INCLUSIVE EDUCATION FOR CHILDREN WITH SPECIAL EDUCATIONAL NEEDS: A CRITIQUE OF POLICY AND PRACTICE IN NEW ZEALAND

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ABSTRACT: This article considers the issue of inclusive education for children with disabilities and special educational needs, in particular with regard to policies and practices in developed countries, such as New Zealand. The article reviews the debate about inclusive education and outlines several confusions about inclusion that have emerged from this debate. It then provides a critique of policies and practices regarding inclusive education in New Zealand, in comparison to those in other developed countries, such as the USA and England. Finally, implications of the issues discussed for developing countries, such as those in the Asia-Pacific region, are outlined.

Introduction

The most important and controversial issue currently regarding the education of children with disabilities and special educational needs (SEN) internationally is that of 'inclusive education'. Just what is meant by inclusive education has important implications for special education policies and practices in developed and developing countries alike. This article will consider this issue with regard to policies and practices for SEN in developed countries, such as New Zealand, the USA and England, and then go on to discuss the implications for developing counties, including those in the Asia-Pacific region. The article begins by reviewing the debate about inclusive education and outlining several confusions about inclusion that have emerged from this debate. It then considers policies and practices regarding inclusive education in New Zealand, in comparison to those in other developed countries. Finally, implications of the issues discussed for developing countries, such as those in the Asia-Pacific region, are outlined.

Debate about Inclusive Education

The debate about inclusive education was re-ignited in 2005 when Mary Warnock published a pamphlet entitled, *Special Educational Needs: A New Look.* More recently, in an edited book by Terzi (2010) with the same title, the original Warnock publication is reprinted as the first chapter. In this Warnock discusses the history of the development of provision for children with SEN in the UK and critically evaluates the issue of inclusion. She concludes that inclusive education should be rethought and redefined in order to allow children with SEN to be included in the "...common educational enterprise of learning, wherever they can learn best" (p.14). In the following chapter Norwich presents a detailed analysis of the issues raised by Warnock, and on the issue of inclusive education he suggests a continuum of provision for children with SEN but with special schools being based on the same site as mainstream schools. Warnock then responds by pointing out that her current views do not represent a u-turn on her part, as she had published her, "...misgivings about the more hard-line inclusionists as long ago as 1993" (Terzi, 2010, p. 117). She goes on to address the continued need for special schools for some children with SEN and states, "...the dogmatic special school closure lobby must recognize that for some children special schools are the best or indeed the only option" (Terzi, 2010, p. 129).

This book is important because there are currently a plethora of books promoting the inclusion of children with SEN in mainstream schools, but a much smaller number that attempt to evaluate the theory and practice of inclusive education. The need for such an evaluation was highlighted by the publication of Warnock's (2005) original pamphlet, which presented a critical review of the effects of inclusion on children with SEN. This had a substantial impact because it was she who, 30 years earlier, chaired the committee that produced the Warnock Report (DES, 1978) that was a major milestone in the development of education for children with SEN in England and other countries, including New Zealand.

In her 2005 publication Warnock referred to inclusion as, "...possibly the most disastrous legacy of the 1978 Report... (p. 20)", since, as she goes on to say, "There is increasing evidence that the ideal of inclusion, if this means that all but those with the most severe disabilities will be in mainstream schools, is not working (p.32)". This

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comment is particularly important since it was the Warnock Report that led to the accelerated implementation of inclusive education in England and other parts of the world.

However, Warnock's (2005) publication was not the first major publication to question the appropriateness of the move towards inclusive education for children with SEN. The first book on this topic was that edited by leading scholars in the field of special education in the USA, Kauffman and Hallahan (1995). Their book was highly critical of the theory of full inclusion, through which it was proposed that all children be educated in mainstream classrooms without the need for special classes, units or special schools of any kind. The book clearly communicated the view that pursuing full inclusion would be damaging, not only to the education of children with SEN, but also to the entire special education community. It provided alternative views of how special education should develop which were authored by many of the most respected academics in the field of special education in the USA.

