

# An international analysis of SEND policy and practice: ScopeSEND

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## Executive Summary

Supporting children and young people with special educational needs and disabilities (SEND) is essential not only for their educational progress and wellbeing but also for the broader aim of achieving inclusive and equitable education systems. There is an increasing interest in the development of inclusive policy and good practice to achieve these goals. England's SEND policy landscape is in a period of significant reform. The UK Government is currently engaged in a wide-ranging review of education policy, with particular emphasis on addressing the longstanding SEND crisis and ensuring the system's long-term sustainability. These reforms are a response to persistent concerns about the implementation and effectiveness of the framework introduced by the 2014 Children and Families Act. The limitations of the current system—both structural and experiential—are well documented (Boesley & Crane, 2018; Castro-Kemp et al., 2019, 2021; Lamb, 2025; Van Herwegen et al., 2018). These developments mirror broader international efforts to strengthen inclusive education systems and respond more effectively to the needs of children and young people with SEND.

This project provides a comprehensive examination of SEND<sup>1</sup> policy regulating provision and implementation of provision across several jurisdictions: the four UK nations (England, Wales, Northern Ireland, and Scotland), Ireland, Finland, Fribourg (Switzerland), Flanders (Belgium) and the Australian states of New South Wales, Queensland and Victoria. The aim of this project is to provide a thorough understanding of elements of best practice and current challenges within the system of SEND provision and policy. These findings will contribute to ongoing SEND reform efforts in England and offer insights to inform policy development in international contexts.

This project has two complementary research strands designed to accomplish this goal. First, a cross-country content and corpus analysis of a range of policy papers mapped with current existing evidence on how stakeholders perceive policy and implementation across jurisdictions (via a rapid systematic review) was conducted. The current report will present the findings from this first research strand. Second, an appraisal of perceptions of policy implementation in each country based on surveys and interviews with stakeholder groups (e.g., pupils and their families, and practitioners) will be conducted to identify common denominators of perceived good practice and respective policy regulations. The findings from this research strand will be presented and discussed in a subsequent report.

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<sup>1</sup> Special Educational Needs and Disabilities

Key of the findings of this analysis of the first research strand are:

1. The jurisdictions under analysis fall along a continuum in their approach to defining SEND, determining eligibility, and providing statutory support - ranging from those closer to a medical model-based framework (Flanders) to those based on identification of needs and biopsychosocial model oriented (Scotland, Ireland, Wales, Fribourg and Finland). England, Northern Ireland and Australia adopt a mixed approach, incorporating elements of both.
2. Among English-speaking jurisdictions, some exhibit significantly more positive sentiment in their SEND policy language compared to others (among them Scotland ranks highest in positivity, followed by Wales and Northern Ireland—all scoring above England). Scotland stands out for language that showcases a broader understanding of inclusive education framing it as not only a presumption of mainstream placement, but also as a commitment to foster belonging, although all jurisdictions show language labelled as positive.
3. All jurisdictions demonstrate some degree of multi-agency collaboration. Those with early years services more closely aligned with Early Childhood Intervention (ECI) models – Scotland, Wales, Finland, Ireland, Switzerland (Fribourg) and Australia (VIC), rather than solely Early Childhood Education and Care (ECEC), tend to specify forms of cross-sector collaboration that reflect interdisciplinary or transdisciplinary approaches (highest level of collaboration), rather than being limited to multidisciplinary ones (lowest level of collaboration) – Australia (NSW) , Australia (QLD), Belgium (Flanders), England and Northern Ireland.
4. In jurisdictions with the most comprehensive early years and multi-agency policies, the following processes are commonly implemented: a) Government-led cross-departmental working groups or specialist centres/teams that coordinate regional multi-agency efforts and bring together expertise across educational stages, age groups, and professional disciplines; b) The use of standardised classification tools, such as the International Classification of Functioning, Disability and Health (ICF), to create a common language for describing children’s everyday needs, often integrated into universal screening or early years assessments.

5. Jurisdictions recognised for having well-developed early years and multi-agency systems - such as Scotland, Wales, Ireland, Finland, and Fribourg - tend to adopt a needs-based definition of Special Educational Needs and Disabilities (SEND) in policy, rather than a medicalised one. This perspective may be supported by effective early identification processes that ensure needs-based data is carried forward into primary education and beyond.
6. Most jurisdictions have additional policies/programmes with a focus on general promotion of wellbeing and mental health, and/or anti-bullying. Mental health seems to be a particular concern in new policies / strategic guidance for schools, especially in recent years, alongside SEND policies.
7. Specific policies for Inclusion are available in Wales, Australia and Ireland (for Early Years). Other jurisdictions, such as Scotland and Finland, provide inclusive guidance embedded in main legislative documents. Specific inclusion guidance is less clear in policies in England, Northern Ireland, Fribourg and Flanders.
8. Teacher training: most jurisdictions analysed have policy frameworks outlining professional standards and requirements for primary and post-primary teaching. However, none require a specialisation in teaching children with SEND. Instead, specialisation is typically offered through optional postgraduate studies. Fribourg stands out as the only jurisdiction that explicitly integrates a multi-agency approach, spanning education, health, and social care, in its training for special and inclusive education.
9. CPD (Continuous Professional Development): jurisdictions differ in relation to: a) the extent to which CPD is mandatory and b) the extent to which the CPD offer is embedded in everyday practice or mostly consisting of courses and workshops. Based on these main differences, countries group into four main models: i) those with mandatory CPD and highly embedded in everyday practice with flexible and wide range of initiatives – Wales, Scotland, Flanders and New South Wales; ii) those with non-mandatory CPD but where this is highly encouraged and embedded in the teaching culture, with broad and flexible offer – Ireland and Finland; iii) those where CPD is non-mandatory (although accountability practices will require evidence of engagement) and mostly non-embedded – England and Northern Ireland; and iv) those where CPD is mandatory and mostly non-embedded – Queensland, Victoria and Fribourg.

10. Existing evidence on how stakeholders perceive SEND policy implementation across jurisdictions shows common views in relation to:
- a) the challenges of navigating the SEND system, including excessive bureaucracy, and unhelpful emphasis on requirements for traditional diagnosis, leading to inequalities in all jurisdictions, except Finland.
  - b) a lack of appropriate training and preparedness in the workforce, except in Finland, where in-school training and mentorship is received positively.
  - c) reductionist views of inclusion in policy and leadership, leading to mistrust in mainstream provision, across all jurisdictions, including Finland; however, co-teaching models are seen as mitigating these challenges in Finland.
  - d) challenges in establishing effective channels of communication between parents and schools, for a sustained relationship – across jurisdictions. Peer relationships were seen as key by both parents and practitioners to support children with SEND.
11. Finland stands out as the jurisdiction where more frequent positive views of SEND implementation were gathered among service users (i.e., practitioners, children and young people and their families). Amongst English speaking countries, Scotland stands out as the jurisdiction where more positive views were identified. However, there is lack of evidence of stakeholder perspectives specific to individual UK nations and evidence from Flanders and Switzerland, especially, is harder to reach. Moreover, negative views are more frequently reported, therefore additional research looking specifically for good practice and in local languages is needed.

**Conclusion:** There seem to be more positive views of SEND policy implementation in countries where policies have a more positive sentiment in the language adopted, broader definitions of SEND that align with biopsychosocial views of development (rather than medicalised approaches), in-depth and embedded in-service training for the SEND workforce, interdisciplinary and/or transdisciplinary collaboration in SEND provision and effective early years support.

**Policy Recommendations:**

- a) Policies should be clear about how inclusion and SEND are defined, aligned with biopsychosocial and needs-based models.
- b) Policy language should be inclusive, aligned with a broader understanding of inclusive education, beyond mainstream placement.
- c) Specialist inter-departmental taskforce groups should be set up to support local authorities or municipalities or regional policy makers in implementing effective needs-based assessment and classifications, using widely regarded needs-based assessment systems.
- d) Specialist inter-departmental taskforce groups should be set up to support local authorities, municipalities or regional policy makers in implementing effective early years assessment, support and identification, channels and hubs for effective communication with schools and families and oversight of workforce training.
- e) A reform of CPD to turn it into an everyday practice in schools, embedded in routines, reflective and with oversight of key high specialists.

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# The project

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## Rationale: motivation and frames of reference

This project aims to address the pressing need for current, internationally comparable evidence on policies governing the provision of services for children and young people<sup>2</sup> with Special Educational Needs and Disabilities (SEND) to learn which elements work effectively. It also examines how these policies are implemented and the outcomes they produce, from the point of view of service users. By providing a comparative analysis, the project seeks to inform policy development in England and internationally, taking into account broader educational system contexts.

The SEND policy landscape in England is undergoing significant transformation. At the time of writing, the United Kingdom (UK) Government is undertaking a broad review of education policy, with a particular focus on addressing the ongoing SEND crisis and enhancing the sustainability of the SEND system<sup>3</sup>. These efforts follow widespread dissatisfaction with the existing framework introduced by the 2014 Children and Families Act. Evidence of the limitations and challenges associated with the current SEND system - both at the systemic level and from the perspective of service users - is well documented (Boesley & Crane, 2018; Castro-Kemp et al., 2019, 2021; Lamb, 2025, Van Herwegen et al., 2018).

Given this context, it is critical that policymakers and education leaders develop a comprehensive understanding of international trends in SEND policy, particularly the relationship between policy design, implementation processes, and outcomes. These outcomes include not only conventional indicators such as academic attainment and employability, but also, importantly, the lived experiences of the children and families the SEND systems are designed to serve.

To this end, the project undertakes a comparative review of SEND policies, implementation practices, and user experiences in a selection of relevant countries. While these findings will highlight examples of good practice in SEND provision to inform policy in England, all countries will be given equal analytical weight to allow for significant contributions to international policy development.

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<sup>2</sup> The term 'children and young people' refers to individuals from birth up to the age of 25, in line with definitions used in UK SEND legislation and policy (e.g., Children and Families Act 2014).

<sup>3</sup> In December 2024, the UK Parliament issued a call for evidence titled 'Solving the SEND Crisis' and available here:

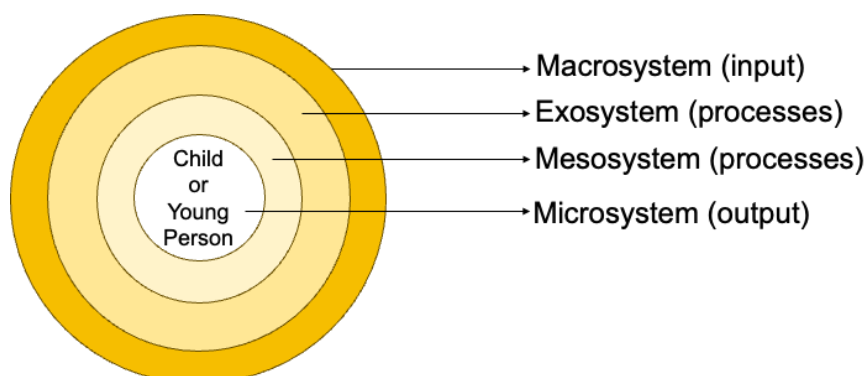
<https://committees.parliament.uk/committee/203/education-committee/news/204487/solving-the-send-crisis-education-committee-launches-major-inquiry/>

The analysis is guided by the Input-Process-Output (IPO) model of policy analysis (GALAIS et al., 2021), which is complemented by Bronfenbrenner's Bioecological Model of Human Development (Bronfenbrenner & Morris, 2007).

The IPO model - previously applied in policy analyses across education (Hosshan et al., 2020), public health and other sectors (Bugin et al., 2021), emphasises that meaningful policy evaluation must consider the relationship between statutory regulations (INPUT), the mechanisms and processes through which these regulations are implemented (PROCESS), and the outcomes achieved (OUTPUT). Processes are recognised as context-dependent, and their efficacy may vary across national and local systems. In this project, we examine these three components across countries, focusing on regulatory frameworks, implementation mechanisms, and outcomes. Outcomes are broadly conceptualised, encompassing both traditional success indicators, where this data is available (e.g., educational attainment and employment) and qualitative insights into the experiences of system users.

Given the context-dependent nature of cross-country comparisons and interpretations of input-process-output dynamics, we draw on Bronfenbrenner's Bioecological Model (Bronfenbrenner & Morris, 2007) to conceptualise the relationships between regulatory frameworks, implementation processes, and resulting outcomes. This model posits that human development is shaped by multiple interacting environmental systems. These range from the child's immediate surroundings—such as family, school and community institutions (microsystem)—to the interrelations among these entities (mesosystem), and broader societal influences including parental employment and policy (exosystem and macrosystem). By applying this frame of reference, the project offers a holistic understanding of how SEND policies impact child development within complex, layered and unique social environments, illustrated in figure 1.

Figure 1. Frame of reference of the project, combining the Bioecological theory of human development and the Input-Processes-Output model



## Indicators of Interest

Indicators of interest have been defined in this research as key elements of SEND policy within education systems that guide the support for children and young people with SEND. The scientific literature and extensive knowledge exchange by team members with stakeholders - including professionals, educators, policy makers, people with lived experience of SEND, and academic research, have informed decision-making as to which indicators to include in the analysis. The following indicators have been defined as key for this research project and will be covered in the current report: the education system (phases and types of setting), definition of SEND or equivalent, eligibility benchmarks, assessment for eligibility, statutory documents and/or other support plans, early childhood intervention and education/care, cross-sector provision, other specific programmes, modifications and policy arrangements, inclusion policy/guidance, and workforce training requirements.

Each indicator of interest is defined in the following section, accompanied by a rationale explaining its relevance for analysing policy and practice. Illustrative examples are provided where appropriate.

## The Education System

**Key Questions:** What does compulsory education look like? What are the different phases of Education? What type of settings are available? What are the various possible routes within the system?

The analysis of SEND policies, services and systems across jurisdictions must be situated within the broader context of each jurisdiction's general education system. This includes understanding the structure and types of education settings (e.g., mainstream schools, special schools or resource units), the phases of education (e.g., early years, primary, secondary and post-compulsory education), in addition to the policy frameworks that govern access and provision. Funding structures will be analysed at a later stage in the project.

These education systems are shaped by broader socio-political, economic and demographic factors. For example, population diversity, levels of economic inequality, urban-rural divides, and the distribution of resources across regions can all significantly influence how SEND services are delivered and experienced (Florian & Black-Hawkins, 2011; OECD, 2008). The nature of teacher training, accountability systems, and funding mechanisms also differ widely between countries and affect the extent to which inclusive practices are implemented (Ainscow et al., 2006). In this report we will include

a brief contextualisation of country demographics, with a more in-depth analysis of perceived inequalities (e.g., via stakeholder interviews) to be provided at a later stage. While the current report will provide only brief contextualisation of SEND policies within wider education systems, our established partnership with the [Centre for Education Systems](#) (see section on Next Steps of this report) will extend this considerably.

## Definition of SEND or equivalent term, eligibility benchmarks, assessment for eligibility and statutory and/or other support plans

**Key Questions:** What terms and concepts are used to designate the group or groups of children with SEND? What are the implications of this for establishing eligibility thresholds and assessment, as well as for designing statutory and non-statutory support plans?

Not all jurisdictions use the term SEND (Special Educational Needs and Disabilities). However, unless referring to a specific jurisdiction that uses a different term to describe children and young people receiving special support, this research will use the term SEND, as it is legally recognised in England under the *Children and Families Act 2014*<sup>4</sup>. SEND is a term attributed to children or young people who have a learning difficulty and/or a disability that requires special educational support, including needs relating to cognition and learning, communication and interaction (such as speech, language and communication needs), sensory and/or physical impairments, and social, emotional and mental health.

In this research, two elements relating to the SEND definition adopted in each jurisdiction were examined: a) the underlying conceptualisations of inclusive education based on those definitions, evaluated against well-established theories of development, disability, and inclusion, and b) the *sentiment* expressed in policies that define SEND, via empirical data analysis.

Policy language matters. It is widely recognized that the terminology used in policy to describe certain groups of people, or the services and systems supporting them, often reflects philosophies or approaches to provision. Research indicates that policy language is influenced by underlying beliefs and worldviews. In turn, language can also influence how the public engages with policy implementation. For instance, a study on UK welfare reform found that changing the term from "welfare" to "support" led

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<sup>4</sup> The Children and Families Act 2014 is the legislation regulating provision for children with SEND in England, at the time of writing, and can be accessed here: <https://www.legislation.gov.uk/ukpga/2014/6/contents>

to greater public acceptance of the reforms (Brewer et al., 2024). Similarly, research on different milestones in the development of educational policy in Finland showed that replacing "special education" with "inclusive education" shifted how teachers and administrators approached student support (Takala et al., 2009). In general, when language associated with the medical model in Finland was changed to language related to a needs-based model, a conceptualisation change around inclusion and support was seen around SEND (Ahtiainen et al., 2021; Thuneber et al., 2014). Outside of education, research on climate change suggests that using the term "climate challenge" instead of "climate crisis" led to greater public engagement (Bruine de Bruin et al., 2021).

In this study, we explored the language used to define SEND via sentiment analysis of the policies' *corpus*<sup>5</sup> and considered how this may be influencing practice and provision, as perceived by key stakeholders. We have also analysed positions on inclusive education and conceptualisations of special needs based on theory of child development and learning and on inclusive education literature.

