

## **Juxtaposition of Inclusive Education and Lifelong Learning: A Comparative Analysis**

Dr. Amritpal kaur

Assistant Professor, Lovely Professional University, India  
Correspondence Dr. Amritpal Kaur (amritpal.25105@lpu.co.in)

### **Abstract**

The millennial development goals clearly “ensure inclusive and quality education for all and promote lifelong learning”. The millennium development goal 2 has focused on achieving universalisation of the basic primary education whereby the target was to achieve an ‘education for all. Sustainable development goals-4 emphasized on the education, quality learning and diversity along with the life courses. The primary school education is also required to be taken into consideration in an explicit manner so that the transition between the school levels could be taken up more exclusively. Certain policy areas such as child care and education, special education needs, vocational education, adult education need cohesive alignment. Unquestionably, inclusive education is an important sector. With the advent of globalization and industrialization all across the world can we think of children having tough time in getting education due to their physical or mental impairments? The benefits given to the disabled are negligible. Education will certainly improve their status in the society. But no special arrangements are made at the school level to provide children with disability an appropriate environment for education. The research at the global level has shown that the concept of equal opportunities has been adversely affected worldwide because the capacity of educational policies in lower and middle income nations has institutional and economic bottlenecks. Therefore, these inequalities have to be seen by the international donors. In this paper, a juxtaposition of all these issues will be highlighted in context of developed country like UK and developing countries like India and Malaysia. The jurisdictions which are chosen for this paper are United Kingdom because it has the most established and comprehensive legislation and this law have an influence on the disability legislation in Malaysia and India. Malaysia and India are chosen due to their close proximity in terms of legislation on disability. Part 1 of the paper will be an introduction to special or inclusive education. Part II will focus on legislation in UK, India and Malaysia. Part III will highlight the challenges faced by the disabled pupils and role of Information and communication Technology (ICT). Lastly, the paper find gaps in the legislations of the abovementioned jurisdictions and conclude with some recommendations.

**Key words:** Sustainable Development Goals, inclusive education, lifelong learning, ICT

### **I Introduction:**

*“We want a society in which disabled children's needs are met, aspirations supported and their rights respected”*

Right to education is universal in nature. It is an important tool of social change. No doubt the education sector has undergone tremendous changes at the global level as different

international documents such as Economic and Social Council, has been quite active and it adopted a resolution in 1950 related to prevention of disability and rehabilitation entitled as "Social rehabilitation of the physically handicapped". A resolution was adopted by General Assembly in 1971 as "Declaration on the Rights of Mentally Retarded Persons" which focused on the rights of the people suffering from disability<sup>i</sup>.

Children with disability are the most disadvantaged sections of society. They are the worst effected in our education system as they are not taken as the integral part of general education system. It strictly does not mean that nothing has been done for the benefit of this group but a lot is yet to be done in terms of lifelong learning of this section. It is significant to note that majority of persons suffering from hearing and visual impairments neither have basic literacy nor are these individuals treated without cruel neglect. Moreover, special children if given an opportunity can lead meaningful life by contribution to the social and economic well being of the family and community.

The term inclusive education has got impetus across the globe and several countries like India and Malaysia are committed to the inclusive education as these countries are signatory to the Salamanca Statement. However, there was a dramatic shift from medical to social model of disability; an inclusive education came into the limelight again so that these disabled children can be integrated in the mainstream setup. The major objective is to educate disabled children along with their peers. So the need was felt to set up more inclusive schools by offering diversity.<sup>ii</sup>

It is significant to note that the definitions of inclusive education are changing rapidly<sup>iii</sup> as it is often used to describe placement of the disabled child in the mainstream classroom and it does not focus on child's participation in overall educational setup.<sup>iv</sup> Just that disabled child is physically present in a mainstream setting does not automatically result in inclusion.<sup>v</sup>

Sadly, special children are wrongly seen as that section of the society, whose systems are revolving around the rehabilitation needs. On the other hand, social model has emphasized on a human right issues and it includes the right to dignified life, education, employment, social participation. Salamanca statement 1994 has developed an international policy<sup>vi</sup> which stresses on inclusive society so that education can be achieved for all. The UNESCO Guidelines for Inclusion extensively deals with the identification and removal of environmental, attitudinal, educational barriers regarding participation and needs of all learners.<sup>vii</sup>

UN Convention on the Rights of Persons with Disabilities<sup>viii</sup> mandates that the governments are to provide an access to basic and free primary education for special children so that effective education can be facilitated in various education sectors.<sup>ix</sup>

Furthermore, although inclusion now dominates the discourse, but still it takes many different forms in different countries. It is because of the lack of theoretical and policy clarity at the international and national levels with respect to the concept of inclusion.<sup>x</sup> In fact the term integration is different from inclusion. In simple words, integration means a disabled child is getting admission to the school but inclusion means he or she is has full participation in the mainstream set up.

