Comparability with Indian Approaches on Inclusive Education for Specific learning difficulties (SLD)

*Sherin Susan Suresh and **Dr. Thamilselvan Palanichamy

*M.Sc. Applied Psychology, **Assistant Professor, Department of Psychology, PSG College of Arts & Science, Coimbatore, India.

ABSTRACT

Inclusive education is a bold step adopted in the field of school education system despite the challenges involved in it. It is an effort to place students irrespective of all their differences in age-appropriate levels to receive high-quality instruction, interventions and support that enables them to meet success in the core curriculum. The objective of this research is a comparative review of inclusive education services in India, China, United States, Thailand and Singapore. These countries were selected due to their cultural similarities or dissimilarities to India. The method used in this research was a systematic review of studies available on Inclusive Education in India and other countries. In India, the results show that the focus is on developing teachers' awareness of children with "Specific Learning Disabilities" (SLD) and their diagnosis, but there are gaps in its implementation. The United States has the most uniform and comprehensive service (IDEA, 2004), followed by Thailand, due to its services in the university demonstration schools (schools that are run in association with a university to provide training and research opportunities for teachers). Our review found that China and India had limited services to assist the students with special needs in mainstream classrooms. In the paper, we conclude that India has a long way to go in its development of a uniform and comprehensive system for Inclusive Education concerning legislations, services and training provisions for the mainstream teachers.

KEY WORDS: Inclusive Education, Specific Learning Difficulties, Services and Approaches

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I. INTRODUCTION

Inclusive education is a provision in the education system where students, regardless of any challenges they may have in learning, are placed in age-appropriate general education classes in schools with better proximity to ensure that every child receives quality instruction, interventions and support so that they are able to meet the needs of the core curriculum (Bui, Quirk, Almazan, & Valenti, 2010; Alquraini & Gut, 2012). It is the process of increasing the participation of students in regular classrooms and reducing the exclusion of the students who are affected by mild to moderate learning difficulties. The basic assumption is that children with learning disabilities have an equal right to experience mainstream education as students without a learning disability. Hence, all students should be allowed to have effective participation in their classrooms. This program is the outcome of the legislation that all students receive their education in the least Restrictive Environment (LRE). This means they study and participate with their peers without disabilities to the maximum degree possible, with general education being the first choice for all students (Alquraini & Gut, 2012). Inclusive education is expected to address the needs of children already present in regular classrooms and possess mild to moderate learning disabilities that generally go undetected and untreated. Such children run the risk of becoming dropouts or juvenile delinquents due to poor school performance. It also allows for the prevention of the exclusion of such children with disabilities from the mainstream. It is also necessary to give importance to the individual needs of every child in the classroom.

In this context, the following individual learning requisites become the prime focus:

- The needs of students who are not to be excluded from the mainstream who are at the same time unidentified and thus ignored.
- The truth that every child is different and special. Hence, each one of them has their own special needs. The success of inclusive education is characterized by acceptance, understanding and attending to each student's differences, including the child's physical, cognitive, academic, social and emotional characteristics. The main aim is to help all students feel welcomed, appropriately challenged and supported in their efforts. Some of the challenges to inclusiveness include:
- A lack of awareness and poor sensitivity among the administrators, teachers and parents.
- Absence of an effective system for screening, assessment and suitable intervention procedures.

- The attitude of transferring the responsibility of catering to the specific learning needs to the special educator. This is responsible for lack of skills among regular teachers to deal with the children with learning disabilities.
- Shortage of services like resource rooms, occupational therapy, speech therapy, etc. and the realization of the need of such resources.

Teachers who teach children with learning disabilities face certain challenges based on the various special needs of the learners. These needs include:

- Children with visual, hearing, motor problems and intellectual deficits are easily identified and provisions are also there to meet their needs.
- Children with severe Specific Learning Disabilities (SLD) pertaining to reading, writing, spelling and arithmetic are also now getting attention and many educators come forward to help them.

The government of India has set up measures to provide opportunities to children to improve their capabilities through the provision of community-owned quality education in a mission mode. SSA (Sarva Shiksha Abhiyan) in India was launched for this very purpose in 2001.

