

Achieving Education for All: A Comparative Study of Educating Disabled Children in the UK and China

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Abstract. Educating disabled children is a vital part to reach universal education, as well as social equality and justice. This study conducts a comparative analysis of inclusive education policy practices for disabled children in the UK and China. The research investigates the policies employed in both countries to provide equitable educational opportunities for disabled students. Key similarities and differences in the two systems are identified, involving how cultural, societal, and policy factors influence the design and effectiveness of inclusive education. The research findings indicate that while the UK emphasizes inclusive practices and individualized support, China focuses on integration within mainstream classrooms. Challenges were observed in both systems, including a lack of professional training and teacher resources. By comparing and evaluating successful strategies, though from the lens of human development, students in China may benefit more from the UK's inclusive policy, however, policy needs to be localized to combat country-specific barriers such as low social acceptance. This research contributes to the global discourse on inclusive education, facilitating cross-cultural learning and policy enrichment to ensure all children regardless of disability receive an equitable and quality education.

Keywords: Disabilities, Inclusive Education, Comparative policy study, Social Justice, Human Development.

1. Introduction

Equality Act 2010 primarily defines disability as a diverse range of physical, sensory, intellectual, or mental impairments, which could either be permanent or temporary [1]. This thus restricts people to engage in daily activities, for example, walking, listening, or learning as normal people did [1]. At the same time, some disabilities are invisible, as it is hard to detect due to a lack of visual representation. To be specific, symptoms such as cognitive dysfunctions, brain injuries, learning differences, and mental disorders, are considered as invisible disabilities [2]. Take a learning disability as an example, suggested by National Joint Committee on Learning Disabilities (NJCLD), students with this disorder usually have difficulty in the acquisition process, and use of reading, writing, listening, and speaking skills, as well as cannot function reasoning or mathematical abilities as normal others, and this is intrinsic to individual [3]. Attention-deficit/hyperactivity disorder (ADHD), Dyslexia are common disorders within the learning disability domain [4].

However, all these kinds of disability aren't rare across the world population. According to the World Health Organization's (WHO) report published in 2023, approximately 1.3 billion people have distinctive types of disability, in other words, 1 in 6 are disabled [5]. Lots of these data are based on visible disability, thus, more people are indeed disabled invisibly. But little attention was paid to disabled groups, including support for them and their fair access to opportunities within areas like education and employment. Scheer and Groce criticized that disability has turned to the social disadvantage that has caused a detrimental impact on individuals [6]. For example, being rejected work by employers, especially in the industrial pathway, faced direct or indirect bias by employers in recruitment and being questioned of disabled people's work ability [6,7]. While in the schooling system, disabled people reported having faced exclusion and discrimination both within peers and teachers, and unequal treatment in the process of admission [8].

To better address the issue of marginalization and discrimination, and eliminate social disability, decades ago, Education for All (EFA) has already been claimed as an international policy agenda across over 155 countries [9]. The earliest agreement happened straight after a conference in Jomtien

in 1990, and confirmed getting education as a basic human right [9]. With time moves, the development of EFA has made numerous progress. In 1994, Salamanca Statement specifically about special educational needs (SENs) was agreed by 92 governments and 25 international organizations, and emphasized the importance of inclusive education based on the principle of social equity [10]. For instance, it claims regular schools have the responsibility to combat discrimination, create welcoming communities and achieve education for all by catering students' diverse needs and abilities [10]. Convention on the Rights of Persons with Disabilities (CRPD) was later drafted in 2006, and has 82 signatures which has become the highest number in UN's history on convention [11]. Within all the articles in the CRPD, from the perspective of education, it reaffirmed the non-discrimination foundation of education, proposed the purpose of education is to fully develop an individual's potential without excluding disabled children, and offered individualized support where necessary [11].

The UK and China are two of the countries which signed the convention and have introduced policies regarding education for disabled children [12]. Also, the UK and China serve as compelling examples to explore the significance of education for disabled children due to their distinctive approaches and outcomes.

In this case, this article will focus on comparing the UK and China's policies on providing education for children with special needs, and the current circumstances of policy practices. Similarities and differences will then be discussed, as well as critically evaluating if one country's policy strength could be shared. This comparative research utilized literature-based methods to explore. The research findings are especially crucial for future researchers and policy makers to understand education policy for disabled children through a cross-cultural lens. To ensure that every disabled child receives the care, support, and education they deserve, best practices could be identified, and a global dialogue could be established while comparing and contrasting the achievements and challenges within the UK and China in terms of governmental commitment and public societal attitudes. This would foster a more inclusive, sustainable educational environment that is more socially just.

