Inclusive Education in England, Australia, the United States, and Canada: Quo Vadis?

Steve Sider
Wilfrid Laurier University
Mel Ainscow
University of Manchester
Suzanne Carrington
Queensland University of Technology
Carolyn Shields
Wayne State University
Sofia Mavropoulou
Queensland University of Technology
Smita Nepal
Queensland University of Technology
Kiara Daw
Wilfrid Laurier University

Abstract

We provide a high-level overview of inclusive education developments in England, Australia, the United States, and Canada, the countries within which much of our research has been completed. For each country, we discuss the work that we have each done within that context, key policy initiatives, and identified levers of system change. Despite significant international, national, and regional policies and agreements to support inclusive education, there remain many gaps between the vision for inclusive education and the reality on the ground. We offer three "now what?" areas to consider in moving toward achieving Sustainable Development Goal 4—inclusive and equitable quality education—by 2030: implementation, context, and a focus on inclusive, not special, education.

Introduction

School-system leaders and policymakers can learn from international education experience and research. We, the authors, have each had significant research programs in England, Australia, the United States, and Canada and have also engaged in extensive comparative and international research. This article has provided an opportunity to examine the inclusive education policy and practice contexts of the identified countries in situ and in relationship to each other. This leads to considerations of the question, *Quo vadis*, or what might we imagine next, for inclusive education from a comparative and international perspective? Thus, the article does not follow the typical format of a scholarly journal with a literature review, methodology, findings, and discussion. Instead, we have used our situated experience in these countries to describe the policy contexts and identify levers of change before turning to three areas that we believe need to be addressed to move the inclusive education agenda forward in our countries and beyond: implementation, context, and focus.

Using this differentiated approach, the article addresses two related questions: First, what is the state of inclusive education in England, Australia, the United States, and Canada? And, second, what are the resulting implications and opportunities to take us to and beyond 2030, when the Sustainable Development Goals are targeted to be achieved? Sustainable Development Goal 4, agreed to by governments around the world in 2015, aims to ensure inclusive and equitable quality education for all by 2030 (Department of Economic and Social Affairs, n.d.). Inclusive education, as defined by the United Nations Educational, Scientific and Cultural Organization (UNESCO: 2017), is "a process of strengthening the capacity of the education system to reach out to all learners" (p. 7). Since the United Nations Convention on the Rights of Persons with Disabilities (CRPD; United Nations General Assembly, 2006) was published and ratified by 177 (now 187) countries (Department of Economic and Social Affairs – Disability, n.d.), inclusive education has become an obligation for signatory countries. General Comment No. 4 on Article 24 of the CRPD states that there is an obligation "to move as expeditiously and effectively as possible" toward the realization of the inclusive education rights of students with disabilities, which "is not compatible with sustaining two systems of education: mainstream and special/segregated education" (Committee on the Rights of Persons with Disabilities, 2016, p. 11). The focus in the UNESCO definition and in the Convention's General Comment No. 4 on education system change and capacity building is highlighted here because we have addressed levers of system change in this article. Thus, inclusive education is about ensuring that every learner is authentically engaged and belongs in their local school; this is accomplished by strengthening educational systems to ensure that this occurs for every child.

Overview of Contexts

We recognize that context matters in this endeavour to foster inclusive education for every child, everywhere. In an effort to understand the diverse contexts that we represent, we begin by considering the four countries in which much of our research and advocacy have been completed: England (Mel Ainscow), Australia (Suzanne Carrington, Sofia Mavropoulou, Smita Nepal), the United States (Carolyn Shields), and Canada (Steve Sider,

Kiara Daw). We follow a similar pattern of first addressing our positionality in terms of the research and activist work we have been engaged with in our respective contexts, and we then consider key issues of inclusive education policy, before turning to identify key levers of change that need to be considered for system change to occur. *Levers*, sometimes referred to as "drivers" in the scholarly literature, are policies and strategic actions taken to enact change in organizations and the individuals within them (Fullan, 2021; Leithwood, 2005). Our focus on levers to influence change responds to the need to understand system capacity to make inclusive education a reality for every child. Identifying levers of system change for inclusive education has shown promising direction for future research (Carrington et al., 2022). From this preliminary examination of inclusive education in England, Australia, the United States, and Canada, we articulate what must be done going forward to ensure that inclusive education is realized globally.

England

Positionality

Running through this account of the situation in England regarding the challenge of inclusive education is my (Ainscow's) own professional journey (see Ainscow [2016] for a more detailed account). Over the last 30 years or so, my thinking has moved from a narrow focus on special education to a much wider concern with processes I have called "school improvement with attitude": from efforts to achieve integration for particular groups of learners toward the development of inclusive forms of education that focus on the presence, participation, and achievement of all children and young people; from an analysis of the characteristics of individual learners to the analysis of barriers and resources that exist within particular learning contexts; and from an emphasis on the development of individual schools toward efforts to achieve system-level reform through a focus on levers for change (Ainscow, 2005).

These changes have led me to argue that what is needed is an inclusive turn (Ainscow, 2007). This represents a radical new approach to the way in which difficulties in education are defined and addressed. However, this change is difficult to introduce, not least because the traditional perspectives and practices associated with the field of special education have continued to dominate thinking in the field, encouraged by what Sally Tomlinson (2012) referred to as an expanded and expensive SEN (special educational needs) industry. In the context of England, the way national policies have evolved make inclusive education particularly difficult.

Key Policy/Practice Issues

England is an interesting case for thinking about ways of promoting inclusion and equity in education. In particular, it is a country where there are worrying differences within the community in relation to economic factors. For example, data for 2019–2020 suggested that 31% of school-aged children were living in poverty and that those eligible for free school meals (an indicator of family poverty) were the equivalent of 18.1 months behind in their learning at age 16 compared to their less disadvantaged peers (Child Poverty Action Group, n.d.).