Two years later an Australian scholar, Jenkinson (1997), published a book, the stated aim of which was to stimulate debate about the inclusion issue. She provided a critique of the education of children with SEN in both mainstream and special school settings that drew on research and practice in the field of special education in Australia, Canada and the UK. Interestingly, Jenkinson reported that, during the 1990s in some parts of Australia, plans to phase out special schools had been abandoned and there was a swing back to retaining a range of options for meeting the needs of children with SEN. The book provides a balanced and soundly argued debate on the topic of inclusive education.

A few years later a group of academics in the field of special education in England, concerned that there appeared to be an increasing trend toward inclusive education for children with SEN, despite minimal debate about its merits from experts in the field of special education, decided to produce an edited book with the aim of stimulating such a debate (O'Brien, 2001). The first chapter (Hornby, 2001) identified several confusions about inclusion and proposed the adoption of 'responsible inclusion', following the work of Vaughn and Schumm (1995) in the USA, which describes a more measured approach to inclusion for children with SEN.

The next book to be published on this topic was that edited by Cigman (2007), which was produced in response to Warnock's (2005) negative comments about inclusion. The book comprised chapters by many senior academics in the field of special education in the UK, including proponents of full inclusion, so provides a range of views. Cigman, who like Warnock, is a philosopher rather than a special educator, highlights some of the confusions about inclusion that were identified previously (Hornby, 2001). She concludes that supporters of full inclusion have distorted the arguments for inclusive education found in influential documents such as the Salamanca Statement on Special Needs Education (UNECSO, 1994). This talks of a *majority* of children with SEN being educated in mainstream schools, whereas full inclusionists refer to it as supporting the idea that this applies to *all* children with SEN. Cigman favours what she calls 'moderate inclusion' which encompasses the concept of a continuum of placement options being available, from special schools, through units for children with SEN in mainstream schools, to placement in mainstream classrooms, which is currently the reality in most countries.

Recently, Farrell (2010) published a book that is focused on evaluating criticisms of special education as well as considering the rationale for inclusive education. The criticisms of special education that he addresses include: limitations of the special education knowledge base; the unhelpfulness of classifications such as autism; problematic use of types of assessment such as intelligence testing; negative effects of labeling on children with SEN; and a lack of distinctive pedagogy and curriculum in special education. He marshals considerable evidence and concludes that these criticisms are based on misunderstandings or a lack of knowledge of current theory, evidence and practice in the field of special education. Issues regarding the rationale for inclusive education that are addressed include the social construction of disability and SEN, rights-based justification for inclusion, and reliance on post-modern perspectives of education. He concludes that the rationale for inclusive education is seriously flawed, and that there is a lack of empirical evidence to support its effectiveness. Finally, he cites comments from several government sources in the UK in support of his perception that the influence of inclusive education is declining.

Confusions about Inclusive Education

The literature referred to above has highlighted the fact that there are some confusions about inclusive education. The major confusions about inclusive education are discussed below with a focus on implications for both developed and developing countries. The confusions are about definitions, rights, labeling, peers, etiology, intervention models, goals, curricula, reality, finance, means and ends, and research evidence.

Definitions

First and foremost there is confusion about what is meant by inclusion, as noted by Norwich when he states, "...its definition and use are seriously problematic" (Terzi, 2010, p. 100). The term is used in various ways, for example, to refer to inclusive schools or an inclusive society. Many sources (e.g. DfEE, 1997) refer to advancing

'inclusive education' as meaning increasing the numbers of children with SEN in mainstream schools, while maintaining special schools for those who need them. In contrast, other sources (e.g. CSIE, 1989) use the term inclusion to describe a state of affairs in which all children are educated in mainstream classes within mainstream schools with only temporary withdrawal from this situation envisaged.

Perhaps the most serious confusion is that caused by the conflation of social inclusion with inclusive education for children with SEN. The term social inclusion is typically used to refer to the goal of bringing about an inclusive society, one in which all individuals are valued and have important roles to play. Social inclusion in education refers to the inclusion in mainstream schools of children with a wide diversity of differences, difficulties and needs. This has a much broader focus than inclusive education for children with SEN, but is often used by proponents of inclusion as if it meant the same.

