needs Education within the Education System*. Retrieved from <https://www.european-agency.org/country-information/germany/national-overview/special-needs-education-within-the-education-system>.

³² Ministerium fuer Arbeit und Soziales. *Persoenliches Budget*. Retrieved from http://www.einfach-teilhabe.de/DE/StdS/Finanz_Leistungen/Pers_Budget/pers_budget_node.html.

who pursued different approaches. Therefore, consensus on legally binding social programmes on a European level remains difficult to attain.³³

Whereas most states accepted the policies firstly introduced by the 1993 EU Social Policy Green Paper suggesting that education in mainstream schools should be preferred for persons with disabilities, instead of segregating them from other learners; their actual implementation on the nation state level faces various challenges.³⁴ As states cannot be forced to pursue non-discriminatory policies, dedication to these goals varies with the capacities and political will of a nation. Furthermore, reliable information to compare the progress of member states is hard to measure, because comparable data is often lacking as the 2016 report of the European Parliamentary Research Service points out.³⁵ While there is information on the number of persons with SEN, there is little internationally comparable data in relation to access and learning outcomes as well as the effectiveness of allocated resources.³⁶

A report published by the Academic Network of European Disability (ANED) experts in 2011, has furthermore found that access to mainstream education strongly varies with the type of impairment – people with certain learning difficulties such as dyslexia are more easily integrated in the classroom than those with cognitive impairments.³⁷

As previously mentioned, depending on the country, children are either educated in ordinary schools, in separate classes within ordinary school or in special schools. Countries like Germany still invest heavily in special schools that are focused on educating children that often have hearing, visual or intellectual impairments. The ANED researchers further reveal that the definition of SEN strongly varies among member states – whereas some define SEN associated with “varying degrees of functional and structural impairments” (eg. Germany, Hungary) others also include any students facing social disadvantages or those who are considered outstandingly gifted (eg. UK, Finland, Slovakia). Consequently, persons with different impairments face diverse barriers to their inclusion into mainstream education. Particularly the access to secondary and higher education still remains difficult, as some countries cease assistive equipment support by the age of 16. In relation to this, mobility in higher education is an outstanding issue. Countries pursue different approaches on who to support – some will only assist their citizens, others will only support foreigners and another group will actually help both.³⁸ Another factor is policies that fail to address the transition between education levels. As of yet, only a few countries require secondary schools to provide transition plans for their students. Overall, the report points out that countries still focus too heavily on common curricula and less on tailoring them to individual students’ needs, which is why special schools were introduced in the first place.³⁹

³³ Mabbett, D. (2005). The Development of Rights-based Social Policy in the European Union: The Example of Disability Rights, *JCMS* 43(1), p.107.

³⁴ *Ibid.*, p.108.

³⁵ European Parliamentary Research Service. (2016). *EU Implementation of the UN Convention on the Right of Persons With Disabilities*, p.30.

³⁶ ANED. (2011). *Inclusive Education for Young Disabled People in Europe: Trends, Issues and Challenges*. <http://www.disability-europe.net/downloads/72-aned-2010-task-5-education-final-report-final-2-0>, p. 10.

³⁷ ANED. (2011). *Inclusive Education for Young Disabled People in Europe: Trends, Issues and Challenges*. <http://www.disability-europe.net/downloads/72-aned-2010-task-5-education-final-report-final-2-0>, p. 7.

³⁸ *Ibid.*, p.38.

³⁹ *Ibid.*, p.10.

Last but not least, the austerity crisis had a significant impact on the funding for inclusive education programmes and has caused some major setbacks in EU countries such as Greece, Hungary and Spain.⁴⁰

3.2 China

3.2.1 A resource-centred approach

The Chinese government focuses heavily on affirmative action and programmatic policies to enforce its educational goals. This is especially the case for SEN pupils who generally find easier access to educational institutions. Yet, a big challenge lies in the effectiveness by which a school can accommodate a student. As mentioned previously, the diversity of disabilities and the unique challenges every set of disabilities pose put the adaptability of the system under stress. The Chinese response to the dilemma posed by the pressing need to mainstream inclusive education and providing adequate support to those most severely afflicted with their impediments lead to the creation of the 'Special education school as backbone, learning in regular classroom as main body' approach. Within this system inclusiveness is assumed unless insufficient at which point special education schools step in to facilitate. This approach is somewhat reminiscent of the resource-centre approach found within Portugal. Schools are urged to have an open door policy towards people with disabilities. Much like the EU, China's diversity leads it to strong local educational traditions and executive centres of gravity. Nevertheless, there are certain general trends in China's educational plan that benefits those with special educational needs (SEN). China's 'one pass rule,' a provision that requires every local educational administration to enrol all children with disability in order for them to be able to claim full compulsory educational compliance has been a strong boost to enrolment amongst students with disabilities. The more hard-line statement that schools are disallowed to reject children with disabilities to enrol in general is meant to complement and ensure full compliance with the national plan. As a balance to these requests, the state makes efforts to provide all facilities needed to ease accessibility and inclusion. These facilities are then provided by these SEN schools that function as resource centre. The linking of these facilities is then meant to enable every school to offer a full curriculum to their students, with both integrated and special classes as needed.