Over the past few decades, scientific understandings of development and disability have evolved significantly. Historically, disability and special needs were closely associated with medical diagnoses, reflecting a medical model approach, where the focus was on the individual's impairment as the source of the problem. This perspective was challenged by human rights movements advocating for the social model of disability. According to this view, the source of difficulty lies not within the individual but within the environment. Therefore, it is the environment—not the person—that must change to support inclusion. By the late 1990s, a more complex and dynamic understanding of development and disability began to emerge (Simeonsson, 2006). This shift aligned with the biopsychosocial model of disability, formalised by the World Health Organization (WHO) in 2001 through the *International Classification of Functioning, Disability and Health (ICF)*. The biopsychosocial model adopts a systemic view of development and of needs and strengths, recognising that disability arises from restrictions in everyday life participation—defined as involvement in everyday life activities. These restrictions result from the unique and dynamic interaction between an individual's body functions and structures, the activities they engage in, and environmental and personal factors. Importantly, environmental factors can both hinder and facilitate participation, allowing this model to account for very specific and individualised combinations of strengths as well as needs (WHO, 2001).

The social and especially the biopsychosocial model are arguably better aligned with an inclusive policy ethos when compared to the medical model. While definitions of inclusive education remain non-consensual (Florian & Black-Hawkins, 2011), it is

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<sup>5</sup> In linguistics, '*Corpus*' designates a large and representative collection of language data, in this case the text of the policies under analysis.

widely recognised that two or more children with the same diagnosis experience different everyday life needs and consequently require distinct approaches to support (Castro & Pinto, 2015; Dockrell et al., 2019; Lollar & Simesonsson, 2005). Dockrell and colleagues (2019) found that provision is unfairly assigned to children with Autism and Developmental Language Disorder (DLD), because of lack of consideration for their everyday life needs, with supports being decided on the basis of their diagnosis. However, if we consider that inclusive education is more than just mainstream placement, truly inclusive practice should consider specific needs, beyond diagnostic categories, and recognising individuality. In support of this view, a helpful model may support the understanding of inclusive education in its complexity, accounting for not only placement (specialist *versus* mainstream education setting), but also for levels of belonging and arenas of belonging, or contexts (Qvortrup & Qvortrup, 2018). There are many benefits to adopting a presumption of mainstream, including the creation of opportunities to celebrate diversity (Florian & Black-Hawkins, 2011). However, it is as important that systems and services can promote high levels of psychological sense of belonging across education arenas, or settings. Belonging has been linked to better socio-emotional and mental health outcomes (Castro-Kemp et al., 2020) and positive school climate (Wang & Degol, 2016), which in turn led to more positive learning outcomes (Kutsyruba et al., 2015). In sum, policies that promote levels of belonging with concern for contextual elements, may be more aligned with a more comprehensive understanding of inclusive education, beyond that of mainstream placement.

Despite shifts in international policy and scientific research, SEND policy does not always reflect these evolving paradigms. In England, for example, we have highlighted inconsistencies between the rhetoric of policy and the *processes* used to implement it (Castro & Palikara, 2016). The *Children and Families Act 2014* introduced a progressive, cross-sector model of support, bringing together education, health, and social care, in line with international perspectives on development and disability (WHO, 2001). However, in practice, the policy has been perceived as ineffective (Boesley & Crane, 2018; Gaona et al., 2024). Several factors contribute to this gap between intent and implementation. These include, among others, eligibility criteria rooted in medicalised definitions of need, rather than reflecting the policy's holistic aims; a lack of appropriate assessment tools and classification systems; and funding mechanisms and workforce training that are not aligned with a biopsychosocial model of disability. Together, these issues hinder the effective realisation of the policy's holistic vision.

In this research we will examine country policies for SEND against these conceptualisations of need, looking to first, position the different jurisdictions, based on policy narrative, within a continuum between medical and biopsychosocial or needs-based approaches to how SEND is defined; second, we will examine the policy-practice gap, if any, based on current available evidence on stakeholders' experiences of

implementation. Lastly, we will look to identify patterns of policy elements (input) and respective processes, that lead to more positive experiences by stakeholders (output).

## Early Childhood Intervention and Education/Care and cross-sector collaboration

**Key Questions:** To what extent is there a transdisciplinary early childhood intervention system in place? Is the focus towards prevention from birth, across sectors, or towards early childhood education and care? What are models of cross-sector collaboration in SEND provision across jurisdictions, as regulated by policy?

The term *Early Childhood Intervention* (ECI) is often mistakenly used interchangeably with *Early Childhood Education and Care* (ECEC). However, the scientific literature consistently distinguishes ECI as a distinct and specialised approach that extends beyond the traditional domains of ECEC. While ECEC typically focuses on general developmental and educational support for young children, ECI is a targeted, transdisciplinary form of provision designed to support children who have or are at risk of having developmental delays or disabilities, as well as those who are vulnerable due to socioeconomic, environmental, or familial factors such as poverty or social exclusion (Meisels & Shonkoff, 2000).

ECI is characterised by a holistic, family-centred approach, which integrates services across health, education, and social care sectors. It is not limited to formal diagnoses or school readiness but emphasises early and proactive support from birth onwards, placing the *needs of both the child and the family* at the core of intervention planning (Bruder et al., 2019; McCarthy & Guerin, 2022). This approach aligns with bioecological and systemic models of child development (Bronfenbrenner & Morris, 2007), which view development as the result of complex interactions between biological, psychological, and environmental factors. The latter are widely regarded as comprehensive conceptualisations of how children develop and learn.

Importantly, ECI frameworks often reject the need for a formal diagnosis before initiating support, particularly in the early years, recognising that early risk factors can have long-term consequences if not addressed. Instead, services are often based on functional assessments and observed developmental vulnerabilities (Bagnato et al., 2014). This makes ECI distinct from more medicalised or deficit-based models that rely on standard diagnostic categorisation, not always possible in very young ages, even when clear everyday life needs are present.



The scope and availability of ECI services vary significantly across countries. For example, the Head Start and Early Head Start programs have provided federally funded early intervention services in the USA targeting children from low-income families, and integrating health, nutrition, and parental support into early education (Love et al., 2005) for decades. These have been replicated in other jurisdictions. In contrast, many countries offer primarily educational early childhood programs, with limited integration of health and social services unless a formal diagnosis is present (OECD, 2015). This disparity underscores the importance of policy frameworks that recognise ECI as a multidimensional and rights-based, family-centred form of early support. In this research we will look at the extent to which each jurisdiction provides early years support which is more aligned with an ECI framework *versus* ECEC, with consideration for the implications of this to the SEND system. This will then be triangulated with stakeholders' views of support in the early years.

We also investigate the extent to which national policies across selected jurisdictions explicitly prioritise and require cross-sector collaboration in the context of SEND, and we look to characterise models and processes of collaboration between education, health, and social care sectors, and whether they stem from systems implemented in early years provision. We evaluate whether these models align with established typologies of collaborative practice, including multidisciplinary, interdisciplinary, and transdisciplinary approaches. In multidisciplinary models, professionals from different sectors work in parallel while maintaining their disciplinary boundaries. In interdisciplinary models, professionals contribute their expertise through shared decision-making and communication structures, though assessment and support may still occur separately. In contrast, transdisciplinary approaches, entail a more holistic synthesis of knowledge and co-construction of solutions across traditional sectoral divides. Collaborative practices that move from interdisciplinary to transdisciplinary are less fragmented, more efficient and consequently may lead to better outcomes (Castro-Kemp & Samuels, 2022; Pimentel Walker et al., 2021). Understanding which model is aspired to, provides valuable insight into the depth and quality of collaborative practice in SEND provision.

Lastly, we explore the potential relationships between the nature of cross-sector collaboration and other key indicators under investigation in this research. Specifically, we consider how collaboration models may influence or be influenced by the training and preparedness of the education and allied health workforce, and the way SEND is defined and operationalised in policy. We then triangulate the analysis with stakeholders' views on effectiveness of collaboration practices.

## Other specific programmes, modifications and policy arrangements and specific inclusion policy and/or guidance

**Key Questions:** Are there specific policies, regulations and/or governmental programmes to target specific aspects of SEND, such as (but not exclusive to) mental health, wellbeing, belonging, or others biopsychosocial elements of children's lived experience in school context? Is there a specific policy explicitly regulating the country's approach to inclusion, or an inclusion guidance document? To what extent is inclusion explicitly framed in the policy?

Some jurisdictions have developed targeted policies that address specific elements of the educational experience, rather than focusing solely on overarching educational frameworks. These policies often aim to improve conditions that indirectly or directly affect children and young people with SEND, even if they are not explicitly labelled as SEND policies. For instance, policies promoting student wellbeing, mental health, or anti-bullying measures play a crucial role in shaping inclusive educational environments and can significantly impact the experiences and outcomes of students with SEND (e.g. Nikolaou, 2017).

In this research, we aim to identify and analyse specific policies that, while not exclusively focused on formal definitions of SEND, may be relevant to understanding the broader SEND system in each jurisdiction. By examining these targeted policies, we can gain insights into how systemic support for students with SEND is embedded - intentionally or not - within the wider educational policy landscape. We then triangulate this information with stakeholders' views on the need for specific policies, as available in published scientific research.

We also look at whether jurisdictions have articulated explicit legal or policy-based commitments to inclusive education. Particular attention is given to the language used in policies - whether it promotes integration, or broader inclusivity, considering belonging and context (Qvortrup & Qvortrup, 2018) - as this often reflects different ideological and systemic orientations.

## Workforce training

**Key Questions:** How are pre-service teachers trained to support children with SEND? How are in-service educators trained to continue developing their skills and knowledge? How is continuous professional development (CPD) characterised, is there an emphasis on outsourced CPD opportunities, or is the emphasis towards CPD embedded in everyday systems and services?

In this research, we analyse the general structure and delivery of both pre-service training and Continuous Professional Development (CPD) for educators across multiple jurisdictions, drawing on policy documents and available empirical evidence. Our analysis distinguishes between systems that integrate CPD into educators' routine professional practice - such as through embedded supervision, peer collaboration, and in-situ training - and those that rely primarily on externally provided, episodic CPD initiatives. Scientific literature suggests that sustained, collaborative and embedded CPD may be more effective (Bates & Morgan, 2018; Gore et al., 2017). We also examine what SEND training is required for supporting children with SEND in schools, across jurisdictions.

## Goals, Research Questions and Timeline

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The main goal of this project is to produce a comprehensive examination of policies regulating provision of SEND services in the four nations of the United Kingdom (England, Wales, Northern Ireland and Scotland), Ireland, Australia (specifically New South Wales - NSW, Queensland – QLD and Victoria – VIC) Switzerland (Fribourg), Belgium (Flanders) and Finland.

The research questions (RQ) examined in this research are:

RQ1: *How do the 4 UK nations, Ireland, Australia, Fribourg, Flanders, and Finland compare in terms of policies for SEND (against indicators of interest)?*

RQ2: *How are the different country policies reflected on current SEND outcomes within each country?*

RQ3: *How do the 4 UK nations, Ireland, Australia, Belgium, Switzerland, and Finland compare in terms of stakeholders' perceptions of the success of their SEND system, across indicators?*

RQ4: *To what extent may perceived elements of best practice in SEND policy and implementation identified in the cross-country analysis be context-specific and/or applicable across countries?*

The IPO framework guided research question formulation, where RQ1 will provide answers in relation to the policy INPUT and PROCESS in each country and across countries, RQ2 and RQ3 will provide answers aligned with the OUTPUT component of the model, and RQ4 will synthesise all information gathered to illuminate potential patterns of INPUT and PROCESSES leading to effective OUTCOMES, as perceived by service users.

Results will be interpreted in light of Bronfenbrenner's Bioecological Model (Bronfenbrenner & Morris, 2007), with INPUT data conceptualised as macrosystemic influences on child development, PROCESSES conceived as exo- and mesosystemic influences and OUTPUTS interpreted as microsystemic phenomena impacting on child development.

## Methodology

The research triangulates methods of data collection, including document and text analysis, desktop and systematic reviews, and semi-structured interviews. Table 1 shows how these methods are used to address the project's research questions, framed by the IPO model for policy analysis and the Bioecological model of human development.

Table 1. Link between research questions, theoretical and analytical framework and methods adopted

Research Questions	IPO Model (analytical framework)	Bioecological Model (theoretical framework)	Analytical approach adopted in the full research project
RQ1: <i>How do the 4 UK nations, Ireland, Australia, Switzerland, Belgium, and Finland compare in terms of policies for SEND (against indicators of interest)?</i>	Input and Processes	Macrosystem Exosystem	Policy analysis (content and corpus analysis)
RQ2: <i>How are the different country policies reflected on current SEND outcomes within each country?</i>	Output	Exosystem Mesosystem Microsystem	Policy analysis (content and corpus analysis) and evidence review
RQ3: <i>How do the 4 UK nations, Ireland, Australia, Belgium, Switzerland, and Finland compare in terms of stakeholders' perceptions of the success of their SEND system, across indicators?</i>			Evidence reviews and interviews with stakeholders

RQ4: <i>To what extent may perceived elements of best practice in SEND policy and implementation identified in the cross-country analysis be context-specific and/or applicable across countries?</i>	Link Input-processes-output	Cross-systems	Triangulation of data gathered by identification of patterns and interpretation against theory
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The current report covers preliminary results derived from content and text analysis of policy documents as well as from a rapid systematic evidence review of perceptions of policy implementation in all jurisdictions of interest, against pre-defined indicators of interest for a comprehensive overview of SEND policy systems and services and does not include primary data collection via interviews. The latter will be reported in 2026.

In addition to the indicators of interest defined in this report, a comparison of how jurisdictions record pupil data, inspections and appeals systems will be included in the final research but not covered in the current report. Those indicators resulted in few (if any) studies identified in our evidence review, and therefore there is low triangulation potential until we complete the research with interview data.

## Country selection

The initial selection of jurisdictions was guided by an algorithmic decision tree (see Appendix A), which applied three criteria: (a) results from the 2022 PISA analysis focusing on SEND indicators<sup>6</sup>, (b) data from the UNESCO Global Education Monitoring (GEM) Report (OECD, 2020), and (c) the feasibility of data collection (languages mastered by the team). This decision process is illustrated in Figure A1 (Appendix A). Based on these criteria, the selected jurisdictions were: the Australian states of New South Wales, Queensland and Victoria, Belgium (Flanders), Switzerland (Fribourg), and Finland. In addition, the four UK nations (England, Northern Ireland, Scotland, and Wales) and the Republic of Ireland were included due to their geographical, cultural, and political relevance, particularly in light of ongoing policy developments in England.

The broader ScopeSEND project has been updated through our partnership with the Centre for Education Systems (CES) to include policy analysis and a systematic evidence review of jurisdictions currently under review by CES. These include Estonia, France, Poland, Japan, Singapore, New Zealand, Netherlands and Ontario. However, this current report focuses exclusively on the initial set of jurisdictions.

<sup>6</sup> PISA (Programme for International Student Assessment) 2022 data is available here: <https://www.oecd.org/en/data/datasets/pisa-2022-database.html>

## Procedure

To address the research questions explored in this research, we adopted: a) Policy analysis, which involved both content analysis of policy documents and *corpus* analysis of policy texts; and b) A systematic review of relevant evidence (see Table 1). Interviews with stakeholders are ongoing and data derived from those will be triangulated at a later stage with results covered in this report.

Policies in each country were selected based on: 1) a desktop review of governmental websites for each jurisdiction, with a focus on the education system to begin with; 2) Expanded review of governmental websites to other sectors, as required in each case to fully understand SEND provision; 3) identification of key policy documents via governmental sites; 4) liaison with key collaborators in each country to member-check relevant policies and to gather additional policy documents that may not be available on the web. The role of the country-based academic collaborators was key to ensure a context-specific view of policy and to assist with translations when necessary (Lloyd et al., 2024).

Policies were primarily collected through online desktop research, focusing on those most relevant to understanding indicators of interest in each jurisdiction. Once a set of policies was identified, international collaborators in each jurisdiction reviewed them to ensure they adequately reflected regulations for the indicators under investigation. Where applicable, collaborators also recommended additional documents for inclusion. A list of policy documents consulted is available in Appendix D.

It is important to note that in the cases of Belgium (Flanders) and Australia (Queensland, New South Wales, and Victoria) and Switzerland (Fribourg) relevant policy is governed both at the regional and national (or Commonwealth) levels. Where this applies, we refer to the broader national framework—Switzerland, Belgium or the Commonwealth of Australia—as appropriate. Accordingly, references to ‘Switzerland’, ‘Belgium’ or ‘Australia’ denote national-level documents or policies, while ‘Fribourg’, ‘Flanders’, ‘QLD’, ‘NSW’ or ‘VIC’ are used specifically when referring to regional policies within that jurisdiction.

### *Content Analysis of policy documents*

The content analysis of policy documents employed a deductive approach, aiming to identify policies, and specific sections within those, detailing regulations and procedures relevant to understanding how our indicators of interest are operationalised in each country. Deductive content analysis is guided by pre-existing theoretical frameworks or research questions, allowing researchers to systematically code textual data based on predefined categories (Elo & Kyngäs, 2008). The identified sections were

converted into country-specific narratives, looking to answer our key questions within our indicators of interest.