England is also typical of many countries in having strong spatial concentrations of poverty and poor educational outcomes. These typically occur in places with weak physical, economic, and service infrastructures for addressing poor educational outcomes. Meanwhile, decades of centralized reform have had the effect of fragmenting the school system in ways that encourage the creation of separate provision of various kinds for some students (Kerr & Ainscow, 2022).

For the last 30 years, England has pursued a market-driven approach to educational policies (Salokangas & Ainscow, 2017). Reforms have included the introduction of a national curriculum, coupled with central-government mechanisms to hold schools publicly to account. These moves have enabled the creation of publicly available data based on schools' performance in national-level standardized attainment tests. In addition, new forms of centrally managed school inspections have been introduced, with punitive measures applied to those schools deemed to be underperforming (Salokangas & Ainscow, 2017). These range from changes in school leadership to school closure in extreme cases.

During the same period, England has promoted school autonomy as core to its reforms (Fiske & Ladd, 2017). It has done this more intensively than in any other country, primarily through its academies program. *Academies* are state-funded schools that operate as self-governing, not-for-profit charitable trusts. While there were just 803 academies in England in the 2010–2011 academic year, by 2022–2023 this had increased to 9,887 (Male, 2022). These developments have been set within a policy context where the dominant model has become schools linking together in multi-academy trusts, with oversight coming from national rather than local government.

There is much evidence to suggest that these changes in English education policy have had particularly perverse effects for the most vulnerable children and the schools they attend (Kerr & Ainscow, 2022). For example, over recent years, attainment gaps between the most and least advantaged students have begun to grow noticeably at both primary and secondary levels, despite having previously been relatively stable (Hutchinson et al., 2020). There is evidence too that some school leaders have responded to growing challenges by becoming expert at "protecting" their own schools (Ainscow, 2023). Often this has been by intentionally recruiting more advantaged student cohorts to their schools. Another concern is the emergence of *off-rolling*, defined as when a child is removed from the school roll for the school's benefit rather than in the child's best interests (Ainscow, 2023).

During the period of these massive reforms, the education system has also seen an increase in the number of children and young people being excluded from schools or placed in segregated provision (Ainscow, 2023). Meanwhile, the government has recently announced plans to build new special schools, following what is seen as a crisis in the number of places available in various parts of the country (Whittaker, 2024).

Another worrying development is the expansion of labels that situate problems of educational progress within children, not least through the adoption of the term "special educational needs and disability." This has led to the widespread use of the shorthand label "SEND," which is explained on the government's website as follows:

Special educational needs and disabilities (SEND) can affect a child or young person's ability to learn. They can affect their: behaviour or ability to socialize, for example they struggle

to make friends; reading and writing, for example because they have dyslexia; ability to understand things; concentration levels, for example because they have attention deficit hyperactivity disorder (ADHD); and physical ability. (Gov.UK, n.d., "Overview")

Alongside the pressures on schools created by market forces, this unquestioned emphasis on student deficits has led to a massive expansion in the number of learners being labelled in order to attract additional resources to support their education (Ainscow, 2023). This, in turn, has placed additional pressures on local-authority budgets that were already stretched. And, of course, this has created further barriers to the development of inclusive schools.

Levers of Change

This picture of the current English context is far from comprehensive. Nonetheless, it serves to show that the English case is an extreme example of a growing international direction in relationship to inclusive education: a competitive and fragmented school system, operating in an unequal society, in which public services are being reduced and inequities are increasing. Clearly, these developments present new challenges to efforts for promoting inclusion and equity. Looking to the future, there are, however, lessons that have emerged that might be helpful in terms of moving the English system in a more inclusive direction. Previously my colleagues and I have argued that evidence is the lifeblood of inclusive development (Ainscow et al., 2006). This means that deciding what kinds of evidence to collect and how to use it requires care since, within education systems, what gets measured gets done. The challenge, therefore, is to harness the potential of evidence as a lever for change while avoiding the potential problems. In other words, we must measure what we value rather than is often the case, valuing what we can measure.

Australia

Positionality

I (Carrington) have spent most of my life advocating for equity and inclusion for people with disabilities with a particular focus on transforming schools. On completion of my teaching qualification in 1982, I was appointed to a new special school in a rural town in Australia. The students at the special school were selected by school principals and psychologists from the local regular schools and were placed in the segregated special school away from their peers and siblings. The creation of a special school in this small town legitimized the decisions of a group of educators to move a group of young people from their local school to a segregated place—a special school. This placement would have influenced life chances for these young people (Slee, 2011). In 1985, I became a teacher at a special school for children with complex disabilities that was attached to an institution in Australia. Most of the children had developed self-stimulatory behaviour such as rocking and banging their heads due to boredom, anxiety, or unhappiness or through copying their peers. The children's cognitive, physical, and social and emotional development were clearly stunted and affected by their life living in an institution. These types of experiences highlighted to me the need for children to be in an inclusive, loving, and caring environment, living with their family in their own community.

In 1989, I taught at a special school in England where the children lived at home with their parents in high-rise apartment blocks but travelled to school every day in a special school bus, so they had little contact with children who did not have disabilities. The children had delayed language, cognitive impairment, difficulties with social skills, and behaviour challenges. These experiences in special schools in Australia and England reinforced my belief that children with disability should be included in regular schools. I knew that there was a need for special education teachers to work collaboratively with regular schoolteachers in one education system rather than continuing with a dual system of special and regular schools. I believed that the resources allocated to special schools could support a more inclusive education for everyone.

