

**This is an electronic reprint of the original article.
This reprint *may differ* from the original in pagination and typographic detail.**

Author(s): Butler, Cathal; Naukkarinen, Aimo

Title: Inclusion and democracy in England and Finland

Year: 2017

Version:

Please cite the original version:

Butler, C., & Naukkarinen, A. (2017). Inclusion and democracy in England and Finland. In A. Raiker, & M. Rautiainen (Eds.), *Educating for Democracy in England and Finland : Principles and Culture* (pp. 109-126). Routledge. Routledge Research in International and Comparative Education.

All material supplied via JYX is protected by copyright and other intellectual property rights, and duplication or sale of all or part of any of the repository collections is not permitted, except that material may be duplicated by you for your research use or educational purposes in electronic or print form. You must obtain permission for any other use. Electronic or print copies may not be offered, whether for sale or otherwise to anyone who is not an authorised user.

Chapter 9

Inclusion and democracy in England and Finland

Cathal Butler & Aimo Naukkarinen

Introduction

This chapter will explore how concepts of democracy and modern neo-liberal policy have acted to support, and act as a barrier to, the successful inclusion of students in mainstream settings, in England, Finland, and internationally. Basic elements of democratic practice will be explored to explain the development of practices to support the education of all children - including those with special educational needs (SEN) - which have generally moved to take greater consideration of the diversity of needs of all students, and to allow for greater opportunities for them to participate, and succeed in mainstream educational settings. This will be followed by a more in-depth focus of how modern educational policy considerations impact on inclusive practice. Considerations outside of political elements will also be summarised, to give a broader view of current issues facing countries, schools, and staff, in meeting an inclusive agenda.

Definition of main concepts

There are a range of definitions of democracy, depending on whether the focus is on the pure concept, or democracy as a form of governance. Democracy is both an ideal and a process. Cambridge Dictionaries Online (2015) defines democracy as ‘...the belief in freedom and equality between people, or a system of government based on this belief, in which power is either held by elected representatives or directly by the people themselves.’ In democratic education, the students should have equal access to school and to the curriculum, and have the opportunity to attend heterogeneous learning environments in school, i.e. learning environments should be socially representative of the national community (e.g. García-Huidobro & Corvalán, 2009). Grossman (2008) emphasizes citizenship rights, participation and pluralism (for instance, in relation to race, gender, and ethnicity), in order to deal with diversity. In sum, key elements within democracy are equality in general, as well access and participation, all of which are relevant to the concept of inclusion.

There are a number of potential definitions for inclusion. This is a point that will be returned to, but for now it is worth focusing on the index of inclusion (Booth & Ainscow, 2002), which provides a range of different potential definitions of the term inclusion. Major ideas include that every individual should be valued equally, and everyone should have the ability to participate in the culture, curricula, and community of schools. These clearly match the description of democracy in the previous paragraph. Individuals with disabilities should be valued, rather than seen as having problems to overcome. School policies should respond to the diversity of needs of students. A final important element of the index of inclusion is the

recognition that inclusion is both an ideal, and a process that requires continuous updating to ensure that barriers to participation and learning are reduced or removed.

Similar ideas in relation to inclusion are espoused in the Salamanca Statement (UNESCO, 1994), which states that every child has a right to education, and that countries should set out education systems whereby the diverse characteristics, abilities, and learning needs of children should be taken into account, so that all children can be educated in mainstream schools. It is also noted that an inclusive education system should be more cost-effective. The concept of neoliberalism is harder to pin down, as is evident from other chapters in this book. Mitchell (2005) identifies a number of elements of neo-liberalism which impact on inclusive policy. These are the importance of free market processes, competition, and accountability, through standard setting and high-stakes exams. Notions of accountability will be the most important theme related to neoliberalism, which will be a focus later in the chapter.

Methodology

Following discussion between the authors, it was decided to split the chapter into the following sections –

- Policy and practice in relation to SEN in Finland and England up to 1994
- Contemporary Policy and practice in Finland, England, and internationally, post 1994, in response to the Salamanca statement
- Factors that act to support or as barriers to inclusive education
- Conclusions

In every section, discussion will be focused on the major similarities and differences between England and Finland and the reasons for them.

Historical Policy

In both England and Finland, attempts to educate individuals with special educational needs and disability can be traced back to the early 1800s (Warnock, 1978; Kivirauma, 2015). This provision was mainly supported by religious and charitable organisations. These “special schools” predate the beginnings of universal education in both countries.

In Finland, the state got involved in the education of people with disabilities in the 1860s. The interest in educating children with disabilities stemmed from a civilizing and control project of the people that was manifested in the originating of a nation-wide public education system (Kivirauma, 1989), e.g. the 1866 Primary School Decree. The Foster Act (1870) in the UK set out a similar process in the UK, developing universal access to primary education, under the oversight of local education authorities.

Access to primary education did not extend to those with SEN at this time, with the *Idiots Act* (1886) and the *Mental Deficiency Act* (1913) covering the rights of these individuals in

England. In Finland, in 1892 the *Decree for Schools for Sensory Impaired* paved the way for people with certain types of disabilities, transferring the responsibility of students with hearing and visual impairments to the state while in England the *Elementary Education (Blind and Deaf Children) Act* (1893) transferred the responsibility of students with sensory impairments to Local Authorities long before other categories of need. Looking back, the lack of opportunity and access for learners with and without disability in this era can easily be described as undemocratic.

From the 1900s to the 1930s, in Finland, there were a few auxiliary schools for students with learning difficulties in bigger cities (Kivirauma, 1989), alongside schools for those with sensory impairments, and reform schools for students with maladjusted behavior. Access to education was strongly promoted in 1921 by the *Compulsory Education Act*. However, children who needed more support could still be legally exempted. In England in the early 20th century, the *Warnock Report* (1978) indicates that there was a debate over whether children considered “mentally defective” should be catered for at all educationally. The democratic ideals of equal access to school and to the curriculum, as well as pluralism in relation to intellectual diversity, were far from coming true.