## **II Legislations in United Kingdom, India and Malaysia:**

The present study has significance in the present era of humanitarian and human right laws, and the researcher has chosen these two developing countries mainly because India and Malaysia has borrowed most of its laws from Britain. It's the legacy which is left to us.

Moreover, the well established legal systems of well developed countries will be of great help in context of disability. The criteria we seek are the existence of legislation, guidelines, policies or any framework on persons with disabilities in general and also with special reference to special education (if any).

In countries like UK, there is a major drive to break down discrete and inflexible categorization of disabled children by introducing 'special education needs.' The emphasis is on the major disabilities faced by the children suffering from disabilities. UK has a policy wherein it is assumed that one fifth child has a 'special educational need' during their primary education period<sup>xi</sup>. In United Kingdom the Disability Discrimination Act 1995 (DDA)<sup>xii</sup> is the comprehensive law and it focuses that every education is a basic right of every child. The Disability Discrimination Act 1995 (DDA) has contemplated that until the education of child achieve certain targets, they shall participate in the mainstream classes. An 'individual Education Plan' has been introduced under the law which will be framed according to the individual needs of a particular child. Furthermore, it is illegal to discriminate against special children in education, employment, transport basic services and goods. However part IV of the Act was introduced pursuant to the Special education needs and Disability Act 2001 (SENDA). DDA placed educational institutions under a duty to encourage access for and integration of disabled pupils and students at all levels of education<sup>xiii</sup>. Section 28A of the Act mandates that the 'responsible body'<sup>xiv</sup> shall not discriminate against a disabled child<sup>xv</sup> at the time of admission. The discrimination could be in any form such as by way of less favorable treatment or a failure to make reasonable adjustments.

The provision of 'reasonable accommodation' given in Disability Discrimination Act, 1995, Equality Act, 2010 in developed countries like UK, in context of education is significant step in the right direction. However, the need of an hour is to promote self-employment schemes by provision of interest free and easy loans to these persons after completion of their study to start their business.

In developing countries there is no specific framework for the children with disabilities. In India there is no specific framework to deal with the special children though certain policies have been framed at the international level such as Education for all (EFA) and universalisation of primary education through Millennium Development goals (MDG 2).<sup>xvi</sup> Additionally, Article 21-A has been added through 86<sup>th</sup> amendment in the Indian constitution. Another landmark legislation adopted by India with respect to the education of children is the Right of Children to Free and Compulsory Education Act, 2009, commonly known as RTE Act, 2009. Initially disabled children were not included in the definition of 'child' but by way of an amendment through the RTE Act (2010), children with disabilities have are considered as a disadvantaged group in the Section 2(d) of the RTE Act. The National Policy for Persons with disabilities, 2006 has also emphasized on the need for mainstreaming of children with disabilities in the general education system through inclusive education<sup>xvii</sup>. Despite the fact that a large number of legislations the practical reality is grim in terms of the education of special children as very little efforts are made to uplift these little souls.<sup>xviii</sup>

An introduction of new law, the Rights of Persons with Disabilities Act, 2016 is a much awaited legislation which made an effort to promote the integration of children with disabilities in regular schools where government has made all endeavors to promote non-formal education programmes for special children through vocational

training programmes, by provision of reading materials free of cost. The department of social justice and empowerment took an initiative whereby Session of the United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP) Working Group on Asian and Pacific Decade of Persons with Disabilities held at New Delhi in 2015 whereby the focus was on implementation of Incheon strategy related to disabled persons. Indian Government is moving ahead with a vision of inclusive society, equal opportunities and accessible india. The DEPwD<sup>xxix</sup> and the Ministry of Social Justice and Empowerment has introduced flagship program known as the “Accessible India Campaign (Sugamya Bharat Abhiyan)” and it is a step towards inclusive society. Sadly, the ground realities are still different as many of these enthusiastic campaigns failed to achieve the determined targets due to lack of cohesive approach.