Key Policy/Practice Issues

The Australian Government ratified the Convention on the Rights of Persons with Disabilities (2006) in 2008 and 2009, formally affirming the right to inclusive education for people with disabilities (Cologon & Mevawalla, 2023). Many of the provisions in the Convention are reflected in Australian legislation through the Disability Standards for Education 2005 (Australian Government, 2005, reviewed in 2020) and the national collection of information on Australian school students with disabilities who receive adjustments (Education Ministers Meeting Schools Policy Group, 2022). The Standards state that students with disabilities are entitled to enrol in their local school and access education on the same basis as their peers (Australian Government, 2005). The Standards also require preschools, schools, and post-school education and training centres to make reasonable adjustments to ensure that students with disabilities are provided with the same learning opportunities across the curriculum and programs of study as students without disabilities.

Students with disabilities, making up almost 20% of school populations (Australian Institute of Health and Welfare, 2020), have been particularly discriminated against (Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, 2021). In 2020, although the majority (71%) of students with disabilities attended regular classes in mainstream schools, 18% of students attended special classes in mainstream schools. Twelve percent of students with disabilities attended segregated special schools rather than their local primary or secondary school (Australian Institute of Health and Welfare, 2020). This national evidence documented the continuing co-existence of inclusion, integration, and segregation in the school system in Australia, which has been sustained through the operation of a dual education system for students with disabilities.

Levers of Change

The complex nature of educational policy development and provision among states and territories in Australia has impacted progress of implementation of a national inclusive education system (Carrington et al., 2024). There is also variability in the progress observed in strengthening professionals' commitment to the promotion of inclusion and equity (Saggers et al., 2023). In addition, only a few states have embedded inclusion, as defined in this article, as an important feature of their educational policies, plans, and policies. Different conceptualizations of the notion of inclusive education in these policies have

supported progress or delayed movement toward the realization of inclusive education as described in *General Comment No. 4* (Saggers et al., 2023). According to the Australian *National School Reform Agreement* report, no Australian state or territory has been successful in addressing equity in achievement and outcomes (Productivity Commission, 2022).

Clearly there are challenges in Australia associated with achieving agreement between state and territory governments on how inclusive education should be implemented to serve all students with disabilities in a unified education system. This challenge could be overcome with a national inclusive education approach to policy and practice (Mavropoulou et al., 2021).

United States

Positionality

I (Shields) have spent the past 24 years working in higher education with a focus on transformative leadership—leadership that is inclusive, just, and equitable for all students; however, I had previously taught in K–12 [kindergarten–Grade 12] education for 20 years. During that time, I acquired what was then three levels of Ontario's (Canada) certification in special education, including gifted education, and developed and taught in both a non-categorical special education program in one high school and in a gifted high school program in what was then considered the poorest and most multicultural high school in Saskatoon, Saskatchewan. During that time, I also taught a university course in gifted education. Hence, my interests have always covered the range of abilities, ensuring that all opportunities were open to all students. For example, although many colleagues believed that students who were dyslexic could not be included in gifted programs, we were able to demonstrate the contrary. Moving to the United States, I continued my involvement with inclusive and equitable education as I taught graduate students seeking master's and doctoral degrees as well as certification in special education.

Key Policy/Practice Issues

In the United States, discussions about inclusive education are often more frequently referred to as "special education." In 2020–2021, over 7.2 million students (15% of the public school population) received special education services under the Individuals with Disabilities Act (IDEA; 1975; National Center for Educational Statistics, 2023), which guarantees all students with a disability a free and appropriate education in the least restrictive environment. This act, in principle, has supported the education of students with disabilities with, rather than separately from, their non-disabled peers; however, the reality has often been far from this principle.

Many years of research support the IDEA (e.g., Hollenbeck, 2007; Lewis et al., 2021), which asserts that students must be educated in the least restrictive environment possible; nevertheless, because education falls under state jurisdiction and because funding, policies, and accountability requirements vary widely from state to state, practices vary widely. For example, in the state of Michigan, where my university is located, for the school year 2021–2022, students fell just short of the 70.78% graduation target, reaching just 68.87%

and the dropout target of 22.89% or less was barely achieved. Further, it was anticipated that more than 69.92% of students would be educated in a regular class for at least 60% of the day, with the target being slightly exceeded at 71.71%. Only 4.34% of students with special educational needs were educated in a separate facility. Statewide, 99% of teachers were reported to be highly effective or effective in supporting students with disabilities (MI School Data, n.d.).

Levers of Change

A key level of change is accountability processes and associated measures. Special education services in the United States are highly accountability-driven. Moreover, unlike some other countries, comparative data are widely and quite easily accessible, even though delivery and services are not necessarily comparable. In accordance with the IDEA (1975), each state is required annually to submit a report, the State Performance Plan and Annual Performance Report, to the U.S. Department of Education Office of Special Education each year. This report includes data about 17 special education indicators, and the data on Indicators 1–14 are required to be reported publicly. Each indicator has a stated target, and state summaries indicate which of the targets have been met, and which have not. These indicators include information on dropout rates, graduation, performance on state tests, suspension and expulsion by race/ethnicity, parental involvement, and so on. Additionally, data are disaggregated for 13 different disabilities including autism spectrum disorder, cognitive impairment, emotional impairment, deafness, blindness and so forth. Where targets are not met, each state is required to report procedures for tiered corrective action where necessary. However, as indicated above, when 99% of teachers self-report that they are effective or highly effective in meeting the needs of students with disabilities, in reality there is often more accountability on paper than in reality.

The second major lever of change, closely associated with accountability, is funding that comes from a combination of federal, state, and local sources and supports programs, services, and personnel for students with disabilities. For example, in Michigan in 2022–2023, the School Aid budget for special education included \$1.5 billion in state funding and \$461.0 million in federal funding (Michigan Fiscal Brief, 2023). However, these amounts fell far short of the actual expenditures. Moreover, there have been considerable disparities in special education funding, largely because Michigan's education system is primarily funded through property taxes, a system which results in automatic and considerable perpupil disparities at the outset. Thus, legislative proposals can either facilitate or stifle equalization of special education funding efforts. Until funding policies become less political and more universal, the inequities apparent within and between states are likely to persist regardless of the facilitating legislation of the IDEA (1975).

