

# Benchmarks and inspiring practices of Inclusive Education

A comparative study of five European countries

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With the support of



## A comparative study on Inclusive Education?

Although international (and particularly European) legislation on Inclusive Education is clearly established, its application remains uneven, including within Europe<sup>1</sup>.

These disparities can be explained by different historical trajectories, political systems, and conceptions of education. Furthermore, the gaps in terms of resources (mostly financial) dedicated to disability policies and to the **'inclusivity' dynamics**<sup>2</sup> tend to accentuate those discrepancies. In short, the budgetary commitment and political priorities of each country play a decisive role in the effectiveness and the implementation of Inclusive Education.

In France, it should be reminded that in 2018 and following a collective complaint lodged by Unapei and other associations, the Council of Europe condemned France's violation of the rights of persons with disabilities and their families. This condemnation shines a light on the remaining obstacles to the education of many children with disabilities. Moreover, it highlights the need for an in-depth thinking on the accessibility of the education system and its inclusive nature, which requires adapting teaching methods, tools, materials, as well as the school environment and routine<sup>3</sup>.

**We might want to ask ourselves the following question: where does France stand, on a European scale, in terms of education and inclusion of children with disabilities?**

→ It seemed therefore interesting to have, within Unapei and its European networks, a reference document highlighting the disparities and specificities between European countries. This might help identify benchmarks and tendencies on Inclusive Education as well as understand the overall status of European countries on the matter.

### ***How and why should this document be used by Unapei and its European networks?***

In addition to providing a better understanding of where France stands in terms of education and inclusion of children with disabilities, this study could also serve as an opportunity to:

- **Draw on inspiring practices** to fuel both local and national advocacy and move public policy forward;
- **Understand what works and what does not** in the implementation of Inclusive Education policies;
- **Open up to broader reflection** on the contribution of the medicosocial services, especially in France, and the importance of promoting them within the context of Inclusive Education.

<sup>1</sup> In 2007, the EU signed the Convention on the Rights of Persons with Disabilities, which entered into force in 2011.

<sup>2</sup> "A dynamic of inclusivity involves the constant development and improvement of policies, educational practices and infrastructures to guarantee each pupil, regardless of their particularities, the same opportunities for learning and success". - Sonia Ahéhinnou, vice-president of the Unapei in charge of education and schooling.

<sup>3</sup> See « Pas si douce France ! Les droits des personnes en situation de handicap et de leurs familles sont bafoués par l'État français. » on the website unapei.org (April 2023).

## About Unapei

**The Unapei movement brings together 900,000 people:** persons with disabilities, families, friends, professionals, caregivers, helpers, voluntary workers and sympathisers. They are all committed players to a solidarity-based and inclusive society.

Unapei is a network of 330 associations and over 3,000 institutions and facilities in France. As main player in the medicosocial sector in France, it brings together 'militant entrepreneurs'. They all fight to ensure that each person and each family has access to their rights and can receive support based on their needs, expectations and choices throughout their lives.

For nearly 60 years, Unapei has been innovating by drawing on its diversity and unique expertise, combining that of persons with intellectual disabilities, families and professionals.

→ For more information, visit [www.unapei.org](http://www.unapei.org).

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# Introduction

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## GENERAL BACKGROUND INFORMATION

The **Convention on the Rights of Persons with Disabilities** (CRPD), ratified by the European Union, came into force in 2011. It marks a turning point in the recognition of the rights of people with disabilities at international level. The adoption of this convention was the result of a global process of commitment to the inclusion of people with disabilities, and particularly in the field of education.

According to a recent UNICEF report<sup>4</sup>, there is now a **general international consensus, according to which every child, regardless of their disability, is capable of learning and developing skills**. Inclusive Education is referred in **79%** of legislation worldwide, with the general idea that no child should be excluded from education at school on the grounds of their disability. However, **fewer than one in ten countries have specific laws** guaranteeing the effective inclusion of disabled children in the education system.

When it comes to the education of children with disabilities in the countries of the **European Union**, the following data reveal a contrasted picture:

- Approximately **1,1 million of children with intellectual disabilities** attend special school or institutions, whereas 700,000 children attend 'mainstream' schools<sup>5</sup> ;
- Around **20,000 children with intellectual disabilities** do not benefit from any form of schooling, highlighting the remaining difficulties of access to schooling for them<sup>6</sup> .
- The school drop-out rate remains a cause for concern: it is **twice as high** for pupils with disabilities, with **one in five** leaving school prematurely<sup>7</sup> ;
- Although around **one in three** students with disabilities manages to obtain a higher education qualification, this is still much lower than for those without disabilities (almost **one in two**)<sup>8</sup>.

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<sup>4</sup> *Global Report on Early Childhood Care and Education (ECCE)*, UNICEF & UNESCO, June 2024.

<sup>5</sup> *Indicateurs d'inclusion : Droits et inclusion des personnes en situation de handicap intellectuel dans 29 pays européens*, Inclusion Europe, 2023.

<sup>6</sup> *Indicateurs d'inclusion : Droits et inclusion des personnes en situation de handicap intellectuel dans 29 pays européens*, Inclusion Europe, 2023.

<sup>7</sup> *Disability in the UE: Facts and figures*, European Council of the European Union. (<https://www.consilium.europa.eu/en/infographics/disability-eu-facts-figures/>)

<sup>8</sup> *Disability in the UE: Facts and figures*, European Council of the European Union. (<https://www.consilium.europa.eu/en/infographics/disability-eu-facts-figures/>)

## THE CONCEPT OF 'INCLUSIVE EDUCATION' ACCORDING TO THE INTERNATIONAL LEGISLATION

**Article 24** of the UN Convention of the Rights of Persons with Disabilities enshrines the **right to Inclusive Education** for children with disabilities:

*"In realizing this right, State Parties shall ensure that:*

- A) *Persons with disabilities are not excluded from the general education system on the basis of disability, and that children with disabilities are not excluded from free and compulsory primary education, or from secondary education, on the basis of disability;*
- B) *Persons with disabilities can access an inclusive, quality and free primary education and secondary education on an equal basis with others in the communities in which they live;*
- C) *Reasonable accommodation of the individual's requirements is provided;*
- D) *Persons with disabilities receive the support required, within the general education system, to facilitate their effective education;*
- E) *Effective individualized support measures are provided in environments that maximize academic and social development, consistent with the goal of full inclusion."*

**General Comment No. 4** of the UN Committee on the Rights of Persons with Disabilities (2016) enshrines the normative nature of the Article 24 and reminds us the official definition to the term of **inclusion**<sup>9</sup> :

*"Inclusion involves a process of systemic reform embodying changes and modifications in content, teaching methods, approaches, structures and strategies in education to overcome barriers with a vision serving to provide all students of the relevant age range with an equitable and participatory learning experience and environment that best corresponds to their requirements and preferences."*

The term of 'inclusion' therefore aims for the participation and involvement of all pupils, with the intention of making the most of the learning potential of the class as a whole. In this way, teaching loses its homogeneity in favour of a vision in terms of the plurality and diversity of individual needs. Inclusive Education must then be understood as a **systemic and agile transformation of the educational environment that involves and promotes the whole school community**<sup>10</sup>, and not just the disabled pupil.