The research on inclusive education forms the basis for the following benefits for students:

Over the past three decades, research has shown that students with and without disabilities have higher achievement and improved skills through inclusive education (Bui, et al., 2010; Dupuis et al., 2006; Newman, 2006; Alquraini & Gut, 2012). For children with Specific Learning Disabilities or SLD, the academic gains include reading, writing, number skills, along with subjects like social studies and improvement in communication skills and social skills. More time in the classroom with children who have specific learning difficulties is associated with less rates of absenteeism and referrals for disruptive behaviour. With inclusion comes more diversity in classrooms, children with specific learning difficulties will be subject to more expectations and a sense of healthy competition and so their performance improves and children can be taught based on different learning needs.

Parent's feelings and attitudes:

A review of literature (de Boer, Pijl, & Minnaert, 2010) found that on an average, the parents are somewhat certain that inclusion is a good option for their children who have a Specific Learning Disability (SLD). The more experience the parents have with inclusive education, the more positive parents were about Specific Learning Disability. Inclusion also ensures social conformity of parents and their children with specific learning difficulties with the expected and accepted norms of society.

Inclusive Education in India:

According to research by the UNESCO Institute for Statistics (UIS), there were 73 million children of primary school age out of school in 2010, from the higher count of 110 million out-of-school children in the mid-1990's. About 80% of the Indian population lives in rural areas that cannot provide for special schools. This shows that there are an estimated 8 million children out of school in India (MHRD 2009 statistics) of whom, many have been marginalised by dimensions such as poverty, caste, gender and disability. This shows the growing need for inclusive programs in schools for children with Specific Learning Disability.

The general population of India still struggles with the awareness of the needs and services of children with SLD. Three fourth of the population of India survives on an income of less than rupees 100, or two dollars a day. Even when we are adjusting for the purchasing power parity, this amount puts millions of people below the global poverty line. So, these people with disabilities will account for the "Conversion Handicap" which is a term coined by Amartya Sen. According to him, "the Conversion Handicap is when people with disabilities derive a lower level of welfare from a given level of income than the rest of the population, due to additional costs incurred in converting income well-being" (Sen, 1999). In India, although there is a surge of inclusive education programs, there are still services for individuals with special needs that are provided in segregated settings (special schools, special programs by Non-Governmental Organizations, etc.). Educators, researchers and movie makers are trying to develop public awareness concerning the various services for students with SLD. In India, along with an understanding of the importance of including children with SLD in mainstream society, the individuals with learning disabilities can achieve more functional independence that can help to promote more productive living. According to Balasubramanian (2012), "In India, awareness on inclusive education in schools is still at the infancy stage and educational institutions are sceptical about having children with and without learning disabilities studying in the same classroom. There is general reluctance to give admission to a child with specific learning differences, as it involves challenges".

The emergence of the term 'inclusion':

Until the 18th century, Children with Special Needs (CWSN) were not given adequate opportunities to explore their potential. The political reformers of France and America inspired those in medicine and education to turn their attention towards educational needs of such individuals with the idea of fraternity, equality and

liberty (Chadda, 2003). According to UNESCO -at the UN-Committee on Rights of the Child-Centre for Human Rights, inclusion is a basic human right. It is the right of every single human being with a disability to have the opportunity to participate fully in all community activities offered to people who do not have disabilities (October 6, 1997 Geneva). In the United States, the Education for All Handicapped Children Act (EAHCA) of 1975 states that, education for children with disabilities was made mandatory where it was needed to provide Free and Appropriate Education (FAPE) in the Least Restrictive Environment (LRE) along with the non-disabled peers to the maximum extent possible. With the help of the Regular Education Initiatives (REI), regular class teachers also became more instrumental in the inclusive practice in the USA. Circumspectly, laws and legislations such as Individuals with Disabilities Education Act (IDEA) of 1990 (which was later called as EAHCA), 1997 and 2004, Assistive Technology (AT) Act of 1998, Carl D. Perkins Vocational Education Act etc. advocated for the further development of inclusive education for children with disabilities in public schools. With more and more changes, the world was beginning to understand the sheer success of including children with specific specific learning difficulties in mainstream classrooms. So, in 1971, the Planning Commission of India included a plan for a program for Integrated Education (IE). The government of India later launched the IEDC (Integrated Education for Disabled Children) scheme in 1974. The aims of IEDC included:

- Providing educational opportunities to CWSN (Children With Special Needs) in regular schools.
- Facilitating their retention in the school system.
- Placing children from special schools to common schools.

The scope in the schools included pre-school training, counselling for parents of children with SLD along with remedial programs for all kinds of disabilities. The scheme also provides facilities to motivate these children in the form of books, stationery, uniforms and allowances for transport, reader, escort, etc. (Chadha, 2003).