Canada

Positionality

Prior to my (Sider) work in a faculty of education, I was a teacher and principal for 15 years. It was during this time that I became increasingly aware of my responsibility to foster instructional and leadership practices within my school that would support the full and

authentic belonging of all my students. There was no singular moment that shaped these practices but multiple interactions with students, teachers, and family members (including my own) that nurtured my beliefs about inclusive education. As a school administrator, I built time into our school day for teacher collaborative planning, engaged parents and caregivers through diverse means such as informal drop-in opportunities, and identified inclusion "champions" who would regularly bring aspects of inclusion to departmental meetings. In the second half of my career, as a faculty member in a post-secondary institution, I have explored these kinds of practices in my research in Canada (e.g., peer coaching, Sider, 2019; family engagement, Sider & Maich, 2022; collaborative leadership, Sider et al., 2021). Increasingly, I have collaborated with peers in diverse countries to better understand the barriers to and opportunities for inclusive education. This work has been supported by research assistants such as Kiara Daw (co-author), who have helped bring new perspectives, particularly regarding the intersecting aspects of identity that students with disabilities have.

Key Policy/Practice Issues

Inclusive education has a long history in Canada, dating back to provincial policies that supported students with disabilities as early as 1980. Education is a provincial and not a federal matter in Canada so, although there is much that is the same across the country, policy development and implementation for inclusive education has looked subtly different in the different provinces and territories (AuCoin et al., 2020). For example, most provinces passed initial legislation and policy guidelines supporting students with special educational needs in the 1980s. The focus in these early policy directives, and in the resulting school practices, was on traditional special education models by which students with disabilities were educated in segregated settings with other students with disabilities, either in specialized schools or in neighbourhood schools. The policies themselves did not refer to "inclusive education" but to "special education." More recent legislation across Canada has aimed to provide more inclusive environments, but significant gaps remain between the language of inclusion and the practice of inclusion.

The province of New Brunswick has been considered a champion of inclusive education in Canada and has had one of the most progressive educational plans for inclusive education in the country (AuCoin et al., 2020). Efforts toward inclusive education began in 1986 with the release of Bill 85, which mandated public schools to include all students in the public education system, ensuring students with disabilities were placed in regular classrooms amongst their peers (AuCoin et al., 2020). Throughout the country, this was considered a revolutionary practice and gained the province significant attention. Since 1986, the province has gone through several program reviews, including the 2006 Connecting Care and Challenge Report which assessed the progress of the implementation of Bill 85 and which yielded many recommendations at the systemic level (AuCoin et al., 2020). Following this review, the province mandated additional changes, which resulted in the 2012 review that focused on actions that could be taken at the district, school, and classroom levels to effectively support students and teachers (AuCoin et al., 2020, p. 316). The province has received global attention for its fully inclusive education system although recently concerns have been raised about efforts in the province to maintain its vision of inclusive education.

Canada is often a country that is looked to for effective models of inclusive education (Alur & Timmons, 2009; Christou et al., 2022). However, the reality is that Canadian provinces continue to struggle with implementing and maintaining inclusive education in schools. The policy landscape is robust across the country, but students with disabilities continue to experience segregation and exclusion from full participation in schools (Sider et al., 2022).

Levers of Change

We focus here on two levers, one that has led to effective change and one that has served as a barrier to inclusive education for students with disabilities in Canada, First, the positive lever to enacting change: there is much more awareness of inclusive education in Canada since equity, diversity, and inclusion efforts have escalated over the past 20 years (Sider & Maich, 2022). Thus, the needs of students with disabilities are more known now than ever, as is awareness of the benefits of inclusive education for all students. This awareness has been driven by four factors: (a) pre-service teacher education programs across the country now have mandatory courses in inclusive and special education; (b) there has been a massive investment in in-service teacher professional learning on inclusive education; (c) advocacy groups for students with disabilities are prolific across the country; and (d) Canadian researchers have been prolific in their research and publications related to inclusive education and disability (e.g., Sharma et al., 2021; Specht et al., 2016). We know more about inclusive education, its benefits, and resources for effective instruction than ever before.

As noted in the section on the United States, one of the levers to system change is access to appropriate and fulsome datasets. One of the barriers to effective inclusive education in Canada has been the glaring lack of comparable data that can be used to document the numbers of students with disabilities and the types of supports being provided in diverse parts of Canada. Data are a critical lever to ensuring that change efforts are successfully implemented, and we lack comparative national data. Some school districts are collecting identity-based census data but often using different questionnaires and thus developing different datasets, which makes it difficult to compare across provincial and territorial contexts to see where, when, and how progress toward inclusive education is being effectively achieved. The lack of consistent, longitudinal data has made it challenging to identify patterns and trends related to inclusive education across the country. Relatedly, as in the United States and Australia as well, the lack of a coherent national educational strategy on education, never mind inclusive education, hampers efforts to ensure that all students with disabilities across the country have equitable access to services to meet their needs.

Quo Vadis?

These brief accounts of the policy contexts of, and levers of change in, England, Australia, the United States, and Canada indicate that inclusive education remains an elusive target in all four countries. It is important to keep in mind that the policy–practice contexts that we have described may not fully reflect the experiences in individual or localized contexts within each country or the perspectives of other scholars. It is worth

noting that each account reflects the particular perspectives of the relevant authors. We each have our own particular research interests, as attested by our positionality statements, that influence our areas of focus.

There are similarities and differences in the experiences of each of these countries with regard to inclusive education. For example, the education systems in the United States and England are characterized by significant performative accountabilities; understanding their experiences of inclusive education within accountability frameworks is therefore instructive for other contexts. As well, despite decades of policies at national or provincial, territorial, and state levels that speak to inclusive education, in each of the countries there remain significant gaps in practice. For countries that have been more recently attempting to implement inclusive education, this can seem disheartening. If countries with significant educational budgets and inclusive education policy contexts struggle to implement inclusive education, how can countries without large educational budgets or well-established inclusive education policy contexts reach Sustainable Development Goal 4?