In 1944, in England, the *Butler Act* conceded that the mainstream school environment was likely to be the appropriate setting for the education of most children. This seems consistent with democratic ideals. This marked the beginning of the turning away from segregated settings, for all but the most severely disabled children. However, until 1970, those with the most severe impairments were still deemed ‘ineducable’, so access to education was still impossible for some. This shift to access to education for all children did not occur in Finland until 1997 (*Amendment to Comprehensive School Act 1368/1996*).

The need for special education services grew in Finland between 1940 and 1960, as primary school and grammar school education expanded (Kivirauma, 1989). In 1952 the *Auxiliary School Decree* and in 1958 the *Primary School Act* strengthened the status of both auxiliary schools and observation classes (for students with maladjusted behavior), the latter imposing that once transferred to any form of special education setting, the student cannot participate in regular education setting. Finnish special education teacher training began in 1958. Separate special education placements for citizens regarded as deviant were seen as modern and signs of progress (Kivirauma, 2015).

In Finland, integration and mainstream class placement in the education of students with SEN was first mentioned in 1966 in the Rehabilitation Committee report (Saloviita, 2006). In 1968, the *Comprehensive School Act* ascertained the move from a parallel school system to a nine-year comprehensive school system in 1972-1977. Comprehensive school provides all citizens equal access to education with free support systems. This policy change - accompanied by the development of social services - has been very important to the development of democratic education and inclusion in Finland. The amount of students receiving special education grew from 2 to 15 percent between the mid-1960s and the end of the 1970s (Kivirauma, 1989). The principle of integration was introduced, but it was then

based on “readiness” of the student (Saloviita, 2009). Part-time special education (elaborated on below) became a central means of support in Finnish basic education.

In the UK, the 1978 *Warnock Report* can be seen as key in the movement towards a modern vision of inclusion. The report challenged the simple distinction made between the disabled and the non-disabled. The discourse was subtly altered, with the term “Special Educational Need” being coined, suggesting that they had different or more complex educational needs, moving away from previous negative labels. This was an attempt to ensure equality in the perception of these learners. A similar shift occurred in Finland in the mid-1980s.

The 1981 *Education Act*, following the *Warnock Report*, officially adopted the term “special educational needs”, and revised the categories of need instituted in 1944. A formal assessment process with statements was established for those with learning difficulties, setting out entitlements of therapy and/or support. A key aim for the *Act* was that children with SEN should be integrated into mainstream schools wherever possible, matching the language of integration also being used in Finland at this time. However, in both countries, this was qualified; children were only integrated in mainstream schools if their needs could be reasonably met there with appropriate resources, and without detriment to their classmates.

In Finland, the *Basic Education Act* abolished tracking, streaming, exemption, auxiliary schools and observation classes. Differentiated and individualized instruction was emphasized. The law promoted equal access by decreasing segregation and increasing individual support. Municipalities were given the autonomy to categorize special education services. According to some critics (e.g. Kivirauma, 2001) local authorities began developing new medicalization-oriented categories for special education students, and special teacher education programs were named after disability-based categories.

Inclusive Policy Post-Salamanca

The *Salamanca Statement* (UNESCO, 1994) has been hugely influential in shaping international policy in the last 20 years, shaping the discourse around SEN and accentuating, access and child-centred pedagogy to meeting needs. Participation is highlighted in the *Salamanca Framework of Action* (1994). In many ways, inclusive education appears to support democratic ideals within educational settings. In this section, we will look specifically at the responses from Finland and England, before looking briefly at international responses.

In Finland, the assessment of SEN in the mid-1990s (Blom et al, 1996) meant special schools and classes. The knowledge, attitudes and practices of teachers, schools, and municipalities were segregation-orientated. Based on this, the educational management system aimed to support the integration of municipal service systems and the development of inclusive school culture (Halinen & Järvinen, 2008). In the assessment document the *Salamanca Statement* was not discussed, which can be seen as an indication of slow Finnish inclusive development.

In contrast, the influence of the *Salamanca Statement* impacted quickly in England. The principle of *inclusion can be identified in documents such as Excellence for All Children* (DfEE, 1997), *Every Child Matters* (DfE, 2003), and *Removing Barriers to Achievement* (DfE, 2004). Common principles recur across policies, including targeted early intervention, the need for high expectations and aspirations for children, and the desire to improve children's outcomes. The latter two strongly overlap with the more general educational policy of the New Labour Government to drive up standards in schools. This can be interpreted as a drive towards a more equitable and democratic education system.

In England, the 2001 *Special Educational Needs and Disability Act* further strengthened the position of those with SEN and disability, stating that educational settings could not discriminate against individuals due to their needs. They were expected to provide reasonable adjustments to support individuals, in order to support them to achieve their democratic right of participation in education.

Finnish legislation (the *Basic Education Act* 1998; the *National Core Curriculum for Basic Education* 2004) stated that, whenever possible, the student should attend regular class in the neighbourhood school. The effect of *Salamanca Statement* can be seen in the banning of policies based on disability categories in both education and teacher education and in the emphasizing of IEP, multiprofessional collaboration, and learning environment development as ways of continuous support (Halinen & Järvinen, 2008).

Similar ideas emerge in England in the *SEN Code of Practice* (DfE, 2001, 2014). The document, which all schools must follow, provides centralised guidance on expectations for all schools, detailing policy in relation to identification, assessment, and provision in early years, primary, and secondary phases. The importance of schools and teachers (as well as other professionals) working in partnership with parents is highlighted. Children should also be able to participate and voice their opinions when important decisions are being made in relation to them (e.g. setting their educational goals, choice of school, etc.). The 2001 *Code of Practice* highlights the important role of teachers and school in achieving inclusion. Every teacher, through good planning and differentiation should be able to support the learning needs of a diverse group of pupils in one classroom.

A revised version of the *Code of Practice* was published in 2014, following updates to policy in the Child and Families Act (2014), explicitly covering the age range 0-25 to ensure that learning opportunities for SEN children do not stop after 18 years of age. 'The youth guarantee' in Finland is similar. Everyone under the age of 25 is offered a study place or place for on-the-job training or rehabilitation within three months from unemployment (Ministry of Culture And Education, 2012).