In addition, many inclusionists speak of inclusion as a process. This process involves whole school reorganisation in order to develop inclusive schools. Implicit in this process, however, is the eventual goal of full inclusion. Therefore, since the word inclusion is used in so many different ways, it is important in order to avoid confusion, to be clear about what is meant by each specific use of the term. For example, while the majority of people involved in education are in favour of inclusive schools which include most children with SEN, many have reservations about full inclusion which envisages all children with SEN being educated in mainstream classes.

Rights

A critical confusion concerns the rights of children with SEN. A typical argument put forward in favour of full inclusion is that it is a basic human right of all children to be educated along with their mainstream peers. To segregate children for any reason is considered by many inclusionists to be a denial of their human rights. However, there are two main confusions here. First of all there is confusion between human rights and moral rights. Just because someone has a human right to a certain option doesn't necessarily mean that it is morally the right thing for them to do (Thomson, 1990). Thus, although their human rights allow children with SEN to be educated alongside their mainstream peers, for some of them this may not, morally, be the right or best option. As Warnock puts it, "What is a manifest good in society, and what it is my right to have... may not be what is best for me as a schoolchild" (Terzi, 2010, p. 36).

A second aspect of the rights confusion concerns priorities. As well as their right to be included, children also have a right to an appropriate education suited to their needs. "It is their right to *learn* that we must defend, not their right to learn in the same environment as everyone else" (Warnock, in Terzi, 2010, p. 36). That is, the right to an appropriate education which meets children's specific needs is more important than the right to be educated alongside their mainstream peers. Therefore, it cannot be morally right to include all children in mainstream schools if this means that some of them will not be able to receive the education most appropriate for their needs.

Labeling

Inclusive education is regarded, by its proponents, as preferable because it enables avoidance of some practices that are central to special education, such as the identification of SEN and the setting up of Individual Education Plans. According to inclusionists, this is because such practices can result in labeling children with SEN. Being labeled as having SEN is seen as stigmatizing them and therefore, according to inclusionists, should be avoided. There is then a dilemma, since if children are identified as having SEN, there is a risk of negative labeling and stigma, while if they are not identified there is a risk that they will not get the teaching they require and their special needs will not be met. This confusion is referred to as the "dilemma of difference" by Norwich (in Terzi, 2010, p.91). However, this concern is the product of confused thinking as it is clear that children with SEN attract labels from other children and teachers even when they are not formally identified as having SEN. So being stigmatized is not necessarily a result of the identification but related to the fact that their SEN mark them out as different in some way. Therefore, avoiding identifying SEN will not prevent children with SEN from being stigmatized. But it may prevent them from getting the education that they need.

Peers

Another confusion is related to the use of the term 'peers'. One of the proposed hallmarks of inclusion is that children with SEN are educated along with their peers in mainstream classrooms. However, as Warnock points out, "Inclusion is not a matter of where you are geographically, but where you feel you belong" (Terzi, 2010, p.34). Many children with SEN are more comfortable with peers who have similar disabilities and interests to themselves, rather than peers of the same chronological age. So for these children a sense of belonging, and therefore being included

in a learning community, is more likely to result from placement in a special class or special school than a mainstream classroom.

Etiology

An important confusion related to inclusion concerns theories about the etiology of SEN. Until around four decades ago it was assumed that SEN resulted entirely from physiological or psychological difficulties inherent in children themselves. Since this time awareness has grown concerning just how much social and environmental factors can influence children's development and functioning. However, some inclusionists have taken this social perspective to its extreme and suggest that SEN are entirely socially constructed. Both Warnock and Norwich (Terzi, 2010) consider this to be going too far in denying the impact that impairments can have on children's learning. They consider it important to acknowledge the role of physiological and psychological factors as well as social factors in the etiology of SEN.