<sup>9</sup> General comment No. 4 on Article 24 - the right to inclusive education, 2016.

<sup>10</sup>Sonia Ahéhéhinou, vice-president of the Unapei in charge of education and schooling.

## PLAN

The following study is presented in three sections which constitute criteria aimed at evaluating, or at least comparing, the implementation of Inclusive Education policies in five pre-selected European countries/ States:

### The Law on Inclusive Education:

- What laws define disability and the way it is compensated in the field of education?
- To what extent do the texts lean towards an inclusive approach to education?
- What level of alignment with international conventions and UN recommendations characterizes the different States?

### The Definition of Roles in Inclusive Education:

- What are the prevailing modes of operations (balanced coexistence between medicosocial services and the education system, de-institutionalisation with the absorption of medicosocial services by the education system, etc.), and who are the main players involved?
- How and to what extent is the contribution of the medicosocial services taken into account and mobilized in the implementation of Inclusive Education policies?
- What tools are available to those involved?

### Resources invested in Inclusive Education policies and how they are received by those who benefit from them<sup>11</sup>:

- What practical means are governments using to implement their national legislation and international norms in favour of Inclusive Education?
- What are the difficulties encountered by the States implementing these policies?
- How do the most primarily concerned – people with disabilities and their families, as well as the associations representing them – view these policies, and what criticisms might they make of them?

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<sup>11</sup> Anne Revillard, *La réception de l'action publique*, 2016.

## METHODOLOGY

The choice was made to focus on five European countries/ States with different histories, economic and political systems to France. These five countries were first used in a French comparative study by the Cour des Comptes on Inclusive Education which was published in September 2024. The document deals in great detail with the matter of funding methods. Here are some figures about the countries selected, taken from this study, depicting the schooling of children with disabilities<sup>12</sup>:

- **Italy** (59 million inhabitants): in 2020-2021, more than **300,000** children with disabilities were enrolled in Italian schools<sup>13</sup>.
- **Sweden** (10.5 million inhabitants): in 2022-2023, **22,000** children with disabilities were enrolled in special schools, from primary to secondary level. There is no data on the proportion of disabled children attending mainstream schools.
- **Germany** (84 million inhabitants): in 2020-2021, **180,000** children with disabilities attended mainstream schools - **44%**<sup>14</sup>, an augmentation which subsequently led to a slight decline in the number of special schools<sup>15</sup>.
- **Portugal** (10 million inhabitants): in 2017-2018, nearly all children with disabilities were enrolled in mainstream schools (**99%**).
- **England** (53 million inhabitants): in 2023-2024, out of the **9 million** pupils in school, **1,57 million** display special educational needs.

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<sup>12</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>13</sup> Italy has a total of around 2.5 million pupils in school.

<sup>14</sup> Germany has a total of around 2.9 pupils in school.

<sup>15</sup> 3,300 in 2010 against 2,800 in 2019 according to the same study.

## SOURCES

It was particularly useful to draw on:

**1 – Pre-existing comparative studies, international comparisons and analyses**, notably:

- *Le Cahier de comparaisons internationales de la Cour des Comptes sur l'école inclusive* (2024)<sup>16</sup> ;
- The work of Inclusion Europe – in particular on inclusion indicators<sup>17</sup>, or on the inclusion of pupils with complex supports needs in mainstream schools<sup>18</sup> (2023) ;
- Specialised literature, mainly in French (Hospimedia, for instance<sup>19</sup>).

**2 – Primary sources emanating directly from the States concerned**, in particular government sites, articles in the local press or other news and information sites.

**3 – For Italy, Germany and England, primary sources promoting the expression of the most primarily concerned, namely people with disabilities, their families and the associations that represent them** (via claims, statements, articles from association's websites), this in order to provide a critical view of public policies on Inclusive Education through the lens of those primarily concerned.

→ *All references can be found at the end of the document (last page).*

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<sup>16</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>17</sup> *Indicateurs d'inclusion: Droits et inclusion des personnes en situation de handicap intellectuel dans 29 pays européens*, Inclusion Europe, 2023.

<sup>18</sup> *Exploratory study on the inclusion of pupils with complex supports needs in mainstream schools*, Inclusion Europe, 2018.

<sup>19</sup> « Les pays modèles de l'école inclusive ont misé sur la pédagogie et les coopérations », in *Hospimedia*, October 2023 (online).

## The Law on Inclusive Education

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→ What criteria should be questioned?

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In **France**, the **Law no. 2005-102 of February 11th, 2005**, following on from that of **1975**, enshrines the '**right to education**'. The **Law no. 2013-595 of July 8th, 2013** (Article L. 111-1 of the French Code of Education) reaffirms this right by emphasising the **inclusive nature** of education: '*[The public service] recognizes that every children share a capacity to learn and improve. It has to ensure the inclusion of all children, whatever special needs they may have*'.

### Italy; Pioneer in Inclusive Education

In **1977**, Italy became the first country to close its special schools and institutions and place its children with disabilities in mainstream schools. The aim of the successive laws passed between **1971** and **1992**, and of the case law of the Constitutional Court, was to move from an approach based on integration to an **inclusive teaching model geared towards the full educational development of the entire class group**<sup>20</sup>.

Italy ratified the UN Convention on the Rights of Persons with Disabilities in **2009**. Since then, other national laws and guidelines have expanded the scope of this text:

- In **2009**, the '**Linee guida per l'integrazione scolastica degli alunni con disabilità**' (Guidelines for the school integration of pupils with disabilities) introduced two fundamental concepts: the acceptance of the diversity of pupils with disabilities as a source of enrichment, and the importance of paying attention to the needs of each pupil, whether they have a disability or not;
- In **2010**, the law no. 170/2010 on '**Nuove norme in materia di disturbi specifici dell'apprendimento in ambito scolastico**' (New rules on specific learning disabilities in the school environment) enshrined the shift to an **inclusive approach** to education and affirmed the need to provide all the necessary tools and support to enable the full development of each pupil,

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<sup>20</sup> Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire, Cour des Comptes, 2024.

in their complexity and individuality. At the heart of this strategy is the **individualization** of the educational offer;

- In **2012**, the Miur (Ministry of Education) developed a specific ministerial directive entitled '**Intervention Tools for Pupils with Special Educational Needs and Territorial Organization for School Inclusion**' which recognizes the possibility that any pupil may have special educational needs. Subsequently, inclusive teaching methods are established for all pupils who experience difficulties for various reasons<sup>21</sup> ;
- In **2013**, a circular introduced the **Annual Inclusion Plan**, a document allowing each school to define its educational needs, organize the necessary interventions, and monitor their results<sup>22</sup> ;
- In **2015**, the so-called '**Buona Scuola**' law considerably reformed the **Italian school system** and promoted the inclusion of all pupils with disabilities<sup>23</sup> ;
- In **2017** and then **2019**, the **Decree on Inclusion** embodies the final step, giving greater weight to the **role of families** and through the creation of **Territorial Inclusion Groups**. The **Individualized Educational Plan** became the fundamental tool with which the class council was now required to design a specific educational plan for each pupil with a disability<sup>24</sup>.