2. Historical Developments of Education Policy for Disabled Children in the UK

The UK has experienced a long history in providing education to disabled children, as Figure 1 represents. It could be traced back to the introduction of mass education through 1870, 1876, 1880 education acts, but only unofficial institutions were established to teach children who were described as having learning difficulties, and schools of this function were seen as experimental [13]. Meanwhile, in the late nineteenth and early twentieth centuries, professional educationists, medical experts and psychologists emerged with growing interest in special education and school children [13]. During the second world war, while special schools were closed, disabled children were transferred to attend ordinary schools, which laid the foundation for public attitudes to change towards inclusion [13].

Later in the 1944 Education Act, it introduced eleven types of impairments to better address the needs of disabled children and young people, and it was the first time that the education system admitted a sizable number of disabled children, and confirmed that Local Education Authorities would be in charge of their education [13]. Children classified as 'mentally impaired' were not transferred from health authorities to local education authorities, until the Education Act in 1970 [13]. Warnock challenged the notion of impairment categorization, he criticized this strategy for neglecting individual's complexity, which just simply defines if one child is disabled or not, and decides if they require special education, but paying less attention to providing actual SENs to support [14].

In 1981, the education policy for disabled children experienced another new progress. The concept of SENs was introduced in the Education Act, to replace the old idea of impairment categorization [13]. Lauchlan and Greig concluded that because of the 1981 Education Act, special education was

replaced by a more comprehensive understanding of SENs [15]. This also indicated the amendment in policy attempted to provide sufficient safeguards, and rights to those with SENs, and where possible, to provide their education with support of their special needs in normal schools, this further highlighted the shift from segregation to inclusion when implementing education for children with SENs.

The Special Educational Needs and Disability Act broadened the rights of disabled students, as it was created to remove physical, academic, and instructional barriers that prevent handicapped students from attending regular schools at universities, colleges, and high schools' level [13]. For example, in the admission process, schools cannot treat disabled students as less favorable compared to non-disabled candidates. Institutions were required to provide reasonable adjustments if disabled children faced substantial disadvantages that prevent them from learning and participating as non-disabled others [16].

Key points that signpost the progress of UK's Education for disabled children

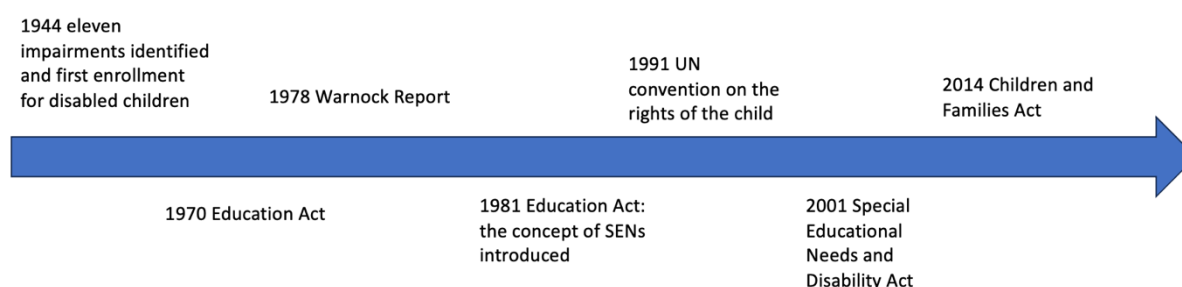


Fig. 1 Key points that signpost the progress of UK's Education for disabled children [13,17]

3. Historical Developments of Education Policy for Disabled Children in China

China's policy on educating disabled children started much later than the UK, as Figure 2 represents. Disabled students were officially recruited to study in regular schools in the 1980s, under the instruction of two governmental laws, the revised Constitution and the Compulsory Education Law [18]. Every kid must get compulsory education once they turn six, according to the Compulsory Education Law of 1986, which also established special schools or classes for school-age children and adolescents with intellectual disability, visual impairment, and hearing impairment during that time period [19]. While the revised Constitution law 1982 mandates that the education system and society must provide support and opportunities to citizens with disabilities [20]. Xu et al proposed that during the 1980s, China faced limitations in financial resources to support all children with disabilities due to an undeveloped national economy. However, the Chinese government demonstrated a dedication to ensuring mandatory education for children with disabilities. As a result of this commitment, educational offerings have become more diversified, which is particularly evident in an increase in the participation of students with disabilities in the educational system [21].