The case of schools in the Beijing municipality shows that this resource approach is beneficial to the quality of inclusive education. In 2011 the Beijing Municipality Commission of Education emphasised a commitment to develop both special education schools and inclusive regular schools in parallel. In an effort towards more mainstreaming, the funding for special schools was preserved whilst additional investments were allocated into inclusive schools. As a consequence, schools within Beijing have been using these resources to implement changes at the teaching-level. As a general trend, Chinese teachers tend to be more numerous and teach fewer hours than their European counterparts. One of the reasons for this difference is the heavier emphasis on class preparation and extra-curricular activities. Within the Beijing Municipality, teachers are encouraged to invest this additional time into closer teacher-to-teacher collaboration. Teachers within this model have a closer level of interaction and have the capabilities to create a comprehensive curriculum that is more fitted to individual students' needs. In addition, these networks enhance the exchange of best practices and reduce stigma across the schools. It had been shown for example that contact between experienced SEN teachers and mainstream

⁴⁰ European Parliament. (2016). *Vulnerable Social Groups: Before and After the Crisis*, p.5.

schoolteachers overall made the latter more open and capable to accommodate SEN pupils into their classes. More recently, Beijing has been experimenting with digital interaction platforms allowing teaching from a distance for those students who are physically incapable of attending classes.

To further foster inclusive action, the Special Education Advancement Program was run nation-wide between 2014 and 2016. The project was funded by the welfare lottery fund and provided financial resources for preschool education for about 11,000 children with disabilities and their families.⁴¹ A recent trend in China is resource centres that support educational institutions with knowledge and technological aid. In Sichuan Province, Yunnan Province and Xinjiang Uyghur Autonomous Region the organisation Save the Children has cooperated with local education bureaus to improve inclusive education and set up such resource centres. The three-year project aimed at training school staff at all levels and make sure that these actions are continued in a sustainable manner after the project is finalised. The resource centres are meant to develop county-level policies, procedures and guidelines on how to identify students with SENs, develop individual plans, assess the performance of teachers, monitor schools' progress, co-ordinate between different institutions to find children with disabilities and collate data, train teachers, develop special materials and equipment as well as to provide rehabilitation services as well as consultancy for parents.⁴²

3.2.2 Challenges to Inclusive Education Approaches in China

As mentioned previously, it can be challenging to assess the reach of inclusive education programs in China. Higher education is especially hard to access as students are only admitted if they meet the general admission requirements of the state as according to Article 34 of Regulations on the Education of Persons with Disabilities. Students need to present documents on their physical health and if the requirements are not met, enrolment into higher education schools can be denied.

China also faces similar issues as the EU in terms of comprehensive and comparable data on inclusive education. There are stark contrasts in development and access to resources between poor and rich regions as well as between groups of people in one place, which makes it difficult to make general assumptions on the overall state of inclusiveness in China.⁴³

Furthermore, pupils with SENs are mostly categorised by visual or hearing impairments or intellectual disability.⁴⁴ The definition of disability in China is therefore still a medical one and less of a social one, which can lead to the exclusion of certain types of disabilities from regular classrooms.

Due to the competitive nature of the Chinese school system and the evaluation of teachers based on their pupil's exam results, teachers have lower incentives to try and practice inclusive approaches. Teacher training programmes and collaborative problem solving among colleagues could provide relief and the support needed.⁴⁵ Also, financial support

⁴¹ China Disabled Persons Federation. (2016). *Statistical Communiqué on the Development of Work of Persons with Disabilities in 2014*. Retrieved from:

http://www.cdpcf.org.cn/english/Resources/statistics/201603/t20160323_545438.shtml.

⁴² Ming Liu. (2013). *Developing resource centres for inclusive education in China*. Retrieved from:

http://www.eenet.org.uk/resources/eenet_newsletter/eer2/page20.php.

⁴³ Malinen, Olli-Pekka. Inclusive Education in China. In: *CEREC WP* (4:2013), p. 9.

⁴⁴ Ibid.

⁴⁵ Ibid., p.14.

programmes as promoted by the recent update of the regulations on education for people with disabilities could provide additional support.

Particularly in Western China, inclusive education has proven to be harder to implement due to resource constraints. There is a general lack of special education schools and even if they are existent, they cannot serve as resource centres like their counter-parts in more developed areas due to the lack of above-mentioned resources. China has been trying to tackle this issue through its the National Plan for Medium-And-Long-Term Education Reform and Development (2010-2020), but particularly in the West, this goal remains difficult to achieve. Beijing also further aimed to work on this issue through its cooperative Gansu Basic Education Project, co-funded by the EU, which operated from 1999 to 2006. While this programme was focused on improving access to education more generally, it also had a special focus on pupils with SENs. However, as John Chi-Kin Lee et al. point out, the western region, despite many efforts to train teachers on special education, is prone to negative attitudes towards inclusive education, a lack of expertise and resources.⁴⁶

⁴⁶ John Chi-Kin Lee et al. (2016). *Educational Development in Western China: Towards Quality and Equity*. (Sense Publishers: Rotterdam), p. 15.

