

State of the Art Report

Inclusion policies and practices in DIGIT]ALL[project participating countries

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A new approach to digital education and inclusion



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Introduction



Nearly three decades ago, due to a rethinking of the ethics of exclusive practices (Thomas, 2013), the concept of inclusion was first introduced as an alternative educational approach to segregated learning opportunities for students with diverse needs and abilities. Thus, the Salamanca Statement and Framework for Action (UNESCO, 1994) introduced a new and previously underutilized understanding of inclusive education (IE) as a practice that provides comprehensive learning opportunities for all students (Hardy & Woodcock, 2015) but especially allows children with special educational needs (SEN) to access mainstream education (Artiles & Kozleski, 2016). Ever since, several international initiatives such as the CRPD (Convention on the Rights of Persons with Disabilities; UN, 2006) or the Sustainable Development Goal for Education (SDG4; UNESCO, 2015) have given new momentum to the IE movement. As a result, education systems around the world are striving to implement IE. This manifests itself in changes in policy and regulatory frameworks, which in turn lead to, for example, redesigning initial teacher education (e.g., Morton et al., 2021) or placing students with SEN in mainstream schools (Lindner et al., 2019).

Notwithstanding the fact that, according to the guiding principle of inclusion, promoting equal access to and opportunities for quality education for each and every student must be a top priority in all education systems, previous and current study findings have highlighted several problems related to IE. First, there is no scholarly consensus on the definition of SEN (e.g., Nilholm & Göransson, 2017; Magnusson, 2019), which in turn makes “attempts to measure or compare such a complex equity issue (...) unsurprisingly challenging” (Loreman et al., 2014, p. 4). Moreover, profound differences in national IE policies and practices further limit the scope for cross-country comparisons. Furthermore, even within several countries, there is a wide variety of legal frameworks, and their practical implementation related to inclusion (e.g., Ramberg & Watkins, 2020). However, as Hardy and Woodcock (2015) noted, inclusive education as an approach to advancing students with diverse needs and abilities requires consideration of relevant policies within and across national jurisdictions. Against this background, the current report, prepared within the framework of the Erasmus+ project **DIGIT]ALL[**, highlights the main differences and similarities in definitions of SEN, relevant legal frameworks, procedures for identifying and assessing SEN, and common practices for promoting inclusion in the participating countries Austria, Germany, Portugal and Romania. Using the information obtained the authors attempt to identify issues that currently exist in the area of educational policy and practice related to students with SEN, as well as possible opportunities for improvement.

1. Definition of SEN



Definition of SEN

Austria

Pursuant to section 8(1) of the Compulsary Education Act 1985, a special educational need is to be assigned if a student, due to a not only temporary physical, mental or psychological functional impairment or impairment of sensory functions, is not able to follow the lessons in the elementary school, lower secondary school or polytechnic school without special educational support. Furthermore, according to the Federal Ministry of Education, Science and Research, the following special educational needs can be identified: (1) Learning, (2) Disabilities of different types, severity and complexity, (3) Vision, (4) Hearing, (5) Language, (6) Physical and motor development and (7) Behavior.

Germany (North Rhine-Westphalia)

In Germany, the overall definition of SEN by the KMK (Kultusministerkonferenz; i.e. supreme administrative authority of a federal state for the area of schools and education; 1994) reads as follows: "Special educational needs are assumed for children and adolescents who are impaired in their educational, developmental, and learning possibilities that they cannot be adequately supported in the lessons of the regular school without special educational support (KMK, 1994, p. 5)." However, Germany is a federal country consisting of 16 federal states ("Bundesländer"). Educational policy in Germany is a state matter. Thus, there are significant differences regarding the definition of SEN between each federal state. In the following, we provide detailed information about the SEN definition for the federal state of "North Rhine-Westphalia" (cf. "School ministry of North Rhine-Westphalia (NRW)": <https://www.schulministerium.nrw/sonderpaedagogische-foerderung>): "A child has a need for special educational support if – after an appropriate decision by the school authority which is based on pedagogical and, if necessary, medical reports, the child requires special support in his or her personal and school development" (School Ministry of NRW). Accordingly, in NRW, special educational needs can be differentiated into the following dimensions: (1) Learning, (2) Language, (3) Emotional and social development, (4) Hearing and Communication, (5) Vision, (6) Cognitive development, (7) Physical development and (8) Autism spectrum disorders.