Integrated Education in India

The concept of Integrated Education began in the mid 1950's and it was considered to be the solution for the problem of segregated services. In 1952, the Ministry of Education launched a comprehensive scholarship scheme which was an advanced beginning for the Inclusive Education initiative by the Government (Chadha, 2003). This proved to be highly successful for children with SLD. So, in 1971, the Planning Commission of India made provisions for integrating children with SLD in the mainstream classrooms. included in its plan a program for integrated education. The government launched the Integrated Education for Disabled Children (IEDC) in December 1974 (Chadha, 2003). But the IEDC has not been able to see much success in its facilities and planning as only a little more than one lakh CWSN were covered by IEDC. But it did find success in developing awareness in the importance of integrating CWSN into the mainstream classes, which was noted in 1986 in the National Policy. The National Policy on Education, (NPE, 1986) and the Program of Action, 1992 expressed the need to integrate children with disabilities with other children who do not have learning disabilities. The main objective of the NPE, 1986 was to "integrate the physically and mentally handicapped with the mainstream community as equal partners, to explore their hidden potential and to enable them to have a higher quality of life with courage and confidence".

A few years later, the government of India started another project investigation on Inclusive Education. It shifted from the traditional school-based approach to the Composite Area Approach (Sen, 1999). In 1987, the Ministry of Human Resources Development (MHRD) and UNICEF launched a task called the Project Integrated Education for the Disabled (PIED) (Chadha, 2003). Here, instead of an individualized school approach, the cluster approach is emphasized. All schools in the area were expected to enrol the kids who had some learning difficulties. Teachers were also given special training programs to teach these children by meeting their special needs. This project was introduced in one administrative block each in Madhya Pradesh, Maharashtra, Nagaland, Orissa, Rajasthan, Tamil Nadu, Haryana, Mizoram, Delhi Municipal Corporation and Baroda Municipal Corporation. This approach had many successful aspects such as it was more cost effective and easier to organize than the special schools approach. It was also considered to be the most successful way towards the total universalization of the education of children with disabilities (Chadha, 2003). It acted as the gateway to freedom for children with specific learning difficulties in India. Chadha (2003) also spoke about the importance of attributing the difficulties of the child with SLD, not as a problem within the child, rather he chose to see it as due to the inefficiency in the school system, along with the teaching programs and interventions and the organization and management of the school.

Another step towards the universalization of primary education was taken by the District Primary Education Programme (DPEP). Here, the children with special needs were also included (Chadda, 2003). A number of districts had successfully implemented it. The main aim of the DPEP was to include primary level children with suitable teacher preparation, infrastructure facilities, aids and appliances. There are also over 1100 special schools run by non-governmental organizations with government support (Natarajan, 2000).

The above-mentioned programs were all collaborative efforts taken up by the Government and NGOs of India and it provided functional independence with the help of various facilities and aids in education. Hence

the entire concept of including children with disabilities along with the non-disabled children in the mainstream classrooms is a major step towards universalization of education.

In 1947, the Indian government began a new initiative in the education and rehabilitation of persons with disabilities. Progress was slow till 1981, but things changed with the declaration of the International Year of the Disabled Persons by the United Nations (Singh, 2004). Another initiative was taken by the government of India to provide opportunities for functional independence for individuals with disabilities. Singh (2004) had wide consultations with experts from the Government of India and in 1986 formed a body to standardize courses at different levels and thus the Rehabilitation Council became a registered society. But due to the lack of effective authority to enforce these standardization rules on the other organizations that functioned for the same purpose, the Rehabilitation Council was given the status of a Statutory Body through a Parliamentary Act (1992) which came into effect in June, 1993. This new body was called the Rehabilitation Council of India (RCI). The RCI was given statutory powers in order to standardize and regulate training policies and programs in the field of rehabilitation and special education in India. The 1992 RCI Act was later reauthorized in 2000 along with an amendment to make the council broader based on its coverage by including important duties such as the promotion of research in rehabilitation and special education services. It enabled the maintenance of uniformity in the definitions of various disabilities in conformity with the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full participation Act, 1995, cited in Singh, 2004).