### **Sweden: 99% of children with disabilities benefit from Inclusive Education**

Since the **1960s**, Sweden has pursued a policy of closing its institutions (de-institutionalisation). A great proportion of children with special needs are now enrolled in the mainstream education system, while those with more 'complex' needs or disabilities remain in special schools or sections/ classes attached to mainstream schools<sup>25</sup>. Children on the Autism Spectrum Disorder may for instance benefit from a specific program or enrolment in a special school adapted to their needs<sup>26</sup>.

Directly based on the UN Convention on the Rights of Persons with Disabilities, the **Government Bill 2016/17:188** on the '**National Goal and focus Areas for the Disability Policy and the National Strategy for Systematic Monitoring of Disability Policy 2021- 2031**' provides a guideline for the Swedish disability policy for a whole decade. It includes specific measures for education, a priority area of action. The **Swedish Education Act** stipulates that all children must have equal access to school, regardless of their gender, geographical residence, financial and social situation. Teachers are responsible for ensuring access to education for all. The

<sup>21</sup> « L'evoluzione dell'inclusione scolastica in Italia » in *l'Orientamento*, July 2024 (online).

<sup>22</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>23</sup> *Inclusione scolastica, cosa pensa Anffas, on the website of the « Associazione nazionale di famiglie e persone con disabilità intellettive et disturbi del neurosviluppo ».*

<sup>24</sup> « L'evoluzione dell'inclusione scolastica in Italia » in *l'Orientamento*, July 2024 (online).

<sup>25</sup> Note: There are no accurate statistics in Sweden on the number of children/ pupils with disabilities, as there is no official terminology for disability. Therefore, Swedish statistics only cover the number of pupils in special schools and schools for pupils with severe learning disabilities.

<sup>26</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

Swedish education system is based on the philosophy according to which all learners have an equal right to personal development and learning experiences<sup>27</sup>.

### **Germany: Further behind on Inclusive Education issues?**

In Germany, the right to education for children with disabilities was not introduced until **1962**, and in **1978** for students with more complex support needs. In the same year, the first specific curriculum for children with disabilities was published<sup>28</sup>. Germany ratified the UN Convention in **2009** and is also part of the **2030 Agenda** which includes the goal of inclusive education for all. However, the medical approach to disability still prevails. Until **2009** and the ratification of the UN Convention, the German education system relied almost entirely on special schools<sup>29</sup>. Thus, Germany now relies on a system characterized by the **coexistence** of medical and social services, with a range of special institutions and schools, and the education system, with possible access to mainstream schools<sup>30</sup>. Inclusive Education is based on **Article 24** of the CRPD (*'Persons with disabilities are not excluded from the general education system on the basis of disability, and that children with disabilities are not excluded from free and compulsory primary education, or from secondary education'*). Pupils with disabilities are therefore entitled to accommodations and support in order to pursue their education and attend mainstream primary and secondary schools.

The **Länder**<sup>31</sup> are responsible for the inclusion of students with disabilities. Policies, laws and their implementation can therefore greatly vary depending on each Land. For example, some Länder are legally prohibited from refusing a place to disabled children in mainstream education<sup>32</sup>.

### **Portugal: A new role model for Inclusive Education?**

In Portugal, until **2018**, Inclusive Education was governed by **Decree-Law 3/2008**, which provided for **specialised support in mainstream schools and the creation of special schools**<sup>33</sup>. Prior to this, the successive texts of **1987** and **1991** respectively laid down the possibility for having *'differentiated pathways'* in order to provide *'opportunities for all to succeed at school'*, as well as the principle of one school for all<sup>34</sup>. But the country gradually phased out its special schools, transforming them into resource centres within schools: *'This country has rethought its education system with all the players in the system. Special schools have been transformed into resource centres. Teachers followed their pupils [into mainstream schools],*

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<sup>27</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>28</sup> *Exploratory study on the inclusion of pupils with complex supports needs in mainstream schools*, Inclusion Europe, 2018.

<sup>29</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>30</sup> « Les écoles allemandes tentent d'équilibrer entre enseignement spécialisé et inclusion », épisode 1 de *L'inclusion en Europe*, in *Hospimedia*, March 2024 (online).

<sup>31</sup>Note: a 'Land' or 'Bundesland' (plural: Länder/ Bundesländer) is the name for the 16 federal states/ subdivisions in Germany)

<sup>32</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>33</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>34</sup> « Vers une école accessible à tous, l'inspiration portugaise », in *Vers une école inclusive*, March 2024 (online).

which helped to acculturate mainstream school teachers', explains Helen Portal, advocacy officer at the association Inclusion Europe<sup>35</sup>.

The **Decree-Law no. 54-2018 – the legal regulation for Inclusive Education** -, reflects the desire to move away from a model of specific legislation for pupils with special needs. It also abandons the system of categorising students<sup>36</sup>. This law calls for the creation of a *'school culture where everyone finds opportunities to learn and the conditions necessary to achieve their full potential, by meeting the needs of each student, valuing diversity and promoting equity and non-discrimination'*<sup>37</sup>. This **global approach to education** affirms the right of every pupil to receive support for learning and being included, as well as specific resources that can be mobilised to meet their educational needs<sup>38</sup>. The law also sets out a **pyramid of services** comprising universal, selective and additional measures, to be used in a graduated manner<sup>39</sup>.

### **England: Stepping up their efforts towards Inclusive Education**

The English education system, through the **Children and Families Act (2014)**, makes education in mainstream schools for pupils with disabilities a principle of law<sup>40</sup>. Prior to this, in **2010**, the **Equality Act** prohibited discrimination on the grounds of disability in a variety of areas, including education. The Act forces schools to make reasonable adjustments to enable pupils to have equal access to education.

In England, the national government has established a general legislative framework, but local authorities are primarily responsible for decisions regarding the schooling of pupils with special needs or disabilities.