Portugal

In Portugal, a child or adolescent with special educational needs (currently called educational needs) has one or more limitations at the physical, cognitive, behavioral, social, or emotional level that significantly affect their learning or do not allow them to learn according to their abilities. Consequently, they need to access supports in order to learn, whether the limitation is superficial or profound, permanent or occasional. Based on the Universal Design of Learning model and the multi-level approach to curriculum access, Portugal establishes a school that addresses the needs of each individual at the academic, behavioral, social, and emotional levels. Thus, any child or adolescent may have educational needs throughout the learning process, and schools should take learning support measures to improve the learning process (inclusive education). Furthermore, there is no categorization of special educational needs in Portugal.

Romania

In Romania, special educational needs refer to children with developmental delays, special medical problems, behavioral problems, learning problems/delays, mental health problems and genetic defects- all of which require specific therapies to give the child a chance at a normal life. The definition of SEN in the Romanian legislation is based on internationally developed concepts. According to the Organization for Economic Cooperation and Development ([OECD], apud MECTS, UNICEF & RENINCO Association, 2010), special educational needs can be classified into the following categories:

Category A refers to special educational needs arising from different types of disabilities (e.g. those who are blind or partially sighted (amblyopic), deaf or partially deaf (hypoacusis), mentally handicapped, multiply disabled). From a medical point of view, these requirements are usually considered as derived from organic disorders (of structures or functions).

Category B refers to the educational requirements of pupils with learning difficulties which are not obviously or directly related to factors which may justify inclusion in category A or C.

Category C refers to special educational needs which are considered to be primarily the result of socio-economic, cultural and/or linguistic factors (e.g. immigrants, ethnic minorities). Accordingly, any student may have SEN at some time during their schooling, for various periods of time and at different levels and intensities, requiring additional support.



Legal framework

It should be emphasized that the “Salamanca Statement and Framework for Action and Special Needs Education” (UNESCO, 1994) as well as the “Convention of the United Nations on the Rights of Persons with Disabilities” (UN, 2006) are the main legislation on SEN that have been considered by educational policy in all four countries. In the following, however, the individual pieces of legislation that were relevant in terms of educational policy developments in the individual countries will be addressed.

Austria

With regard to school and class placement, the School Organization Act (1962) was of great importance, as special schools were established as the place where students with SEN should receive the best possible education. Almost thirty years later, however, with the Organisation Act Amendment published in 1993, parents or legal guardians were given the right to decide whether the student should attend a regular or a special school. As far as the course of action following the determination of SEN is concerned, the most important legal act is Section 8(1) of the Compulsory Education Act. Thus, in addition to the requirements for the assignment of SEN, it specifies how to proceed with school and class placement and curriculum, and what requirements must be met in order for SEN to be withdrawn. Since the Education Reform Act published in 2017 and entered into force on January 01, 2019, the Directorate of Education has been responsible for identifying and allocating special educational needs, deciding on the appropriate educational measures and ensuring their quality. A supplementary circular letter (7/2019) from the Federal Ministry of Education provides specific details on the procedure for identifying and allocating SEN. In addition, it contains information about which characteristics of students are explicitly not considered prerequisites for the assignment of a special educational need (e.g., beginning skills in the language of instruction, dyslexia and dyscalculia, no presence of a disability). Further, the main objectives of special and inclusive education support measures are formulated.