India's Current Stand on Inclusive Education

Statistics from UNESCO Institute for Statistics (UIS) have shown that 73 million children of primary school age were found to be drop-outs in 2010, which was much lower than the 110 million out-of-school children in the mid 1990's. Around 80% of the Indian population lives in rural areas where the children do not have any provision for special schools to meet their special needs. This shows that there are an estimated 8 million children out of school in India (MHRD, 2009 statistics) many of whom are marginalized by dimensions such as poverty, gender, disability and caste. According to Deepa (Deepa, 2006), "Inclusion may be the key word in India's current education policy, but there is a world of difference between the law and its implementation." Her research showed that in India most schools do not have special educators or counsellors, although there are students with disabilities in the mainstream classrooms. The Rehabilitation Council of India Act, 1992 states that children with disabilities have the right to be taught by a certified and trained teacher to teach children with disabilities. In a survey conducted by the National Centre, 55% of 89 schools in India have students with children with disabilities but only 20 special educators were employed along with 12 providing training to teachers to teach children with disabilities (Deepa, 2006).

Chatterjee (2003) explained how parents of children with disabilities are also resistant to the concept of Inclusive Education. Factors such as lack of awareness, sensitiveness and education by inclusive education within the parental community has a negative impact on Integrated Education. Lakshmi (2003) found that roughly 10% of the population of India come under some category of disability of which around 2% are people with a mental disability. Although mainstream education has grown in terms of programs and teacher training services, the special education field is still in its infancy when compared to mainstreaming and integrated education (Lakshmi, 2003) despite the earnest efforts of the RCI and DPEP. Parental attitude towards their children with disabilities is still a barrier between normalcy and abnormal discriminatory, which further hampers the growth of Inclusive Education.

The National Census showed that per 1000 students who have a disability between the ages of 5-18, the enrolment years in the mainstream schools was actually higher in the rural areas than in the urban areas. 475 out of the 1000 students with disabilities attend a mainstream school in the rural areas whereas 444 out 1000 students with disabilities study in rural areas. This is due to the higher prevalence of special schools in urban areas than in the rural areas as there are more resources in the urban areas.

The implications of the National Education Policy (NEP) 2020 on inclusive education specifically for children with learning disabilities:

The latest National Education Policy released in 2020 resulted in expectations about improvements in the infrastructure, services, pedagogy and assessments for children with learning disabilities as well as other disabilities that come under the category of Socio-Economically Disadvantaged Groups (SEDGs). The very inclusion of children with learning disabilities within the category of the SEDGs fails to capture the essence of the difference between children with a physical disability and those with a learning disability. The services to be provided for children with a learning disability ranges on a continuum where on one end, children are given assistance for their learning needs in a resource room set up in the regular schools which will include special educators to provide them with help for their unique learning needs while ensuring that these children experience full integration in the regular curriculum as instructed in the RPWD act (the Rights of Persons with Disabilities act). One-on-one teachers and tutors, peer tutoring, open schooling, appropriate infrastructure and suitable technological interventions have been emphasized to ensure access for certain children with disabilities.

Teachers who are qualified with a B.Ed. are eligible for short term courses to learn how to help children with learning disabilities. These certificate courses can be done pre-service or in-service, either as a full time or a part time course. Even blended mode will be made available.

Despite all these services, the RPWD act has a provision where children with benchmark disabilities can choose between regular or special schools. But there is no specification on what basis this choice can be made and by whom other than the severity of the learning disability. Teachers and special educators can help children with their educational and rehabilitation needs and also help parents to find better ways to deal with their children's needs, including home-schooling needs and difficulties. But the question of how these children in regular classrooms and who suffer from a learning disability will be supported by their own teacher and by special educators and whether it is adequate remain unanswered. Another question that arises here is how can teachers who do not have formal training in special education accurately identify children who have a learning disability and those who have specific learning difficulties due to other personal or social reasons. Education on the other end of the continuum, where children will be home schooled will be carried out based on the efficiency of the guidelines RPWD act. But the effectiveness will depend on whether these guidelines will truly be based on the principles of equity and equality of educational opportunities with children who fall under the category of the regular education system. Effective assessment systems must be selected and the pedagogy to educate these children will require proper validation based on the needs of the children. This will be the responsibility of the newly formed national assessment centre PARAKH. Although the NEP 2020 has tried to make changes and revolutions to the education of children with learning disabilities in regular schools, special schools as well as home schooling, the efficiency and effectiveness of these new facilities can only be assessed based on their successful practical applications.