Intervention Models

Inclusion is also regarded, by its proponents, as being preferable to special education because it is suggested that the latter is based on a medical or deficit model of intervention, as opposed to focusing on students' needs and strengths. This is a confused and inaccurate view, for several reasons. Special education interventions have been influenced by medical, psychological and several other treatment models, as discussed by Farrell (2010) who concludes, "The knowledge base of special education includes a wide range of disciplines and contributions supplemented by related research and methods informing evidence-based practice" (p.50).

This focus on evidence-based practice is an important aspect of special education because of the regular intrusion of controversial interventions such as Facilitated Communication and the Doman-Delecato programme which are not only ineffective but are also potentially harmful (Hornby, Atkinson and Howard, 1997). These two examples of interventions highlight another reason why the movement toward full inclusion needs to be carefully evaluated before it is universally adopted. It is similar to these interventions in that its proponents have not yet established a sound theoretical base nor do they encourage research to be conducted into its effectiveness.

Goals

An important confusion that impacts on the issue of inclusion concerns the goals of education, as noted by Terzi (2010). This confusion applies to all children but is particularly important for children with SEN. In recent years there has been increasing emphasis on academic achievement as the primary goal of education in many countries. Governments have focused their attention on the improvement of academic standards by various means including the establishment of national curricula and national assessment regimes. This has deflected attention away from the broader goals of education, such as those concerned with the development of life and social skills.

Including children with SEN in mainstream schools that are driven by the need to achieve high academic standards results in the goals of education for many of these children being inappropriate. The major goal of education for many children with SEN must be to produce happy, well-adjusted and productive citizens. As stated in the Salamanca Statement on Special Needs Education (UNESCO, 1994, p.10), "Schools should assist them to become economically active and provide them with the skills needed in everyday life, offering training in skills which respond to the social and communication demands and expectations of adult life."

Curricula

Another problem has been the confusion surrounding entitlement and the appropriateness of curricula for children with SEN. From when a national curriculum was first proposed in the U.K., influential people and organizations in the SEN field supported the government's intention to include children with SEN in this curriculum to the greatest extent possible. That all children with SEN should be entitled to have access to the same curriculum as other children was seen as being a step forward. This was in fact the case for many children with SEN, for example, those with severe visual impairment who, in the past, may have been denied opportunities such as taking science subjects. However, for the majority of children with SEN, who have learning or behavioral difficulties, it has been a backward step, as noted by Warnock (Terzi, 2010). National curricula, with their associated national assessments and their consequences, such as league tables of schools, have emphasized academic achievement much more than other aspects of the curriculum such as personal, social and vocational education. Therefore, having a national curriculum as the whole curriculum is not appropriate for children with moderate to severe learning or behavioural difficulties and leads to many of them becoming disaffected.

Inclusion in an unsuitable curriculum directly contributes to the development of emotional or behavioral difficulties for many children, which leads them to be disruptive and eventually results in the exclusion of some of

them from schools. As argued by Farrell (2010), the priority for children with SEN must be that they have access to curricula which are appropriate for them, not that they are fitted into a national curriculum which was designed for the mainstream population.

Reality

A common confusion occurs among educators influenced by the rhetoric of full inclusion, despite its contrast with the reality of the situation in schools. The rhetoric of full inclusion suggests that it is possible to effectively educate all children with SEN in mainstream classrooms. However, the reality of the situation in mainstream schools is that many teachers do not feel able or willing to implement this scenario (Croll & Moses, 2000; Scruggs & Mastropieri, 1996).

The reality is also that, in many countries, there is insufficient input on teaching children with SEN in initial teacher education courses and limited in-service training on SEN available to teachers. This means that many teachers do not have the knowledge and skills necessary for including children with a wide range of SEN in their classes and are also concerned that there will be insufficient material and financial resources, and in particular support staff, to effectively implement a policy of full inclusion.

Finance

A key confusion concerns the funding of children with SEN in general and those who are included in mainstream schools in particular. As discussed by both Warnock and Norwich in the book by Terzi (2010), a variety of solutions to the issue of funding have been proposed but there is still no agreement on what is the most satisfactory funding model.