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<sup>35</sup> « Les pays modèles de l'école inclusive ont misé sur la pédagogie et les coopérations », in *Hospimedia*, October 2023 (online).

<sup>36</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>37</sup> « Le mouvement pour l'inclusion scolaire est mondial mais il faut passer du droit aux actes », in *Hospimedia*, November 2020 (online).

<sup>38</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>39</sup> « Vers une école accessible à tous, l'inspiration portugaise », in *Vers une école inclusive*, March 2024 (online).

<sup>40</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

## The Definition of Roles in Inclusive Education

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→ What criteria should be questioned?

- What are the prevailing modes of operations (balanced coexistence between medicosocial services and the education system, de-institutionalisation with the absorption of medicosocial services by the education system, etc.), and who are the main players involved?
- How and to what extent is the contribution of the medicosocial services taken into account and mobilized in the implementation of Inclusive Education policies?
- What tools are available to those involved?

In **France**, Inclusive Education relies on a complex inclusive **partnership** between the **education system and the medicosocial sector**. While the current trend leans toward the inclusion of pupils with disabilities in mainstream classes (through specific programs, with human assistance, and adapted tools), **medical and social support** remains fundamental to the success of inclusion, with the involvement of various players working in coordination to provide an educational pathway adapted to pupils with disabilities.

### Italy, with the creation of the profession of ‘support teacher’

In Italy, after the closure of special schools in **1977**<sup>41</sup>, the human resources of these structures were integrated to ordinary classes. Moreover, the Miur (Ministry of Education) also created a network of **106 territorial support centres**. These are schools dedicated to special needs, with teachers and researchers specialising in technologies for Inclusive Educations<sup>42</sup>.

Special teachers have now become ‘**support teachers**’<sup>43</sup>. The support teacher is assigned to the class of the pupil with a disability in order to facilitate their integration process. The support teacher is not a human assistant assigned to the pupil only, but rather a professional resource assigned to the whole class to meet the educational needs of the entire class group, while specifically taking into account the needs of the pupil with a disability. Italian schools have a ratio of **1.4 pupils with a disability per support teacher**, a better ratio than that recommended by the CRPD – which is a ratio of two pupils with disabilities per support teacher<sup>44</sup>. If necessary, educational support can be supplemented by

<sup>41</sup>Note: With the exception of a few special institutions that remain open, notably those for blind and deaf children.

<sup>42</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>43</sup> « Les pays modèles de l'école inclusive ont misé sur la pédagogie et les coopérations », in *Hospimedia*, October 2023 (online).

<sup>44</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

**‘assistants for autonomy and communication’**. These assistants are assigned to the pupil and not the class<sup>45</sup>. The school’s medical staff also actively participates in the child’s care. All professionals as well as the child’s family work to implement the **individualised educational plan**<sup>46</sup>. In addition, medical and social services can also directly intervene in the school, during class hours: *‘It is really the plurality of interventions within the school that allows the pupil with a disability to become independent. Moreover, for the most severe disabilities, the emphasis will be placed on socialisation and access to autonomy in the individualised education plan’*, explains Marianna Rusciano<sup>47</sup>.

Paid by the State, teachers follow in Italy a five-year course at university, followed by a year of **specialisation. Initial teacher training** is geared towards **more inclusive practices**, comprising **20%** of the curriculum – up to **100 %** for specialised support teachers. However, in reality, less than **one in three support teachers** is specialised and less than **one in four** support teachers has undergone specialised training<sup>48</sup>. Support teachers are actually often selected from what are known as *‘programme lists’*, designed to make up for the shortage of specialised staff. In such cases, they do not receive any specialised teacher training. In addition, many specialised teachers are assigned late in the school year. For example, for the **2021-2022** schoolyear, **20%** were still missing one month into the school year and the start of lessons<sup>49</sup>. As in France, Inclusive Education in Italy is indeed coming up against serious recruitment difficulties: *‘It is increasingly complicated to find specialised teachers, especially for the lower secondary schools’*, explains Maria Alongi. She points out that studies are long and expensive, and posts are getting harder to fill. What’s more, it is sometimes difficult to get educators – from social and medical services – to work alongside the specialised teachers. Funding for these posts has to be applied for every year, and varies greatly from one region to another<sup>50</sup>.

## **Sweden, divided between special education and the state school system**

In Sweden, the education system is divided between special education and mainstream schooling for pupils with disabilities.

In mainstream schools, **two types of support** may be provided, depending on the pupil’s needs. The first is **‘additional adaptation’**, which provides help with timetable planning, adapted learning materials and a specialised teacher for a limited period of time. **‘Special support’**, on the other hand, is intended for pupils who need more regular, specific support. In that case, a specialised

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<sup>45</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>46</sup> « L’Italie tente de déstigmatiser le handicap grâce à une scolarité totalement inclusive », in *Hospimedia*, épisode 5 de l’inclusion en Europe, March 2024 (online).

<sup>47</sup> « Les pays modèles de l’école inclusive ont misé sur la pédagogie et les coopérations », in *Hospimedia*, October 2023 (online).

<sup>48</sup> The National Institute of Statistics in Italy reports that 37% of specialist teachers have not actually received any dedicated training.

<sup>49</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>50</sup> « L’Italie tente de déstigmatiser le handicap grâce à une scolarité totalement inclusive », in *Hospimedia*, épisode 5 de l’inclusion en Europe, March 2024 (online).

teacher accompanies the pupil for a longer period of time. In addition to the teacher, a **student assistant** is responsible for accompanying the disabled pupil during the school time, for example by taking notes of the lesson for them.

If necessary, the pupil may be placed in a **special education group** in a special school. Special education classes for severe intellectual development disorders may be directly integrated into mainstream or special schools<sup>51</sup>. In **special schools**, the emphasis is put on language and communication. Classes are highly participatory and teaching groups are small, **from 3 to 15 pupils**. In secondary schools for the deaf and hard of hearing children, teaching is provided either in sign language or in Swedish with auditory technology<sup>52</sup>. Swedish special schools are fully integrated into the education system and constitute an alternative like any other. They offer pupils comprehensive care with an emphasis on independence and autonomy. Pupils attend these special schools for **10 years**, mainly full-time, with the possibility of boarding for pupils who are further from home.

In Sweden, teachers usually start out in mainstream education and, if they wish, can then train to work in special education. Those who undertake this professional training can obtain a certificate in special education in addition to their initial diploma in mainstream education<sup>53</sup>.

### **Germany, where both systems work together**

In Germany, special schools constitute an integral part of the Inclusive Education system. There is no legal obligation to provide Inclusive Education in mainstream schools or to make reasonable adjustments in the German Länder, except in the cities of Bremen and Hamburg. Although the proportion of pupils with disabilities attending special schools has been decreasing in recent years<sup>54</sup>, more than **half of all pupils with special needs** still attend special schools. Actually, this proportion is even increasing in certain Länder that have not implemented any inclusion policy<sup>55</sup>.