With this in mind, we now turn to key considerations that we would propose in response to Quo vadis, what is next, for how we might "move the needle" on inclusive education going forward to 2030 and the desired achievement of Sustainable Development Goal 4? We focus on three areas to guide progress toward inclusive education not only in Australia, England, the United States, and Canada but also beyond. These three areas are (a) implementation, (b) context, and (c) focus. As a collective of scholars, we recognize that there have been some successes in achieving inclusive education but in many other ways we have had very little success. It has been 30 years since the Salamanca Statement (UNESCO & Spain Ministry of Education and Science, 1994), which outlined international commitments to including all students in schools, yet not enough has changed in our respective countries. So, quo vadis, where do we go from here?

Implementation

First, we believe that the policy frameworks that guide inclusive education at an international level are relatively robust in their guidelines and directives. The challenge that countries face is not so much a problem of policy but one of implementation of that policy. Sustainable Development Goal 4 compels countries to offer equitable and inclusive education ensuring "equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities" (Department of Economic and Social Affairs, n.d.). In 2015, over 160 countries were signatories to these United Nations goals. Significant energy has been put into these global policy documents, but translating international obligations into national or subnational implementation is often difficult. The problem of implementation and execution of the goals may be exacerbated by the fragmented authorities that have jurisdiction over educational practice in the signatory countries. Implementing a consistent definition of inclusive education across geopolitical boundaries has proven difficult as some countries have relied on a special education model whereby disabled students are segregated from their peers. Sustainable Development Goal 4 and the Convention on the Rights of Persons with Disabilities provide clarity on what is meant by inclusive education and our collective commitment to it: inclusive education aims to ensure that every child, regardless of disability or any other aspect of identity, is supported academically and socially in their local school.

As noted in our introduction, we need to foster system change to make inclusive education policy a reality. In contexts such as New Brunswick and Portugal, governments have developed policy and, concurrently, program changes at the system level that have enabled inclusive education practices at the classroom and school level. These changes have included allocating sustainable and adequate funding to ensure that appropriate supports are available. In the example of Portugal, since 2008, it has had in place laws envisioning the provision of education for all students, without exception, in their local mainstream school (see, e.g., Alves et al., 2020). This legislation has led to special schools being transformed into resource centres for inclusion, tasked with supporting their former students, who are now placed in mainstream schools (Organisation for Economic Co-Operation and Development [OECD], 2022). Importantly, the Portuguese legislation has moved away from a view that it is necessary to categorize students in order to intervene. Rather, it supports the idea that all children and young people can achieve a profile of competencies and skills at the end of their compulsory education career, even if they follow different learning paths. It is worth noting that, as the Portuguese education system has moved forward in relation to inclusion over the last two decades, the country is one of the few with a positive trajectory of improvement in all of the subjects assessed by OECD's Programme for International Student Assessment. The implication is that policies based on inclusion and equity can provide a means of improving outcomes for all.

These examples demonstrate that inclusive education can move from policy to classroom reality. This requires an enactment of levers of changes such as awareness of the benefits of inclusive education (e.g., Hehir et al., 2016), commensurate funding to ensure that adequate supports are available in classrooms, and the political will to implement structural practices to engrain inclusive practices at the local level (Ainscow et al., 2006). Another implementation lever that can help move us closer to the promise of inclusive education is providing enhanced professional learning programs for teachers and school leaders to build their skills in, attitudes toward, and knowledge for supporting all students (Sider & Maich, 2022). School leadership for inclusion is of relevance for policymakers and practitioners around the world since school leaders have significant opportunity to influence an inclusive school culture (DeMatthews et al., 2020; Sider et al., 2017). However, establishing an inclusive school culture that is equitable for all is challenging because of pressures to meet system accountability demands (Ainscow, 2007; Blackmore, 2006; Shields, 2011). Transformative leadership theory, which centres equity and inclusion, could be a way forward in reimagining the role of the school leader, not only in relationship to disability but also in regard to other aspects of identity (Shields, 2022).

Context

As we have noted earlier, we recognize that contexts have been influenced by important aspects of history, geography, culture, and other factors. The decision by the United States government to remove itself from UNESCO is an example of how political maneuvers can impact a country's engagement with the broader educational community and the need for collective action. As well, the particular political structures and histories of countries mean that inclusive education will have to be implemented in different ways in different contexts. We have seen this even within countries featured in this article. For example, Australia, the United States, and Canada, as federal systems, place the focus on

education at the provincial, territorial, or state level. In these contexts, it is important to have national guidelines for inclusive education, which provides consistency across the country.

Although geopolitical contexts should provide nuances to the implementation of inclusive education policies, we do not need to "reinvent the wheel" in each country that implements inclusive education. Lessons that are being learned from global leaders in inclusive education—whether that is New Brunswick or Portugal—should be able to be adapted for other contexts. Awareness of levers of change that have been shown to be efficacious in multiple contexts (e.g., Ainscow, 2005; Hehir et al., 2016) is an important starting point that policymakers and practitioners should consider. A lever that has been identified earlier in this article is the importance of ensuring fulsome and transparent datasets. Identity-based data can help with decision-making and with program evaluation, lessons that UNESCO's Institute for Statistics (n.d.) has been advocating in order to meet Sustainable Development Goal 4. Consistency across contexts in collecting and reporting data is critical to achieve inclusive education (Ainscow et al., 2006).