Germany (NRW)

Germany is a federal country with differences regarding the laws and regulations between each federal state. In the following, we provide detailed information about the laws and regulations for



the federal state of “North Rhine-Westphalia” (location of the Paderborn University) (cf. “School ministry of North Rhine-Westphalia; NRW”):

(1) School law for the federal state of North Rhine-Westphalia (School Law NRW) [Schulgesetz für das Land Nordrhein-Westfalen (Schulgesetz NRW – SchulG)] – particularly §19/20 and

(2) Regulation about special educational support, home schooling, and school for the sick [Verordnung über die sonderpädagogische Förderung, den Hausunterricht und die Schule für Kranke (Ausbildungsordnung sonderpädagogische Förderung – AO-SF)] – 29.04.2005.

The “(1) school law for the federal state of North Rhine-Westphalia” and the “(2) regulation about special educational support, home schooling, and school for the sick” form the legal framework regarding special educational needs in the federal state of North Rhine-Westphalia. They contain paragraphs on the different dimensions of special educational needs, the decision about students’ special educational needs, and places of special educational support.

Portugal

Apart from international legislation, namely the Declaration of Salamanca, Human Rights, in Portugal the most important legislation regulating Inclusive Education is the Decree-Law 54/2018, which is a general law that bases Inclusive Education. The Normative Order n.º 6478/2017 describes the profile of students leaving compulsory education, which in Portugal is 18 years old. The Normative Order n.º 5908/2017 describes the Autonomy and Curricular Flexibility of schools. Furthermore, the Decree-Law n. No. 17/2016 establishes the guiding principles of the organization and management of curricula, assessment of knowledge and skills to be acquired and developed by students in basic and secondary education. The Normative Order No. 1-F/2016 deals with assessment and Law No. 51/2012 deals with the approval of the Student Statute and School Ethics.

Romania

Regarding the legal framework in the field of special education, Romania takes into account the legislation created by international bodies for the education of people with special educational needs (SEN). In addition to the current legislation, the Ministry of Education, on the basis of the 1995 Education Law, elaborates regulations in the field of special education. The methodology for the organization and operation of educational services for children/pupils with disabilities integrated in public schools, through itinerant and support teachers (2011). The framework plan for special education in the perspective of compulsory education of 10 classes; the concept of



integration and inclusion. The decree of the Ministry of Education on the approval of the methodology for the assessment and integrated intervention for the inclusion of children with disabilities in the degree of disability, in the educational and vocational orientation of children with special educational needs, as well as for the empowerment and rehabilitation of children with disabilities and/or special educational needs (2016). Romania is organized by 41 counties. Every county has a school inspectorate who manages all education processes including the department SEN. The School Inspectorate of Suceava County, Department of Special and Inclusive Education, has elaborated a system procedure for case management for children with special educational needs (2020).

2. Identification of SEN (SEN assessment)

Procedures for identifying students with SEN vary widely from state to state. Accordingly, medical, psychological and educational professionals, as well as parents or legal guardians, may participate in the process of identifying and assigning SEN. Assessment practices have a significant impact on a students' academic career, not only because they affect grade placement and resource allocation, but also because the label of "SEN" often cannot be quickly reversed. The following subsections present in detail the country-specific procedures for identifying and assessing SEN.

Austria

As a rule, the school principals together with the parents or legal guardians submit an application for the determination of special educational needs directly to the legal department of the educational board after all possible support measures have been exhausted. Whether a special educational need exists or not is examined by the educational board in a procedure. In this process, expert opinions are sought from school psychologists as well as diversity managers to assess whether a disability exists. Diversity managers have an educational perspective on the child and assess the level of participation in the classroom. The parents or legal guardians may also submit medical, psychological or educational findings or reports. The legal department of the educational board then decides whether a special educational need exists and which curriculum and school the child should attend. The parents or legal guardians receive a legal decision.