Inclusive Education in China

In 1994, the United Nations Educational, Scientific and Cultural Organization (UNESCO) organized a world conference on the Special Needs Education in Spain and concluded during this conference with the Salamanca Statement, to call for Inclusive Education around the world (UNESCO and Ministry of Education and Science, Spain, 1994). This report set the framework for UNESCO's future work in Inclusive Education. Since then, the UNESCO has been organizing a number of events to sponsor the development of both policies as well as skills for inclusive education in several developing countries including China, Argentina, Chile, Brazil, India, Lebanon, Latvia, Zimbabwe, Paraguay and Uruguay. Inclusive education as a concept was imported to Hong Kong in the 1970's and it was included in the government's education policy document which was titled "integrating the Disabled into the Community: A United Effort (Board of Education, 1996). According to the Report of the sub-committee on Special Education (Board of Education, 1996), integration in Hong Kong has been very similar to the method of Mainstreaming in the United States. But it has also been practised in the form of full-time education for children with selected categories of disabilities in the mainstream classrooms. These children with special needs are expected to follow the standard curriculum of general schools with the help of some support. The colonial government did not take any action to put the policy into practise. But this policy was later put into practise in September 1997 after giving the full power to Hong Kong from Britain to Mainland China. The government perceived the implementation of integration as a symbol of Hong Kong's alignment with the developed nations and regions in promoting and protecting human rights and equal opportunities (Board of Education, 1996). In China, the concept of inclusive education met with a lot of apprehension as most of the schools follow an elite education system where academic excellence is given top priority and is one of the reasons for the survival of the schools.

Integration in China has been implemented since the year 1997. But the primary comments on its effectiveness were negative as was reported in newspapers and other mass media. With the government's determination to continue to expand integration as much as possible (Education Commission, 2000) and the interaction of various forces that may pull the policy makers in opposite directions, an overall examination of the development of integration in Hong Kong, its implementation, its progress, issues that have emerged and how it sits with the overall education system will provide insight into its future development. In December 2002, the Education and Manpower bureau (EMB) absorbed the education department so that it could provide smoother administrative procedures with regards to integration. Today, the EMB provides for all of the special education services in Hong Kong.

When viewing the provision of services of special education and general education in Hong Kong, the traditional methods of education have been followed. But there are 6 types of special schools to meet the individual needs of children with special needs and this may include physical disabilities, mental retardation, visual impairment, hearing impairment, social development and even any medical conditions that may cause deficiencies in children's capacities. Currently, there are integrated as well as segregated education services provided in Hong Kong but there is a higher incidence of enrolment of students in special schools rather than in special segregated classes in regular classrooms. A study in 2011 ("Basic statistics on primary, junior secondary and special education schools in China") which was adapted from the Ministry of Education of the People's

Republic of China, 2011; National Bureau of Statistics of China, 2011, showed that there are totally 255,662 Chinese children of primary and junior middle schools enrolled in regular classes while there was 169, 951 Chinese children enrolled in special education classes. This showed that a majority population of the children who have some disability or some other form of special education need was already placed in a mainstream setting.

Despite all this, it has been found that by following the traditional practices of providing instructions for learning (such as rote learning) and the highly competitive culture in schools, pose great obstacles for inclusive education in China. Yet schools continue to motivate the teachers to provide more student-centred teaching strategies that will be better able to meet the unique needs of the children with special needs. In China, the efficiency of the educational culture has given more emphasis on selection and competition. Even the efficiency of the teachers and their teaching strategies have been based on the high-test results of the children in the examinations. Hence, most teachers were less than enthusiastic to harbour children with learning disabilities in their regular classrooms. According to OECD (2012) in 2010, the average size of the classroom in a Chinese Primary School was 37.4 students while the OECD average was only 21.2 students which posed as another obstacle for providing effective inclusive education services to the children with special needs. It is important to motivate the teachers to use their extra time when they are not teaching, to help those children with special education needs by providing them tutoring sessions, consulting other professionals in the field of education as well as outside education to deal with the child's needs and help the school in the development of programs related to inclusive education.