Focus

The focus of work globally needs to be squarely on inclusive education and not special education. Unfortunately, in countries such as England, the United States, and Canada, reference in policies and programs is still often made to special education. This continued reliance on the medical model, by which disability is viewed as a deficit within an individual and as something that needs to be fixed, is harmful to the essential idea of inclusive education, which does not "other" those with disabilities (Tomlinson, 2012). The social model of inclusion, which addresses systemic barriers—which anyone might experience—and a universal-design-for-learning approach (CAST, n.d.) comprises a model that needs to be emphasized globally. Relatedly, it is important to unpack the intersections between inclusive education for students with disabilities and other aspects of identity (DeMatthews, 2020). There is a benefit of understanding the unique experiences of students with disabilities, but we need to expand research to the more complex—and more comprehensive—task of understanding how schools can fully and authentically include the whole student (Ryan, 2006).

Many countries continue to offer special, segregated settings as part of a dual education system. To move the needle on inclusive education, we need to stop advocating for specialized schools and ensure that resources are available in local schools to support all learners. In particular, we need to look to examples of systems that have abolished segregated school settings to demonstrate how others might follow. One lesson that can most certainly be learned from these contexts is that political commitment to inclusive education matters. The UNESCO global education monitoring (GEM) report (2020) focused on inclusion and education; to move the political support for inclusive education forward, we advocate for an annual global conference on inclusive education to share how inclusive education functions in contexts such as Portugal and New Brunswick and to ensure that monitoring and reporting are prioritized.

The good news is that some countries have not established special education needs industries (Tomlinson, 2012), so they do not have to dismantle these in favour of inclusive

systems. Relatedly, we have noted that, in some contexts in which we have worked, all students are included in schools because there are no other options. As a teacher in a village school in Ghana asked one of the authors, "Where else would they [disabled] go?"—the point being that the community school was the only option, so all students were provided for in that setting. Perhaps this is where some Indigenous communities in Canada and beyond can provide significant insights. In these communities, all children are welcomed, and each is seen as having a particular gifting and contribution to make to the community. There is much that can be learned from these experiences about inclusive education.

Thus, in considering quo vadis, what is next, for inclusive education, it is important to acknowledge that implementation, context, and focus must be areas that we collectively turn to. These areas of change—whether for countries such as England, Australia, the United States, or Canada, all of which have had long and contested histories with inclusive education, or other global jurisdictions—must be addressed for inclusive education to move forward.

Conclusion

In summary, we believe that suitable international policy frameworks are in place and that there exist numerous examples of jurisdictions that have effectively implemented inclusive education. We recognize the challenges of translating international guidelines and agreements into national and subnational policies and commitments. However, these challenges cannot prevent our collective efforts in ensuring that every child fully and authentically is included in their local school. Leaving behind the special education model, a medical perspective with a deficit approach that continues to marginalize and disadvantage students with disabilities, for a more dynamic, universal approach of authentic inclusion is possible. As a result, there is hope. Our quo vadis is to articulate a key question: What do we want our society and our world to be like? As Sustainable Development Goal 4 indicates, there needs to be a greater focus on equity, social justice, belonging, and hope. We want to move beyond the rhetoric and the aspirational language of inclusive education policies to see a multiplication effect of evidence-based inclusive education practices that are responsive to contexts.

For Canadian scholars, since this special issue is about Canada's connection to the world, a comparative and international perspective is important because it provides an opportunity to re-examine policies and practices in the Canadian context. Examining the current state of inclusive education in England, Australia, the United States, and Canada—particularly in relationship to the achievement of Sustainable Development Goal 4—should compel scholars from Canada and elsewhere to share lessons across borders and further commit to inclusive schools where every child authentically belongs.

The lessons from England, Australia, the United States, and Canada are challenging ones. Forty years of history have demonstrated that we have not moved the needle far enough toward inclusive education in our four contexts. However, our children's futures—and those of our societies—are relying on us to ensure that this is not repeated in the next 30 years.

References

- Ainscow, M. (2005). Developing inclusive education systems: What are the levers for change? *Journal of Educational Change*, *6*(2), 109–124. https://doi.org/10.1007/s10833-005-1298-4
- Ainscow, M. (2007). Taking an inclusive turn. *Journal of Research in Special Educational Needs*, 7(1), 3–7. https://doi.org/10.1111/j.1471-3802.2007.00075.x
- Ainscow, M. (2016). Diversity and equity: A global education challenge. *New Zealand Journal of Educational Studies*, 51(2), 143–155. https://doi.org/10.1007/s40841-016-0056-x
- Ainscow, M. (2023). Promoting equity within education systems: Lessons from Great Britain. *FORUM*, 65(1), 87–97. https://doi.org/10.3898/forum.2023.65.1.11
- Ainscow, M., Booth, T., & Dyson, A. (2006). Improving schools, developing inclusion. Routledge.
- Alur, M., & Timmons, V. (Eds.). (2009). *Inclusive education across cultures: Crossing boundaries, sharing ideas.* Sage.
- Alves, I., Campos Pinto, P., & Pinto, T. J. (2020). Developing inclusive education in Portugal: Evidence and challenges. *Prospects*, 49 (3–4), 281–296. https://doi.org/10.1007/s11125-020-09504-y
- AuCoin, A., Porter, G. L., & Baker-Korotkov, K. (2020). New Brunswick's journey to inclusive education. *Prospects*, 49 (3–4), 313–328. https://doi.org/10.1007/s11125-020-09508-8
- Australian Government. (2005). *Disability standards for education 2005* (Legislative instrument). https://www.legislation.gov.au/F2005L00767/latest/text
- Australian Institute of Health and Welfare. (2020). *People with disability in Australia*. Australian Government. https://www.aihw.gov.au/getmedia/ee5ee3c2-152d-4b5f-9901-71d483b47f03/aihw-dis-72.pdf.aspx?inline=true
- Blackmore, J. (2006). Social justice and the study and practice of leadership in education: a feminist history, *Journal of Educational Administration and History*, *38*(2),185–200, https://doi.org/10.1080/00220620600554876
- Carrington, S., Lassig, C., Maia-Pike, L., Mann, G., Mavropoulou, S., & Saggers, B. (2022). Societal, systemic, school and family drivers for and barriers to inclusive education. *Australian Journal of Education*, 66(3), 251–264. https://doi.org/10.1177/00049441221125282
- Carrington, S., Mavropoulou, S., Saggers, B., & Nepal, S. (2024). *Inclusive education in Australia policy review*. Autism CRC. https://www.autismcrc.com.au/sites/default/files/reports/5-084_Monograph_Inclusive_Education_In_Australia_Policy_Review.pdf
- CAST. (n.d.). About Universal Design for Learning. Retrieved March 26, 2024, from https://www.cast.org/impact/universal-design-for-learning-udl
- Child Poverty Action Group. (n.d.). Child poverty facts and figures. Retrieved March 26, 2024, from https://cpag.org.uk/
- Christou, T. M., Kruschel, R., Matheson, I. A., & Merz-Atalik, K. (Eds.). (2022). European perspectives on inclusive education in Canada: Critical comparative insights. Routledge.
- Cologon, K., & Mevawalla, Z. (2023). In solidarity and hope: Understanding inclusive education. In K. Cologon & Z. Mevawalla (Eds.), *Inclusive education in the early years: Right from the start* (2nd ed.; pp. 4–23). Oxford University Press.
- Committee on the Rights of Persons with Disabilities. (2016). *General comment no. 4 on the right to inclusive education* (CRPD/C/GC4). https://digitallibrary.un.org/record/1313836/files/CRPD_C_GC_4-EN.pdf?ln=en
- DeMatthews, D. (2020). Addressing racism and ableism in schools: A DisCrit leadership framework for principals. *The Clearing House: A Journal of Educational Strategies, Issues and Ideas*, 93(1), 27–34. https://doi.org/10.1080/00098655.2019.1690419