Germany (NRW)

In general, the parents or legal guardians initiate the SEN assessment and allocation process for their child. In exceptional cases (e.g., a target-/curriculum-oriented education is not possible for a student or students are at high risk of harming themselves or other person because of emotional and social difficulties), the school can initiate the SEN assessment and allocation process. The school authority decides on the opening of the SEN assessment and assignment process. SEN teachers provide their expert opinion regarding students' SEN. If necessary for the SEN assessment and assignment process, the school authority can involve further specialists or specialized services (e.g., medical doctors). If there is a diagnosed need for special educational support, the school authority suggests to the parents at least one regular school that can provide specific support. The school authority's suggestion is not mandatory. The parents or legal guardians can also decide for another school or special school. Students' need for special support will be evaluated annually by the class conference.

Portugal

In Portugal, any educational agent (teachers, parents...) can request the referral of a child or young person to be submitted a specialized assessment. The referral is made to the person in charge of the school, who asks a multidisciplinary team to make a professional assessment and decide on the child's condition within 30 days. At the end of the assessment and when the need to apply the simplest learning support measures is confirmed, these measures are agreed upon in the class teacher council to which the student belongs. In case of application of complex measures (selective and/or additional), a professional pedagogical report is prepared with the conclusions and guidelines for the pedagogical intervention. In case of application of additional measures, an individual pedagogical program is also prepared, operationalizing the measures, their application and evaluation.

Romania

In Romania, a physician specialist performs the assessment and classification of SEN when there is a particular medically relevant impairment (deafness, musculoskeletal problems, visually impaired). In the case of behavioral problems, learning problems/delays, psychological problems, mental problems and genetic defects (speech disorders), a psychologist, in collaboration with a psychiatrist specialized in child psychiatry, certified by the Romanian College of Psychologists and working in a private practice, performs the assessment and assignment of SEN. The Special and Integrated Education Department specialists, make the children's evaluation, based on System Procedure regarding the Case management for children with SEN and give them a certificate. Based on the certificate issued by the specialist, the children are integrated into a regular school with adaptation of the curriculum or enrollment in a special school is recommended.



3. Common practices to promote inclusion

Austria

Historically and currently, policies concerning inclusive education strongly focused on disability. However, the ratification of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) in 2008 sparked intense debates about the promotion and implementation of inclusive teaching practices and the existence of segregated school programs (i.e., special schools) in Austria. As a result, the NAP (National Action Plan, regarding measures to fulfill the obligations of the UNCRPD) was published by the Ministry of Social Affairs in 2012. Since then, several important steps have been taken toward a more inclusive school system. Accordingly, a number of 'inclusive model regions' (i.e., raising the number of inclusive schools and at the same time reducing the number of segregated education programs) were implemented in certain parts of Austria (Buchner & Proyer, 2020). In addition, a teacher education reform has taken place, meaning that inclusive education courses are now part of the curriculum as part of the training for future secondary teachers. According to the National Education Report (2021), 60% of students with SEN are taught in integrative classes (less than half of the students with SEN in one classroom) in mainstream schools. In comparison, only 54.7% of students with SEN were taught in inclusive classes in the 2015/16 school year. In addition, so-called "cooperative classes" were introduced, in which small classes of students with SEN are taught together with mainstream classes for a few hours per week. In summary, Austria, as many other countries, has taken important steps in recent decades that have brought schools closer to inclusive education. However, segregated schooling remains a well-established part of the Austrian school system.

Germany (NRW)

In Germany, there are significant differences regarding the implementation of inclusion between each federal state: e. g., in some states the exclusion rate of students with SEN declined, while in others it increased or did not change (Hollenbach-Biele & Klemm, 2020). The federal states have also different approaches regarding the continuation or discontinuation of special schools. Some federal states are sticking to the concept of special schools for the different support needs, while other federal states intend to include all students with special educational needs in regular schools (Werning, 2017). Inclusive schools with a high level of student well-being and achievement scores (focus on students with learning difficulties) are characterized by a high level



of established cooperation structures between regular and special needs teachers and their shared responsibilities for all students (Lütje-Klose, Neumann, Gorges, & Wild, 2018).