The education of pupils with disabilities can therefore take several forms:

- The pupil attends a **special structure – school or institution**;
- The pupil attends an external class to the structure – **Außenklasse** (equivalent to the UEE or ‘Unité d’Enseignement Externalisée’, meaning ‘externalised teaching unit’ in France): this consists of a small group of pupils with disabilities who attend classes alongside a regular class at a mainstream school. These pupils benefit from the presence of one or two

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<sup>51</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>52</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>53</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>54</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>55</sup> « Inklusion in der Schule – wie die Umsetzung in Deutschland gelingt », in *Deutsches Schulportal der Robert Bosch Stiftung*, February 2022 (online).

**specialised teachers** in addition to the educational resources provided by the school<sup>56</sup>;

- The pupil is fully **included** on a regular class at a mainstream school<sup>57</sup>.

**Cooperation** between mainstream schools and the medicosocial sector ensures the inclusion of pupils with disabilities through a multi- and interdisciplinary approach:

- For each pupil, an **individual integration plan** is elaborated in collaboration with education and health professionals as well as the parents. This plan details the pupil's specific medical and social support needs. The teams also coordinates the services needed to meet the specific needs of each pupil with a disability<sup>58</sup> ;
- **Interdisciplinary coordination** is also implemented: German schools work closely with health professionals (therapists, doctors...) in order to ensure that the pupil's medical needs are addressed. **Coordination committees** bring everyone together to plan the necessary support;
- Depending on the pupil's needs, some medical and social services, such as therapy sessions, may be provided by the school itself. Alternatively, medical appointments or therapy sessions may be arranged at specialised medical centres<sup>59</sup>.

To support children in their learning, schools can provide **teaching aids** and **classroom assistants** to provide individualised support<sup>60</sup>. Schools also have to provide **material and technological adaptations** – such as the use of **assistive technology** or physical adaptations, etc. - to classrooms in order to ensure accessibility for all.

Teachers undergo initial teaching training at university known as '**Studienseminar**'. For those who wish, **specific training programs** cover adapted teaching methods and the specific needs of pupils with disabilities. Curriculum includes **adapted training techniques**, differentiated teaching strategies and classroom management skills to create an **inclusive learning environment**<sup>61</sup>. Once assigned to their post, teachers take part in in-service training programs to keep up to date with pedagogical developments and new teaching methods, including those related to Inclusive Education<sup>62</sup>. However, recent studies show that there is still a great deal of room for improvement when it comes to teacher training in Germany: **89%** of the teachers questioned admitted that they had not been sufficiently prepared and trained for inclusive teaching during their studies

<sup>56</sup> « Les écoles allemandes tentent d'équilibrer entre enseignement spécialisé et inclusion », épisode 1 de L'inclusion en Europe, in *Hospimedia*, March 2024 (online).

<sup>57</sup> « Les écoles allemandes tentent d'équilibrer entre enseignement spécialisé et inclusion », épisode 1 de L'inclusion en Europe, in *Hospimedia*, March 2024 (online).

<sup>58</sup> « L'intégration des enfants handicapés dans les écoles allemandes : un exemple de modèle inclusif », in *Connexion Française* (online).

<sup>59</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>60</sup> « L'intégration des enfants handicapés dans les écoles allemandes : un exemple de modèle inclusif », in *Connexion Française* (online).

<sup>61</sup> « L'intégration des enfants handicapés dans les écoles allemandes : un exemple de modèle inclusif », in *Connexion Française* (online).

<sup>62</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

and training, while **71%** of them admitted that they often felt overwhelmed by the implementation of inclusion in mainstream schools<sup>63</sup>.

### **Portugal, mobilising the medicosocial services via ‘multidisciplinary teams’**

In Portugal, most pupils with disabilities attend **mainstream schools**. Some schools have made the choice to maintain **special units** which are similar to the ULIS system in France – ‘*Unité localisée pour l’inclusion scolaire*’, meaning ‘Localised Unit for School Inclusion’<sup>64</sup>. Special institutions have been transformed into **Resource Centres for Inclusion** to support mainstream schools. **Learning support centres** are responsible for promoting inclusion, producing educational resources and assessment tools for the various components of the school curriculum and organising the transition between the childhood and adult sectors. By implementing these centres, Portugal is drawing on the expertise of its former special education system – in other words, on the knowledge of the medicosocial sector<sup>65</sup>. Learning support centres make it possible to rethink learning methods, and to move beyond the school curriculum with a wide variety of teaching and learning methods, adapted to the level and capacities of each pupil, including in terms of communication<sup>66</sup>.

**Decree-Law 54 of 2018** established the creation of **Multidisciplinary Support Teams for Inclusive Education**. This team’s mission is to support the implementation of Inclusive Education for pupils with disabilities. They are responsible in particular for:

- Raising awareness of Inclusive Education within the educational community;
- Proposing learning support measures to be mobilised in order to encourage inclusion;
- Monitoring and supervising the implementation of learning support measures;
- Advise teachers on the implementation of inclusive teaching practices;
- Prepare technical-pedagogical reports, individual educational programmes and individual transition plans;
- Monitor the operation of learning support centres.

Teachers in Portugal undergo initial training at different levels, depending on the level they plan to teach. This initial training includes a generic and introductory approach to issues relating to the inclusion and support of pupils with special needs. Teachers can also receive training in areas such as special education. In-service training is offered to teachers to update and broaden their knowledge and skills. It may include training courses, workshops, study circles and conferences<sup>67</sup>.

<sup>63</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>64</sup> « Vers une école accessible à tous, l’inspiration portugaise », in *Vers une école inclusive*, March 2024 (online).

<sup>65</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

<sup>66</sup> « Vers une école accessible à tous, l’inspiration portugaise », in *Vers une école inclusive*, March 2024 (online).

<sup>67</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

## England, which relies on local co-construction with the medical and social services

In England, the family of a pupil with a disability can choose between inclusion in a mainstream school/ environment and placement in a special school that meets a **specific educational need**. Local authorities assess a child's disability through the '**EHC6 Needs Assessment**' procedure, which specifies the **education, health and care plan** for the pupil. This plan defines the long-term goals for the pupil and specifies the **adjustments** to be made to ensure support that meets their needs, most often in a mainstream school. The work of mainstream schools relies heavily on a **co-construction** working method, in order to create a strong link between the educational community and the medicosocial services. Thus, mainstream schools must:

- Appoint a **SENCo**, the teacher responsible for monitoring the pupil;
- Inform parents of the educational arrangements in place for their child;
- Cooperate with the local authority in order to develop local offer to meet identified needs;
- Include the identification of those needs in pupil monitoring;
- Involve specialists to advise them in this identification.