In Finland, one major development in the last 20 years has been that part-time special education (PTSE) has become a central type of support. PTSE does not label students as attending a special school or class does. An official referral is not needed and the placement is temporary. PTSE secures the uninterrupted functioning of a classroom, is cheap compared

to special class teaching, and is better for sparsely inhabited rural areas. The most dominant form of PTSE has been the clinic type, in which 2-4 students study, usually independently, with one special education teacher in his/her classroom. The other type, co-teaching, has been used much less (Saloviita & Takala, 2010). Although PTSE temporarily interrupts the student attending his/her regular education group, it can enable the student's access to curriculum.

Realizing the ideals of equal access and participation can be assessed in relation to the volume of separate special education. According to Statistics Finland (2015), the number of SEN-categorized basic education students grew in the 2000s to 8.5 percent by 2010. In 2014, roughly half of SEN-categorized students attended regular education, with 28 percent attending special class and 12 percent special school full-time. The number of students attending PTSE between 2002-2014 was 20-23 percent. Placement of students in separate special education settings has not been the exception, but a rather typical. In England, Black and Norwich (2014) note that after three decades of downward trends in special school population, there has been slight increases from 2007 onwards. The most striking trend is the high proportion of secondary school aged pupils attending special schools in England – the implication is that mainstream schools may be less able to deal with the needs of these learners. In addition, special schools increasingly cater for children with a range of 'complex' needs.

The Special Education Strategy (Erityisopetuksen strategia, 2007) introduced ideas for increasing support in Finnish regular education. Since 2004, Finland has funded special education, school welfare, and student guidance and counselling development programmes (Halinen & Järvinen, 2008), anticipating the legislation of the 2010s. The *National Core Curriculum for Pre-primary Education* (2010) and the *National Core Curriculum for Basic Education* (2014) contain a three-tiered organization of support. The principle of early intervention is central to three categories of support: general support that every student is entitled to, intensified support, and special support.

Intensified support and special support both involve careful assessment and planning of students' learning pathways involving multi-professional teams, parents and students. If general support is insufficient, pedagogical assessment resulting in a plan for intensified support is completed in the school's student welfare group. If this support is inadequate, a more extensive pedagogical assessment will be done. The municipality education officer makes an official decision concerning special support, after which the student's IEP is completed. For the first time in Finnish basic education, the curricula strongly promotes the development of school culture (Halinen, 2015), giving school communities new possibilities for inclusive development in a social model framework (Booth & Ainscow, 2002).

The *Salamanca Statement's* aim of cost-effectiveness has been hard to achieve in Finland, since the percentage of students receiving expensive separate special education has constantly been high. To decrease both the identification of pupils with SEN and separate special education, in 2010 the funding system was changed from being based on the number of students with SEN (pupil weight funding) into one based on total enrolment (census-based

funding). Pulkkinen and Jahnukainen (2015) found that principals and local authorities in the new system pay more attention to early identification, which can eventually decrease costs. For students needing special support, small special education groups were seen as effective learning environments and regular education teaching groups were seen as financially most effective. It was felt that more resources for PTSE were needed to promote inclusion. English policy documents express the rhetoric of inclusion being cost-effective e.g. in *Excellence for All Children* (DfEE, 1997). However, there is no research directly commenting on the cost effectiveness of the English education system, particularly given the range of different initiatives and elements of government spending supporting inclusive education. Looking beyond Finland and England, many countries have responded to the Salamanca statement by adopting inclusive policy (Johansson, 2014). In countries like Australia for example, the ability for mainstream schools to reject students with disabilities has been restricted. However, it is still felt that the extent to which inclusive education is put into practice is limited (Hunt, 2011). In Malaysia, Lee and Low (2013) note that inclusion exists in government policy but is not fully implemented. Research from a number of countries suggest that teaching staff may not be able to support inclusion in mainstream classrooms. (Malak, 2013; Fraser, 2014). For Ainscow and Cesar (2006), the millions of children who do not have access to education in developing countries are a more prominent policy focus than students with SEN.

Inclusive policy development can also be hampered by competing political policies. Berhanu (2011) for example mentions the conflict in Sweden between inclusive policy recommending that all children attend mainstream schools, and the policy of allowing parents a choice of settings, which includes a special setting if that is their choice. Engsig and Johnstone (2014) also highlight recent changes in policy in Denmark. They talk of a new law requiring at least 96 percent of students with disabilities to attend mainstream schools. They anticipate a tension between this and an increasing standards agenda which expects schools to be improving in proficiency, evidenced by academic testing, year on year. This issue will be returned to in relation to England in the next section.

Two key American policies highlighted by Husband and Hunt (2015) are the *No Child Left Behind Act* (NCLB; 2002), and the *Individuals with Disabilities Education Acts* (IDEA; 1997). The NCLB focuses on raising academic achievement, with accountability a strong element - testing is used to ensure that there are increases in academic achievement for all students. This mirrors ideas which we will return to when discussing current English policy. A key element of the IDEA act, aligning with NCLB, is that there should be high expectations for children with disabilities, and that they should access the general curriculum in the general classroom to the maximum extent possible. While the policy, focusing on high expectations, aspirations, and access is laudable, it would seem that these policies in the USA have not been successful. Husband and Hunt (2015) note that NCLB has not, as a whole been successful in raising standards, with many states not achieving the proficiency rates required, with a new policy expected in the near future to replace it.

Factors that act to support, and factors that act as barriers to inclusion

The previous section has shown that in both countries close attention has been paid to the cause of inclusion in the last 20 years. Concurrently, there has been a growing use of ICT and assistive technologies to support learners' engagement with education (BECTA, 2003). The exposure of events such as the Special Olympics can help to foster more positive attitudes (Li & Wu, 2012). Higher visibility in the local community has also led to more positive attitudes to people with learning disabilities, though it is worth noting that exclusionary practice and prejudice, undermining access, participation and pluralism, is still experienced by those with disabilities (SCOPE, 2014).