In Malaysia, a beautiful developing country of Asian region, the special education had not got much attention as there was a bifurcation of the responsibilities between the Ministry of Education (it focused more on children with hearing, visual and mental disabilities) and ministry of Women, Family and Community Development (it focused more on women and family).<sup>xx</sup> Though these government departments were focusing independently towards integration policies but major changes were witnessed in Malaysian special education programmes due to the dramatic shift from medical model of disability towards social model of disability. Resultantly, Malaysian special education policies saw rapid progress which included framing of teacher training programmes for special educators and also setting up of special Education Division in 1995. The Education Act 1996 had seen a new chapter on special education and the Ministry of Education also introduced new education rules (special education) in 1997.<sup>xxi</sup>

The major special education programmes in Malaysia are inclusive programs, special schools and integration programmes. The students enrolled with these special programs are getting monthly allowance. The persons with Disabilities Act, 2008 has emphasized on the non-exclusion of children suffering from sensory, cognitive or physical impairment from the formal education system. No doubt Malaysia has shown fast pace development in the sector of special education as National Education Blueprint is prepared for 2013-2025.<sup>xxii</sup> However, on the other side of the coin, there are innumerable issues and dilemmas that need careful attention and diligent actions to realize inclusive education for all citizens in Malaysia. Recently, UNICEF Malaysia disability consultant Zoe Gan revealed certain startling facts wherein according to study conducted in 2012, it has been found that only 1% of all special children are studying in public schools in Malaysia and it covers both inclusive education or special needs education. Thus one can well imagine the status of other 99 percent children with disabilities, those are out of school or are hidden in four walls of the houses as there are not many facilities available for them in terms of access, education, employment, inclusion or integration in the mainstream set up. “Discrimination can and does happen on a daily basis in terms of access to things that able-bodied people take for granted. If you want to get into a school or go to the supermarket or the doctor doing that can be almost impossible for a wheelchair user in Malaysia and Malaysia doesn't have a process of approaching all buildings from a perspective of universal design based on equal access for all,” she said.<sup>xxiii</sup> It is important to remember that unlike laws in the UK and US, although Malaysia is claiming to protect the rights of children with disabilities, but the key words like 'discriminate' and the phrase 'to protect children with disabilities against discrimination' failed to find place in the laws or legislations of Malaysia. Therefore, the hopes of developing countries like Malaysia to achieve the target of becoming an inclusive society by 2020 is at stake until the issues of discrimination in education, workplace, employment and access are not resolved in timely manner.<sup>xxiv</sup>

In Malaysia the major weaknesses of the law among others are as follows:

1. The related departments are not bound to comply the law but are to submit reports.
2. No provision in the Persons with Disability law to enquire about the breaches of the provision and there is no provision to remedy the grievances of the aggrieved persons in the education sectors.
3. A comprehensive study must be undertaken on its national legislation, and to identify provisions with need to be revised or amended so as to harmonize with the provisions of the UNCRPD.
4. Malaysia does not have distinctive laws to fight against discrimination faced by the children with disabilities.

Table 1 below depicts the comparative study of abovementioned three jurisdictions on the parameters of existing legislation, the departments dealing with the Persons with disability and children with disability in context of special education and policy guidelines. It has been observed that in UK and India the legislation on disability was

<b>Table 1<sup>xxv</sup></b>			
<b>Criteria</b>	<b>UK</b>	<b>INDIA</b>	<b>MALAYSIA</b>
<b>Legislation</b>	DDA,1995 DDA,2005 Equality Act,2010 Special Education Needs and Disability Act,2001	The Rights of Persons with Disabilities,2016	Education Act,1996 The Persons with Disabilities Act, 2008
<b>Department on Disability</b>	The Disability Rights Commission (DRC) Department for Children, Schools and Families now known as Department of Education,2009	Ministry of Human Resources and Development,1985 Department of Disability Affairs,2012 Department of Empowerment of Persons with Disabilities (DEPwD)(Disability Division of Ministry of Social Justice Empowerment,1998)	Department of Social Welfare Malaysia, Ministry of Women, Family and Community Development,1946 Special Education Department, Ministry of Education 1987 National Council for Persons with Disabilities,2008
<b>Policy/Guidelines on special Education</b>	Special Educational Needs Code of Practice The Education (Special Educational Needs) (England)	NPE 1986 IEDC Scheme 1992 The National Curriculum Framework for School Education (NCFSE)	National Policy for Persons With Disabilities 2007(No national policy on CWD) Education Rules (Special Education) 1997 National Education Blueprint