For the state of North Rhine-Westphalia, the implementation of the 9th School Law Amendment Act has resulted in a large number of special schools having to be closed (Barow & Östlund, 2019). Since school year 2008/2009, the proportion of students with SEN among all students has increased from 5.9 percent to 8.2 percent in 2018/2019, accompanied by a slight decrease in the proportion of students with SEN in special schools (Hollenbach-Biele & Klemm, 2020). And although the state of NRW has changed the system for allocating special education teacher positions for students with learning and development disorders to a throughput model (i.e., teacher positions are allocated on a lump sum basis), many inclusive schools have not been allocated special education teacher positions (Goldan, 2021). In summary, although inclusive education systems were pushed by the NRW government and several special schools were closed, after 2017, due to a change of political representatives, the closure of special schools was stopped. Against this background, a dual education system is maintained in NRW to this day (Barow & Östlund, 2019).

Portugal

Portugal has implemented policies and practices aimed at an inclusive education system in recent decades (Alves, 2019), but especially since the last education reform in 2018 (Alves et al., 2020). In the 1970s, special school was considered an option for students with certain characteristics (physical, sensory, or intellectual disabilities). Today, 99% of students with disabilities attend mainstream schools (Pinto & Pinto, 2018). Furthermore, Legislative Decree 54/2018 rejects the idea that students with SEN must be categorized, but recommends that all students can achieve a profile of competencies at the end of compulsory education, even if they follow different learning paths. Against this background, the diversity of students and the complexity of schools are recognized, and the main objective of schools is to develop individuals who are independent, responsible and active citizens. In addition, most special schools were transformed into resource centers for inclusion as a result of a legislative decree published in 2008. Accordingly, specialists connected to the resource center provide psychological support or physical therapy for students in mainstream classrooms (Alves, 2015). While these developments may be important milestones on the road to inclusion, data suggest that over half of students with complex needs spend less than 40% of their time with the rest of the class (DGEEC, 2018). In summary, the legal framework and policy appear to support inclusion, and schools will be assessed for their level of inclusion beginning in May 2019. However, by implementing the idea that students should reach a certain



level of proficiency by the end of compulsory education, the differences between learners are still implicitly presented as challenges (Alves, 2019).

Romania

Although Romanian schools are trying to adapt their educational offer in terms of inclusion (Ghergut, 2010). The integration of students into mainstream schools started in the 2001/02 school year. After this period, the teachers are in fact signaling some important challenges of the inclusion education initiatives in Romania (Alexiu, 2017). “Inclusive school” is present since more than 15 years in the programmatic documents of the educational system and the idea became more pregnant after 2007 since Romania is member of the EU. In addition, the Ministry of Education opted for the self-contained classroom model, in which students move between special and mainstream schools, and the itinerant model, in which one or more students with mild disabilities are placed in mainstream schools (Walker, 2010). In the school year 2019/20, 16.645 students enrolled in special primary and lower secondary education (Statista Research Department, 2022).

The results of a study by Ghergut (2010) indicate that teachers overall show positive, favorable attitudes toward promoting inclusive education and the possibility of including students with special education needs in mainstream classrooms. However, a recent study by Alexiu et al. (2016) suggests that some teachers and principals are reluctant to embrace the inclusion process and show little interest or motivation in changing their traditional teaching practices. In this context, teachers complain about a lack of resources and special training.

In summary, in the Romanian education system exist some barriers in admission of the disabled students in mainstream schools (at all levels but increasing as the education level increase) . And, although the number of students with SEN in mainstream classes has increased in recent years (Tonita, 2021), empirical findings suggest that discriminatory resistance of the society is reflected in schools. That can stand in the way of implementing new and contemporary forms of teaching for integration of children with SEN (Alexiu et al., 2016).

Summary analysis

Although there are a number of studies that have compared in depth the implementation of inclusion-related policies in different education systems (e.g., EADSNE, 2011; Smyth et al., 2014; Strangvik, 2010), this report focuses explicitly on SEN policies and practices in four European countries: Austria, Germany, Portugal and Romania. By providing an overview of important country-specific legal frameworks and their practical application, not only can similarities and differences be uncovered, but also processes of learning from each other can be set in motion.