Cross-country comparisons were made against theory and evidence available for each indicator. This interpretative process was backed up with additional empirical evidence obtained via *corpus* analysis of the policy texts, here conducted and reported for English-speaking countries only.

### *Corpus Analysis of Policy documents*

*Corpus* analysis is a method for examining large collections of text using computational tools to detect patterns in language use, such as word frequency, collocations, and semantic structures. This approach allows researchers to generate both quantitative and qualitative insights into how language shapes meaning, frames issues, and conveys ideologies (Kutter, 2017). In the context of policy research, *corpus* analysis is particularly useful for examining how specific topics are represented, how language evolves over time, and which discourses dominate policy narratives.

The process of *corpus* analysis typically begins with assembling a *corpus*, such as a set of policy documents, which is then analysed using specialised software. In a recent study, for instance, we applied *corpus* analysis to Ofsted reports of early years settings, examining the language and sentiment used in reports referring to different quality ratings (Castro-Kemp & Kemp, 2025). Similar approaches have been taken by others, including using sentiment analysis of Ofsted reports across different educational phases (Bokhove & Sims, 2021).

In the current project, we used quantitative *corpus* and sentiment analysis to complement and strengthen our qualitative policy analysis. This triangulation of methods enhanced the rigour of our findings and supported a deeper understanding of how key policy indicators are framed in official documents (Schlunegger et al., 2024).

The corpus analysis was performed in the R statistical programming language using the *quanteda* R package. All corpus items for each country – including pdfs, presentations and word processor documents - were converted into text and attached to a range of applicable themes, allowing for country analysis at a thematic level. For each country, the number of tokens (e.g. words and specified word pairs) in all corpus items was calculated by theme. We undertook two analyses of the data.

1) We analysed the frequency of concepts by country and theme. A bank of concepts was developed, for example ‘early childhood’, ‘vulnerable’ and ‘SEND’, with ‘special needs’, ‘special educational needs’ and the acronyms ‘SEND’ and ‘SEN’ all mapping to the same concept: ‘SEND’. These concepts were then searched for in the token lists for each theme and frequencies of concepts were reported. These

frequencies were turned into a percentage of total tokens for each country and theme grouping, with these reported below as ‘concept’ clouds.

2) We looked at the sentiment of corpus items by country and theme. Using the AFINN sentiment dataset (Nielsen, 2011), a lexicon of English words allocated an integer score between -5 (most negative) and +5 (most positive), we matched the tokens in each corpus item to their score. For each country and theme grouping we calculated a mean sentiment value. The values are presented below, with differences between countries assessed using t-tests. Statistical significance was determined at the  $p < 0.05$  level. To complement this data, we used an additional NRC sentiment dataset (Mohammad & Turney, 2013) which allows for analysis by a wider range of sentiments, including ‘trust’ in addition to ‘positive’ and ‘negative’. For each set of corpus items by country and theme we counted the tokens in the sentiment datasets for each sentiment type. We then worked out the overall proportion of tokens in country and theme that were coded with each sentiment. These proportions are reported below, with differences between countries assessed using prop-tests. Statistical significance was determined at the  $p < 0.05$  level.

### *Rapid Systematic Evidence Review*

A rapid qualitative evidence review was undertaken following the approach outlined by Booth and colleagues (Booth et al., 2024) to allow for a focused and time-efficient synthesis of relevant literature. The review employed a framework synthesis method as described by Dixon-Woods and colleagues (Dixon-Woods, 2011), enabling the structured integration of qualitative findings. The process for selecting relevant studies adhered to the PRISMA (Preferred Reporting Items for Systematic Reviews and Meta-Analyses) guidelines to ensure transparency and rigor (Page et al., 2021).

### *Search Strategy*

Methodological guidance recommends limiting database searches to a focused selection to ensure relevance and manageability (Carroll et al., 2011). Following consultation with an information specialist at the Institute of Education (UCL), two databases - Web of Science and EBSCO (ERIC) - were identified as the most likely to yield pertinent literature.

Search terms were initially developed by the research team in collaboration with knowledge users and subsequently refined in consultation with the specialist librarian to optimise both sensitivity (capturing relevant studies) and specificity (excluding irrelevant results). The final search strategy was structured according to the PICOS framework (Population, Intervention, Comparison, Outcome, Study Type) (Amir-Behghadami & Janati, 2020), and the full list of terms is provided in Appendix B.



In addition to the systematic database search, experts from each jurisdiction contributed by identifying relevant grey literature to ensure a more comprehensive evidence base. The search was conducted in the first three months of 2025.

### Inclusion and Exclusion Criteria

This review included peer-reviewed academic articles published between 2014 and 2024, in English or in any of the relevant local languages. It is acknowledged that the search itself used terms in English, and so academic collaborators in the jurisdictions were key to provide additional grey literature. To be eligible, studies were required to report qualitative data capturing the views, attitudes, or perspectives on SEND policy or provision. Qualitative methods included interviews, focus groups, ethnographic approaches, qualitative observations, as well as participatory or co-creation methodologies.

Eligible studies also needed to include participants who were either practitioners, caregivers, or young people with SEND. Additionally, studies had to have some connection to the education sector - whether early years, primary, or secondary education - and not be solely situated within clinical or healthcare settings. Research addressing any type of SEND was considered for inclusion.

### Quality Assessment

The Joanna Briggs Institute (JBI) Critical Appraisal Tool<sup>7</sup> was used to assess the quality and potential bias of the included studies. This tool provides a structured checklist designed specifically for evaluating qualitative research, focusing on key aspects such as the alignment between the research methodology and study objectives, the appropriateness of data collection methods, and the consideration of ethical issues. It is particularly well-suited for appraising studies that explore teaching practices, learning environments, or the impact of policy, making it an appropriate choice for this review.

### Data Extraction and Analysis

Data extraction was conducted by a single reviewer using a structured Excel template. The following information was collected from each included study: title, year of publication, authors, jurisdiction, study aim, specific area of SEND addressed, study design, participant type (practitioners, caregivers, or children and young people), age

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<sup>7</sup> The Joanna Briggs Institute Critical Appraisal Tools are available here: <https://jbi.global/critical-appraisal-tools>

range of participants, sample size, data collection methods (e.g., interviews, surveys), and data analysis method (e.g., thematic analysis, interpretative phenomenological analysis [IPA], content analysis).

To synthesise the key qualitative findings from each paper in this review, a framework synthesis approach was employed. This involved mapping the extracted data against a set of predefined indicators that were designed to capture key elements of SEND provision, assessment, and support across diverse educational settings. The framework was developed through a combination of policy review, existing research on inclusive education, and input from stakeholders, ensuring that it reflected the most salient dimensions of SEND systems. Framework Analysis was used to organise and interpret the data, systematically aligning the study findings with the established indicators. These indicators are detailed in Table 2.

Table 2. Indicators included in the framework analysis

Indicator	Meaning	Number of Codes
Definition of SEND or Equivalent	How SEND is defined across different educational systems and policies.	4
Eligibility Benchmarks and Process	The criteria used to determine whether a child qualifies for SEND support and the process of flagging for assessment.	16
Assessment for Eligibility	Methods and tools used to assess a child's eligibility for SEND support.	35
Education System	The structure of education provision, including mainstream and specialist settings.	60
Early Childhood Intervention	Availability and effectiveness of early interventions for young children with SEND.	13
Statutory Documents and Support Plans	The role of EHCPs, IEPs, or equivalent documents in structuring support.	17
Specific Programs, Modifications, and Arrangements	Types of programs, classroom modifications, and interventions used for SEND students.	173
Workforce Training	The preparedness of educators and professionals to support SEND students.	71
Inclusion Policy or Guidance	Policies that promote or hinder inclusive education in mainstream settings.	22
Cross-Sector Provision	Collaboration between education, healthcare, and social services for SEND provision.	24

Using this framework, qualitative data from the included studies were systematically coded and charted against each of the predefined indicators. When insights emerged that did not align with the existing framework, new themes were added inductively to ensure comprehensive representation of the data. Once the qualitative findings were mapped to the indicators, they were further coded at a more granular level to capture the subcomponents and nuances within each broader theme.

This layered coding approach allowed for a structured yet flexible analysis, enabling meaningful comparison across studies and jurisdictions. It also facilitated the identification of recurring patterns, variations in practice, and notable gaps in SEND provision and support, thereby strengthening the synthesis and interpretive depth of the review.

## Results

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This section presents results obtained from the policy analysis conducted (content and *corpus*) and from the evidence review.

Jurisdictions were compared in relation to the indicators of interest; the education system (phases and types of setting), definition of SEND or equivalent, eligibility benchmarks, assessment for eligibility, statutory documents and/or other support plans, early childhood intervention and education/care, cross-sector provision, other specific programmes, modifications and policy arrangements, inclusion policy/guidance, and workforce training requirements.

Interpretations of policy orientation were made based on theory and literature available, supported with empirical analysis of the text and triangulated with stakeholders' views gathered in the rapid evidence review of the scientific literature.

### The Education System

Table 3 provides an overview of the Education Systems across jurisdictions.

The education systems across these jurisdictions share a broad structure - early childhood, primary, secondary, and post-secondary - but differ significantly in governance, curriculum structure, types of settings, and approaches to inclusion and faith-based education, reflecting demographic characteristics.

The UK Nations (**England, Wales, Scotland, Northern Ireland**) maintain similar school types (state-funded, private/independent, faith-based, and special schools), but

**Scotland** (Curriculum for Excellence) and **Wales** (Curriculum for Wales) have a distinct curriculum and Scotland has a unique qualification system (National 4/5s, Highers). **Wales and Scotland** are less selective than **England**, as England retains grammar schools<sup>8</sup> in some areas.

**Ireland** is unique in the dominance of faith-based (mostly Catholic) primary schools, even though they are publicly funded. It has a two-cycle secondary system and an optional Transition Year that provides a break from exams and focuses on life skills.

**Switzerland (Fribourg)** and **Belgium (Flanders)** offer early academic tracking and a strong emphasis on vocational education, particularly in secondary education. **Flanders** is known for a pillarised system, where Catholic schools (privately run but state-funded) dominate. Children begin *kleuteronderwijs* (early childhood) at 2.5-year-old, then progress to *lager onderwijs* (primary) and *secundair onderwijs* (secondary). Different pathways are made available around age 12 into general, technical, or vocational routes. Special schools exist but mainstream placement has increased following policy reforms in 2014. **Switzerland's** system varies across cantons, reflecting its federal governance. In **Fribourg** (chosen for being both French and German speaking, thus illustrating a uniquely diverse approach), education is offered in both languages, depending on the region. Children attend Kindergarten from around age 4 or 5, followed by primary school, lower secondary, and upper secondary, which includes both academic (*gymnasiale Maturität*) and vocational tracks (*VET*). Fribourg places emphasis on integrating children in mainstream schools, with support measures as appropriate, though special education settings are available for children with complex needs.

**Finland** stands out for its fully comprehensive, non-selective education system, with emphasis on teacher autonomy, minimal private provision, and high levels of inclusion within mainstream schools. Education is compulsory from ages 6 to 18 and includes pre-primary, primary, lower secondary, and upper secondary education. Early Years provision happens until age 6 and is non-compulsory. This is followed by one year of pre-primary education beginning in the autumn term of the year the child turns age 6 (compulsory). Basic education then follows from ages 7 to 16 and is followed by upper secondary education. Students enter upper secondary the year they turn 16, and it typically lasts three years, with learners choosing between general upper secondary (leading to the matriculation examination) or vocational pathways (leading to vocational qualifications).

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<sup>8</sup> Grammar schools are state secondary schools in England that select their pupils by means of an examination taken by children at age 11. Therefore, these schools are selective based on exam scores. Research using the National Pupil Dataset has demonstrated that Grammar schools may be contributing to perpetuate inequalities (Gorard & Siddiqui, 2018).

In **Australia**, the three jurisdictions under analysis (New South Wales (NSW), Queensland (QLD) and Victoria (VIC)) follow a similar structure but use state-specific *curricula* and qualifications. The system features a strong private and faith-based sector, particularly Catholic schools, and increasing investment in inclusive practices, though specialised settings still play a significant role. In **Australia NSW**, education is overseen by the NSW Education Standards Authority (NESA). NSW has a large private and Catholic school sector, and policies encourage mainstream placement for students with additional needs, though support units and special schools remain in use. **Australia QLD** is governed by the Queensland Curriculum and Assessment Authority (QCAA), with the final qualification being the Queensland Certificate of Education (QCE). QLD has a flexible curriculum and strong vocational education pathways. Both integrated and specialised services co-exist. In **Australia VIC**, education is overseen by the Victorian Curriculum and Assessment Authority (VCAA); students achieve the Victorian Certificate of Education (VCE) or VCAL (vocational). Victoria promotes mainstreaming policies and funding models that support diverse learning needs, while still maintaining specialist schools.

In terms of demographic characteristics, England and Australia are the most populous countries, followed by Flanders, Scotland, Northern Ireland, Wales, Ireland, Switzerland and Finland<sup>9</sup>. Investments in Education have changed considerably over time. A recent OECD report (2023) provides changes in investment from primary to tertiary education institutions, showing that Ireland, Australia, Belgium and Finland have invested more in recent years (from the highest to lowest rise in investment), while the UK invested less. Swiss data is missing. When looking at investments in Education as US Dollars converted as proportion of GDP per full-time students, Belgium is the country with the highest investment, followed by UK, Finland (though here there is a significant difference in vocational training, where investment is much higher, levelled with Belgium) and Australia<sup>10</sup>.

Funding models appear to be similar across jurisdictions, with SEND provision being funded by Education and Health sectors across all. Differences are more

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<sup>9</sup> Population statistics are given by:

United Nations, *World Population Prospects*, Url:

[https://www.un.org/development/desa/pd/sites/www.un.org.development.desa.pd/files/wpp2022\\_summary\\_of\\_results.pdf](https://www.un.org/development/desa/pd/sites/www.un.org.development.desa.pd/files/wpp2022_summary_of_results.pdf);

Eurostat (for Belgium, Switzerland): [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Population\\_and\\_population\\_change\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Population_and_population_change_statistics);

Office for National Statistics (UK):

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>;

Australian Bureau of Statistics (ABS): <https://www.abs.gov.au/statistics/people/population>;

Statistics Finland: [https://stat.fi/til/vrm\\_en.html](https://stat.fi/til/vrm_en.html);

And Central Statistics Office Ireland: <https://www.cso.ie/en/statistics/population/>

<sup>10</sup> Based on OECD (2023), *Education at a Glance 2023: OECD Indicators*, OECD Publishing, Paris, <https://doi.org/10.1787/e13bef63-en>.

apparent in relation to how funding is managed and allocated, between more centralised and more federal/regional/decentralised management; the latter is more prevalent in Flanders (as a specific jurisdiction in Belgium), in Fribourg (as a Canton in Switzerland) and in Finland, with the key role of municipalities. This will be covered in more detail in subsequent reports.

Table 3. Overview of Education Systems across jurisdictions, considering phases of education and type of setting.

Jurisdiction	Types of Settings				Phases of Education & Age Ranges		
	State Funded	Private	Faith-based	Specialised versus mainstream settings	Early Years	Primary	Secondary & post-16
England <sup>11</sup>	Community schools, academies <sup>12</sup> (majority), grammar schools (minority).	Independent fee-paying schools (5.9% of total number of pupils in UK)	Voluntary aided schools (a third of state-funded schools, with some also being academies and grammar schools)	Specialised (<10%) and mainstream provision (majority)	Nursery (3–4ya), Reception (4–5ya); non-compulsory, but majority attend.	Years 1–6 (5–11ya)	Years 7–11 (11–16ya) GCSEs <sup>13</sup> - Years 12–13 (16–18ya) A-levels or vocational qualifications for university entry

<sup>11</sup> Relevant policies: 56, 59, 63, 65 in Appendix D.

<sup>12</sup> School academies in England are publicly funded schools that operate outside local authority control with greater freedom over their curriculum, finances, and school management compared to traditional state schools. Academies are directly funded by the Department for Education (DfE) and can be run by individual trusts, multi-academy trusts, or sponsors. Url: <https://www.gov.uk/types-of-school/academies>

<sup>13</sup> GCSEs (General Certificate of Secondary Education) are academic qualifications in a particular subject, typically taken by students in England, Wales, and Northern Ireland at the end of compulsory secondary education, usually around age 16. They assess knowledge and skills across a broad range of subjects and serve as a key milestone for progression into further education, vocational training, or employment. Results influence post-16 education choices, such as A-levels, apprenticeships, or other vocational qualifications. Url: <https://www.gov.uk/what-different-qualification-levels-mean>

Jurisdiction	Types of Settings			Phases of Education & Age Ranges			
	State Funded	Private	Faith-based	Specialised versus mainstream settings	Early Years	Primary	Secondary & post- 16
<b>Wales<sup>14</sup></b>	Community schools, Voluntary controlled/aided schools, Foundation schools, Welsh-medium schools, All-through (3–16/18). No academies or grammar schools in Wales.	Independent fee-paying schools (2% of pupils in Wales)	Voluntary aided and voluntary controlled schools, often Church in Wales or Catholic. These are part of the maintained sector.	Mainstream is the majority; special schools and PRUs (Pupil Referral Units) offer specialised provision. Also includes EOTAS for learners outside school settings.	Funded early education from age 3; includes nursery schools and nursery classes in primary schools. Provision varies by local authority.	Years 1–6 (ages 5–11). Education is compulsory from age 5.	Years 7–11 (ages 11–16) – Key Stage 3 & 4. Years 12–13 (ages 16–18) – Sixth form or FE colleges; learners take A-levels or vocational qualifications.