Referring largely to PISA results, Mitchell (2014:322) summarizes five factors that are behind the good reputation of Finland's basic education system in educating all students:

[1] The balance between centralized and decentralized control of education, [2] High quality teachers, [3] Philosophy of education for all in comprehensive schools, [4] Quality early childhood provisions, and [5] Comprehensive support for students with special educational needs (Mitchell, 2014:322).

Comprehensive support consists of IEPs, learning pathway plans, PTSE, student welfare support, teacher assistants, small groups, special classes, special schools, and, as a combination of all above, three-tiered multi-professional support. PTSE has been considered crucial especially in supporting literacy skills and offering support flexibly within regular education. Whether all forms of comprehensive support in Finland promote inclusive education, will be discussed below.

In the following subsections, we will look at a range of factors, and discuss whether they have acted to assist or impede the progress of inclusion in England and Finland.

Marketisation

In England, perhaps the largest barrier to the successful implementation of inclusive policy is a broader policy shift within education towards a more competitive, market-driven philosophy that can endanger the ideal of equal access to school and to the curriculum. Tomlinson (2005) dates this philosophy back to the Conservative governments of the 1970s and 1980s which placed schools within league tables, based on pupils' examination results. Parents are expected to use league tables for school selection. Given that children with SEN are likely to fare poorly in national assessments, their inclusion in schools can lead to a drop in a school's standing within the league table. This could lead to a drop in parents applying to send their children to the school, and therefore a drop in income for the school. More generally, it has also been stated that the competitive atmosphere engendered by league tables is incompatible with the basic tenets of inclusion (Davies et al, 1998). The situation in Finland is quite different. According to Sahlberg (2011) the early 1980s Global Educational Reform Movement's (GERM) efforts to improve student learning has increased testing of rote learning, over-focused on literacy and numeracy, decreased creativity through outcome-

based teaching, become market-oriented, controlled and accountability-driven. Sahlberg then notes that Finland has chosen a different way: none of the GERM elements above have been accepted in Finland in the ways they have been adopted elsewhere. Instead, from the 1980s Finland has built a culture of trust within the educational system.

In Finland, the *Basic Education Act* (1998) abolished school districts, allowed school specialization and competition to some extent, and gave parents restricted opportunities to choose their child's school (Ahonen, 2002). According to Seppänen and Rinne (2015), until the 2010s the basis of comprehensive school and neighborhood school prevailed, but recently the state has voiced fear of unequal fragmentation of comprehensive schools. The state has not used its regulative powers, but has supported troubled schools by positive discrimination. The absence of a powerful private basic education sector makes marketization effects in Finland different from those of England.

Standards and inclusion

A broader "standards" agenda strongly promoted in the UK by the Labour government of the 1990s and 2000s, focusing in particular on basic competences in literacy and numeracy, has also proven incompatible with the inclusion agenda. This is because students must be shown to be making measurable progress within subjects, an element that can prove problematic especially to students with certain special educational needs (*Salt Report*, 2010). Schools wishing to include students with a range of needs need a higher level of resources and support to achieve measurable achievements, making those students "less attractive" to schools, which may lead to denial of access for them. This may help to explain the slow progress towards inclusion, as reported by Norwich (2002), and Ofsted (2004). A similar issue has already been identified in the USA and Denmark, in this chapter.

In Finnish basic education, standardized testing is uncommon. Reflecting the culture of trust, teachers are the main organisers of assessment procedures (Peruskoulun opetussuunnitelman perusteet, 2014:48-60).

How inclusion is conceptualised

Another key political influence has been the lack of clarity around the concept of inclusion, and its definition. Armstrong and Barton (2008) claim that successive British governments have failed to truly engage with the concept of inclusive education, and retain the view that special schools have an important role, particularly Pupil Referral Units catering for students with severe emotional and behavioural difficulties, who are the most likely to be excluded from mainstream settings. Mary Warnock, who had a significant impact on the development of inclusive policy through the *Warnock Report* (1978) has raised questions about inclusion, and has now questioned the current policy. The simple idea that all children can be educated under one roof seems problematic.

Returning to the shared understanding of the concept of inclusion, it is worth highlighting that the *Salamanca Statement* discusses ALL children, so is not exclusive to children with SEN. The concept of inclusion can be interpreted very broadly and can be applied to diverse groups, based on disadvantage and marginalisation due to their gender, socioeconomic status, language, ethnicity, and geographic location (Mitchell, 2005). While research can be used to identify issues for the inclusion of these groups in England (e.g. Dyson et al, 2009), it would certainly appear that when discussing the concept of inclusion, both in research, and in policy, in England, the focus is still very much on those with SEN. In Finland, the focus on inclusion is also very much on students with SEN, which can partly be explained by the powerful role of special education professionals, both academic and in the field, in shaping the concept, policy, and practices of inclusion. Indeed, there is a view that trying to coalesce a large range of groups under a “one-size-fits-all” inclusion policy, stating that one form of provision can universally meet all needs is likely to be counter-productive (e.g. CESI, 2002).

Finnish conception and practices of inclusive education emphasize equity in learning at the expense of equity in participation (Naukkarinen, 2010:188), based on the idea of the least restrictive environment. Students with disabilities are educated in regular classroom with other students or in the placement option as close as possible to that. ‘How teaching is done and what happens in the classroom is more important than what kind of classroom it is and where it is’ (Savolainen, 2009:128).

Participation in heterogeneous learning environments is watered-down in the legislation. The amendment (642/2010, 17§) to the *Basic Education Act* states that ‘...[s]pecial-needs education is provided (...) in conjunction with other instruction or partly or totally in a special-needs classroom or some other appropriate facility’. Although proposed, primacy of regular education placement was not included in the legislation. A clear definition of inclusion is missing in the *National Core Curriculum for Basic Education* (Peruskoulun opetussuunnitelman perusteet, 2014), although many characteristics of inclusion are mentioned. These escape clauses have given room for non-inclusive organization of education.