The previous chapters presented the prevailing SEN definitions, legal frameworks, SEN identification and assessment approaches, and common practices to promote inclusion in each country. However, this final chapter is dedicated to summarizing and cross-referencing previous findings in order to provide new insights and subsequently suggest improvements.

SEN definitions

The international trend towards inclusive education and the related task for teachers to include students with SEN into mainstream classrooms goes hand in hand with the problem of defining SEN. Specifically, educational scholars and practitioners face the challenge of determining who has the authority to define it (Lebeer et al., 2010). However, for shaping policy approaches and planning support interventions that specifically target at-risk students and for comparing strategies across countries, overarching SEN definitions would be a forward-looking development. According to the OECD Strength through Diversity Project, medical, social, and biopsychosocial models of disability have influenced policy and practice worldwide (Brussino, 2020). Thus, under the medical model, disability is rooted in the person, caused by health conditions, and therefore limited to the definition of impairment. Moreover, not contextual factors (e.g., structural barriers) are problematized, but the individuals with disabilities themselves. Within the social model, problematization shifts from the person to societal aspects that stand in the way of successfully meeting the needs of individuals with disabilities. Finally, the biopsychosocial model describes a more holistic approach to defining SEN. Accordingly, a person's well-being is understood as something that depends on the biological, psychosocial, and societal responses to their disability. With this in mind, both medical and social measures are being considered to meet the needs of people with disabilities.



In recent years, there has been an overarching shift from a narrow, medical paradigm to a broader, biopsychosocial paradigm (Brussino, 2020). However, countries continue to vary widely in how they define SEN (Brussino, 2002; Lebeer et al., 2010), as illustrated below.

As for the participating countries, all adopt a fairly broad definition of SEN. However, definitions include a problematization of the student who needs additional support to learn and develop. Therefore, they represent medically oriented SEN definitions that focus on the disabled or impaired learner and give limited consideration to contextual factors. However, unlike Austria, Germany (NRW) and Romania, the Portuguese SEN definition actually takes into account the need to provide a set of special educational resources. In addition, Portugal is considered the only one of these four countries that has recently abandoned the categorization of students with special educational needs. In Austria, Germany (NRW) and Romania, on the other hand, there are clear categories to which students are assigned according to certain characteristics. In Austria and Germany, the national categorization of SEN includes physical impairments, learning disabilities, and mental disorders. In Romania, in addition to two categories that take into account organic disorders and learning difficulties, there is a third category that considers societal and cultural factors that contribute to a learner experiencing difficulties during their school years. Against this background, SEN and related support mechanisms are seen as something that can affect anyone, depending on age and life circumstances.

Procedures for the identification and assessment of SEN

Just as the definitions of SEN differ, so do the procedures for identifying and assessing special educational needs in different regions of the world and sometimes even within a single country, as the example of Germany clearly shows. In addition, this area also reflects the dominance of a deficit-oriented, often medicalized approach that only partially considers environmental factors and parent/legal guardian involvement (Barow & Östlund, 2019). Accordingly, in the case of Romania, only medical and psychological experts are responsible for the process of identifying and assessing SEN. Against this backdrop, parents/guardians, teachers, and other education stakeholders have little or no voice in supporting the assessment of SEN. In Austria, NRW and Portugal, parents or legal guardians are usually involved in initiating SEN identification and assessment. In Austria and the German federal state of NRW, school authorities decide on the opening of the SEN assessment and assignment process. In Portugal, on the other hand, the request is made to the school principal, who then assigns a multidisciplinary team to initiate the process of SEN assessment. In all three countries, teachers can help to take into account the