The pupil can then benefit from a '**Teaching Assistant**', assigned to the class<sup>68</sup>.

**Special schools** also offer specific teaching methods to meet special educational needs, in four main areas: **communication and interaction, cognition and learning, mental, emotional or social health** or **physical and sensory needs**. These schools can go even further in specialising within an area, for instance around one particular disorder to support children on the Spectrum of Autism, blind or deaf pupils, etc. <sup>69</sup>. The **Responsible Commissioning Body** organises the provision of healthcare around the pupil<sup>70</sup>.

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<sup>68</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>69</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>70</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

## Resources invested in Inclusive Education policies and how they are received by those who benefit from them

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→ What criteria should be questioned?

- What practical means are governments using to implement their national legislation and international norms in favour of Inclusive Education?
- What are the difficulties encountered by the States implementing these policies?
- How do the most primarily concerned – people with disabilities and their families, as well as the associations representing them – view these policies, and what criticisms might they make of them?

In **France**, Unapei and its partners have been denouncing the French's government's **failure to respect the right of education** of children with disabilities for several years, particularly through the **#Jaipasécole campaign**. Many parents have spoken out about the inadequacy of the school system for their children on the website [ma rentrée scolaire - #jaipasecole - marentrée.org](http://ma.rentrée.scolaire-#jaipasecole-marentrée.org) - Unapei.

### Italy, where the system shows its limits

In Italy, schools are funded by the State, regions and municipalities. Miur (the Ministry of Education) provides **80%** of total funding, covering basic services. The State also provides support for pupils with special educational needs by allocating special funds for such things as **teacher training**, the **acquisition of digital resources** or **to promote inclusion**. Regions and local authorities provide the remaining **20%** of school funding. Municipalities and provincial authorities fund the **physical accessibility of school buildings**<sup>71</sup>. However, according to the Italian National Institute of Statistics, school accessibility remains limited. In the **2020-2021** school year, only **one school in three** was accessible to pupils with limited mobility. The absence of a lift or a means of transport suitable for disabled pupil is the most widespread obstacle to school inclusion (**45%**), with schools lacking an internal stairlift (**29%**) or toilets that comply with the standards (**24%**)<sup>72</sup>.

Each school, as part of the definition of the **three-year plan for educational offer**, elaborates the inclusion plan setting out the use of resources, including the removal of architectural barriers and the identification of facilitators. In each school, the **inclusion working group** supports the teachers' council in the definition and implementation of the **inclusion plan**. The latter has been

<sup>71</sup> Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire, Cour des Comptes, 2024.

<sup>72</sup> Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire, Cour des Comptes, 2024.

criticised for its lack of effectiveness<sup>73</sup>. Italian schools adopt a 'no backpack' approach where children have all their textbooks and supplies on site. In the primary school, children learn side by side at small, close knit tables that encourage interaction with each other. Spaces outside the classrooms are available to allow for work in small groups<sup>74</sup>. Overall, the number of pupils per class drops from **25 to 20** as soon as there is at least one pupil with special educational needs<sup>75</sup>.

### **What the most primarily concerned people have to say about Inclusive Education – Italy:**

*'In nursery school, it works. It's when the children get older that it gets more complicated. Normally, secondary school pupils follow the lessons in class, but it is sometimes too complex for some of them.'* (Marianna Rusciano)<sup>76</sup>

The association representing disabled people and their families in Italy is the **Anffas, Associazione Nazionale di Famiglie e persone con disabilità intellettive e disturbi del neurosviluppo**. It participated actively in the consultations opened by the Italian government in **2014** at the time of the overall reform of the school system. It has also produced a major analysis of the implementation of the **2017 Decree** on promoting school inclusion for pupils with disabilities, a document that has taken into account the feedback from parents and families<sup>77</sup>.

In **2023**, a survey was carried out by the Paideia Foundation and BVA-Doxa on 'The impact of disability on the family system', which has benefitted from the participation of 1,000 Italian families with a child, **a third** of whom had a disability. When parents of children with disabilities were asked what could be improved to better include their child, **43%** responded 'specialised training for support teachers'. Also, according to the survey results, for **77%** of families without a child with a disability, the presence of a child with a disability would have a positive impact on their child's schooling, as it would promote for **51%** of them new forms of learning or improve the classroom climate (**26%**). For **9%** of families who do not have a child with a disability, on the other hand, it would negatively affect their child's schooling by making the classroom 'climate tiring' or by slowing down teaching<sup>78</sup>.

## **Sweden, where there is no national fund dedicated to special education**

<sup>73</sup> Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire, Cour des Comptes, 2024.

<sup>74</sup> « L'Italie tente de déstigmatiser le handicap grâce à une scolarité totalement inclusive », in *Hospimedia*, épisode 5 de l'inclusion en Europe, March 2024 (online).

<sup>75</sup> « Les pays modèles de l'école inclusive ont misé sur la pédagogie et les coopérations », in *Hospimedia*, October 2023 (online).

<sup>76</sup> « L'Italie tente de déstigmatiser le handicap grâce à une scolarité totalement inclusive », in *Hospimedia*, épisode 5 de l'inclusion en Europe, March 2024 (online).

<sup>77</sup> « Scheda su questioni piu' rilevanti del decreto legislativo N. 66/107 contenente 'Norme per la promozione dell'inclusione scolastica degli alunni con disabilità' », *Anffas*, 2017.

<sup>78</sup> « inclusione Scolastica: l'incontro con la fragilità è arricchimento », Fondazione Paideia, (online).

The Swedish Ministry of Education is responsible for the education system, and the Ministry of Social Affairs is responsible for the support systems – education and health, technical aids, personal assistance. The education system is funded by State tax revenues, collected locally. There is no national fund dedicated to special education. The Swedish education system is decentralised and structured according to national objectives and rules. Decisions regarding the implementation of the Education Act and the national curriculum are therefore taken within the **290 municipalities**<sup>79</sup>. As a result, funding and investment for the inclusion of pupils with disabilities vary greatly from one municipality to another. Schools receive an **allocation** based on the number of pupils enrolled. In accordance with the **Education Act**, they may request additional funding from the municipality if the special needs of a pupil go beyond what is originally provided by special educational measures. Pupils and parents do not have to pay for teaching materials, school meals, health services and transportation<sup>80</sup>.