	Regulations 2001	(2000) National Policy on PWD 2006(National Policy of ICT on school education)	2013-2025 (Integrated and Inclusive education)
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enacted in 1995. Indian law on disability was known as the Persons with Disabilities (Equal Opportunities, full participation and protection of Rights) Act<sup>xxvi</sup>. However, Malaysia took the initiative to introduce an enactment in 2008 after it became signatory to UN Convention on Rights of Persons with Disabilities, 2006. Three jurisdictions have full fledged departments which are working for the rights of disabled persons and also focusing on the special education programmes. In UK, the new Special Educational Needs Code of Practice is a significant law which focuses on commitment with respect to persons with disability. A consistent approach regarding special education needs of special children is the central point in this practice.<sup>xxvii</sup> Similarly, the policy guidelines for “Inclusive Schooling: Children with Special Educational Needs” further promotes the practical aspects of the framework. For instance, Local Education Authorities (LEA) are also making all efforts to promote the inclusion of a special child in mainstream education set up.<sup>xxviii</sup>

In India, state governments are emphasizing on achieving the goals of inclusive education through ICT and the access through Braille systems or screen readers or facilitation in education, is provided in majority schools. Further, national policy has mandated the sensitization of the school teachers regarding use of ICT’s for special children. The capacity building programmes are initiated for teachers enabling them to promote inclusive education through ICT.<sup>xxix</sup> In Malaysia, special children with learning disabilities are receiving integrated and inclusive education. The special education programmes deals with special education classes located in the regular schools. All these students including student with visual and hearing impairments, are having an access to all the facilities available for regular students.<sup>xxx</sup> The ministry of education has been stressing on creating partnership with the NGO’s and the corporate houses to provide wider platform of educational facilities to special children.<sup>xxxi</sup>

**Table 2**

<b>Parameters</b>	<b>UK</b>	<b>INDIA</b>	<b>MALAYSIA</b>
Definition of Persons with Disability	Yes	Yes	Yes (the definition does not use the words 'on an equal basis with others)
Reasonable Adjustments	Yes	Theoretically-Yes Practically-No	Theoretically-Yes Practically-No
Special Education	Yes	Yes	Yes

Encourage Research	No	Yes	Yes
Disability Living Allowance	Yes (for children below 16 years)	National Scholarship for CWD, Fellowship for Higher Education	yes
Legal Action on non-compliance	Yes	Yes	No

It is evident in Table 2 that Malaysia lacks in legal action and compliance with respect to Persons with disabilities. Indian Government has introduced National Scholarship schemes for disabled persons in professional or technical or post matric courses( where the duration of these courses are more than one year). The eligibility includes disability more than 40 percent and the total family monthly income shall not exceed Rs.15000/-.

The categories of scholarships are as follows:

Category	Day Scholars	Hostelers
Graduate / PG courses in Professional / Technical	Rs. 700	Rs. 1000
Diploma / Certificate level professional courses	Rs. 400	Rs. 700

In India, reservation to the tune of three percent has been provided for the students suffering from disabilities, in government and government aided educational institutes.

In Malaysia the monthly welfare assistance given to disabled persons are RM<sup>xxxii</sup> 300 and there is a provision for its increase to RM 500. Recently, Prime Minister Datuk Najib Razak had also announced in his budget speech that a sum of RM535 million will be allocated to groups for the disabled. The amount is to cover employee allowance, disabled children training allowance and assistance for the disabled who are unable to work, among other things.<sup>xxxiii</sup>

**III Challenges:**

Inclusive schools have many challenges as these schools primarily focus on learning, teaching, achievements and attitudes of special children. The major challenge is not only related to their performance, but new offers or opportunities are provided to these students especially those who have suffered difficulties in their activities. However, it cannot be inferred that all students shall be treated in the same manner but it revolves around the varied life experiences and needs of these students. Thus the potential of ICT need to be explored in order to enhance the learning experiences of these children by offering new opportunities to them. Moreover when new technologies are becoming a ‘tool for inclusion’, then we should not give it a second thought. Further, all primary teachers need to cater the special needs of special students through ICT.