4 Sharing Knowledge and Best Practices

Cooperation with international institutions that originate from Europe further knowledge transfers and can help to build common values for inclusive education. One such project was led by Save the Children, which provided external support for setting up research centres to assist in bridging the gap between national policies and the actual implementation of inclusive education. Training in those centres can help reduce the fear in educators facing pupils with SENs and supports them in setting up appropriate individual plans those children. These centres, as outlined above, contribute to the formulation of policies on the county level and also have potential to accumulate knowledge and data to refine national guidelines on inclusive education.⁴⁷ In accordance with recent China's focus on sustainable growth and innovation, these institutions, in the long run, will contribute to prepare children for the labour market and make China's workforce not only more inclusive, but also more effective and innovative.

The EU had previously supported a project implemented by Save the Children and the China Disabled Persons Federation in 2009 that aimed at piloting a "replicable model of accessible, quality inclusive education in mainstream schools, supported by resources from special schools and the wider community".⁴⁸ Teacher training, new mechanisms for technical support, transfer of expertise, developing an inclusive environment, developing national surveys on inclusive education were some focal points of the 36 month project.

The EU, within its Erasmus+ programme, currently runs a project in cooperation with China on developing curricula and teacher education especially in primary schools by developing a special Master's programme which promotes "learning values, attitudes, creative and helpful teaching strategies."⁴⁹ This also involves the creation of a website on inclusive education in China. Currently, Sichuan Normal University, Tibet University of Nationalities and Guangxi National University take part in the project on the Chinese side, which is coordinated by the Southwest University.

Furthermore, to tackle the lack of training of teachers in rural China, the EU has supported the EU-China Gansu Basic Education Project. The programme relied on information and communication technologies, residential courses, mobile training teams and school-based professional development through local Teacher Learning Resource Centres.⁵⁰

For the future, the idea of a classroom approach similar to those used in Norway to accommodate the needs pupils with SENs might bear great potential for China, as it is not overly focused on the individual, but more strongly on the idea of mutual learning in groups with different mastery levels. This is also suggested by an Includ-ed study identifying interactive groups including pupils with different mastery levels, gender, ethnicity and disability, dialogic reading which requires students to read in more spaces and times and extended learning time which allows for after-school tutoring and learning programs. 20 schools in 6 different countries were part of the study, which, instead of requiring additional

⁴⁷ Enabling Education Network. (2012). *Developing resource centres for inclusive education in China*. Retrieved from http://www.eenet.org.uk/resources/eenet_newsletter/eer2/page20.php.

⁴⁸ Europe Aid. (2009). *Steps from exclusion to inclusion: achieving quality inclusive education for children with disabilities in China*, p. 1.

⁴⁹ Up2Europe. (2015). *Promoting inclusive education through curriculum development and teacher education in China*. Retrieved from: https://www.up2europe.eu/european/projects/promoting-inclusive-education-through-curriculum-development-and-teacher-education-in-china_83537.html.

⁵⁰ John Chi-Kin Lee et al. (2016). *Educational Development in Western China: Towards Quality and Equity*. (Sense Publishers: Rotterdam), pp. 15-16.

resources, reorganised the ones that they already had in a more effective way.⁵¹ Flecha et. al instigate that “by providing in-classroom support, inclusive actions allow teachers to teach the same curriculum to all pupils and facilitate individualized support.”⁵² In relation to this, as China has also started inclusive education in rural areas first, the experience from these schools will be particularly valuable. Approaches that are successful in various settings with low socio-economic backgrounds are likely to be successful in other situations as well, because they require little or no additional resources, but solely the effective re-organisation of resources.

Policies like Germany's personal budget could furthermore support students and their families with money to afford personal assistance in the classroom to enhance equal participation in interactive groups. Attempts to develop a programme in China similar to this one could be seen in projects like the Special Education Advancement Program.

Countries have pursued and continue to pursue inclusive education in very different ways as it can be seen from the three main types identified in examples from Norway, Portugal and Germany. However, even within these countries, approaches can be starkly diverse due to a nation's organisational nature, as it can be seen in Germany where the actual implementation of inclusive policies is left to the *Länder*. For a country of the size and diversity of China, top-down approaches in terms of policies will always be difficult to implement. Therefore, national guidelines that are composed of best practices, which are constantly updated and supported by experience from both European countries and China, will continue to greatly help further inclusive education.

⁵¹ Flecha, R. et al. (2015). *Successful Educational Actions for Inclusion and Social Cohesion in Europe*. Heidelberg and New York: Springer, p.32-33.

⁵² Ibid. p. 33.

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