The Swedish National Agency for Education is responsible for the public school system, preschool education, school-age childcare services and adult education. It is responsible for equal access to education, regardless of pupils' abilities. The National Agency for Special Needs in Education and School ensures that children, young people and adults benefit from adequate conditions in order to achieve their educational goals, regardless of their functional abilities. It coordinates the Swedish government's support for special education, aiming to help pupils achieve their educational goals. Municipalities and regions are jointly responsible for Sweden's schools. Municipalities manage schools in accordance with the national goals stipulated in the Education Act. They distribute resources and organize education so that pupils can achieve the national goals. Finally, they must provide children, adolescents, and young adults with disabilities with an education equal to that received by other members of the community<sup>81</sup>.

### **Germany, where Inclusive Education comes up against federalism**

Each 'Land', through the elaboration of its **Schulgesetz** – education law -, has the possibility to implement measures in favor of Inclusive Education: material adjustments, inclusion in mainstream schools, alignment of special education timetables with general education in order to facilitate the transition between schools, harmonization of programs, better information for parents of pupils on the possible choices, etc.<sup>82</sup>. Policies in favour of school inclusion tend to be particularly heterogeneous: *'When we talk with principals from other Länder, it is almost as if we were talking with colleagues from another country'*, explains Timur Erdem. As a result, *'Inclusion is indeed a federal rule, but there are not necessarily all three possibilities – mainstream school, externalised unit in a mainstream school or special school – in each Land'*, says Eleonore Frölich. Some Länder, including the largest of them, base their support strategy for pupils with disabilities more on special needs schools than on 'inclusive' mainstream schools. It is particularly the case in Bavaria and Baden-Württemberg, unlike large municipalities such as Bremen or Hamburg.

<sup>79</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>80</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>81</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>82</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

The Bertelsmann Foundation thus emphasizes that while overall, the rate of school inclusion is increasing – approximately **45%** of children with special needs now attend mainstream schools, whereas **55%** of them attend special schools and institutions –, ‘*These evolutions reveal considerable disparities between Länder*’<sup>83</sup>

From a financial perspective, it is difficult to identify a general trend in Germany, since there **16 different funding sources**, one for each Land. Overall, however, we see that funding allocated to Inclusive Education is increasing in the majority of Länder<sup>84</sup>. Furthermore, Inclusive Education requires the development of a partnership between medicosocial institutions, and mainstream schools. Yet, while funding for teacher’s salaries systematically falls to the Land, ‘*It often happens that the funder of the special school is not the funder of the partner schools, which can raise some issues.*’ Special schools themselves do not necessarily report to the same funder. As a result, it is sometimes difficult to set up projects due to the inability to clearly charge services. ‘*The funding system is extremely complicated*’, summarizes Eleonore Frölich, Director of the Comeniuschule<sup>85</sup>.

The overall finding remains that of **underfunding** of inclusion policies in Germany, according to the statements of Herr Wassmuth, President of the *Bundeselternrat*<sup>86</sup>. In a study carried out by Mark Rackles, former Secretary of State for Education on behalf of the Academy of German Schools and the Bertelsmann Foundation, we see how the inclusion process within German schools has, in recent years, entered into total stagnation<sup>87</sup>. Moreover, during their committee on special schools – ‘*Fachausschuss Förderschule*’ – in **2017**, the Bundeselternrat noted that ‘*children included in mainstream schools are often faced with inadequate conditions, forcing parents to compensate for this lack of support and guidance, and ultimately to turn to special schools, depriving their child of an Inclusive Education*’<sup>88</sup>. In a study by the ‘*Institut für angewandte Sozialwissenschaft*’ on parent’s view on Inclusive Education, **78%** of parents with experience in Inclusive Education were reluctant. This shows a certain rejection of Inclusive Education. When it comes to the teachers, the German School Barometer for **2023** showed that **73%** of teachers believe that children with special needs would be better supported in special schools and admit feeling overwhelmed by Inclusive Education<sup>89</sup>.

**What the most primarily concerned people have to say about Inclusive Education – Germany:**

The main association representing people with disabilities and their families in

<sup>83</sup> « Les écoles allemandes tentent d’équilibrer entre enseignement spécialisé et inclusion », épisode 1 de L’inclusion en Europe, in *Hospimedia*, March 2024 (online).

<sup>84</sup> « Bildung und Inklusion in Deutschland », *Bundeszentrale für politische Bildung*, August 2023 (online).

<sup>85</sup> « Les écoles allemandes tentent d’équilibrer entre enseignement spécialisé et inclusion », épisode 1 de L’inclusion en Europe, in *Hospimedia*, March 2024 (online).

<sup>86</sup> « Zwei Drittel aller Eltern befürworten die inklusive Schule: Ein Interview mit dem Vorsitzenden des BundesElternRats », *Friedrich Verlag*, (online).

<sup>87</sup> « Bundesländer bremsen Inklusionsprozess an Schulen ab », *Deutsches Schulportal der Robert Stiftung*, June 2021 (online).

<sup>88</sup> « Zwei Drittel aller Eltern befürworten die inklusive Schule: Ein Interview mit dem Vorsitzenden des BundesElternRats », *Friedrich Verlag*, (online).

<sup>89</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l’inclusion scolaire*, Cour des Comptes, 2024.

Germany is **die Bundesvereinigung Lebenshilfe**<sup>90</sup>. The association advocates for every child's right to a quality education and the freedom for parents to choose whether to enrol their child in a mainstream or special education setting, with sufficient information and advice to inform their choices.

Other studies show high satisfaction among parents whose children, whether with or without disabilities, attend mainstream schools that welcome students with disabilities. **73%** of them are satisfied and describe their experiences with the school as good. They consider the learning environment, teachers and class cohesion to be better when children with disabilities are enrolled<sup>91</sup>. However, parents of children with disabilities appear less satisfied with measures promoting Inclusive Education. Parents from eight Länder indeed gathered in front of the UN building in Geneva to highlight Germany's lack of efforts to promote Inclusive Education.

On the transition from the education to professional field, the vast majority of students with disabilities appear to leave school without a recognized qualification: **72%**. According to the **2018** Education Report, the proportion of students with special educational needs in upper secondary schools was **0,3 %** during the **2016-2017** school year.

### **Portugal, which has had to completely overhaul its approach to education**

In Portugal, responsibility for the elaboration, management, and funding of public education has historically rested primarily with the Portuguese Ministry of Education. In recent years, this responsibility has been gradually **decentralised** and **shared**. Schools have more autonomy, and municipalities tend to be more involved. Municipalities are funded by the Ministry of Finance and their own revenues, generated by local taxes. The Ministry of Education ensures the allocation of human resources to mainstream schools. For special structures within mainstream schools, it also provides a **monthly allocation** of operating funds. The Ministry of Education also allocates funds to support **partnerships between Resource Centres for Inclusion and mainstream schools**<sup>92</sup>.