There is also confusion about the relative cost of provision for SEN in mainstream or special facilities. At first sight special schools and units appear expensive, so inclusive education seems to be the cheaper option. But this is only true in the short term. If the education system does not provide young people with SEN with the knowledge, skills and attitudes they need to achieve independence and success after they leave school the cost to society will be far greater in the long-run in terms of unemployment benefits, welfare payments and the costs of the criminal justice system. Thus, special provision for a small number of children with SEN is costly but it is likely to be much less so than the later consequences of not making suitable provision.

Means and Ends

An important confusion with inclusive education that has been addressed by Warnock (Terzi, 2010) is whether inclusion is a means to an end or an end in itself. Proponents of full inclusion argue that segregated SEN placement is wrong because a key goal of education should be to fully include children in the community in which they live. Therefore, they ought to be included in their local mainstream schools. However, as suggested by Warnock, inclusion in the community after leaving school is actually the most important end that educators should be seeking. Inclusion in mainstream schools may be a means to that end but should not be an end in itself. For some children with SEN, segregated SEN placement may be the best means to the end of eventual inclusion in the community when they leave school. In contrast, inclusion in mainstream schools which does not fully meet children's SEN may be counterproductive in that it is likely to reduce their potential for full inclusion in the community as adults.

Research Evidence

There is confusion about the research base for inclusive education with many inclusionists appearing to believe that an adequate research base for inclusion is unnecessary or already exists. However, Lindsay's (2007) review concluded that reviews of the research evidence in support of inclusion to date have been inconclusive, suggesting that an adequate research base for inclusion has not been established. Farrell (2010) in his book cites a raft of relevant studies, many of which report negative findings regarding the impact of inclusive education. Norwich concludes that there needs to be more intensive research to provide evidence regarding the policy and practice of inclusive education (Terzi, 2010). Such research needs to take a long-term view of outcomes for children with SEN who experience either inclusive or segregated schooling. The findings of two long-term follow-up studies of children with SEN, who were 'included' in mainstream schools following periods of time attending special schools, suggests that children with SEN who experience inclusive education may often be disadvantaged in the long term (Hornby & Kidd, 2001; Hornby & Witte, 2008).

As Warnock has concluded, 'What we really need is evidence of where different children with different disabilities thrive best, and how the pitiful casualties of some inclusive comprehensive schools can be best avoided' (Terzi, 2010, p. 139).

Critique of Policy and Practice Regarding Inclusive Education for Children with SEN in New Zealand

New Zealand has one of most inclusive education systems in the world with less than 1% of children educated in special schools, classes or units in mainstream schools. The 1989 Education Act gave the legal right for all children to attend their local mainstream school from age 5-19 years. In 1996 the Ministry of Education (MoE) introduced a policy called 'Special Education 2000' which was intended to bring about mainstreaming for all children, that is the inclusion of all children with SEN in mainstream schools.

The 1989 Education Act also set up self-managing schools, so that New Zealand now has one of the most devolved education systems in the world, with individual schools governed by Boards of Trustees made up mainly of parents. The only requirement on schools from the MoE regarding children with special education needs (SEN) is a very general one, that schools identify students with special needs and develop and implement teaching and learning strategies to address these needs (MoE, 2009).

When policy and practice regarding inclusive education for children with disabilities and SEN in New Zealand is compared with that from other developed countries, such as the USA and England, two differences are clear. First, New Zealand policy for inclusive education has been more radical than that in most developed countries, with an espoused goal of educating all children with disabilities and SEN in mainstream schools. The impact of this policy is evidenced by the slightly smaller percentage of children with SEN in special schools and classes than is the case in England (around 1.35%), and the substantially smaller percentage than that in the USA (around 8%). The second difference is that when the actual practice of providing for children with disabilities and SEN in mainstream schools is compared with that in England and the USA, glaring deficiencies in the New Zealand system become apparent. These are outlined below in order to highlight the disparity between the rhetoric and reality of inclusive education in New Zealand.

No Legislation for SEN

There is no specific education legislation in New Zealand regarding children with SEN This is in contrast with the 1996 Education Act in England and the Individuals with Disabilities Education Act (IDEA) in the USA. These are both examples of legislation that set out statutory responsibilities for schools regarding provision for children with SEN. Since this is lacking in New Zealand and schools are self-governing, what schools provide for children with SEN varies widely between schools and is often inadequate.