Although, there is a surge in school's participation in integration in the last few years, China is yet to reach its goal of creating a school community in terms of qualified and trained teachers to teach children with SLD in the inclusive setup. This is because most of the educational services are still provided in segregated settings rather than in inclusive ones. Problems such as non-acceptance of an inclusive school structure and a high reluctance on the part of the teachers to adopt new and more effective instructions, curriculum and assessment procedures for children with specific learning needs. Professionals who advocate for integration in schools, must strive for creating more opportunities for appropriate educational services that will be equally beneficial to children disregarding whether they have a learning disability or not. It is also important to ensure that definite and concrete changes take place in schools and in the educational system in China. This would require a shift from the highly competitive school culture and a purely academic oriented curriculum to one that is more acceptant of each child's unique learning methods. It is also important to give more importance to the level of personal growth of a child rather than only to the academic success of the child.

Inclusive Education in the United States

In 1975, the Education for All Handicapped Children Act (EAHCA) was passed in the United States which was later referred to as the Individuals with Disabilities Education Act (IDEA) 2004, to provide free public education for children with learning disabilities. But the development and implementation of inclusive education has taken decades to get to where it is now. Traversing through many controversies, legislations and even research has helped to shape a collaborative relationship between special education and general education.

The process of providing inclusive education services starts with the initial assessment of the child's abilities and formation of the Individualized Education Program (IEP) based on which the child will be provided with the appropriate services to meet his/her educational needs. The student is then placed in the Least Restrictive Environment (LRE) with their same age peers. In some cases, the child may only receive assistance from a special education teacher in the general classroom setting itself. But in some cases, the child is placed in a segregated setting to cater to his/her unique learning difficulties. In other cases, the children may be placed in a mixed placement program. During the course of the day, the child will attend the regular classes and also go to a resource room for pull-out services for those areas where the child faces difficulty in learning. Not only are the children given educational services but they are also given adaptive physical education, occupational therapy, counselling, vision and/or hearing services.

Schools in the United States provide academic accommodations and modifications to assess the child and to provide educational instructions. Some schools also provide assistive technology to the children with learning disabilities to aid in their learning within the classrooms. In some schools, provisions for transportation of the children with special needs to school are also available. One program that may be given for children with special needs is the 'Extended School Year' where the child is given educational services for half a day for six weeks during the summer holidays. This is provided because during the summer holidays the child does not receive any classes and so they may face a regression in their learning of academics or skills which poses as a hindrance in their educational progression. Older children such as adolescents are provided with goals in their IEPs so that they can meet their vocational goals and learn appropriate life skills. Parents are also given progress reports of the child's performance in class and to see whether or not the child is meeting the educational goals set out in the IEP. The child is also re-evaluated once every three years in order to find if there are any other problems that the child faces and that need to be addressed.

75% of students with disabilities spend part of or their whole day in the regular education classrooms along with their non learning-disabled peers. The rest of the students who have disabilities will receive academic instructions in a self-contained class or in a pull-out class or may even be put in a residential or in a hospital placement (National Education Association [NEA], 2009). Regular students can also benefit from the additional support extended in the regular classrooms for children with learning difficulties.

Inclusive Education in Thailand

The number of students in Thailand who have disabilities and attend regular schools has been increasing significantly for the past few years. (Office of the Education Council, 2015). According to the Compulsory Education Act of 2002, all Thai children of ages 7 to 16 years must be enrolled in schools excluding those who have completed a total of 9 years of education. Section 12 of this Act ensures that the Ministry of Education, the Education Service Area Offices, Local Administration and other Educational Institutions organise educational services for those children with specific needs such as children with any learning impairments, physical, emotional, communication and/or social impairments. It also includes children who are dependent on others, children who do not have caregivers, children who are gifted and children who are disadvantaged. This is to ensure that all children receive compulsory education through appropriate programs and services including methods, programs, services, technologies, materials, etc. based on the child's specific needs so that all children irrespective of whether they have some disability or not, will receive equal and fair opportunities to compulsory education.

According to the Persons with Disabilities Empowerment Act (B.E. 2550), persons with disabilities are entitled to "education as set forth in the legislation on national education or the national education plan, which suits their physical and mental condition in a specific educational institute, a general education institute, and alternative education or non-formal education, where the agencies involved shall be responsible for providing suitable and necessary facilities, medias, services and any other educational assistance for disabled persons". This act was passed in order to ensure that all children with disabilities will receive an education whether it takes place in a specific or a general educational institute and it can include formal as well as non-formal education. The Education for Persons with Disabilities Act B.E. 2551 [4] of 2008, ensured the right to education for people with disabilities including free education from birth or whenever the disability occurred and spanning till the end of the person's life, choosing those educational services and/or institutions based on the child's unique needs and providing quality education with good standard and assurance based on their needs. The persons with disabilities also have the right to choose what type of educational institute they wish to attend (i.e. special or general educational institute). Despite all these steps taken by the Thai government to improve inclusive education, there is still a long way to go in the progress of inclusive education.