The unsatisfactory socio-emotional well-being of Finnish students is partly a sign of insufficient emphasis on student participation. Too many students do not like school and too many classrooms are restless; more learner-centeredness and joy of learning are needed (e.g. Ahtola & Niemi, 2014; Kupari et al, 2012; Välijärvi, 2015). Ahtola and Niemi (2014, 140) argue that Finland ‘...has not shared the international interest in the possibilities and responsibilities of school communities to advance the well-being of children and youth’. Also, the Finnish mindset has an effect on the appreciation of participation. Traditional agrarian characteristics of authoritarianism, obedience, coping on one’s own, not reflecting on one’s feelings, overall conformity, and rejection of people regarded deviant might have discouraged community building in classrooms and schools (for descriptions of Finnish identities, see Ahtola & Niemi, 2014; Saloviita, 2009; Simola, 2005).

Other factors impacting inclusive practice

A number of other factors touch on schools' abilities to give students and children opportunities to participate in mainstream settings. The first area of focus is regional variation, noted by Armstrong (2005). Some local authorities favour inclusive placement where possible, with others maintaining an approach of sending more students to special schools. The term 'postcode lottery' applies, with a child likely to have different access and opportunities depending on where s/he lives. There are also troubling provincial differences (e.g. Statistics Finland, 2015). A key factor relevant to this issue is funding. The *Salamanca Statement* noted that inclusion is a cost effective approach. However, the additional resources and support added in both countries' educational policies to support inclusion in the last 20 years has not always been supported by country's education budgets (Pulkkinen & Jahnukainen, 2015).

Another major factor is parental attitude. Glazzard (2011) has provided evidence relating to parental resistance to inclusion within English schools. In this instance, the resistance arises from parents whose children do not have special educational needs. Parents were concerned about being children with social, emotional and behavioural difficulties being in the same class as their children. Parents resist inclusion if they think it may impede their own child's education. This is an interesting point as it potentially involves a contest between the democratic rights of children with disabilities, and those without. In Finland, there is also resistance toward inclusion from the politically powerful teacher union.

Teacher attitude towards inclusion is also identified as an important aspect in research. t Teacher attitudes are generally more positive for less serious forms of SEN in both countries (Avramidis & Norwich, 2002; Moberg, 2001). Part of the reason for negative attitudes towards inclusion may be the lack of inclusive placements or informative input on inclusion within teacher training courses (EADSNE, 2010). Hodkinson (2005) has raised concerns that in England final year teacher trainees have limited understanding of implementing inclusive pedagogy in classroom settings. In Finland, teacher education is divided into teacher education and special teacher education; this adds to the challenge of achieving inclusive teacher education (Naukkarinen, 2010).

In English policy, the role of the pupils' voice is prominent. However, Lewis and Porter (2004) report issues in providing equivalent opportunities for children with learning difficulties. Research has shown that students are given little or no say in important meetings that decide their future (Smart, 2004, Carnaby et al, 2003). Indeed, it was noted by De Matteo et al (2002) that students may not be given the support to be able to engage with transition meetings. The latest Finnish basic education legislation aims to improve the opportunities of students to have their voices heard. This can be seen as a twofold problem of students holding neither direct power nor representational power through participation. The opportunities for the student to have a say in matters concerning him/herself should be improved, as well as the channels of representational power in student communities.

Conclusions

A three stage democratic, inclusive process for developing equity in education in England and Finland has been identified (Halinen & Järvinen, 2008 UNESCO, 2007). The first stage, 'access to education', was advanced by *the Compulsory School Act* of 1921 in Finland and achieved in 1997 as students with severe and profound mental disabilities were granted access, and in 1870 and 1970 in England.

The second, 'access to quality education', refers to curricula, teacher training, and learning material. PISA standings from the 2000s show that quality learning outcomes have become a reality for the majority of Finnish basic education students. Research shows that an essential part of quality inclusive education, student participation, still has to be promoted more in the Finnish school system. England's standing in PISA tables is not as impressive, though the idea of improving quality and standards is explicit within educational policy. However, student participation seems to be supported in English policy, though the research discussed raises questions about whether practice matches policy.

The issue of whether England can simultaneously have a successful inclusive policy whilst maintaining a specific standards agenda is open to debate. Indeed Hodkinson (2014:250) broadly asks:

Is inclusion as a global initiative even possible given the unrelenting moves towards increased accountability, standards and economic prosperity which are necessarily folded into the neoliberal globalisation of the education product?

It is too soon to evaluate the most recent changes in policy in relation to SEN in England. However, it would appear that as long as a standards agenda is maintained, the success of any inclusive policy is questionable, as is whether the current inclusive policy can be considered cost-effective, as the Salamanca Statement claims.

Returning to Finland, the third stage in developing equity in education, 'access to success in learning', emphasizes '...removing learning obstacles and adequately supporting all students to facilitate their learning, healthy growth, and development' (Halinen & Järvinen, 2008:81) with the support of flexible learning environments, professional collaboration, and inclusive pedagogies. These ideas were clearly set out as goals in the policy document *Every Child Matters* in England. As learning outcomes assessed by PISA, the third stage has been achieved well in Finland. However, it can be argued that participation with peers in regular education learning environment is part of successful learning, healthy growth, and development. Based on the strong emphasis on inclusion in mainstream settings in England, this can be deemed to be largely achieved. However, developing access to successful learning in Finnish basic education also means that the number of students in small groups, special classes, and special schools should be reduced, conservative pedagogies (Simola,

2005) should be transformed into inclusive ones, and students' well-being in school should be addressed.

Segregated practices based on rehabilitation do not sufficiently enable democratic virtues of access, pluralism, active participation and belonging in everyday life. Therefore more efforts should be put in transforming segregated practices into ones based on support. One way to proceed could be the adoption of social-psychological and organizational-psychological mindsets in school reforms (e.g., organizational learning, communities of practice, professional learning communities; see Naukkarinen, 2010).