No Statutory Guidelines for Schools about SEN

In New Zealand there are no statutory guidelines for schools regarding SEN that schools must follow. Guidelines on many SEN issues are provided by the MOE, but schools can choose whether to take heed of these or not. This is in stark contrast with the requirements specified in the IDEA in the USA, and the detailed statutory guidance for schools provided within the Code of Practice for SEN (DfES, 2001) in England. These set out detailed guidelines for the procedures that must be followed and the resources that must be provided for children with SEN and their families. Since statutory guidelines are absent in New Zealand provision for children with SEN in mainstream schools varies widely and in many cases is inadequate.

No Requirement to Have SENCOs or SEN Committees

Establishment of Special Educational Needs Coordinators (SENCOs) in all New Zealand Schools, with a time allocation of least 0.2 in primary schools and 0.4 in secondary schools, was recommended in the Wylie Report (2000) on special education but was never implemented by the MoE. As a result, schools may have staff assigned to this role but typically limited time allocation is made for them to do this job, and most do not have any training in the SEN field.

No Requirement for SENCO Training

For New Zealand schools that do have SENCOs there is no requirement for them to have qualifications on SEN or to undergo training once they are assigned this role. This is in contrast to England where training is compulsory for SENCOs. Relevant training is available at most NZ universities but this needs to be undertaken at the teachers' own expense and in their own time, so currently, few of them take up these opportunities.

No Requirement for Individual Education Plans

While comprehensive guidance on Individual Education Plans (IEPs) is provided to schools (MoE, 2011),

INCLUSIVE EDUCATION FOR CHILDREN WITH SPECIAL EDUCATIONAL NEEDS IN NEW ZEALAND

individual schools decide who will have IEPs, the format and content of IEPs, and the extent to which parents are involved. Therefore, whether students with SEN have IEPs or not varies widely between schools and IEP procedures are often inadequate.

No Statutory Training for Mainstream Teachers on SEN

Until 2011 there was no requirement on institutions offering teacher education to include training on teaching students with SEN. Recently the Tertiary Education Commission (TEC, 2011) specified the SEN content of teacher education by providing an appendix to the graduating teacher standards that sets out the knowledge and skills on SEN that teachers are to become competent in. This is a major step forward, but will take several years to implement. Meanwhile the vast majority of practicing mainstream school teachers have had minimal or no training on teaching students with SEN.

No Full-time Training for Special Education Teachers

In 2011 the MoE contracted Massey and Canterbury Universities to set up a national training programme for the teachers of children with various types of SEN. However, training is mainly part-time, by e-learning, with currently no training at all for teachers of children with intellectual and multiple disabilities.

No Statutory School/Educational Psychologist Involvement

In New Zealand, educational psychologists are based in MoE Special Education Services, with other staff such as speech/language therapists, and typically operate on a case allocation model. They are constrained to work with the 2% of children with the most severe learning and behavioural difficulties. They may be involved in IEPs if invited by schools or parents but have no mandated involvement. In contrast, in England and the USA psychologist input is mandated in assessment and programme planning for children identified as having severe levels of SEN.

No School Counsellors or Social Workers in Elementary and Middle Schools

New Zealand schools do not have counsellors in primary or middle schools, but there are guidance counsellors in high schools. Social workers are not based in schools, but schools have access to social workers who serve several schools. Thus, although the majority of SEN and mental health issues emerge during the primary and middle school years, children in New Zealand have limited access to professionals who can provide specialist help with these until they reach secondary schools.