<sup>14</sup> Relevant Policies: 234, 237, 242 in Appendix D.



Jurisdiction	Types of Settings				Phases of Education & Age Ranges		
	State Funded	Private	Faith-based	Specialised versus mainstream settings	Early Years	Primary	Secondary & post-16
<b>Scotland<sup>15</sup></b>	Local authority schools (majority of school population)	Independent schools (minority of school population)	Denominational schools (majority Catholic)	Specialised (6.8%) and mainstream provision (majority)	Nursery (3–5ya); non-compulsory, but majority attend.	P1–P7 (5–12ya)	S1–S6 (12–18ya), with National Highers (subject-specific qualifications at S5 and S6), and Advanced Highers (beyond S6 for university entry)
<b>Northern Ireland<sup>16</sup></b>	Controlled Schools (c.49%)	Independent fee-paying schools (minority of school population)	Maintained-Catholic schools (c.40%)	Specialised (9.3% of school population) and mainstream provision (majority)	Nursery (3–4ya), Reception (4–5ya), non-compulsory, but majority attend.	P1–P7 (5–11ya)	Years 8–12 (11–16ya) GCSEs Years 13–14 (16–18ya) A-levels for university entry

<sup>15</sup> Relevant policies: 179, 183-185, 187-191, 214, 215 in Appendix D; Relevant sites: [https://www.gov.scot/policies/schools/additional-support-for-learning/?utm\\_source=chatgpt.com](https://www.gov.scot/policies/schools/additional-support-for-learning/?utm_source=chatgpt.com);

<sup>16</sup> Relevant Policies: 162, 166, 167, 169, 170 in Appendix D.

Jurisdiction	Types of Settings			Phases of Education & Age Ranges			
	State Funded	Private	Faith-based	Specialised versus mainstream settings	Early Years	Primary	Secondary & post-16
Ireland <sup>17</sup>	National Schools	Fee paying schools	Predominantly Catholic patronage	Specialised settings (2.3%)			
				Specialised classes in mainstream are a common feature (majority of the 25% of children with special needs in mainstream)			Junior Cycle (12–15ya)
					ECCE Scheme (3–5ya), non-compulsory, but majority attend.	Junior & Senior Infants, 1st–6th Class (5–12ya)	Transition Year (optional)
							Senior Cycle (15–18ya)
				Mainstream provision (majority)			Leaving Certificate

<sup>17</sup> Relevant policies: 72, 83, 93, 128, 129, 132, 133 in Appendix D.

Jurisdiction	Types of Settings				Phases of Education & Age Ranges		
	State Funded	Private	Faith-based	Specialised versus mainstream settings	Early Years	Primary	Secondary & post-16
<b>Switzerland (Fribourg)</b> <sup>18</sup>	Public schools (c.88%)	Government-dependent private schools (4%) and Independent private Schools (8%)	Limited	Mainstream (vast majority) and specialised settings co-exist	Kindergarten (4–6ya). In Fribourg 2 years of kindergarten are compulsory.	Grades 1–6 (6–12ya)	Grades 7–9 (12–15ya) Vocational or academic tracks (15-18/19)
<b>Belgium (Flanders)</b> <sup>19</sup>	Community Schools (c.16.3%)	Private fee-paying schools (c.3%)	Predominantly Catholic schools (majority, 66.69%)	Mainstream (vast majority) and specialised settings co-exist	Kleuteronderwijs (2.5–5ya), non-compulsory but with some of the highest participation rates in Europe.	Lager onderwijs (5–12ya)	Secundair onderwijs (12–18ya), with various tracks

<sup>18</sup> Relevant Policies : 224 in Appendix D.

<sup>19</sup> Relevant policies: 42,45, 53 in Appendix D; Relevant site: <https://onderwijs.vlaanderen.be/en>.

Jurisdiction	Types of Settings			Phases of Education & Age Ranges			
	State Funded	Private	Faith-based	Specialised versus mainstream settings	Early Years	Primary	Secondary & post-16
<b>Finland<sup>20</sup></b>	Municipal schools (majority)	Fee-paying (but state supported) private schools (<3%)	Minimal	Inclusive mainstream (0.7% of students in special schools and 2.1% in special support tier)	Early Years provision (up to 6ya), non-compulsory but almost all children attend.	Pre-primary (age 6-7), primary (age 7-12)	Lower secondary (age 13-15_ and upper secondary education or vocational (age16–18+)
<b>Australia (NSW<sup>21</sup>, QLD<sup>22</sup>, VIC<sup>23</sup>)</b>	Public schools (63.4%)	Independent schools (16.8%)	Mostly Catholic and other denominational schools (19.9%)	Specialised (5.5%) and mainstream settings (majority)	Preschool (4–5ya). Majority attend.	Kindergarten/P rep to Year 6 (5–12ya)	Years 7–12 (12–18), culminating in HSC (NSW), QCE (QLD), or VCE (VIC)

<sup>20</sup> Relevant policy sites: <https://www.oph.fi/en/education-system>; <https://eurydice.eacea.ec.europa.eu/eurypedia/finland/fundamental-principles-and-national-policies>;

<sup>21</sup> Relevant policy sites: Plan for NWS Public education: <https://education.nsw.gov.au/content/dam/main-education/about-us/strategies-and-reports/plan-for-nsw-public-education/plan-for-nsw-public-education-booklet.pdf>; Curriculum planning and programming, assessing and reporting to parents K-12: <https://education.nsw.gov.au/policy-library/policies/pd-2005-0290>; Multicultural education: <https://education.nsw.gov.au/policy-library/policies/pd-2005-0234>;

<sup>22</sup> Relevant Policies: 19, 20, 25 in Appendix D; Relevant sites: For whole education system: <https://education.qld.gov.au/>;

<sup>23</sup> Relevant Policies: 31, 33, 34, 40 in Appendix D.

## Definition of special educational needs or equivalent, assessment for eligibility, statutory and non-statutory processes

### Key findings:

1. The jurisdictions under analysis fall along a continuum in their approach to defining SEND, determining eligibility, and providing statutory support - ranging from those closer to a medical model-based framework (Flanders) to those based on identification of needs and biopsychosocial model oriented (Scotland, Ireland, Wales, Fribourg and Finland). England, Northern Ireland and Australia adopt a mixed approach, incorporating elements of both.
2. Among English-speaking jurisdictions, some exhibit significantly more positive sentiment in their SEND policy language compared to others (among them Scotland ranks highest in positivity, followed by Wales and Northern Ireland—all scoring above England). Scotland stands out for language that showcases a broader understanding of inclusive education framing it as not only a presumption of mainstream placement, but also as a commitment to foster belonging, although all jurisdictions show language labelled as positive.

Figure 2 presents a continuum of policy approaches to defining, assessing, and providing statutory support for SEND. These approaches range from medical model-oriented frameworks to needs-based, biopsychosocial model oriented, as defined previously. This analysis reflects policy content only, i.e., the INPUT stage of our IPO model - and does not account for how policies are implemented in practice.

Table 4 outlines how each jurisdiction defines SEND, conducts eligibility assessments, and issues statutory support documents.

Among the jurisdictions studied, **Flanders** appears to be the closer to a medical model of SEND, as per policy analysis, though not completely reliant on diagnoses. Recent policy changes in 2023 have provided a SEND model more focused on support for learning, so it is likely that Flanders will move in this continuum towards a needs-based approach; the new model defines eight types of need. However, these are still very focused on medical and/or physical needs, based on language adopted only, and without considering implementation perceptions (output), which will be looked at a later stage. In contrast, **Wales, Scotland, Finland, Ireland, and Fribourg (Switzerland)** adopt more needs-based approaches. **Australia, England, and Northern Ireland** exhibit a hybrid model, blending medical and social/participation frameworks. However, it is important to note that some of the Northern Ireland policies analysed have not been implemented due to the suspension of the Northern Ireland Assembly. This will be

explored further in the next phase of the project, which focuses on policy implementation (OUTPUT) and is beyond the scope of this report. Finland and Fribourg adopt the International Classification of Functioning, Disability and Health (ICF; WHO, 2001) to classify needs and abilities; in Finland this is widely used as a common universal system for classifying needs and abilities, but not mandatory.

Figure 2. Continuum of approaches to SEND definition, eligibility, assessment and statutory provision



This interpretation is supported by *corpus* analysis of the policies identified as relevant in English speaking countries. Here, all policies gathered were analysed. For example, word frequencies in these policies show that the words ‘support’, ‘needs’, ‘parents’ are highly used in Scotland, Ireland and Wales, but less so in England, Northern Ireland and Australia, where the word ‘disabled’ stands out. Figure 3 shows concept clouds for all jurisdictions based on frequency of words in policies for SEND.

Figure 3. Concept clouds based on frequency of words in all relevant policy documents for SEND

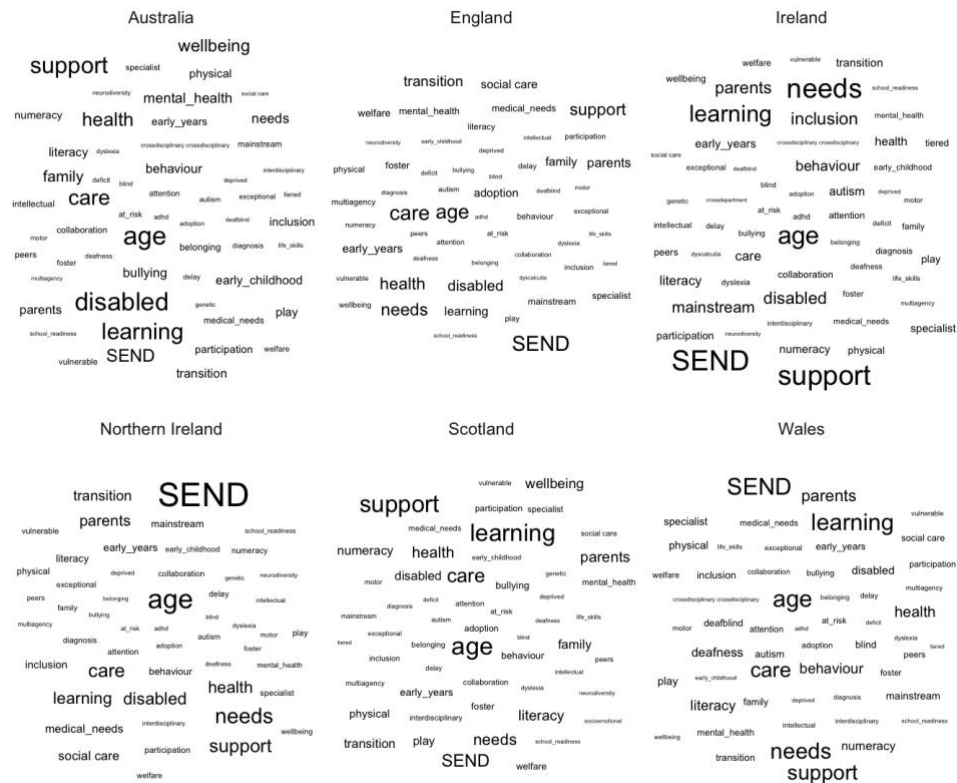


Table 4. Cross-country comparison of SEND definition, assessment for eligibility and eligibility criteria for support services and statutory plans.

Jurisdiction	Definition of SEND	Assessment Process	Statutory Documentation
England	‘Special Educational Needs and Disabilities’ (SEND); Based on the Children and Families Act 2014; SEND includes learning difficulties/disabilities requiring special educational provision.	Multi-professional assessment; led by Local Authorities.	Education, Health and Care Plan (EHCP)
Wales	Additional Learning Needs (ALN) instead of SEND; broad, needs-based definition under the ALNET Act 2018.	Coordinated by ALN Coordinators in schools with multi-agency input.	Individual Development Plan (IDP)
Scotland	Additional Support Needs (ASN) under the Education (Additional Support for Learning) (Scotland) Act 2004.	Flexible, needs-led process; schools work with parents and professionals.	Co-ordinated Support Plan (CSP) (for complex/multi-agency needs, when school support not sufficient) – statutory
Northern Ireland	‘Special Educational Needs’; Definition under SEN Code of Practice (2016) and SEN Act (2016); combines medical and functional criteria.	Formal assessment by Education Authority; not all provisions implemented due to political delays.	Statement of Special Educational Needs
Ireland (Republic)	‘Special Educational Needs’; informed by EPSEN Act 2004; needs-based and inclusive in principle.	School-based teams supported by National Educational Psychological Service (NEPS).	Student Support plans are recommended by policy but have no legislative basis
Finland	‘Special Support Needs’; The focus is on pedagogical support needs within a three-tier support model (general, intensified, special support).	Teachers initiate assessments; support is escalated via pedagogical evaluations.	Individual Education Plan (IEP) in special support tier, flexible document reviewed as needed in school
Switzerland (Fribourg)	‘Special pedagogical needs’, assessed within a biopsychosocial framework (with reference to the ICF); bilingual policy environment.	Managed by local services; bilingual assessments where applicable.	Individualised Education Plan (PI/PEI)
Flanders (Belgium)	Definition based on medical needs (e.g., cognitive, sensory impairments), although recent policy emphasises support for learning which is more based on everyday life/ functioning needs.	Highly specialised assessors, especially for children with complex needs. Psychologists are available at school level.	There are plans for school support (non-statutory and statutory plans for those considered to meet criteria.
Australia (NSW, QLD, VIC)	Uses the term ‘students with disability’ under state policy; aligned with national standards.	School-based assessment with support from Department of Education psychologists and specialists.	Personalised Learning and Support Plans (PLSP)
		Functional behaviour assessments and school-based planning; input from therapists.	Individual Curriculum Plan (ICP) or Individual Education Plans (IEPs).
		Eligibility through assessments reviewed by the Department of Education.	Individual Education Plans (IEPs)



Sentiment analysis for policies in the English-speaking countries shows that some jurisdictions exhibit significantly more positive sentiment in their policy language around SEND (considering all policies analysed). Among them, Scotland ranks highest, followed by Ireland. Australia and England score the lowest, although they still adopt language classed as positive. All countries showed statistically significant differences between their positivity scores.

Table 5. Average *Sentiment* ratings according to the AFINN dataset (Nielsen, 2011) for ‘positive’ sentiment

<b>Jurisdiction</b>	<b>Sentiment score</b>
Scotland	1.29*
Ireland	1.21*
Northern Ireland	1.11*
Wales	1.01*
England	.88*
Australia	.74*
*p=0.000	

## Early Years provision and cross-sector collaboration

### Key findings:

3. All jurisdictions demonstrate some degree of multi-agency collaboration. Those with early years services more closely aligned with Early Childhood Intervention (ECI) models – Scotland, Wales, Finland, Ireland, Switzerland (Fribourg) and Australia (VIC), rather than solely Early Childhood Education and Care (ECEC), tend to specify forms of cross-sector collaboration that reflect interdisciplinary or transdisciplinary approaches (highest level of collaboration), rather than being limited to multidisciplinary ones (lowest level of collaboration) – Australia (NSW), Australia (QLD), Belgium (Flanders), England and Northern Ireland.

4. In jurisdictions with the most comprehensive early years and multi-agency policies, the following processes are commonly implemented: a) Government-led cross-departmental working groups or specialist centres/teams that coordinate regional multi-agency efforts and bring together expertise across educational stages, age groups, and professional disciplines; b) The use of standardised classification tools, such as the International Classification of Functioning, Disability and Health (ICF), to create a common language for describing children's everyday needs, often integrated into universal screening or early years assessments.

5. Jurisdictions recognised for having well-developed early years and multi-agency systems - such as Scotland, Wales, Ireland, Finland, and Fribourg - tend to adopt a needs-based definition of Special Educational Needs and Disabilities (SEND) in policy, rather than a medicalised one. This perspective may be supported by effective early identification processes that ensure needs-based data is carried forward into primary education and beyond.

Jurisdictions vary in terms of the extent to which they provide early years provision which is more aligned with ECI systemic models (rather than ECEC only). Generally, those with a more comprehensive ECI provision, also specify more comprehensive models of cross-sector collaboration, reflecting recent findings by OECD (2025). Scotland, Wales, Finland, Ireland and Victoria, appear to have the strongest policies aligning with ECI models and extensive cross-sector collaboration.

Scotland's Early Years Framework, for instance, supports children from birth to age eight through a holistic, rights-based, and collaborative approach. Education authorities must support children under 3 with disabilities, ensuring multi-agency planning, under the 2006 GIRFEC (*Getting It Right for Every Child*) policy. The Framework emphasises early intervention, inclusive environments, and high-quality services,

promoting equity and empowerment for families and communities. Key elements include universal services, prevention, quality, and collaboration. Policies like Blueprint 2020 expanded free Early Learning and Childcare (ELC) to 1140 hours. In 2024, a Quality Improvement Framework was introduced for 2025 implementation, aligning with United Nations Convention on the Rights of the Child (UNCRC)<sup>24</sup> principles and national standards, focusing on leadership, development, learning, and achievement. The integrated approach to provision continues throughout education phases.