The total number of students with disabilities who attend regular schools in Thailand has seen a steady increase from approximately 25,000 in 2012 to 60,000 in 2015. Three hundred and ten schools in Bangkok are regular schools, 127 are integration schools out of the 427 Bangkok Metropolitan Schools. In an integration school, the students may be placed in one of three types of educational settings, a) regular classroom (full time); b) regular classroom for one half of the day and receive remedial programs for the rest of the day; c) special classroom (full time). In cases where the child is placed in a regular class, a special education teacher prepares the child to cope with the demands of the regular classroom. But if the child is placed in a special classroom then they work side by side with the regular teachers to transfer the students who have some disabilities to the regular classrooms. But in most Thai classes, it is found that students with disabilities who study in a regular classroom will attend special classrooms on a full-time basis throughout their school life and may only participate with the regular class students for extracurricular activities. But modifications to the classrooms to assist the learning of children with disabilities in the regular classroom is not common. So, training teachers in the regular classrooms on the curriculum as well as the adaptations in their instructions to teach the children, will help to make the process of inclusion more effective in the regular classrooms.

The Bureau of Special Education Administration (BSEA) is the organisation that takes the responsibility of providing services to children who have special needs. The BSEA, Office of Basic Education Commission (OBEC) is the agency that is responsible for the provision of education for children with disabilities (Hill & Sukbunpant, 2013). The services include providing special schools, special education centres and even regular integrated primary and secondary schools. It is reported that there are 76 Special Education Centres spread across the provinces of Thailand. These centres are in charge of identifying children who have disabilities in the community, assessing the child, collaborating with the parents, developing the IEP, placing the child in the right educational setting, giving early intervention at home or even at the Special Education Centres and providing services for the child who has disabilities who is out of school (Kritzer, 2012). Children in Thailand may be placed in one or more of seven types of educational placements including: inclusive in regular schools, special schools, home schools, community/private organizations, hospitals, special education centres and informal education centres.

Despite all the provisions for inclusive education given in Thailand, there are still some barriers that it faces including physical barriers such as inadequate infrastructure, transportation from school, environmental arrangements, etc. Policy barriers include embracing a new policy where schools educate all children irrespective of their abilities or readiness. Some of the attitudinal barriers include cultural influences towards disability. Knowledge barriers include lack of knowledge of teachers to modify the curriculum to accommodate the needs of all students without taking into account the specific needs of the children with disabilities.

Inclusive Education in Singapore

As the nation flourished in the 1980's and 1990's, the education of students became the centre of importance for the government and separation of children who learnt using traditional and non-traditional ways. Soon, Singapore formed a Dual Education System involving two categories: mainstream schools and special schools (Poon et al., 2013). The mainstream schools are regular classrooms where children who do not have any disabilities are educated. The special schools are those where children with disabilities are educated. The MOE and National Council of Social Services (NCSS) support 13 Volunteer Welfare Organizations (VWO) in the administration of 20 schools (MOE, 2015). Different programs such as the Metta Welfare Association Presbyterian Community Services for children with autism, the Cerebral Palsy Alliance of Singapore (CPAS) for children with multiple disabilities, Canossian Daughters of Charity for the hearing impaired, etc. are some of the different schools that provide services for children with disabilities. The MOE in 2012, released a common curricular framework to deliver services to children with disabilities in special schools called Living, Learning and Working in the 21st Century: A Special Education Curriculum Framework (MOE, 2012). However, it was not compulsorily to be used by teachers of special schools and so they could follow a separate curriculum all together for the child based on his/her needs.

The 2007-2011 Enabling Masterplan paved the way for an inclusive society and gave six recommendations on special education: 1) the MOE has to take up the responsibility of providing early intervention services and special education; 2) proper and effective assimilation of students with special needs has to be done in the educational settings that involves integrating the dual education system; 3) developing better and more efficient schools and staff; 4) more funding for the support services like volunteer organizations, sports groups, etc.; 5) more efficient delivery of education, support and training that will help to empower both families as well as caregivers; 6) more focus on the planning and management of the transition within schools.