Undoubtedly, the special education of special children and ICT goes hand in hand. The introduction of ICT in the schools of developed and developing countries would have major impact on the learning abilities of students with disabilities. The Scottish Council of Education Technology has introduced this system and has made it compulsory. But there is a word of caution too, that the tool of inclusion should not be made a tool of exclusion because each child with disability has to be seen individually and a plan shall be made accordingly. Though use of laptops in the name of inclusion may sound very fashionable but they have their limitations in the terms of inclusivity. Moreover the slogan of ‘One Laptop, One desk’ is a very catchy slogan but it may not suit the pocket of developing countries. Hence what is ultimately important is not

the hardware but the pedagogy to teach and train the children with disabilities. Their motor skills, eye coordination play a significant role in the learning process because a simple use of internet or websites will fail to provide desired results. Here the objective is to empower the special children to become major contributors in the educational set up. Here the resourceful practitioners could play a substantial role. But, the provision of well trained teaching personals is amongst the major challenge. In developing countries, the major causality is closely related to the economics, therefore cross-sectoral connections are essential for progress.

Indisputably, there are unending efforts at different levels regarding inclusion of special children in the learning process but there are many reasons which adversely affect the growth and progress of these children. Infact these children are denied basic equal rights and are not accepted as equals by the society. No doubt these hurdles are overcome by hard work and struggles by the disabled students and also by those who are advocating on their behalf.

In Malaysia there is lack of psychopathological research regarding the identification of special children. Malaysia is also lagging behind in terms of multi-level and multi-stakeholder research. Therefore, the need of an hour is to conduct systematic and large-scale research and also to identify educational, employment, access related barriers and their solutions. In addition to this the abovementioned sectors must be connected to other life intersections such as employment and economic well being of the children with disabilities.

Furthermore, school officials in India and Malaysia lack basic training to implement educational programs related to disabled children in regular schools. Majority of teacher training programmes at the school and higher education level do not have units for disability studies. Even universities are not training their teachers appropriately to work in integrated culture. There are several schools in developing nations which lack basic equipments to cope with the requirements of disabled children. There is neither disabled friendly transportation nor accessible buildings or infrastructure. Interestingly, in Indian schools or educational institutions few ramps are built to fulfill the directions of new law on disability. It leads to far greater problems and negative attitudes. The state governments have to work proactively to ensure successful implementation of integrated policies at school level. It will also not be an exaggeration to say that Malaysia and India have shown tremendous pace of development in the arena of special education in recent past but still there are unending challenges and issues which need careful attention to achieve inclusive education in developing countries.

## **IV Solutions**

1. Teacher training programmes on special education needs and sensitization training in capacity building is required in developing as well as developed nations.
2. Innovative methods are needed to train educators as mass level
3. Involvement of NGO's is needed in implementing inclusive education effectively in schools
4. School- University Partnership to support research based initiatives
5. Alternative system of education is required whereby disabled students do activities which show their ability not disability.
6. A Cohesive and inclusive examination procedure is needed to cater to the special children and adolescents with learning disabilities, both in India and Malaysia
7. Disability Equality Training (DET) in teacher training courses is urgently needed in Malaysia while in India the ongoing training programmes should be made more effective and streamlined.

8. Standard syllabus for students in primary and secondary education must also be prescribed in order to reduce the dropout rates in India and Malaysia
9. Malaysian government must accelerate its efforts to sign and implement the Marakesh Treaty.
10. An official instruction regarding the provision and usage of sign language interpreter must be issued in Malaysia
11. The school buildings must be made disabled-friendly or accessible especially for the physically challenged students. Universal Design application must be practiced widely and should also be made a compulsory part of any school building, either public schools or private schools across the globe.

## V Conclusion

To sum up, it has been argued that the inclusive education, is a benchmark of educational development. Though Sustainable development goals and inclusive education have shown synergies by broadening the scope of priorities. It has great impact on the technical sessions related to inclusive education but also legitimize the educational development across the globe. It is significant to highlight that inclusive education has to be taken in the multifarious experience, and it will certainly enable it to put it in the political agenda and consequently more work is expected from those who are at the helm of affairs. This broad understanding will certainly have far reaching effect in the educational development and it practitioners and academicians in the developing nations will also be reminded of specific challenges. Therefore the educational needs of this vulnerable section of the society are catered through a vision of inclusive education both in developed and developing countries, in order to disrupt deep rooted segregate ethos.

“Education is a major contributor to the development of our social and economic capital. It inspires creativity and fosters innovation; provides our youth with the necessary skills to be able to compete in the modern labour market; and is a key driver of growth in the economy. And as this Government puts in place measures under the New Economic Model, Economic Transformation Plan and Government Transformation Plan to place Malaysia firmly on the path to development, we must ensure that our education system continues to progress in tandem. By doing so, our country will continue to keep pace in an increasingly competitive global economy”<sup>xxxiv</sup>

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