In Portugal, there is a particularly strong political will, when it comes to Inclusive Education; the evaluation of institutions and schools in Portugal is carried out entirely through the prism of inclusion. This has resulted in the enrolment of **99%** of pupils with disabilities in schools today. Portugal has made the choice to simplify its school curriculum. National curriculum for arts and sports have also been completely revised with an inclusive focus. Furthermore, the ongoing teacher training has been strengthened on **inclusive practices**. In a report, the OECD has recognised Portugal's efforts and progress in implementing Inclusive Education and reforming the education system to meet the individual needs of each pupil. The reforms are however still very recent: *'It is sometimes difficult; there's still reluctance among professionals and parents'*, comments David Rodrigues, National

<sup>90</sup> « Thesen zur Schulinklusion: Inklusive Bildung in der Schule », *Lebenshilfe* (online).

<sup>91</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>92</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

Education Advisor and President of ProInclusion<sup>93</sup>. Indeed, some challenges may persist when it comes to managing **human and financial resources** to support inclusive initiatives, and **initial teacher training**, which is not always appropriate, and the quality of which can vary greatly from school to school<sup>94</sup>.

### England, where there is a shortage of funding

In England, local authorities ensure the proper use of **financial resources**, the implementation of a needs assessment process for pupils, including the elaboration and updating of an **EHC plan**, as well as the liaison between families and schools<sup>95</sup>.

The **Department for Education** funds the **Dedicated Schools Grant (DSG)**, a **funding allocation for schools and services** dedicated to pupils. There is no specific budget allocated to schools to ensure the education of pupils with disabilities. The implementation of the Inclusive Education model remains a current issue for the Department for Education. Indeed, an **alternative SEND plan**, the **SEND and alternative provision improvement plan: right support, right place, right time**, was presented to Parliament by the Secretary of State for Education in **2023**. Its main points are the following:

- Strengthening mediation mechanisms so that parents and caregivers, as well as local authorities, can resolve disagreements effectively;
- Introducing new local and national inclusion dashboards that will strengthen accountability and transparency;
- Increasing investment in the national schools budget, including an additional £1 billion in **2022-2023** for high needs funding;
- Investing £2.6 billion in SEN funding over the next three years, improving existing provision<sup>96</sup>.

#### **What the most primarily concerned people have to say about Inclusive Education – England:**

One of main association representing people with intellectual disabilities and their families in England is **Learning Disability England**. After questioning the association, the main difficulties regarding Inclusive Education in England appear to be the following:

- Being awarded an **Education, Health and Care plan** (EHCP);
- Schools not receiving sufficient funding to implement the EHCP;
- Lack of school places and underfunding;
- Transitioning from education to adulthood/work.

<sup>93</sup> « Le mouvement pour l'inclusion scolaire est mondial mais il faut passer du droit aux actes », in *Hospimedia*, November 2020 (online).

<sup>94</sup> *Review of Inclusive Education in Portugal*, OECD, March 2022 (online).

<sup>95</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

<sup>96</sup> *Cahier de comparaisons internationales de la Cour des Comptes sur l'inclusion scolaire*, Cour des Comptes, 2024.

# Our main findings on Inclusive Education: A Comparative Approach

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## AN APPROACH TO INCLUSIVE EDUCATION THAT VARIES FROM COUNTRY TO COUNTRY, DEPENDING ON A NUMBER OF FACTORS

It varies according to the **approach to disability**: medical or social, with the shared assertion that every child is capable of education as long as the environment adapts to them through both compensation and accessibility. Overall, the countries selected for this study are currently tipping over from a medical approach into an approach that combines the medical and social.

It varies according to the **history** of the countries concerned: in the industrialised countries of the north, the development of a philanthropic culture led to the creation of special institutions and schools (Germany, France), while the process of de-institutionalisation began very early (in the 1970s) in southern Europe (Italy, Portugal).

It also varies within the same country, with major **territorial disparities** for countries with **specific political systems and structures**: for example, Germany and its Länder (Germany is a federalist State) present a greater risk of territorial disparities in the provision of support for children with disabilities. You can encounter some similarities in the case of Sweden which is constituted of 290 municipalities, as well as England.

## REMAINING DIFFICULTIES IN THE IMPLEMENTATION OF INCLUSIVE EDUCATION

The main difficulties regard **recruitment** of human resources, in the education system (in particular when it comes to specialised teachers trained in Inclusive Education) as much as in the medicosocial sector. Thus, there is a major challenge and necessity in upgrading the status of care and medicosocial professions, as well as that of special education. This can be achieved both through symbolic recognition and by raising salaries.

In addition, there are still notable difficulties in **making buildings accessible**, even in the countries that have managed full inclusion in mainstream schools for their disabled pupils. This can be explained by the fact that the laws in favour of physical accessibility remain non-effective in those places; they are struggling to be put into practice.

One question remains unaddressed: the **care and support of children with more complex disabilities and profiles, as well as those with severe intellectual development disorders**. Indeed, it is an outstanding issue in all the countries concerned. This difficulty seems to have been, at least partially, overcome in Portugal, for instance, thanks to the implementation of a completely new approach to education. However, we can see that it is a persistent difficulty in countries considered to be de-institutionalised, such as Italy and Sweden.

→ **What we learned from the study**

The analysis of Inclusive Education policies in the five European countries selected highlights significant disparities in both legislation and practices. A general trend seems however to be emerging, with a **common desire to make Inclusive Education a fundamental principle of legislations**. Despite these efforts, as feedback from families and associations shows, more still needs to be done in order to ensure that Inclusive Education is fully implemented: especially in the fields of accessibility, human resources and financial means.

France is far from being an exception when it comes to the **coexistence of the medicosocial sector and the national education system**; it is the case in most countries selected in this study (Germany, Sweden and England). In addition, all the countries mentioned in the study draw on the expertise of the medicosocial sector in the context of their inclusive schooling policies, in various forms: formal cooperation, merger of medicosocial institutions and facilities into resource and support centres serving the education system and mainstream schools.... In fact, the study showed the importance of **cooperation** between medicosocial services and education systems in order to achieve a truly and deeply inclusive school. This involves in-depth reform of the education and medicosocial systems<sup>97</sup> in order to work towards new forms of organisation and cooperation, based on the **complementarity** between the two sectors. In that case, **formation** is a key lever, because the **recourse to human support – in the broadest sense** – for children with disabilities appears as systematic and essential (specialised teachers, teacher's assistants, resource centres, etc.).

The notion of **Inclusive Education** also leads us to question our **approach to education**, and reaffirms the need for in-depth reform of the education system in that sense: for example, by taking social skills into account in the assessments, or by reducing class sizes. Raising these broader questions allows us to make school a genuine lever for social justice, where every pupil can benefit from the same opportunities for education and fulfilment, regardless of their difference or disability.

To achieve this, a strong political will and substantial financial resources will be needed, with the direct support and assistance of the medicosocial services.

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