In Wales, Early Childhood Intervention (ECI) is part of a comprehensive, state-funded framework supporting children from pre-birth to age seven. Guided by the Early Childhood Play, Learning, and Care (ECPLC) Plan, it promotes holistic development across cognitive, emotional, social, and physical domains. ECI is delivered through integrated childcare, play-based learning, and nursery education, ensuring inclusive, child-centred support. Cross-sector collaboration across education, health, and social care is central. The Curriculum and Assessment (Wales) Act 2021 supports continuity through progression-based learning. Policies aim to ensure equitable, high-quality services, bridging early education and care for seamless developmental support. The integrated approach to provision for SEND is mandated by law across education phases.

Finland's early childhood policy prioritises equity, inclusion, and high-quality pedagogy. The 2018 Act on ECEC (the Act designates services as ECEC, though they appear in many ways aligned with ECI) guarantees children's right to care and mandates individual plans for each child. The National Core Curriculum (2022) emphasises values like diversity and sustainability, combining care, education, and teaching, via an individual plan for every single child. There are multi-disciplinary teams including early childhood special education teachers who work alongside ECEC staff to plan, implement, and assess individualised support for all children. These also serve in consulting roles across multiple teams, facilitating the sharing of best practices and promoting cohesive teamwork. Accountability is promoted via continuous, trust-based improvement through self-assessment. Specific policies have been set up to facilitate access to early years provision for deprived families. Together, these elements form a robust, rights-based framework that supports every child's development and learning from an early age. The integrated approach to provision for SEND is mandated by law across education phases and support tiers.

Ireland's Early Childhood Care and Education (ECCE) sector serves children from age three, with growing state investment despite most provision being private or community based. The state funds up to two years of preschool for 3- to 4-year-olds,

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<sup>24</sup> United Nations Convention on the Rights of the Child available here: <https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf>

with subsidies for disadvantaged areas and a Universal Childcare Subsidy (2017), with additional support for low-income families up to age 15. Oversight is shared between the Department of Education and Youth and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY). The Action and Inclusion Model (AIM) supports children with disabilities through a seven-level framework, from universal inclusion practices to targeted support like specialist equipment, therapy, and extra staffing. It emphasises children's needs over diagnosis and prioritises mainstream inclusion. Coordination is managed by a Cross Sectoral Implementation Group. The integrated approach to provision for SEND is encouraged by law across education phases.

In Fribourg (Switzerland), there is a clear alignment with family-centred ECI frameworks through their emphasis on integrated services, family partnership, early intervention, and culturally responsive bilingual support. This positions the Canton as progressive in supporting young children with additional needs within their family and community contexts. The Canton provides integration of services via collaboration between early childhood education, healthcare, and social services, reflecting the holistic approach typical of family-centred ECI frameworks. Policy documents stress the importance of partnerships with families, recognising parents as central to the child's development and intervention process and encouraging early screening and intervention for developmental concerns, aiming to provide support in natural environments such as home and community settings, consistent with ECI principles. The integrated approach to provision for SEND is legislated across education phases, although framed more generally than in Scotland or Wales, for example, with reference to the use of the ICF.

Australia's national Early Childhood Intervention (ECI) framework is a state-funded framework primarily delivered through the National Disability Insurance Scheme (NDIS) and state initiatives. It supports children with developmental delays or disabilities from birth to school entry, focusing on holistic development across education, health, and social care. ECI adopts a family-centred, strengths-based approach, working closely with families to provide tailored supports such as speech and occupational therapies, assistive technologies, and family services. These are delivered in everyday environments like homes and childcare settings to promote natural learning. To support transitions into primary school, ECI providers collaborate with families and schools to create Individual Education Plans (IEPs) and ensure continuity of care. Planning meetings with schools helps align ECI services with educational supports. ECI operates across sectors, involving paediatricians, allied health professionals, and social care workers to deliver coordinated, multidisciplinary support. ECI is supported by national frameworks: the Early Years Learning Framework (EYLF), promoting inclusive, developmentally appropriate practices; the Disability Standards for Education 2005, ensuring equitable access to education; and the

National Quality Framework (NQF), establishing national standards for inclusive early childhood education and care. These policies ensure that children with additional needs receive comprehensive, integrated support from early years onward. However, there are differences between implementation within the jurisdictions in Australia. In VIC there have been significant investments toward early interventions that yield measurable outcomes, via co-design with service providers, ensuring that interventions are tailored to community needs and grounded in evidence-based practices. In NSW and QLD there are specific early years programmes (such as the ‘Brighter beginnings’ and ‘Stepping Stones Tripple P’) aiming to provide integrated services across health, education, and family support sectors, but they are either still in their early stages and/or do not seem to entail the same systemic integration driven by policy, as seen in Victoria. Cross-sector collaboration for SEND provision across education phases is explicitly promoted in Victoria and encouraged in New South Wales and Queensland.

In Flanders, Early Years provision is evolving. While policies so far have been relatively limited in relation to integration of services and alignment with a systematic, family-centred approach to ECI, there have been very recent policy developments which aim to restructure and strengthen provision by 2027. Until now the provision has been substantially fragmented, with the Flemish Ministry for Welfare, Public Health and Family being responsible for provisions for children aged 0 to 3 years (the childcare sector), and on the other hand the Flemish Ministry of Education and Training being responsible for children aged 2½ to 6 years (the education sector). The professionals who work in these systems, operate with different qualifications, working conditions and regulations, and have different opportunities for professionalisation. However, this is an evolving situation, with significant investments in early childhood in recent months (e.g. ‘1, 2, 3 Inclusie!’<sup>25</sup> aims to promote inclusivity in early years). Across other phases of education (from 2 and half years old), there are Pupil Guidance Centres which provide multi-disciplinary identification, assessment and referral, as mandated by law. Before this age milestone, support is considered within ‘Welfare’, with highly qualified health visitors supporting development and learning.

Northern Ireland’s policy framework for early childhood intervention (ECI) and cross-sector provision is relatively strong in principle, but it has only been partly implemented due to the dissolution of the Northern Ireland Assembly. Recent policy reports have highlighted underfunding (DoE, *A Fair Start*, 2021). Therefore, the situation is evolving and dependent on funding and approval of developed policies. New policies provide a well-structured and legally supported policy framework for ECI and cross-sector provision. It demonstrates a strong commitment to early identification, integration, and family-centred support, particularly in high-need communities. Cross-

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<sup>25</sup> <https://www.kindengezin.be/nl/thema/specifieke-ondersteuningsbehoefte>

sector collaboration across other phases of education is mandated by law regulating statutory provision for children with SEND.

In England, Early Childhood Intervention (ECI) is not a distinct, standalone policy but is embedded within broader frameworks for early years support, primarily within the Early Years Foundation Stage (EYFS) framework, which mostly provides ECEC and the SEND Code of Practice (2015), which regulates multi-agency work with health and social care guidelines. This integration within the EYFS and SEND systems means that early years provision is state supported but delivered through existing early years and health services rather than as an integrated system. SEND support is regulated as a cross-sector provision system, involving education, health and social care. However, processes and guidelines on how to achieve this are limited; for example, no cross-sector government working groups or teams have been established by law to support implementation.

Across jurisdictions, the main *processes* in place to ensure effective early interventions and multi- to transdisciplinary collaborations include: governmental cross-department working groups or specialist centres/teams that oversee the work of regional multi-agency teams, with expertise in all phases of education, disciplines and age groups; classification tools that provide common/standard language for describing everyday life needs of children, such as the ICF, linked to universal screening and/or early identification. Table 6 provides an overview of model of early years provision and extent of multi-agency work in each jurisdiction.

Table 6: Extent of comprehensive early years provision and sustained models of cross-sector collaboration

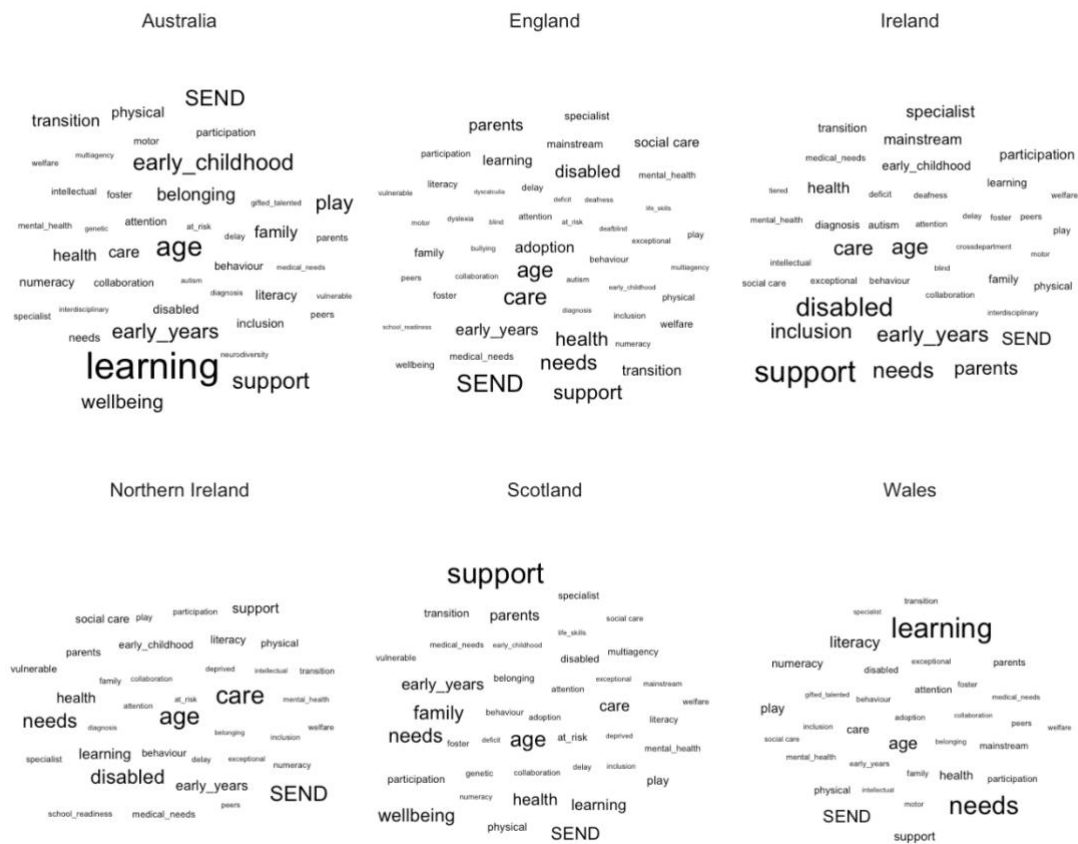
Jurisdiction	Alignment with a ECI Family-Centred Model	Cross-sector provision across education phases <sup>26</sup>
Scotland	<b>Strong:</b> The 'Getting It Right for Every Child' (GIRFEC) framework exemplifies a holistic, child-centred approach, emphasizing integrated services and early intervention.	<b>Inter-disciplinary to transdisciplinary</b>
Wales	<b>Strong:</b> comprehensive, state-funded framework delivered through integrated childcare, play-based learning, and nursery education, ensuring inclusive, child-centred support. Multi-agency collaboration across education, health, and social care is central.	<b>Inter-disciplinary to transdisciplinary</b>
Finland	<b>Strong:</b> Emphasises multi-professional teams in early childhood education and care (ECEC), integrating special education teachers to support individual needs.	<b>Inter-disciplinary to transdisciplinary</b>

<sup>26</sup> Note the definition of multi-, inter- and transdisciplinary provision provided in the section 'Indicators of Interest'.

Jurisdiction	Alignment with a ECI Family-Centred Model	Cross-sector provision across education phases <sup>26</sup>
Republic of Ireland	<b>Strong:</b> The Access and Inclusion Model (AIM) provides targeted supports, including expert advice and additional staffing, to ensure inclusive early years provision.	<b>Inter-disciplinary to transdisciplinary</b>
Fribourg (Switzerland)	<b>Strong:</b> clear alignment with family-centred ECI frameworks through their emphasis on integrated services, family partnership, early intervention, and culturally responsive bilingual support.	<b>Inter-disciplinary to transdisciplinary</b>
Victoria (Australia)	<b>Strong:</b> Adopts the Early Years Learning Framework (EYLF), emphasising a focus on belonging, and supports transitions through coordinated services.	<b>Inter-disciplinary to transdisciplinary</b>
New South Wales (Australia)	<b>Moderate:</b> Implements programs like Families NSW and Best Start, focusing on service coordination and early intervention, though with varying degrees of integration	<b>Multi-disciplinary to inter-disciplinary</b>
Queensland (Australia)		
Flanders (Belgium)	<b>Moderate:</b> Engages in initiatives to make ECEC inclusive, with efforts to embrace diversity and adapt practices to children's needs, in collaboration with family. Very recent changes implemented in Flanders in this area may bring this closer to a transdisciplinary approach when looking at current practice.	<b>Multi-disciplinary to inter-disciplinary</b>
England	<b>Moderate:</b> Multi-agency provision is considered as part of SEND support and statutory provision, but early years provision is not aligned with systemic ECI models.	<b>Multi-disciplinary to inter-disciplinary</b>
Northern Ireland	<b>Moderate:</b> Evolving situation with new policy frameworks which are well aligned with ECI principles but short of funding and workforce. Policies only partially approved.	<b>Multi-disciplinary to inter-disciplinary</b>

*Corpus* analysis of English-speaking countries' policies for early years provision based on frequency of words highlights differences in language aligned with the analysis above, where Ireland and Scotland (stronger on comprehensiveness of early years provision and aligned with a needs-based approach to SEND) adopting terms such as 'support', 'needs' and 'learning' more frequently than others in early years policies (Figure 4). Scotland also refers to 'family' and 'wellbeing' more frequently than others. 'Play' - a key word in early years provision, is more frequently mentioned in Scotland and Australia.

Figure 4. Concept cloud based on frequency of word in policies referring to early years provision





## Other specific programmes, modifications and policy arrangements for SEND, and Inclusion policy and/or guidance

### Key findings:

6. Most jurisdictions have additional policies/programmes with a focus on general promotion of wellbeing and mental health, and/or anti-bullying. Mental health seems to be a particular concern in new policies / strategic guidance for schools, especially in recent years, alongside SEND policies.

7. Specific policies for Inclusion are available in Wales, Australia and Ireland (for Early Years). Other jurisdictions, such as Scotland and Finland, provide inclusive guidance embedded in main legislative documents. Specific inclusion guidance is less clear in policies in England, Northern Ireland, Fribourg and Flanders.

Most jurisdictions have additional policies and/or programmes with a focus on promoting general wellbeing, anti-bullying, school climate or other elements considered important for positive and inclusive education. Table 7 below summarises some of those initiatives in each jurisdiction which are running in parallel to statutory SEND policy. Mental health promotion seems to be a key focus in all jurisdictions. Only Finland has implemented an anti-bullying programme country-wide (currently operating in c.900 schools, and evidence-based). Only Ireland and Australian states have Inclusion-specific policies.

Table 7. Policy initiatives/programmes identified alongside SEND policies

Jurisdiction	Other programmes modifications and policy arrangements for SEND	Focus on Inclusion
<b>England:</b> anti-bullying and mental health	<ul style="list-style-type: none"> <li>• DfE Guidance on Preventing and Tackling Bullying (2017): Provides non-statutory advice for schools.</li> <li>• Mental Health Support Teams (MHSTs): Rolled out nationally as part of the Transforming Children and Young People's Mental Health Provision green paper (DfE &amp; DHSC, 2017). MHSTs support pupils with mild to moderate mental health needs and work closely with schools.</li> </ul>	Not specific.
<b>Wales:</b> Mental health	<ul style="list-style-type: none"> <li>• The Welsh Government has developed a comprehensive Mental Health and Wellbeing Strategy 2024-2034, aiming to improve and protect the mental health of individuals across Wales. This strategy outlines a vision</li> </ul>	<ul style="list-style-type: none"> <li>• The Welsh Government's Inclusion and Pupil Support Guidance outlines the framework for developing inclusive practices within schools. Inclusion is defined as a process where schools, local authorities, and other</li> </ul>

	<p>for mental health services, emphasising a rights-based approach and the elimination of stigma and discrimination.</p> <ul style="list-style-type: none"> <li>• Healthy Child Wales Programme (School-Aged Children): Set for implementation from April 2024 to March 2026, this programme aims to provide a consistent, universal health service for school-aged children. It focuses on health promotion, early intervention, and safeguarding, ensuring that children's health and developmental needs are met throughout their school years.</li> </ul>	<p>stakeholders develop their cultures, policies, and practices to include all children and young people. This involves creating an inclusive curriculum and enhancing staff awareness of inclusive learning and equality issues. The guidance emphasises that inclusion extends beyond placing a child in a mainstream or special school; it requires a comprehensive approach to ensure all aspects of school life are accessible and equitable. The essential principles include developing an inclusive curriculum and improving staff awareness of inclusive learning and equality issues.</p>
<p><b>Scotland:</b> Anti-bullying, school climate, looked after children</p>	<ul style="list-style-type: none"> <li>• The Respect for All: The National Approach to Anti-Bullying for Scotland's Children and Young People is a comprehensive framework established by the Scottish Government to address bullying in all settings where children and young people are present.</li> <li>• The Scottish Government's publication, "Developing a Positive Whole-School Ethos and Culture: Relationships, Learning and Behaviour," released in June 2018, provides policy guidance aimed at fostering positive relationships and behaviour within Scottish schools. The guidance emphasises the importance of creating an inclusive and respectful school environment that promotes positive behaviour and effective learning. Schools are encouraged to develop and apply consistent policies that address behaviour and relationships, ensuring a cohesive approach across all educational settings.</li> <li>• There are regulations specifically to support looked after children, including the Children and Young people (Scotland) Act. This policy aligns itself with the UNCRC, placing the duty on ministers to always prioritise the best interest of children. It also provides regulations around corporate parenting and regulations for children's services. Additionally, the policies "The Promise" and "The Pinky Promise" provide a comprehensive approach to supporting looked after children</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusion policy highly embedded in SEND policy such as the GIRFEC National Practice Model 2022, which contains updated guidance, including: greater emphasis on child-centred practices, rights-respecting, strengths-based practice and the inclusion of children, young people and their families at every stage of the process; simpler language identified which can be used when working together with children, young people and families.</li> </ul>

<p><b>Northern Ireland:</b> Autism, Nurture Groups</p>	<ul style="list-style-type: none"> <li>• The Autism Strategy (2013-2028) is an updated comprehensive, cross-departmental initiative aimed at enhancing support for autistic individuals and their families.</li> <li>• Nurture Groups<sup>27</sup>, recently funded and established by the Department of Education.</li> </ul>	<ul style="list-style-type: none"> <li>• Not specific.</li> </ul>
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<sup>27</sup> A nurture group is a structured, short-term intervention within an educational setting designed to support children with social, emotional, and behavioural difficulties that may be hindering their learning. Nurture groups are typically organised by trained staff and take place in a dedicated space. They are intended to provide a safe, predictable environment where children can develop attachment, trust, language, and emotional regulation skills through modelled relationships and routines.