While learning for disabled children was primarily put under a segregated setting, the Learning at Regular Classroom (LRC) was then raised in 1986 for the first time by the Golden-Key Education Project [21]. Instead of isolating students with SENs in special education schools, the policy titled "Several Problems with The Implementation of Compulsory Education" underlined the necessity to construct special courses in regular primary and middle schools. Additionally, it promoted including disabled students in regular education programs as long as it did not impair their capacity to study [22]. This encouraged the enrollment of disabled children into general mainstream schools, although the concept LRC is not officially defined and advocated. However, this document implies that the mainstream school in China does not have a mandatory obligation to accommodate students with SENs, particularly whose impairments seriously affect their learning in ordinary schools [21]. This

suggests that LRC is relatively restricted compared to more inclusive approaches advocated in the western nations, and the UK is an example of it [21].

The Measures for Implementing Learning in Regular Classrooms for Children and Adolescents with Disabilities were approved by the Chinese government in 1994 [23]. These regulated general schools need to accept children with SENs, including details like targets, admission, teaching requirements and professional training, parental training, as well as potential challenges and solutions during the process of practice [23].

The LRC has gradually grown from 1994 to 2006. In 2006, the Compulsory Education Act was revised again that wrote LRC into the Chinese law system [24]. It was specified that general schools should admit school-aged students with SENs and maximize their possibility to study in the normal education system, as well as offer assistance for their academic work and rehabilitation [24]. More recently, multiple documents were issued by the Chinese government to accelerate the special education reform, aiming to promote greater inclusion. The introduction of the *2010-2020 Outline National Program for Mid-Long Term of Educational Reform and Development* and *2013 Amendment of 1994 Education Regulation* were models of new changes [21]. The practice of LRC has enabled more disabled children to access education as their non-disabled counterparts. Based on the comparison between 1992 to 2010, the enrollment rate of disabled children in LRC boosted from 28 percent to 60.8 percent [21].

Key points that signpost the progress of China's Education for disabled children

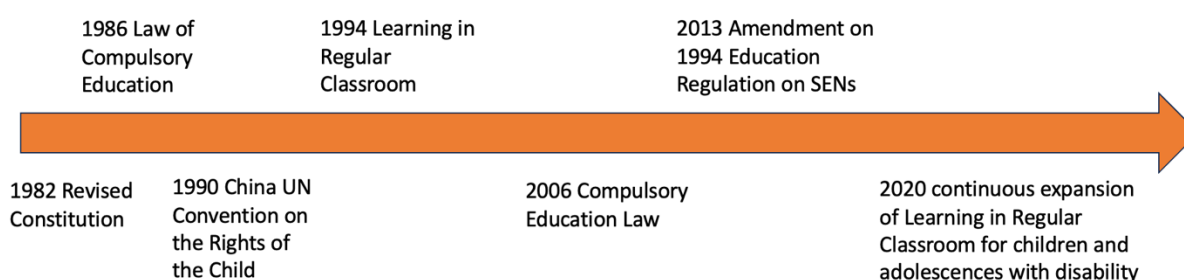


Fig. 2 Key points that signpost the progress of China's Education for disabled children [17-24]

4. Similarities and Differences

With the implementation of policies to provide education to students with SENs, UK and China revealed similarities and differences in terms of their strategies and challenges.

4.1. Similarities

As far as analyzed above, both the UK and China have progressive legislations on how to provide education for disabled children. In the UK, the 1970, 1981 Education Act and 2001 Special Educational Needs and Disability Act protects disabled individuals from discrimination and ensures accessibility in educational institutions and offers corresponding support while the disabled students are included in the mainstream school settings [13]. In China, Compulsory Education Law and LRC emphasized the right to education for disabled children [19,21,23,24]. This suggested that both countries have made efforts to promote inclusive education within mainstream schools. They advocate integrating disabled students into regular classrooms, where possible, to foster a sense of belonging and reduce segregation.

However, both countries have faced similar challenges in the process of inclusion. In Warnes et al's research, their findings reported teachers in mainstream schools experienced increasing workload and high pressure when they trying to cater the needs of every child sitting in the same classroom, including being able to manage to meet the special educational needs of disabled students [25]. A common dilemma is either teachers found spending too much time on students with SENs, but may

harm the benefits of other non-disabled students, or if teachers spent majority of time and attention on non-disabled students, students with SENs cannot get the support they need for their personal development [25]. The issue of lack teacher resource and professional training was raised again in China as well. In Fu et al's article, they underlined the severe shortage and high turnover rate of special education teacher, in which the student-teacher ratio is 1:11, however, is much lower for students who require special educational support [26]. Apart from this, the quality of teacher is another concern. Ellsworth and Zhang wrote a report reflecting on their visit to teachers and principals who taught special education, expanding high-quality teacher training programs in all regions of the country became the most common request [27]. Similar findings were reviewed in Yu et al's research, 68.9 percent of teachers who taught in LRC has only received short-term training [28].