- DeMatthews, D., Billingsley, B., McLeskey, J., & Sharma, U. (2020). Principal leadership for students with disabilities in effective inclusive schools. *Journal of Educational Administration*, *58*(5), 539–554. https://doi.org/10.1108/JEA-10-2019-0177
- Department of Economic and Social Affairs. (n.d.). *Sustainable development goal: 4*. United Nations. Retrieved March 26, 2024, from https://sdgs.un.org/goals/goal4
- Department of Economic and Social Affairs Disability. (n.d.). *Convention on the Rights of Persons with Disabilities (CRPD)*. United Nations. Retrieved March 26, 2024, from https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-Persons-with-disabilities.html#Fulltext
- Education Ministers Meeting Schools Policy Group. (2022). *Nationally consistent collection of data on school students with disability: 2022 guidelines.* Commonwealth of Australia. https://www.nccd.edu.au/sites/default/files/2022%20NCCD%20Guidelines-final-revised-2_0.pdf
- Fiske, H., & Ladd, E. (2017). Self-governing schools, parental choice, and the need to protect the public interest. *Phi Delta Kappan*, 99(1), 31–36. https://doi.org/10.1177/0031721717728276
- Fullan, M. (2021). *The right drivers for whole system success*. Centre for Strategic Education. https://michaelfullan.ca/wp-content/uploads/2021/03/Fullan-CSE-Leading-Education-Series-01-2021R2-compressed.pdf
- Gov.UK. (n.d.). Children with special educational needs and disabilities (SEND). Retrieved March 26, 2024, from https://www.gov.uk/children-with-special-educational-needs
- Hehir, T., Grindal, T., Freeman, B., Lamoreau, R., Borquaye, Y., & Burke, S. (2016). *A summary of the evidence on inclusive education* (ED596134). Instituto Alana; Abt Associates. ERIC. https://files.eric.ed.gov/fulltext/ED596134.pdf
- Hollenbeck, A. F. (2007). From IDEA to implementation: A discussion of foundational and future responsiveness-to-intervention research. *Learning Disabilities Research & Practice*, 22(2), 137–146. https://doi.org/10.1111/j.1540-5826.2007.00238.x
- Hutchinson, J., Reader, M., & Akhal, A. (2020). *Education in England: Annual report 2020*. Education Policy Institute. https://epi.org.uk/wp-content/uploads/2020/09 /EPI_2020_Annual_Report_.pdf
- Individuals with Disabilities Education Act. 20 U.S. Code § 1400 et seq (1975). https://www.law.cornell.edu/uscode/text/20/1400
- Institute for Statistics. (n.d.). *Data for the Sustainable Development Goals*. United Nations Educational, Scientific and Cultural Organization. Retrieved March 26, 2024, from https://uis.unesco.org/
- Kerr, K., & Ainscow, M. (2022). Promoting equity in market-driven education systems: Lessons from England. *Education Sciences*, *12*(7), Article 495. https://doi.org/10.3390/educsci12070495
- Leithwood, K. (2005). Understanding successful principal leadership: Progress on a broken front. *Journal of Educational Administration*, 43(6), 619–629. https://doi.org/10.1108/09578230510625719
- Lewis, M. M., Burke, M. M., & Decker, J. R. (2021). The relation between the Individuals with Disabilities Education Act and special education research: A systematic review. *American Journal of Education*, 127(3), 345–368. https://doi.org/10.1086/713825
- Male, T. (2022). The rise and rise of academy trusts: Continuing changes to the state-funded school system in England. *School Leadership & Management*, 42(4), 313–333. https://doi.org/10.1080/13632434.2022.2095996
- Mavropoulou, S., Mann, G., & Carrington, S. (2021). The divide between inclusive education policy and practice in Australia and the way forward. *Journal of Policy and Practice in Intellectual Disabilities*, 18(1), 44–52. https://doi.org/10.1111/jppi.12373
- MI School Data. (n.d.). Special education summary. Retrieved March 26, 2024, from https://www.mischooldata.org/special-education-summary/.