<p><b>Ireland:</b> Anti-bullying, children with disabilities, and early years specific initiatives for deprived communities</p>	<ul style="list-style-type: none"> <li>• Anti-Bullying Procedures for Primary and Post-Primary Schools (2013) from the Department for Education guides anti-bullying policies in schools where all recognised schools are required to have a written anti-bullying policy that aligns with these procedures and is publicly available. They also place strong emphasis on prevention, requiring schools to take proactive steps to foster a positive school climate, including curriculum-based interventions and awareness-raising activities.</li> <li>• The Wellbeing Policy Statement and Framework for Practice (2018–2023) sets out the Department of Education’s commitment to supporting the wellbeing of all children and young people in schools.</li> <li>• The Participation Framework: National Framework for Children and Young People’s Participation in Decision-making (2021) provides a structured approach to ensuring that children and young people in Ireland have a meaningful voice in decisions that affect their lives</li> <li>• Progressing Disability Services for Children and Young people (PDSCYP): a national programme aiming at ensuring equity in provision of services for all children with disabilities. The vision is to ensure this via one clear pathway, according to children’s needs and explicitly independent from diagnosis. Health services should be provided within education settings in collaboration with parents. A national working group guides and oversees the programme and 24 Local Implementation Groups, (LIG) representative of services and parents, consider how services can be reorganised to achieve improved structure in their area. For children with a disability, specifically, the DEY provides Early Intervention Classes (5 classes for children with ASD, with a 3:1 staff child ratio, including a teacher and qualified staff at level 3 minimum; 2 pre-schools for the children who are deaf with ratio 1:7, one teacher and qualified staff to minimum level 3); and a Home Tuition Scheme, an interim education provision only for children</li> </ul>	<ul style="list-style-type: none"> <li>• The IDG (Interdepartmental group) recommended the creation of an inclusion policy for early years to help promote level 1 universal support (an inclusive culture) (early childhood inter-departmental group report, 2015). Inclusion is here referred to as full ‘participation’ and based on children’s needs, rather than diagnoses. The IDG’s definition of the ‘inclusion’ guiding principle (point 2.3 of the ECIDG report 2015) refers to integration in mainstream, but the principle of equitability refers to equality of opportunity to access and participation by all children in the ECCE programme.</li> <li>• The AIM policy implementation is guided by an Inclusion Charter.</li> </ul>
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	<p>who don't have a placement, or for children from 2.5 years old who are too young to enter early intervention classes; and a network of visiting teachers for deaf and visually impaired children.</p>	
<p><b>Finland:</b> Equality, mental health and anti-bullying</p>	<ul style="list-style-type: none"> <li>• The equality plan</li> <li>• National Mental Health Strategy 2020–2030 (Ministry of Social Affairs and Health, 2020): Focuses on early intervention, universal mental health literacy, and school-based mental health services.</li> <li>• KiVa Koulu (KiVa School) Programme: A nationally implemented, evidence-based anti-bullying programme developed by the University of Turku. Includes universal prevention, targeted intervention, and monitoring tools. Widely adopted across Finnish schools and recognised internationally for its effectiveness.</li> </ul>	<p>Highly embedded the system's ethos and practice.</p>
<p><b>Australia:</b> educational outcomes, mental health and wellbeing</p>	<ul style="list-style-type: none"> <li>• The Alice Springs (Mparntwe) Education Declaration (signed in Dec 2019), sets out the national vision for education and the commitment of Australian Governments to improving educational outcomes. The Declaration places students at the centre of their education by emphasising the importance of meeting the individual needs of all learners, and outlines education's role in supporting the wellbeing, mental health and resilience of young people.</li> <li>• Be You is a universal mental health and wellbeing program for children that can be delivered in schools and early childhood learning services. It was established through the integration of a number of Australian Government funded programs, combining knowledge and expertise gained from these over the years. Be You provides a common framework with evidenced-based information, professional advice and support for educators. Be You is also delivering whole-of-team professional learning to more than 3,000 early childhood learning services, aiming to reach all 15,000 services eventually. Be You is being implemented in 70% of schools nationally.</li> </ul>	<p>Inclusive Education-specific policies:</p> <ul style="list-style-type: none"> <li>• In Queensland, The <i>Inclusive Education Policy</i> (2021) outlines the Department of Education's commitment to an inclusive state education system, ensuring all students can access and participate in learning.</li> <li>• Victoria's <i>Inclusive Education for Students with Disabilities</i> policy (updated in 2024) provides schools with resources and guidance to support the inclusion of students with disabilities.</li> <li>• In New South Wales the <i>Inclusive Education for Students with Disability</i> (updated in 2024) policy provides direction and guidance on supporting the inclusion of students with disabilities in NSW public schools.</li> </ul>

	<ul style="list-style-type: none"> <li>• The Student Wellbeing Hub is an online platform that aims to support Australian schools to promote student wellbeing, safety, and positive relationships. The Hub is underpinned by the Australian Student Wellbeing Framework (2018). The Hub provides high-quality, age-appropriate information and resources targeted specifically to educators, parents and students.</li> <li>• Australia's National Children's Mental Health and Wellbeing Strategy 2021 is a comprehensive, government-led framework aimed at promoting mental health and preventing mental illness among children aged 0-12. There was no national strategy before this one to guide action for supporting children's mental health and wellbeing. Part of the aim is to move beyond support that is framed by pathology and move to a needs-based proactive system.</li> </ul>	
<b>Flanders</b>	<ul style="list-style-type: none"> <li>• In 24/25, an anti-bullying campaign called 'Kies Kleur tegen Pesten' previously introduced as a one-week school-wide event was turned into a Year-Long Campaign.</li> </ul> <p>The government-funded CLB-chat is a low-threshold digital service provided by the Pupil Guidance Centres (Centrum voor Leerlingenbegeleiding, or CLB) to support pupils or families confidentially and accessibly. It allows children and young people or families to contact CLB staff online regarding learning, wellbeing, health, and study choices</p>	Not specific.
<b>Fribourg</b>	<ul style="list-style-type: none"> <li>• The Programme Fribourgeois de prévention du harcèlement scolaire (Fribourg Cantonal Anti-Bullying Programme) was introduced in 2023. As part of the 2023–2024 school year, the Direction de la formation et des affaires culturelles (DFAC) launched a comprehensive "toolbox" aimed at combating bullying and intimidation within schools. This initiative includes peer mediation opportunities, informational evenings for parents, and training sessions for educational staff.</li> </ul>	Highly embedded in country's policy for SEND.

## Workforce training

### Key findings:

8. Teacher training: most jurisdictions analysed have policy frameworks outlining professional standards and requirements for primary and post-primary teaching. However, none require a specialisation in teaching children with SEND. Instead, specialisation is typically offered through optional postgraduate studies. Fribourg stands out as the only jurisdiction that explicitly integrates a multi-agency approach, spanning education, health, and social care, in its training for special and inclusive education.

9. CPD (Continuous Professional Development): jurisdictions differ in relation to: a) the extent to which CPD is mandatory and b) the extent to which the CPD offer is embedded in everyday practice or mostly consisting of courses and workshops. Based on these main differences, countries group into four main models: i) those with mandatory CPD and highly embedded in everyday practice with flexible and wide range of initiatives – Wales, Scotland, Flanders and New South Wales; ii) those with non-mandatory CPD but where this is highly encouraged and embedded in the teaching culture, with broad and flexible offer – Ireland and Finland; iii) those where CPD is non-mandatory (although accountability practices will require evidence of engagement) and mostly non-embedded – England and Northern Ireland; and iv) those where CPD is mandatory and mostly non-embedded – Queensland, Victoria and Fribourg.

Table 8 provides an overview of the pre-service, in-service and continuous professional development (CPD) offer for teachers working in SEND across jurisdictions.

Regarding pre-service training, most jurisdictions analysed have policy frameworks outlining professional standards and requirements for primary and post-primary teaching. However, none mandate a specialisation in teaching children with SEND. Instead, specialisation is typically offered through optional postgraduate studies. Fribourg stands out as the only jurisdiction that explicitly integrates a multidisciplinary approach, spanning education, health, and social care, in its training for special and inclusive education.

Approaches to CPD vary, particularly around whether participation is mandatory and whether CPD is embedded in daily practice or delivered through traditional courses and workshops. In Wales and Scotland, CPD is compulsory but designed to be flexible, reflective, and closely integrated with everyday practice. Flanders also mandates CPD

and embeds it into practice, though both pre-service and in-service training reflect a view of SEND aligned with a definition that is closer to a medical model than other jurisdictions (although not completely reliant on diagnoses and with growing policy efforts to address functioning needs and abilities).

Ireland and Finland offer flexible, embedded CPD models, but participation is not compulsory. Instead, CPD is strongly encouraged through various initiatives that foster a positive professional development culture.

In Australia, CPD policy varies by state. New South Wales (NSW) has a mandatory model that encourages embedded, context-specific professional learning, similar to Wales and Scotland. In contrast, Queensland (QLD), Victoria (VIC), England, Northern Ireland, and Fribourg require only minimum CPD engagement, relying more on external courses and workshops. QLD's framework explicitly states that CPD must occur outside of daily teaching practice. Figure 5 provides a conceptual interpretation of models of CPD based on the policies analysed for all jurisdictions.



Figure 5. Cross-country comparison of CPD based on a) the extent to which CPD is embedded in everyday practice and b) whether CPD is mandatory/there is a minimum requirement.

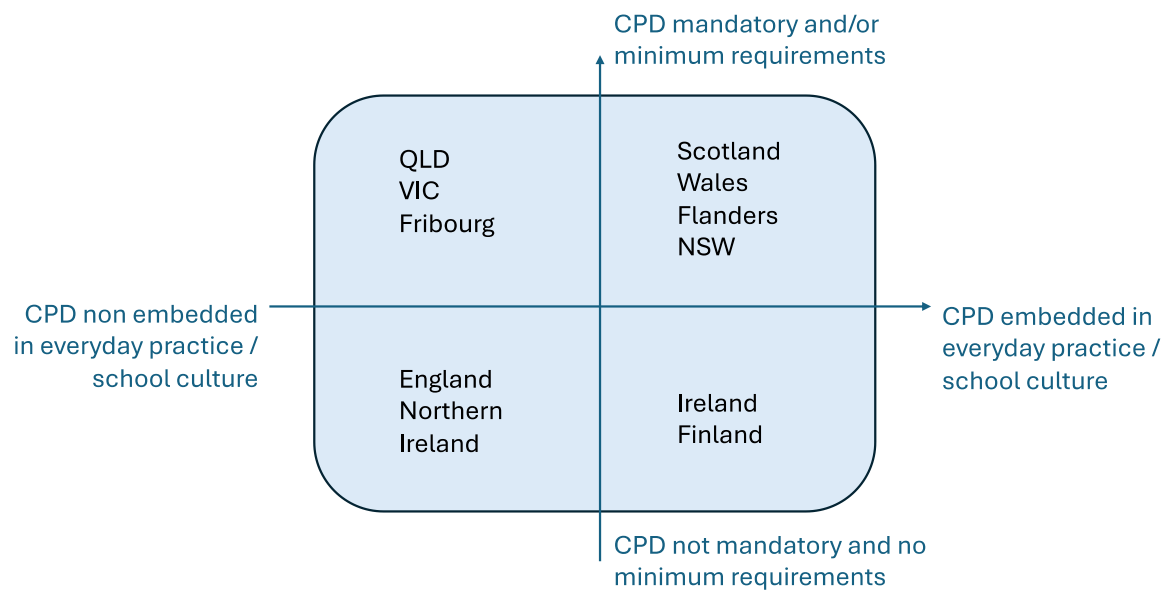


Table 8. Workforce training requirements for working in SEND and CPD models

Jurisdiction	Pre-service requirements	In-service and CPD
England	<p>Prospective teachers are required to apply for Qualified Teacher Status (QTS) via a Postgraduate Certificate in Education (PGCE), via Assessment Only route (for experienced teachers without QTS), or via Undergraduate QTS route (e.g. BEd or BA/BSc with QTS), or via school-based Initial Teacher Training (SCITT). These should meet the Teachers' Standards (DfE, 2011) and align with the Initial Teacher Training (ITT) Core Content Framework (DfE, 2019), which sets out minimum entitlement for trainee teachers. Trainees must also meet literacy and numeracy competencies and pass safeguarding checks.</p> <p>National Award for SEN Coordination (NASENCO) is a mandatory postgraduate qualification for newly appointed SENCOs (Special Educational Needs Coordinators) in maintained schools (must be completed within 3 years of appointment) (DfE, 2015).</p> <p>A PGCert, PGDip, or Master's in SEND/Inclusion is optional for teachers looking to specialise further.</p> <p>Special schools may require or prefer additional qualifications or significant experience with SEND.</p>	<p>There is no statutory minimum number of CPD hours nationally, but:</p> <ul style="list-style-type: none"> <li>Schools are expected to provide regular CPD as part of staff development (refer to Teachers' Standards, Part 2).</li> <li>Ofsted inspects the effectiveness of professional development during school inspections.</li> </ul> <p>CPD delivery is often <b>course- and workshop-based</b>, especially through:</p> <ul style="list-style-type: none"> <li>National Professional Qualifications (NPQs).</li> <li>School-led or MAT-organised training.</li> <li>Specialist providers (e.g. National Association for Special Educational Needs).</li> </ul> <p>Any embedded CPD Practices will vary significantly between schools. The <b>Early Career Framework (ECF, 2021)</b> mandates a 2-year CPD induction for new teachers, with funded training and mentoring.</p>
Northern Ireland	<p>Prospective teachers required to complete ITT (initial teacher training) which includes foundational knowledge on SEND. Maths and English GCSEs are required. SEND related subjects are not specified.</p> <p>Specific and additional training for SENCOs (Special Educational Needs Coordinators) is required, but no mandatory training is required for mainstream teachers.</p> <p>Both qualifications include practical elements.</p>	<p>The Education Authority (EA) in Northern Ireland offers a Training Hub that provides <b>Continuous Professional Development (CPD) opportunities for teachers and classroom assistants</b>. This platform offers a range of <b>courses</b> and <b>resources</b> designed to enhance the skills and knowledge of educational staff, including areas pertinent to SEND.</p> <p>The Special Educational Needs Capacity Building Programme is designed to train teachers and staff in inclusive education practices via <b>workshops, collaborative learning communities,</b></p>

		<p>resource provision, and initiatives to promote parental and community engagement.</p> <p><b>CPD is non-mandatory</b> but strongly encouraged in professional expectations set out by the Department of Education and the General Teaching Council for Northern Ireland (GTCNI).</p>
Wales	<p>Those aspiring to become teachers must obtain <b>Qualified Teacher Status (QTS)</b>, which is typically achieved through completing an <b>Initial Teacher Education (ITE)</b> programme. The most common route is the <b>Postgraduate Certificate in Education (PGCE)</b>, a postgraduate qualification that combines academic study with practical teaching experience.</p> <p>PGCE programmes in Wales are structured to align with the <b>Professional Standards for Teaching and Leadership</b>.</p> <p>There is <b>no statutory requirement</b> for teachers to hold a specific qualification to work in Additional Learning Needs (ALN) provision.</p>	<p>For in-service teachers, <b>Continuing Professional Development (CPD)</b> is a statutory requirement in Wales. The Welsh Government has implemented a <b>National Approach to Professional Learning</b>, which emphasises the importance of ongoing professional development to support the implementation of educational reforms such as the <b>Curriculum for Wales</b>.</p> <p>Furthermore, teachers engage in an annual <b>Professional Development Review (PDR)</b> process, which involves self-reflection, setting professional learning objectives, and aligning individual goals with school improvement plans.</p> <p>CPD is increasingly becoming <b>embedded in everyday practice</b>, though traditional courses and workshops still play a role. The Welsh Government has promoted a more <b>reflective, collaborative, and school-embedded model of professional learning</b> as part of its national reforms via the National Approach to Professional Learning (NAPL).</p>
Scotland	<p>Prospective teachers are required to complete a PGDE (Post-Graduate Diploma of Education) and register with the General Teaching Council for Scotland (GTCS), although a 4-year graduate degree is also a possible route into teaching (BA Ed or MA Education), particularly for those teaching primary.</p> <p>Those wanting a specialist qualification in ASN (additional support needs) are required to: hold a registration with GTCS, and complete an appropriate ASN award equivalent to a</p>	<p>In-service teachers in Scotland are <b>required</b> to engage in ongoing professional development to maintain their GTCS registration (minimum 35 hours annually).</p> <p>In addition, there is a requirement to go through a professional update via CPD, annual Professional Review and Development (PRD), maintain a log of professional learning activities.</p>