contextual factors within a classroom and provide relevant information on the academic and socio-emotional development of the learner. In Austria and Germany (NRW), parents or guardians can decide which school the student should attend (e.g. mainstream school or special school) based on the legal decision whether or not a student has been classified as having special educational needs. However, in Romania, for students who are identified as having SEN after the assessment process, an individual support program is created based on the decision of the special educator and approved by the school principal. Accordingly, parents or guardians have no say in the planning of further measures on the pedagogical, psychological or physical level. In Portugal, when a student is labeled with SEN, the class teacher participates in the elaboration of complex measures and pedagogical interventions. Since students are educated in mainstream schools regardless of their SEN status, there is no need to make a decision about a student's placement in a class. In summary, the processes for identifying and evaluating SENs in all four countries involve a variety of actors. While in Austria and Germany (NRW) parents or guardians are closely involved in the SEN assessment procedure, this is not the case in Portugal and Romania. Accordingly, parents or guardians in Portugal can initiate a SEN assessment, but they are not involved in further procedures and decisions. On the contrary, family participation in decision-making processes and educational programs regarding students with SEN is low in Romania. In addition, a particularly strong reference to a deficit-oriented, medicalizing assessment can be observed in relation to Romania. Accordingly, great importance is attached to the involvement of medical and psychological experts, whereas in Austria, NRW and Portugal multidisciplinary cooperation is envisaged, including special education and mainstream school teachers. However, only in Portugal is a professional pedagogical report prepared by those involved in the SEN assessment, which includes approaches tailored to the individual educational needs of the student labeled with SEN. In Austria, NRW, and Romania, on the other hand, the results of the SEN assessment are primarily used for school and class placement considerations.

Practices to promote inclusion

In recent years, all four participating countries have paved the way for a more inclusive school system, particularly due to the widespread recognition and implementation of legal frameworks for SEN (i.e., “Salamanca Statement and Framework for Action and Special Needs Education” (UNESCO, 1994) and “Convention of the United Nations on the Rights of Persons with Disabilities” (UN, 2006)).

Important steps have been taken in Austria, including the National Action Plan published in 2012, through which the basic principles of inclusion in school education are given even greater

consideration. In addition, due to a reform, teacher education curricula for primary and secondary education now include courses dedicated to the topic of inclusion. Although about 60% of students with special educational needs are educated in mainstream schools, segregated schools remain an integral part of the Austrian education system. This is also the case in NRW and Romania, where schools are slowly trying to adapt their educational offer in view of inclusion, but special schools are still seen as an option for accommodating students with SEN. As explained earlier, there are different forms of special schools in Romania for students with different special needs. In addition, more than 16,000 students were enrolled in Romanian special schools in the 2019/20 school year. In Germany, due to a change of policy representatives in 2017, the closing of special schools was stopped. As a result, in the 2020/21 school year, only 44.7% of students with SEN attended a mainstream school. In Portugal, however, the situation of students with SEN is quite different. Accordingly, 99% of students with SEN are placed in mainstream schools, are not categorized, and receive special psychological support or physical therapy as needed. Yet, on average, students with SEN spend less than 40% of their instructional time with their peers without SEN because they participate in supportive activities outside of the mainstream class. Although the SEN definition and related regulations recognize the diversity of students, students with SEN still need to access special supports outside of the mainstream classroom, which might be a potential barrier to their social inclusion.

In summary, educational policy and practice have taken important steps to promote the inclusion of students with SEN in mainstream schools. However, the fundamental idea of inclusion requires not only the accommodation of students with SEN in mainstream classrooms, but also the provision of quality education for each and every learner. Against this background, the educational systems in Austria, Germany (NRW) and Romania still seem to be far from the idea of inclusion. Portugal is an exception in this regard, although students still need to reach a certain level of literacy at the end of compulsory education and are pulled out of the mainstream class for a certain period of time. However, the implementation of new and contemporary forms of teaching requires far-reaching changes in the minds of all those involved, as could be shown in particular with regard to Romania. Questioning one's own ways of thinking and acting and the willingness to change therefore seem to be necessary to drive inclusion forward. Against this backdrop, it seems reasonable to start with those directly involved and to focus above all on prospective teachers, but also on practicing teachers, and to promote continuing education programs.

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