4.2. Differences

The UK has much early acceptance of disabled children's education, and has higher social inclusion. Before teachers step into their work, they would have to undertake plenty of training, and a large part of it was an inclusion unit, which practiced their skills to cope with students with disabilities [29]. Teachers paid more attention to creating an inclusive and friendly classroom environment, which included making teaching and learning materials more inclusive, for example, the use of easy read fonts, high contrast background color, as well as increasing the diversity of teaching techniques like group work, peer learning, student presentation which encourage the participation of every child in the classroom [29]. However, this is questioned whether this strategy is more cultural-specific, and hard to apply to countries that are more assessment-centered such as China.

In China, however, the LRC strategy is highly rooted in traditional Confucian philosophy, which emphasized on developing together with no one left behind [28]. On the one hand, this suggested LRC is Chinese-specific strategy that allows more children with SENs to go to the same school as non-disabled others, which improves their accessibility to education, however, on the other hand, LRC implies that the concentration is to integrate, rather than providing systematic support, as students with disabilities need personalized accommodation [28]. As a result, approximately 57.1 percent of primary school teachers reported LRC strategy does not benefit students with SENs, as their learning outcome was not facilitated through simply being placed in the same classroom [28]. This could conclude in the teacher's lack of ability to adjust the curriculum and guidance based on the student's individualized needs [28]. Apart from the lack of inclusion and individualized support in the schooling system, China also has a more severe rural-urban disparity issue compared to the UK [27, 28].

5. Discussion

The section above analyzed how the UK and China differed in terms of policy, financial and social support. This further highlighted the importance for Chinese policy makers to learn from British policy, especially in the perspective of inclusion.

An important outcome of inclusive education is the cultivation of empathy and realization of community diversity. While previous scholars have already indicated that empathy is a social and emotional behavior that could be fostered in an inclusive classroom, which is usually seen as the most successful outcome of inclusive education from the developmental aspect [30]. Interactions between disabled and non-disabled students benefit both groups, while disabled children will learn what is regarded as correct behavior, at the same time, it provides non-disabled students with a deeper understanding of diverse experiences and perspectives, contributing to the development of well-rounded, empathetic individuals [31]. Although social acceptance between groups will be higher, the influence of inclusion on academic performance stays controversial. Scholars like Ferguson, Desjarlais, and Meyer recommended that learning in inclusive classroom will give disabled students more opportunities and to make educational progress [32]. However, as discussed earlier, lots of

teachers working in LRC program debated that learning in the same classroom isn't really benefit the disabled children [28], as they might not be learning in their specific pace [31]. Also, assessment type largely determined the extent that inclusion affects academic results.

In China, inclusion might also face other obstacles, for example, low social acceptance. Su et al have conducted a research on different stakeholders' opinions of enrolling disabled children in the regular classroom, including parents of disabled and non-disabled children, and teachers [33]. The findings revealed parents of disabled children represented a higher acceptance of LRC when they have tried putting their children with typically developed ones, and observed their interaction with others, however, when parents of non-disabled children were asked about their attitude toward having disabled children studying and playing with their children, over a half of the parents stated they were not happy with the LRC and having a very low level of inclusion, and the majority of them have either no or little knowledge about SENs [33].

6. Conclusion

To summarize, the comparative study of UK and China's policies on educating disabled children reveals a nuanced landscape shaped by cultural, societal, and historical contexts. While both countries aim to provide inclusive education, their approaches and challenges significantly differ. The UK's policy framework emphasizes an inclusive approach, grounded in international conventions. This approach has led to the integration of disabled children into mainstream schools with tailored support systems. On the other hand, China's policy journey reflects a complex interplay between Confucian values, economic growth, and evolving perceptions of disability. While the government has taken steps towards inclusion, deeply ingrained stigma and inadequate teacher resources and training hinder effective implementation.

The comparative analysis highlights the need for tailored solutions that acknowledge each country's unique challenges. The UK's emphasis on inclusive-based education can inspire China to strengthen its legal and policy framework. China's focus on social harmony could prompt the UK to further engage with cultural attitudes towards disability. Ultimately, the success of these policies hinges on fostering societal acceptance, supporting educators, and recognizing that an inclusive society benefits all its members, disabled or not.

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