An important area for consideration for inclusive policy is the extent to which it is evidence based. Lindsay and Dockrell (2014) note that there are a number of barriers that inhibit research having a strong impact on how policy is developed. In order to arrive at a more nuanced position on how inclusion should be defined in policy, it is likely that further research in natural circumstances, particularly using ethnographic and action research approaches, will be necessary.

References

Ahonen, S. (2002) 'From an industrial to a post-industrial society: changing conceptions of equality in education' in *Educational Review*, 54(2), pp. 173-181.

Ahtola, A. & Niemi, P. (2014) 'Does it work in Finland? School psychological services within a successful system of basic education' in *School Psychology International*, 35(2), pp. 136-151.

Aiden, H. & McCarthy, A. (2014) *Current attitudes towards disabled people*. London: SCOPE.

Ainscow, M. & César, M. (2006). 'Inclusive education ten years after Salamanca: Setting the agenda' *European Journal of Psychology of Education*, 21 (3) pp. 231-238.

Armstrong, D. (2005) 'Reinventing inclusion: New Labour and the cultural politics of special education' in *Oxford Review of Education*, 30(1), pp. 135-152.

Armstrong, F. & Barton, L. (2008) 'Policy, experience and change and the challenge of inclusive education: the case of England' in Barton, L. & Armstrong, F. (Eds.) *Policy, experience and change: cross-cultural reflections on inclusive education*. London, UK: Springer, pp. 5-18.

BECTA (2003) *What the research says about ICT supporting special educational needs (SEN) and inclusion* [Online]. BECTA briefing. Available at: <http://webarchive.nationalarchives.gov.uk/20130401151715/http://www.education.gov.uk/publications/eOrderingDownload/15009MIG2791.pdf>. [accessed 15 February 2016].

Berhanu, G. (2011) 'Inclusive education in Sweden: responses, challenges, and prospects' in *International Journal of Special education*, 26(2), pp. 128-148.

Black, A. & Norwich, B. (2014) *Contrasting Responses to Diversity; school placement trends 2007–2013 for all local authorities in England*. Bristol: CSIE.

Blom, H., Laukkanen, R., Lindström, A., Saresma, U. & Virtanen, P. (Eds.) (1996) *Erityisopetuksen tila*. Helsinki, Finland: Opetushallituksen julkaisuja 2.

Booth, T. & Ainscow, M. (2002) *Index for inclusion: developing learning and participation in schools*. 2nd edn. Bristol: Centre for Studies on Inclusive Education.

Cambridge Dictionaries Online (2015) Available at:
<http://dictionary.cambridge.org/dictionary/english/> [accessed 13 February 2016].

Carnaby, S., Lewis, P., Di Martin, P., Naylor, J. & Stewart, D. (2003) 'Participation in transition review meetings: A case study of young people with learning disabilities leaving a special school' in *British Journal of Special Education*, 30(4), pp. 187-193.

Centre for Economic and Social Inclusion (CESI) (2002) Social Inclusion. Available at:
www.cesi.org.uk/kbdocs/socinc.do [accessed 8 August 2015].

Davies, J.D., Garner, P. & Lee, J. (Eds.) (1998) *Managing special needs in mainstream schools: the role of the SENCO*. London: David Fulton Publishers.

DeMatteo, F.J., Arter, P.S., Sworen-Parise, C., Fasciana, M. & Paulhamus, M.A. (2012) 'Social skills training for young adults with autism spectrum disorder: overview and implications for practice' in *National Teacher Education Journal*, 5(4), pp. 57-65.

Department for Children, Schools, and Families (2010) *The Salt Review, an independent review of teacher Supply for pupils with severe, profound and multiple learning difficulties*. Nottingham: DCSF Publications.

Department for Education and Employment (1997) *Excellence for all children: Meeting special educational needs*. London: HMSO.

Department for Education and Skills (2001) *The SEN Code of Practice*. London: HMSO.

Department for Education (2014) *The SEN Code of Practice*. London: HMSO.

Department for Education (2003) *Every Child Matters*. London: HMSO.

Department for Education (2004) *Removing barriers to achievement*. London: HMSO.

Dyson, A, Jones, L. & Kerr, K. (2009). *Inclusion and social disadvantage in the English education system: the role of area-based initiatives*. Paper presented to the international

research forum 'A Comparative Analysis of Equity in Inclusive Education'. Stanford University, Palo Alto, California, U.S.A., 2-4 February 2009.

Engsig, T. & Johnstone, C. (2015) 'Is there something rotten in the state of Denmark? The paradoxical policies of inclusive education – lessons from Denmark' in *International Journal of Inclusive Education*, 19(5), pp. 469-486.

European Agency for the Development of Special Needs Education (EADSNE) (2010) *Teacher education for inclusion: international review of literature*. Odense, Denmark: EADSNE.

Finland (1998) *Basic Education Act 628/1998*. Helsinki: National Board of Education. Available at: <http://www.finlex.fi/en/laki/kaannokset/1998/en19980628.pdf> [accessed 15 February 2016].

Finland (1998) *Basic Education Decree 852/1998*. Helsinki: National Board of Education. Available at: http://www.minedu.fi/export/sites/default/OPM/Koulutus/yleissivistavae_koulutus/Liitetiedostoja/basicedu_decree.pdf [accessed 15 February 2016].

Finland (2004) *The National Core Curriculum for Basic Education*. Helsinki: National Board of Education. Available at: http://www.oph.fi/english/curricula_and_qualifications/basic_education [accessed 15 February 2016].

Finland (2007). *Erityisopetuksen strategia*. Opetusministeriön työryhmämuistioita ja selvityksiä 2007:47. Helsinki: Opetusministeriö.

Finland (2010) *Amendments and Additions to the National Core Curriculum for Basic Education*. Helsinki: National Board of Education. Available at: http://www.oph.fi/download/132551_amendments_and_additions_to_national_core_curriculum_basic_education.pdf [accessed 15 February 2016].

Finland (2010) *The National Core Curriculum for Pre-primary Education*. Helsinki: National Board of Education. Available at: http://www.oph.fi/download/153504_national_core_curriculum_for_pre-primary_education_2010.pdf [accessed 15 February 2016].