	<p>minimum of 60 Scottish Credit and Qualifications Framework (SCQF) credit points, at SCQF level 9<sup>28</sup> or above and including courses or modules with sufficiently broad and general content to cover pupils with a range of additional support needs, such as the Postgraduate Certificate/Diploma in Inclusive Practice.</p>	<p>While traditional CPD formats like workshops and courses do exist, the <b>core emphasis is on sustained, embedded professional learning</b> tied closely to a teacher's practice, school context, and personal development goals.</p>
<b>Finland</b>	<p>To become a class teacher (primary), individuals must complete a <b>master's degree in education</b> (typically 5 years), including <b>pedagogical studies, subject studies, and teaching practice</b>.</p> <p>Subject teachers (secondary) must complete a master's degree in their subject (e.g. Physics) plus a 60 ECTS teacher education programme in pedagogy (The Subject Teacher Education Programme), typically through a university's teacher education faculty.</p> <p>Admission to teacher education is competitive, with candidates undergoing academic tests and interviews to assess teaching aptitude.</p> <p>An additional one-year qualification is available for those who want to specialise in teaching children with SEND, including individualised support, inclusive pedagogies, disability studies, collaboration with multidisciplinary teams.</p> <p>Some universities also offer a 'SEN teacher education track' which is a 5-year program with special education as the major subject or programs offering a double-qualification as a primary school teacher (i.e. class teacher) and SEN teacher.</p>	<p>There is <b>no statutory obligation</b> for CPD in Finland, but it is <b>strongly encouraged and professionally expected (contractually obligated) to participate in CPD every year</b>. The number of required days ranges from 1 to 5 is related to the type of educational organisation one works at (e.g., in schools a teacher must spend 3 days in development and learning activities during a school year). CPD is <b>embedded in the culture</b> of lifelong learning and professional responsibility.</p> <p>To sustain this embeddedness, CPD is locally driven, often via partnerships with universities, and it includes, in addition to specific workshops and courses, <b>collegial collaboration, self-directed learning, pedagogical innovation, lesson study and peer mentoring and professional learning communities</b>.</p>

<sup>28</sup> Level 9 is equivalent, in Scotland, to a Bachelor's degree (without Honours), a Graduate Diploma, or to a professional development award or advanced diploma qualification.

<p><b>Ireland</b></p>	<p>Prospective teachers are required to: complete a 4-year BEd degree or an undergraduate degree followed by a Professional Masters of Education (PME). For post-primary teachers the undergraduate degree should be in the relevant subject area.</p> <p>Those wanting to specialise in SEN should obtain a Postgraduate Diploma in Special Educational Needs. The DEY funds some postgraduate master's level programmes for eligible teachers in primary and post-primary schools.</p> <p>In the Early Years, the (LiNC) Leadership for INClusion in the Early Years programme is a free course for people working within Early Learning and Care settings designed to support the inclusion of all children in the early years. Graduates of the LINC Programme will be qualified to perform the role of Inclusion Coordinator within their Early Learning and Care Setting and will also be recognised for Lead Educator Status under the DCEDIY Qualification Guidelines.</p>	<p>While CPD is not legally mandated for all teachers, it is strongly encouraged and supported by various initiatives through two statutory organisations:</p> <ul style="list-style-type: none"> <li>• <b>OIDE:</b> support service for teachers and school leaders, funded by the Department of Education, formed from the integration of four support services and launched on September 1, 2023. These support services are the <a href="#">Centre for School Leadership (CSL)</a>, <a href="#">Junior Cycle for Teachers (JCT)</a>, the <a href="#">National Induction Programme for Teachers (NIPT)</a> and the <a href="#">Professional Development Service for Teachers (PDST)</a>.</li> <li>• <b>National Council for Special Education (NCSE):</b> Offers a comprehensive support service for teachers, focusing on SEN, and delivered through in-school visits, whole staff workshops, webinars, in-person seminars, communities of practice. It also develops resources, materials and guidelines to support practice.</li> <li>• <b>National Educational Psychological Service (NEPS):</b> Provides direct educational psychological support to primary, post-primary and special schools in Ireland via consultation and assistance with implementing, monitoring and reviewing support.</li> </ul> <p>CPD is therefore <b>embedded, non-mandatory</b>. The <b>Teaching Council</b> promotes a culture of continuous professional learning, encouraging teachers to engage in CPD activities that enhance their practice and support student learning, including courses and workshops but also <b>school-based initiatives</b>, such as peer collaboration, reflective practice, and participation in professional learning communities.</p>
<p><b>Australia (NSW)</b></p>	<p>Prospective teachers must complete an accredited Initial Teacher Education (ITE) program, such as a four-year Bachelor of Education or a two-year postgraduate Master of Teaching, and register with the NSW Education Standards Authority (NESA).</p>	<p>There is requirement for teachers to complete 100 hours of CPD over a 5-year cycle to maintain accreditation. This includes courses and workshops and some school-based learning. CPD explicitly excludes participation in routine staff, planning and preparation meetings.</p>

	<p>Additional studies are needed to specialise in special and inclusive education. The NSW Department of Education offers roles for special education teachers in various settings, with a teacher education scholarships. The Inclusive Practice in Education Scholarship is also available to current teachers wanting to specialise. Financial support leads to guaranteed permanent employment in a state school, according to location preference.</p>	<p>In 2024, changes to CPD were announced allegedly giving teachers much broader scope in meeting their professional development requirements, which are no longer limited to a specific set of courses and workshops, but provide a wider range of activities, according to the NESA professional development framework. These include ongoing, context-specific, evidence-based and collaborative initiatives such as action learning, coaching and mentoring, professional learning communities, courses, further study, research, among others. The shift seems to change CPD towards <b>a more embedded experience</b>.</p>
<b>Australia (QLD)</b>	<p>Prospective teachers should obtain a Bachelor of Education, or a relevant undergraduate degree followed by a postgraduate teaching qualification (e.g., Master of Teaching) and register with the Queensland College of Teachers (QCT).</p> <p>For those wanting to specialise in SEND, a Bachelor of Education with a special education major or a postgraduate qualification in special education should be completed, with registration with QCT.</p>	<p>Fully registered teachers must engage in annual CPD activities aligned with the Australian Professional Standards for Teachers.</p> <p>CPD encompasses workshops, webinars, and school-based initiatives.</p> <p>The CPD framework values academic study. Examples of activities suggested in policy are: courses and workshops, conferences, participation in pilots or trials, leading school-based policy or curriculum development, practitioner enquiry, action research, work shadowing, among others.</p> <p>Although the range of activities is broad, they seem to be required to <b>not be embedded</b> in everyday life practice.</p>
<b>Australia (VIC)</b>	<p>Prospective teachers must complete a four-year Bachelor of Education, a double degree including an education component, or an undergraduate degree followed by a two-year Master of Teaching. Registration with the Victorian Institute of Teaching (VIT) is mandatory.</p> <p>Qualified teachers can undertake additional postgraduate studies in special education to work in specialist settings and register with VIT.</p>	<p>Teachers must undertake 20 days of professional practice within the registration period.</p> <p>CPD is integrated into performance and development cycles, including goal setting and reflective practice. Any activities that teachers engage in that develop their professional knowledge and practice to support student learning and that are relevant to their teaching context can be counted as professional learning. The VIT expects that all professional learning activities used as evidence to be formal and/or informal learning experiences</p>

aimed at improving the teacher's knowledge, practice and competencies. These may include seminars, conferences, workshops and online learning, professional development days and action research projects within the workplace, short courses, multi-session professional learning and post-graduate study research participation, professional reading, collegiate meetings and professional conversations focused on improving practice and outcomes for learners, research and participation in education-related boards, committees or panels.

Whilst the breath of activities is extensive, **the extent to which these are embedded in everyday practice may vary** and they may not be embedded at all.

## Flanders

Since September 2019, teacher education in Flanders is offered exclusively by higher education institutions and includes six distinct programs tailored to different educational levels and subjects:

- Educational Bachelor's Programs:
  - Pre-school Education
  - Primary Education
  - Lower Secondary Education
- Educational Master's Programs:
  - Higher Secondary Education
  - Art Subjects
- Educational Graduate Program:
  - Secondary Education for Vocational Education and Training (VET) subjects

In Flanders, because of the way in which SEND is defined, teachers aiming to specialise in SEND typically pursue additional qualifications or training focused on the type of special need they wish to become experts on. For instance, Type 3 special needs secondary education is tailored for students with behavioural or emotional challenges and includes individualized curricula.

In Flanders, CPD is considered **a professional responsibility rather than a legal obligation**. Schools have the autonomy to develop their own in-service training plans, which are typically approved by local committees.

CPD activities encompass a range of formats, including:

- **Workshops and Seminars:** Organised sessions focusing on specific educational topics.
- **School-Based Initiatives:** Collaborative projects and peer learning opportunities within schools.
- **Professional Learning Communities:** Groups of educators engaging in continuous learning and reflective practices.

Furthermore, Flanders has implemented a **compulsory induction system for newly qualified teachers** to support their transition into the profession and reduce early career attrition.

There is funding available for CPD from the Government, from pedagogical counselling services and via other grants. There is also a new professional development centre to support schools in implementing evidence-based practice.

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While there is not a singular mandatory qualification for SEND specialisation, teachers often engage in professional development courses or advanced studies in special education to effectively support students with diverse needs.

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#### Fribourg (Switzerland)

Prospective primary school teachers enrol in a Bachelor's program offered by HEP I PH FR – The University of Teacher Education. This program emphasises both theoretical knowledge and practical experience, with approximately 25% of the curriculum dedicated to supervised teaching internships. The program is bilingual, in both French and German.

For teaching at the lower secondary level, candidates pursue a Bachelor's degree in their chosen subject(s) followed by a Master's program in Secondary Education at the University of Fribourg. This pathway leads to the "Diplôme d'Enseignement pour le Degré Secondaire I" (DEDS I) or "Lehrdiplom für die Sekundarstufe I" (LDS I), both recognized by the Swiss Conference of Cantonal Ministers of Education (CDIP/EDK), qualifying graduates to teach across Switzerland.

For those wanting to specialise in SEND, the University of Fribourg offers a unique Bachelor's program in Special Education, combining academic study with professional training. The curriculum covers topics such as intellectual disabilities and socio-emotional developmental needs, integrating knowledge from various disciplines: education, sociology, psychology, medicine, and law. Students engage in internships from the first year, fostering a reflective connection between theory and practice.

Building upon the Bachelor's program, the Masters' in Special Education at the University of Fribourg deepens research and broadens knowledge skills in the field. The program addresses themes like diversity, disability, and the creation of supportive

In Switzerland, including the canton of Fribourg, CPD is mandated at cantonal level. Teachers are required to engage in CPD activities, which can include workshops, seminars, but also school-based initiatives, and are often funded by cantonal or communal authorities. **CPD typically occurs outside of everyday practice**, but it can also be integrated into the school setting.



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learning environments. An optional specialisation in Speech-Language Therapy is available for candidates with a background in that area.

From summer 2025 there will be a new faculty established brings together three departments active in training and research in the field of education and training. This faculty will cover training for primary school teachers, lower secondary, and special education (i.e., specialist teachers , special education teachers and speech therapists).

While the findings above are descriptive and not meant to classify countries according to best practice, results from *corpus* analysis of English-speaking countries may support positioning in relation to what may be more sustained models of training and CPD. Specifically, sentiment analysis of country policies examined in relation to teacher training and CPD show that Ireland presents statistically significantly most positive sentiment (Figure 6) and highest trust-related sentiment (Figure 7), although all jurisdictions have high values of positive and trust-related language. This may reinforce the view that non-mandatory, but highly embedded CPD may be linked to promoting a culture of trust. These findings will be triangulated with additional sources of data to strengthen the evidence-base.

Figure 6. Sentiment analysis of policy documents for workforce training – ‘positive’ labelled terms

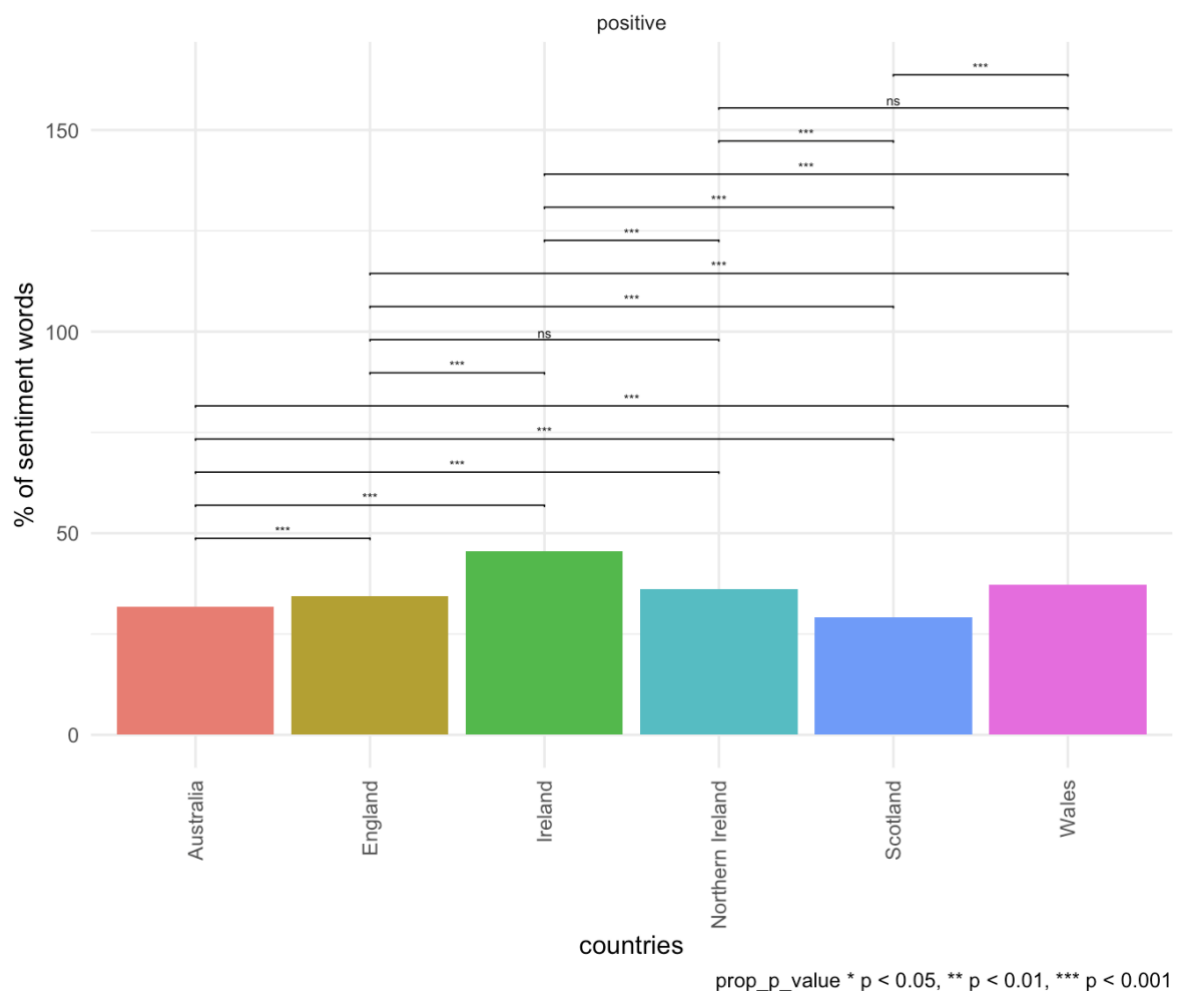
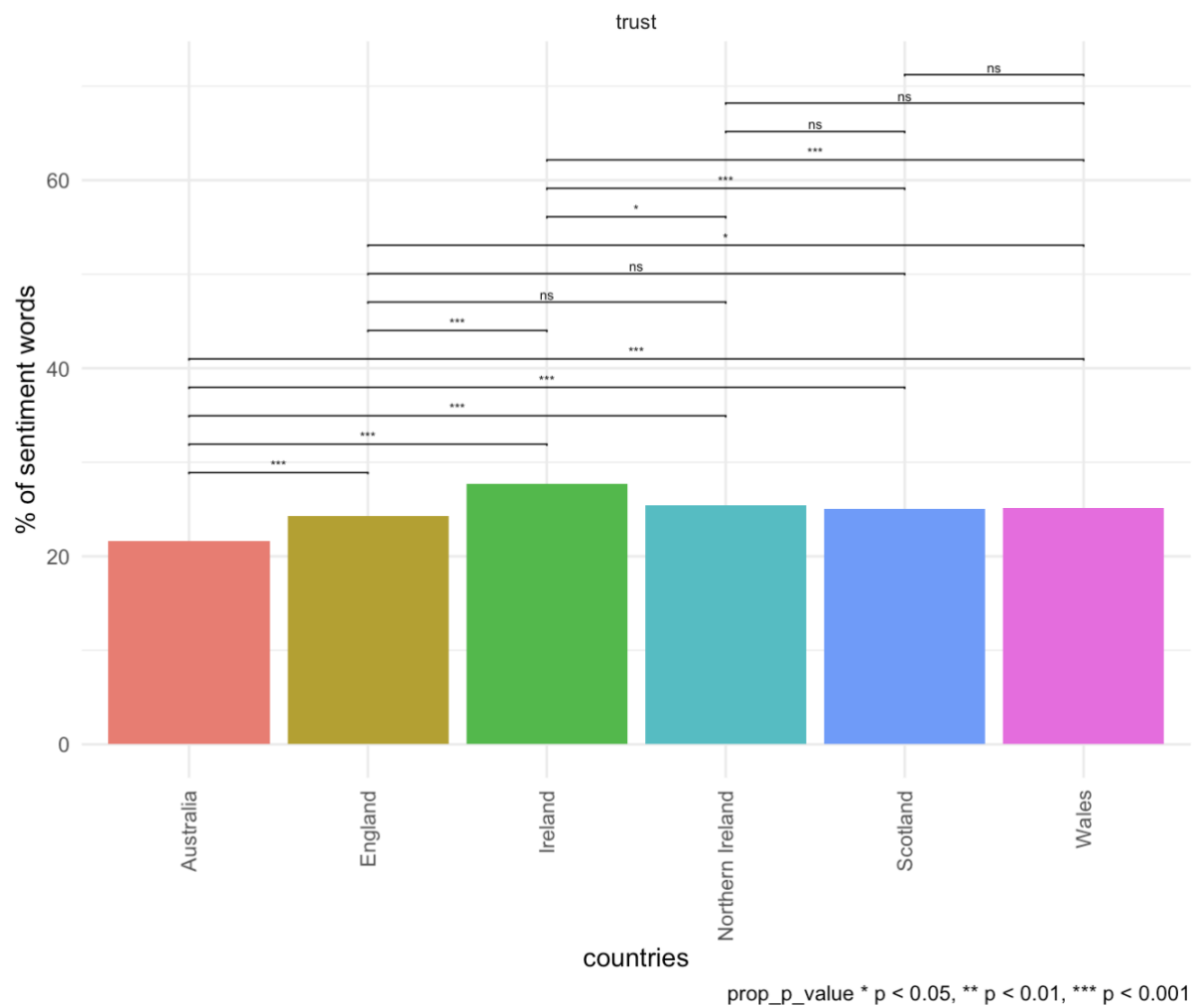