The National Institute of Education was developed in order to conduct the Teachers Trained in Special Needs (TSN) and the Allied Educator-Learning and Behavioural Support (AED-LBS) programs. The AED-LBS is a program which was launched in 2004 and it comprises a one-year training program for those people who are interested in acting as a support to teachers in regular classrooms. The TSN program is one which was launched in 2005 by the Ministry of Education. It requires 10% primary school teachers and 20% secondary school teachers from the mainstream schools in order to complete a three-course sequence over one academic year in order to help students who have learning disabilities (MOE, 2015b). Each one of these courses lasts for a period of three days and it is paid by the Ministry.

Some of the initiatives provided for pre-school children include Development Support Programme, Early intervention programme for infants and children, Integrated Child Care programme and Private Intervention Providers for early intervention. Initiatives for mainstream schools include Allied Educators (Learning and Behavioural Support) [AEDs (LBS)], MOE-Aided Dyslexia Association of Singapore Literacy programme, Pre-service training on special needs, School based Dyslexia Remediation (SDR) programme, School based specialized educational services, Special Education Needs Support office, Student Development teams, Teachers Trained in Special Needs (TSN) and training staff in basic special educational needs awareness in institutes of higher learning. Initiatives for students in special education schools include dedicated transport, expanded SPED school facilities, enhanced professional development opportunities for special education teachers, framework for vocational education, improved vocational education programmes, improved SPED curriculum, satellite partnerships and school-to-work transition programme. Some of the government subsidies and funds include Assistive Technology Fund (ATF), Computer Access Trust fund, Edusave grants, Edusave Pupils Fund, enhanced pilot for private intervention providers, opportunity fund grants, parent support group grant, special education financial assistance scheme, Special Education Needs (SEN) Fund, Straits times school pocket money fund, taxi subsidy scheme and VWO transport subsidies.

Some of the main issues and challenges that are found in implementing inclusive education in Singapore include: a) teacher training programs that fail to provide adequate training to teachers to support and develop learners in the classrooms for pre-service teachers who wish to enter this profession; b) a curricular and pedagogical focus on standardized assessment scores; c) cultural and institutional barriers that may prevent the democratization of educational opportunities.

II. CONCLUSION

The effect of inclusive education has been better able to measure the gains of the child in terms of social needs rather than academic gains. Hence, when deciding what program to place a child in an inclusive program, we must assess the needs of the child and select the environment that will best cater to the needs of the child. In the absence of effective teacher training and sensitization, the curriculum of universal education will remain unattained. Sensitivity and knowing how to adapt curriculum and classroom interventions are vital for the retention and meaningful inclusion of the learning-disabled child. Education is every child's right. Every child has individualized learning needs. To make the ideology of inclusion a meaningful success, effective assessment and intervention is required for every child with special needs. The aim should be to reduce the exclusion of Specific Learning-Disabled children and increase their inclusion in the regular classrooms.

Through inclusive education, all children irrespective of whether they have a learning disability or not, can learn. It ensures all children can attend age appropriate regular classrooms in their own local schools and receive their own appropriate educational programs. These educational programs require a curriculum relevant to the specific needs of the child. So, all children can participate in academic, co-curricular and extra-curricular activities. This also ensures children can benefit to the maximum extent from cooperation, collaboration between home, school and community. It helps to form a sense of belonging for the children in their home, school as well as community and thus be well prepared for life as a child or as an adult. It also involves providing better opportunities for learning for the children with learning disabilities. It also encourages involving parents in the education and activities of their children in local schools.

Although there are many advantages to inclusive education, there are also many barriers, such as attitudes regarding accommodating children with learning disabilities in the regular classrooms, physical barriers in terms of facilities and infrastructure, a rigid curriculum where children are denied experimentation or even different methods of teaching, lack of trained teachers who are well equipped to deal with the children with specific learning needs, inadequate funding that is necessary to include the children with specific learning needs, the high expectations that are kept by parents and teachers regarding the children's performance in the regular classrooms and the organization of the centralized education system that is not conducive to the positive changes and initiative in the children.

Scope for future studies

In addition to the findings of this systematic review, it is important to note that the researcher did not take into account the inclusion of gifted children into regular classrooms. As this population did not come under the purview of the study, it was not included. The study also did not give importance to the advantages and disadvantages that inclusion would bring to the emotional and social life of children with learning difficulties, rather it gave more importance to the academic gains and services provided to meet the educational needs of children with Specific Learning Disabilities.

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