Peruskoulun opetussuunnitelman perusteet 2014. (2014) Helsinki: Opetushallitus. Available at: http://www.oph.fi/download/163777_perusopetuksen_opetussuunnitelman_perusteet_2014.pdf [accessed 15 February 2016].

Fraser, S. (2014) 'Removing the hurdles: a brief highlight of inclusion challenges in Guyana' in *Journal of the International Association of Special Education*, 15(2), pp. 48-55.

Glazzard, J. (2011) Perceptions of the barriers to effective inclusion in one primary school: voices of teachers and teaching assistants in *Support for Learning*, 26(2), pp. 56-63.

Great Britain (1870) *Elementary education act*. London: HMSO.

Great Britain (1886) *Idiots act*. London: HMSO.

Great Britain (1913) *Mental deficiency act*. London: HMSO.

Great Britain (1893) *The Elementary Education (Blind and Deaf Children) Act*. London: HMSO.

Great Britain. (1944) *Education Act*. London: HMSO.

Great Britain (1981) *Education Act*. London: HMSO.

Great Britain (2001) *Special Educational Needs and Disability Act*. London: HMSO.

Great Britain (2014) *Children and Families Act*. London: HMSO.

Grossman, D.L. (2008) 'Democracy, citizenship education and inclusion: a multi-dimensional approach' in *Prospects*, 38, pp. 35-46.

Halinen, I. & Järvinen, R. (2008) 'Towards inclusive education: the case of Finland' in *Prospects*, 38, pp. 77-97.

Halinen, I. (2015) 'Perusopetuksen toimintakulttuurin uudet suuntaviivat', in Salo, O.-P. & Kontoniemi, M. (Eds.) *Kohti uutta. 100 vuotta koulun kehittämistä Jyväskylän normaalikoulussa*. Jyväskylä: Jyväskylän yliopisto, pp. 39-60.

Hodkinson, A. (2005) 'Conceptions and misconceptions of inclusive education one year on - a critical analysis of newly qualified teachers' knowledge and understanding of inclusion' in *Research in Education*, 76, pp. 43-55.

Hodkinson, A. (2014). 'Inclusion 'All present and correct?' A critical analysis of New Labour's inclusive education policy in England' in *Journal for Critical Education Policy Studies*, 11(4), pp. 242-262.

Hunt, P. (2011) 'Salamanca Statement and IDEA 2004: possibilities of practice for inclusive education' in *International Journal of Inclusive Education*, 15(4), pp. 461-476.

Husband, T. and Hunt, C. (2015) 'A review of the empirical literature on no child left behind from 2001 to 2010' in *Planning and Changing*, 46(1), pp. 212-254.

Individuals with Disabilities Education Act, 20 U.S.C. §§ 1400 et seq (2006 & Supp. V. 2011).

- Jahnukainen, M. (2006) 'Erityisopetuksen ja inklusion tilan tulkinnasta: kommentteja Saloviidalle' in *Kasvatus*, 37(5), pp. 505-507.
- Johansson, S. (2014) 'A critical and contextual approach to inclusive education: perspectives from an Indian context' in *International Journal of Inclusive Education* 18(12), pp. 1219-1236, DOI: 10.1080/13603116.2014.885594.
- Kiuppis, F. (2014) 'Why (not) associate the principle of inclusion with disability? Tracing connections from the start of the 'Salamanca Process'' *International Journal of Inclusive Education*, 18 (7), pp. 746-761, DOI: 10.1080/13603116.2013.826289.
- Kivirauma, J. (1989) *Erityisopetus ja suomalainen oppivelvollisuuskoulu vuosina 1921-1986*. Turun yliopiston julkaisu C 74. Turun yliopisto.
- Kivirauma, J. (2001) 'Erityispedagogiikka, normaalisuus ja medikalisaatio' in Murto, P., Naukkarinen, A. and Saloviita, T. (Eds.) *Inklusion haaste koululle. Oikeus yhdessä oppimiseen*. Jyväskylä: PS-Kustannus, pp. 167-183.
- Kivirauma, J. (2007) 'Timo Saloviidan rotuoppi' in *Kasvatus*, 38(1), pp. 66-67.
- Kivirauma, J. (2015) 'Erityisopetuksen historialliset kehityslinjat' in Moberg, S., Hautamäki, J., Kivirauma, J., Lahtinen, U., Savolainen, H. & Vehmas, S. (Eds.) *Erityispedagogiikan perusteet*. Jyväskylä: PS- Kustannus, pp. 25-45.
- Kupari, P., Sulkunen, S., Vettenranta, J. & Nissinen, K. (2012) *Enemmän iloa oppimiseen. Neljännen luokan oppilaiden lukutaito sekä matematiikan ja luonnontieteiden osaaminen. Kansainväliset PIRLS- ja TIMSS-tutkimukset Suomessa*. Jyväskylän yliopisto, Koulutuksen tutkimuslaitos and Opetus- ja kulttuuriministeriö.
- Lee, L.W. & Lo, H. M. (2013) 'Unconscious' inclusion of students with learning disabilities in a Malaysian mainstream primary school: teachers' perspectives' in *Journal of Research in Special Education needs*, 13(3), pp. 218-228. DOI: 10.1111/j.1471-3802.2012.01250.
- Lewis, A. & Porter, J. (2004) 'Interviewing children and young people with learning disabilities: guidelines for researchers and multi-professional practice' in *British Journal of Learning Disabilities*, 32, pp. 191-197.
- Li, C. & Wu, L. (2012) 'A survey study on attitudes of special Olympic Games volunteers toward the inclusion of individuals with intellectual disabilities in China' in *European Journal of Adapted Physical Activity*, 5(1), pp. 28-38.
- Lindsay, G. & Dockrell, J. (2014). Evidence based policy and practice: the better communication research programme in Norwich, B. (Ed.) *Research in special needs and inclusive education: the interface with policy and practice*. SEN Policy Research Forum: Policy Paper 30, March 2014, pp. 37-43.