No Coherent Policy about Inclusive Education

Although 99% of children are educated in mainstream schools, New Zealand still has eight residential special schools and 28 day/special schools. Many of the special schools have satellite classes in mainstream schools and some have several of these classes. A few mainstream schools still have special units or classes, including at least six special units in Auckland and three in Christchurch. However, many special classes have been shut down in the last twenty years, and special schools have also been under threat due to MoE policy on inclusion. Interestingly, in the recent national Review of Special Education (MoE, 2010) consultation was around four options for the future of special schools, one of which was closure of all special schools. Only 1% of submissions agreed with closing special schools. 99% were in favour of keeping special schools. However, this has not stopped a vocal minority calling for their closure. For example, a group calling themselves the 'Inclusive Education Action Group' has been lobbying the government to further the inclusion agenda and close special schools.

Recent government policy in New Zealand has focused on ensuring that all schools are 'fully inclusive' (MoE, 2010). It also notes that special schools will continue to exist but does not clarify what their role will be. It therefore appears to be supporting a continuum of provision for SEN but exactly what this involves is not made clear. In England the government appears to be backing off from the goal of full inclusion, as in the recent Green Paper on SEN (DfE, 2011, p.51) it sets out a change of policy, 'removing any bias towards inclusion that obstructs parent choice and preventing the unnecessary closure of special schools'.

Because New Zealand has no specific legislation on provision for children with SEN and therefore no statutory guidance for schools, the lack of a coherent policy on inclusive education for children with SEN leaves schools to develop practices based on their interpretation of the non-statutory guidance provided by the MoE. Thus, the wide variation in the type and quality of the procedures and practices employed by schools, to cater for students with SEN, is likely to be the case for some time to come.

Implications for Developing Countries

There are several important implications of the issues raised in this article for the design of inclusive education policies in developing countries, including those in the Asia-Pacific region. First, it is clear that there is uncertainty about what is meant by the term 'inclusive education' as used in developed countries, such as New Zealand. Therefore, policy makers in developing countries need to be very clear about how they define inclusive education. Analysis of the situation in New Zealand has highlighted the contrast between rhetoric and reality regarding the practice of inclusive education in schools. There has been an espoused policy of inclusive education for many years but, given the issues outlined above, it is not surprising that the actual practice of education for children with disabilities and SEN in mainstream schools varies widely between schools and in many schools it is doubtful that the special educational needs of all students are met.

Second, it is also clear from this article that there is wide variation between policy and practice, with regard to children with SEN in New Zealand and that in the USA and England. This is also the case for other developed counties, such as those in Europe, which all have widely differing policies and practices of inclusive and special education. So there are many differing models of inclusive education in developed countries that policy makers in developing counties need to be aware of. In addition, when considering inclusive education policy and the reality of provisions for children with disabilities and SEN that are actually provided by schools.

Third, it is important for developing countries not to attempt to adopt models for inclusive education used in developed countries as these cannot be directly transferred because of political, social and economic differences between developed and developing countries. Instead, it is important for developing countries to consider what stage their education systems are at and also to consider what resources are available, both human and practical, to implement any model of inclusive education. In this way developing countries can design a plan for inclusive education that is suitable for implementation in their own education system.

Fourth, it is notable from the above discussion that some developed counties which were following a path towards full inclusion, including New Zealand and England, currently appear to be backing off from this goal and working towards a more balanced model for the education of children with SEN. The implication for developing countries is to avoid making the same mistakes and, from the start, to be aware of the need to develop a realistic vision for inclusive education, which is likely to be a more moderate one, rather than the goal of full inclusion that New Zealand and England are now moving away from.

Actually, it is considered that, what is needed in all countries, both developed and developing, is a policy of 'inclusive special education'. This involves a recognition that all children with disabilities and SEN will be provided for appropriately within the education system, with the majority of them in mainstream schools. Mainstream schools will be organized to provide effectively for a wide range of SEN and disabilities, with most children in mainstream classrooms and a small number in special classes or units within or attached to the school. Mainstream schools will work closely with special schools that will provide for children with the most severe SEN and disabilities. Wherever possible special schools will be on the same campus as special schools. Thus, inclusive special education requires: a commitment to providing the best possible education for all children with disabilities and SEN, in the most appropriate setting, through all stages of a child's education; a focus on effectively including as many children as possible in mainstream schools; a continuum of placement options from mainstream classes to special schools; and, close collaboration between mainstream and special schools.

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