- Michigan Fiscal Brief (2023). Special education funding. Retrieved March 26, 2024, from https://www.house.mi.gov/hfa/PDF/Alpha/Fiscal_Brief_Special_Education_Dec2023.pdf
- National Center for Educational Statistics. (2023). *Students with disabilities*. https://nces.ed.gov/programs/coe/pdf/2023/cgg_508.pdf
- Organisation for Economic Co-operation and Development. 2022. *Review of inclusive education in Portugal*. https://www.oecd.org/publications/review-of-inclusive-education-in-portugal-a9c95902-en.htm
- Productivity Commission. (2022). Review of the National School Reform Agreement: Study report. Australian Government. https://www.pc.gov.au/inquiries/completed/school-agreement/report/school-agreement.pdf
- Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. (2021). Report: Public hearing 7 Barriers experienced by students with disability in accessing and obtaining a safe, quality and inclusive school education and consequent life course impacts. Australian Government. https://disability.royalcommission.gov.au/publications/report-publichearing-7-barriers-experienced-students-disability-accessing-and-obtaining-safe-quality-and-inclusive-school-education-and-consequent-life-course-impacts
- Ryan, J. (2006). Inclusive leadership. Jossey-Bass.
- Saggers, B., Mavropoulou, S., Carrington, S., Paynter, J., Adams, D., Malone, S., Westerveld, M., Mc Keown, G., Constantine, C., Bartlett, T. B., Connor B, Gately, J., Heath, S., Porter, A., Stewart, CJ., Winspear-Schillings, H., Nepal, S., Dunne, J., Saggers, A., Wilde, J., Van Leent, L., ... & O'Connor, K. (2023). Removing educational barriers in Australian schools for autistic students (REBAS): Current trends, gaps, and recommendations in educational research, inclusive policy, and educational practice: White paper. Autism CRC.
- Salokangas, M., & Ainscow, M. (2017). *Inside the autonomous school: Making sense of a global educational trend.* Routledge.
- Sharma, U., Sokal, L., Wang, M., & Loreman, T. (2021). Measuring the use of inclusive practices among pre-service educators: A multi-national study. *Teaching and Teacher Education*, 107, Article 103506. https://doi.org/10.1016/j.tate.2021.103506
- Shields, C. M. (2011). Transformative leadership: An introduction. In C. M. Shields (Ed.), *Transformative leadership: A reader* (pp. 1–17). Peter Lang.
- Shields, C. M. (2022). Responding to the UNESCO framework: A transformative approach to educational leadership. *Leading & Managing*, 28(2), 1–10.
- Sider, S. (2019). Peer coaching in a school in Cairo, Egypt: Implementation, barriers, and pathways to effective adoption. *International Journal of Mentoring and Coaching in Education*, 8(1), 37–51. https://doi.org/10.1108/IJMCE-04-2018-0016
- Sider, S., Beck, K., Eizadirad, A., & Morvan, J. (2022). Canadian perspectives: Performative commitments on equity, diversity, and inclusion by educational institutions. *Global Comparative Education Journal*, 6(1), 15–28. https://www.theworldcouncil.net/uploads/8/6/2/1/86214440/final_gcejournal-wcces_vol6-no.1-sep.2022.pdf
- Sider, S., & Maich, K. (2022). Leadership for inclusive schools: Cases from principals for supporting students with special educational needs. Rowman and Littlefield.
- Sider, S., Maich, K., & Morvan, J. (2017). School principals and students with special education needs: Leading inclusive schools. *Canadian Journal of Education*, 40(2). http://journals.sfu.ca/cje/index.php/cje-rce/article/view/2417
- Sider, S., Maich, K., Morvan, J., Villella, M., Ling, P., & Repp, C. (2021). Inclusive school leadership: Examining the Canadian experiences of school principals in supporting students with special education needs. *Journal of Research in Special Educational Needs*, 21(3), 233–241. https://doi.org/10.1111/1471-3802.12515

- Slee, R. (2011). The irregular school. Exclusion, schooling and inclusive education. Routledge.
- Specht, J., McGhie-Richmond, D., Loreman, T., Mirenda, P., Bennett, S., Gallagher, T., Young, G., Metsala, J., Aylward, L., Katz, J., Lyons, W., Thompson, S., & Cloutier, S. (2016). Teaching in inclusive classrooms: Efficacy and beliefs of Canadian preservice teachers. International Journal of Inclusive Education, 20(1), 1–15. https://doi.org/10.1080/13603116.2015.1059501
- Tomlinson, S. (2012). The irresistible rise of the SEN industry. Oxford Review of Education, 38(3), 267–286. https://doi.org/10.1080/03054985.2012.692055
- United Nations Educational, Scientific and Cultural Organization. (2017). A guide for ensuring inclusion and equity in education. https://doi.org/10.54675/MHHZ2237
- United Nations Educational, Scientific and Cultural Organization. (2020). Global education monitoring report, 2020: Inclusion and education: All means all (3rd ed.). https://unesdoc.unesco.org/ark: /48223/pf0000373718
- United Nations Educational, Scientific and Cultural Organization & Spain Ministry of Education and Science. (1994). The Salamanca statement and framework for action on special needs education (ED.94/WS/18). https://unesdoc.unesco.org/ark:/48223/pf0000098427
- United Nations General Assembly. (2006). Convention on the rights of persons with disabilities (A/RES/61/105 Annex 1). http://www.un.org/development/desa/disabilities/annex-i-conventionon-the-rights-of-persons-with-disabilities.html
- Whittaker, F. (2024, March 6). Budget 2024: £105m for 15 special free schools, and nothing else. Schools Week, https://schoolsweek.co.uk/budget-2024-105m-for-15-special-free-schoolsand-nothing-else/#:~:text=In%20budget%20documents%2C%20the%20Treasury,(SEND) % 20 across% 20England% E2% 80% 9D

Authors' Note

Correspondence concerning this article should be addressed to Steve Sider, 75 University Avenue West, Waterloo, ON, N2L3C5, Canada. Email: ssider@wlu.ca