Malak, S. (2013) 'Inclusive education reform in Bangladesh: pre-service teachers' responses to include students with special educational needs in regular classrooms' in *International Journal of Instruction*, 6(1), pp. 195-214.

Ministry of Culture And Education (2012) *The Youth Guarantee in Finland provides employment, training and a customized service*.
http://www.minedu.fi/export/sites/default/OPM/Julkaisut/2013/liitteet/The_Youth_Guarantee_in_Finland.pdf?lang=en [accessed 4 December 2016].

Mitchell, D. (2005). 'Introduction: sixteen propositions on the contexts of inclusive education' in Mitchell, D. (Ed.) *Contextualising inclusive education; evaluating old and new international perspectives*. London: Routledge.

Mitchell, D. (2014) *What really works in special and inclusive education*. 2nd edn. London: Routledge.

Moberg, S. (2001) 'Opettajien näkemykset inklusiivisesta opetuksesta' in Murto, P., Naukkarinen, A. & Saloviita, T. (Eds.) *Inklusion haaste koululle. Oikeus yhdessä oppimiseen*. Jyväskylä: PS-Kustannus, pp. 82-95.

Naukkarinen, A. (2010) 'From discrete to transformed? Developing inclusive primary school teacher education in a Finnish teacher education department' in *Journal of Research in Special Educational Needs*, 10(1), pp. 185–196.

No Child Left Behind Act of 2001, 20 U.S.C. §§6301 et seq (2006 & Supp. V. 2011).

Norwich, B. (2002) *LEA inclusion trends in England 1997-2001, statistics on special school placements and pupils with statements in special schools*. Bristol: CSIE.

Norwich, B. & Avramidis, E. (2002) 'Teachers' attitudes towards integration/inclusion: A review of the literature' in *European Journal of Special Needs Education*, 17(2), pp. 129-147.

Ofsted (2004) *Special Educational Needs and Disability: Towards inclusive schools*. London: Office for Standards in Education.

Pulkkinen, J. & Jahnukainen, M. (2015) 'Finnish reform of the funding and provision of special education: the views of principals and municipal education administrators' in *Educational Review*, 68(1), pp. 1-18.

Sahlberg, P. (2011) 'The 4th way of Finland' in *Journal of Educational Change*, 12(3), pp. 173-185.

The Salamanca Statement (1994) *The Salamanca statement and framework for action on special needs education: access and quality*. Salamanca, Spain, June 7–10, 1994. Salamanca, Spain: UNESCO and Ministry of Education and Science of Spain.

Saloviita, T. (2006) 'Paradigms of disability services in Finland' in Gustavsson, A., Sandvin, J., Traustadottir, R. & Tössebro, J. (Eds) *Resistance, reflection and change. Nordic disability research*. Lund: Studentlitteratur, pp. 47-57.

Saloviita, T. (2007) 'Erityisopetus - etuoikeus vai modernia rotuerottelua?' in *Kasvatus*, 38(1), pp. 73-76.

Saloviita, T. (2009). 'Inclusion in Finland: a thwarted development' in *Zeitschrift fur inclusion*, 3(1).

Saloviita, T. & Takala, M. (2010) 'Frequency of co-teaching in different teacher categories' in *European Journal of Special Needs Education*, 25(4), pp. 389-396.

Savolainen, H. (2009) 'Erilaisuuden huomioimisesta hyviin oppimistuloksiin' in *Kasvatus*, 40(2), pp. 121-130.

Seppänen, P. & Rinne, R. (2015) 'Suomalainen yhtenäiskoulu ylikansallisen koulutuspolitiikan paineissa' in Seppänen, P., Kalalahti, M., Rinne, R. & Simola, H. (Eds.) *Lohkoutuva peruskoulu - Perheiden kouluvalinnat, yhteiskuntaluokat ja koulutuspolitiikka*. Tutkimuksia 68. Jyväskylä: Suomen Kasvatustieteellinen Seura, pp. 23-58.

Simola, H. (2005) 'The Finnish miracle of PISA: historical and sociological remarks on teaching and teacher education' in *Comparative Education*, 41(4), pp. 455-470.

Smart, M. (2004) 'Transition planning and the needs of young people and their careers: The alumni project' in *British Journal of Special Education*, 31(3), pp.128-137.

Statistics Finland (2015). *Special education statistics*. Available at: http://www.stat.fi/til/erop/index_en.html. [accessed 15 February 2016].

Tomlinson, S. (2005) *Education in a Post-Welfare State*. 2nd edn. Maidenhead, Berks: Open University Press.

UNESCO (1994) *Final report — World conference on special needs education: Access and quality*. Paris: UNESCO.

UNESCO (2007) *IBE-UNESCO Preparatory report for the 48th ICE on inclusive education "International workshop on inclusive education, Andean and Southern Cone regions"*. Preparatory activity of the 48th session of the international conference on education Buenos Aires, Argentina, 12-14 September 2007. Available at: http://www.ibe.unesco.org/fileadmin/user_upload/COPs/News_documents/2007/0709BuenosAires/Argentina_IE_Final_Report.pdf. [accessed 15 February 2016].

Väljörvi, J. (2015) 'Peruskoulun rakenteet ja toiminta' in Väljörvi, J., Kupari, P., Ahonen, A., Arffman, I., Harju-Luukkainen, H., Leino, K., Niemivirta, M., Nissinen, K., Salmela-Aro, K., Tarnanen, M., Tuominen-Soini, H., Vettenranta, J. & Vuorinen, R. (Eds) *Millä eväillä osaaminen uuteen nousuun? PISA 2012 tutkimustuloksia*. Helsinki: Opetus- ja kulttuuriministeriön julkaisuja 2015:6, pp. 179-231. Available at:

<http://www.minedu.fi/export/sites/default/OPM/Julkaisut/2015/liitteet/okm6.pdf?lang=fi>.
[accessed 15 February 2016].

Warnock. M. (2005) *Special Educational needs: a new look*. London. Philosophy of Education Society of Great Britain.

Warnock Report (1978) *Report of the Committee of Enquiry into the Education of Handicapped Children and Young People*. London: HMSO.