Figure 7. Sentiment analysis of policy documents for workforce training – ‘Trust’ labelled terms



## How do the 4 UK nations, Ireland, Australia, Flanders, Fribourg and Finland compare in terms of stakeholders' perceptions of the success of their SEND system, across indicators?

### Key findings:

10. Existing evidence on how stakeholders perceive SEND policy implementation across jurisdictions shows common views in relation to:

- a) the challenges of navigating the SEND system, including excessive bureaucracy, and unhelpful emphasis on requirements for traditional diagnosis, leading to inequalities in all jurisdictions, except Finland.
- b) a lack of appropriate training and preparedness in the workforce, except in Finland, where in-school training and mentorship is received positively.
- c) reductionist views of inclusion in policy and leadership, leading to mistrust in mainstream provision, across all jurisdictions, including Finland; however, co-teaching models are seen as mitigating these challenges in Finland.
- d) challenges in establishing effective channels of communication between parents and schools, for a sustained relationship – across jurisdictions. Peer relationships were seen as key by both parents and practitioners to support children with SEND.

11. Finland stands out as the jurisdiction where more frequent positive views of SEND implementation were gathered among service users (i.e., practitioners, children and young people and their families). Amongst English speaking countries, Scotland stands out as the jurisdiction where more positive views were identified. However, there is lack of evidence of stakeholder perspectives specific to individual UK nations and evidence from Flanders and Switzerland, especially, is harder to reach. Moreover, negative views are more frequently reported, therefore additional research looking specifically for good practice and in local languages is needed.

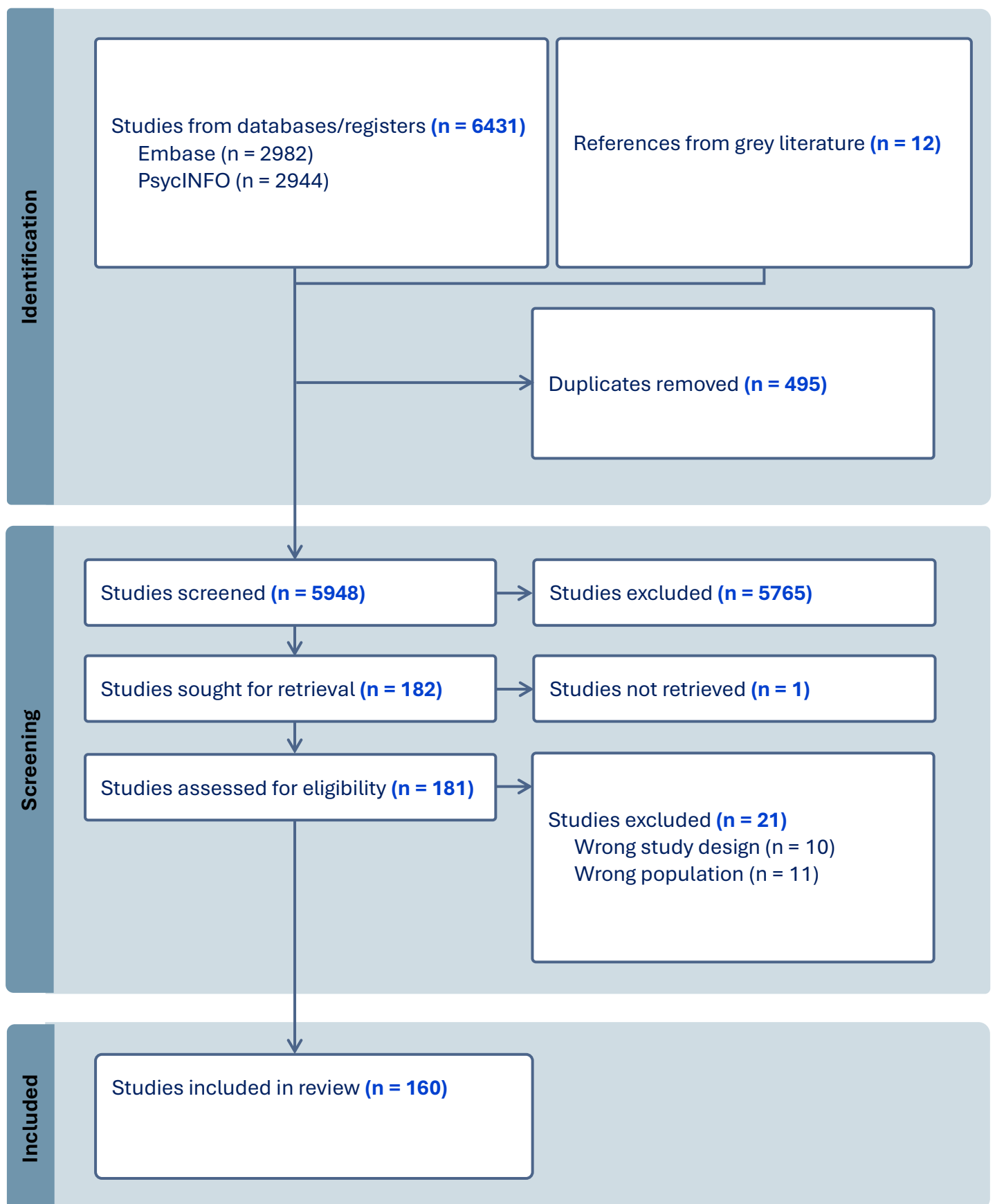
This strand of the project explored how policies and provision services for children and young people with SEND are perceived by their users (e.g., practitioners, caregivers and children/young people) in six countries: the UK, Republic of Ireland, Switzerland, Belgium (Flanders), Finland, and Australia. Such a comparison will enable an examination of good practice and enablers as well as common barriers across these different countries, thus highlighting what may or may not work for different people with lived experience of the systems. This work will inform further policy and provision

service development as well as future interview schedules planned for the overall project.

To answer our research question, a rapid qualitative evidence review was conducted (Booth et al., 2024), in order to conduct a streamlined and time-limited evidence review, with a framework synthesis (Dixon-Woods, 2011). This rapid review followed the Preferred Reporting Items for Systematic Reviews and Meta-Analysis (PRISMA) statement when selecting relevant articles.

Search results were saved within each database and imported into Rayyan software for screening. Two reviewers independently screened titles and abstracts, assessing them against the inclusion criteria. Full texts of potentially relevant studies were then retrieved for further eligibility screening. Figure 8 presents the PRISMA flow diagram.

Figure 8. PRISMA Flow Diagram



The initial search identified 6,431 articles, which, after deduplication, resulted in 5,948 records for title and abstract screening. A total of 181 full-text articles were screened for eligibility, of which 160 studies met the inclusion criteria and were included in the synthesis (see Appendix C for study characteristics). A range of participants reporting on different areas of SEND were represented. Participants were from a range of school types (mainstream, specialist, alternative provision) and education stage (early years, primary and secondary). Study sample sizes ranged from 2 to 1918. Most studies (n = 104) reported on qualitative interview findings and surveys while 42 used mixed methods and 14 studies used other techniques such as observations or narratives. The majority of studies reported on data from stakeholders in England (n = 52), UK General (n = 29) Republic of Ireland (n = 21) with few studies identified for Belgium (n = 2), Wales (n = 2) and Northern Ireland (n = 2) and none reporting on data from Switzerland.

Overall, there were four overarching themes that cut across the different indicators, jurisdictions, and participant types. These themes were (1) ‘navigating the SEND system’, (2) ‘practitioner training and professional development’, (3) ‘inclusive practices and coordination of SEND support’, and (4) ‘relationships and communication’. Each of these themes will be discussed in terms of enablers and barriers to SEND provision and how findings under each theme support the a priori indicators. Where jurisdictions are not described, this indicates data from these countries did not fit the themes or were non-existent. A clear lack of evidence from Switzerland was observed, highlighting the need for primary data collection in Fribourg, to meet the goals of this research.

‘[Navigating the SEND system](#)’ was reported as complex, bureaucratic, and reactive rather than proactive, across jurisdictions. Systems often placed an undue burden on parents and caregivers, reinforcing inequality in access and quality of support. While barriers were consistent globally, the way these challenges manifested and were addressed varied by country.

### **Evidence from Australia:**

- Australian parents described significant challenges due to excessive bureaucracy and rigid systems that failed to adapt to their children’s individual needs (Cumming et al., 2020; Green et al., 2018; Smith et al., 2023; Sun et al., 2024; Tait & Hussain, 2017; Trew, 2024; Tso & Strnadová, 2017).
- Rural families were disproportionately affected due to limited access to specialist services (Tait & Hussain, 2017)
- Socio-economic status-related disparities were evident (Dettman et al., 2022; Sun et al., 2024), with families often feeling compelled to pay for private assessments to access support, highlighting systemic reliance on formal

diagnoses, despite policies stating otherwise (Green et al., 2018; Reupert et al., 2015).

### **Evidence from England and UK (General):**

- Caregivers commonly encountered a “one-size-fits-all” approach, where schools often required formal diagnoses to initiate support, even though, in theory, diagnosis should not be a prerequisite (Burrell et al., 2017; Hassen et al., 2022; Kiernan et al., 2019; Lithari, 2023; O’Hagan et al., 2024).
- Many families felt forced to seek costly private assessments to obtain appropriate interventions early on, exacerbating inequality for lower-income families (Burrell et al., 2017; Hassen et al., 2022; O’Hagan et al., 2024; Lithari, 2023; Potter, 2016).
- Similar to Australia, access to services varied significantly by region, with rural areas experiencing the greatest difficulties (Potter, 2016; Preece, & Lessner Lištiaková, 2021; Ross, 2019).
- SEND support often depended on parents’ persistence and advocacy, creating uneven experiences across families (Martin-Denham, 2022; O’Hagan et al., 2024).

### **Evidence from Finland:**

- Finland stood out as an exception—there was no strong indication of families needing private assessments to secure school support. This suggests a more inclusive and proactive approach to SEND, with fewer socio-economic-related barriers.
- Finnish practitioners supported prioritising individual needs over formal labels, aided by stronger systemic mechanisms such as co-teaching and Response to Intervention<sup>29</sup> frameworks (Alila et al., 2016).
- Caregivers in Finland faced fewer navigation challenges, likely due to a more integrated system and strong communication between families and schools (e.g., Salovita et al., 2017).

### **Evidence from Belgium (Flanders):**

- Belgian studies echoed concerns from other jurisdictions about the over-reliance on caregiver navigation and advocacy to access support. Families with fewer resources or knowledge about the system struggled more to secure help (De Meulder & Murray, 2024; De Schauwer et al., 2023).
- The complexity and formality of the system created barriers to timely and equitable support (De Meulder & Murray, 2024; De Schauwer et al., 2023).

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<sup>29</sup> Response to Intervention (RtI) is a multi-tiered framework that provides early, systematic support to students struggling with learning or behaviour through increasingly intensive levels of intervention.



## Common Themes Across Jurisdictions

- **Burden on families:** In all countries except Finland, families were often left to drive the process, with uneven caregiver involvement leading to inequitable outcomes (Alila et al., 2016; De Meulder & Murray, 2024; De Schauwer et al., 2023; McNerney et al., 2015; Hassen et al., 2022; O'Hagan et al., 2024; Tait & Hussain, 2017). This often reinforced parents' beliefs that getting a diagnosis sooner would lead to better outcomes.
- **Link to diagnosis:** Despite policies claiming otherwise, support was frequently tied to formal diagnoses, pushing families to seek private assessments (Carter et al., 2022; De Schauwer et al., 2023; ; Kendall, 2019; Lithari, 2023; Martin-Denham, 2022; Nwoko, 2022).
- **Geographic and socio-economic disparities:** These were particularly problematic in Australia and the UK, where rural areas and lower-income families faced systemic disadvantages (Green et al., 2018; Kendall, 2019; Potter; 2016; Preece, & Lessner Lištiaková, 2021; Reupert et al., 2015; Ross, 2019). No Belgian paper discussed this.
- **Facilitators of success:** Positive school-family relationships, open communication, and acknowledgement of family challenges were critical enablers of effective SEND support (Cumming et al., 2020; Dettman et al., 2024; Reupert et al., 2015).
- **Professional Perspective:** Practitioners in all countries advocated for needs-based, tailored approaches and highlighted the potential of RTI models—though implementation success depended heavily on educator expertise (Cumming et al., 2020; Sulek et al., 2021). However, no Belgian paper discussed this.

'Practitioner training and professional development' emerged as a central theme across 62 of 160 studies, with widespread evidence of insufficient teacher knowledge of SEND and delivery of provision due to gaps in initial teacher education and limited ongoing professional development. This affected both the quality and consistency of support for students and parental confidence in educational systems in Ireland (Barry et al., 2024; Moore Ramirez & Lynch, 2024), Australia (Beasy et al., 2020; Cumming et al., 2020; Devi & Ganguly, 2024; Mergler et al., 2016; McFadden et al., 2017; Nwoko et al., 2022; O'Leary et al., 2019; Opie et al., 2017; Reupert et al., 2015; Stevens & Wurf, 2020; Sun et al., 2024; Tait & Hussain, 2017; Trew, 2024) and England (Childs-Fegredo et al., 2021; Dimitrellou & Dawn, 2020; Gray et al., 2021; 2023; Mansfield & Soni, 2024; Martin-Denham, 2022; McCarthy et al., 2022; Myles et al., 2019; O'Hagan et al., 2024; Van Herwegen et al., 2018).

### **Evidence from Australia:**

- **Parental Views:** Similar to the UK, parents cited inconsistent expertise among educators in identifying and supporting their children's needs, especially in inclusive settings (Cumming et al., 2020; O'Leary et al., 2019; Reupert et al., 2015; Stevens & Wurf, 2020; Tait & Hussain, 2017).
- **Students reported significant challenges due to teacher assumptions about behavioural norms and academic expectations.** Misunderstandings of neurodivergent behaviour often led to negative interactions (Green et al., 2018; Smith et al., 2023; Trew, 2024). Though teachers who were flexible, fair, knowledgeable and who actively listened to students were valued (Saggers, 2015).
- **Australian practitioners expressed a desire for more targeted training and CPD but faced structural challenges similar to those in England, including funding limitations and access issues** (Cumming et al., 2020; Beasy et al., 2020; Devi & Ganguly, 2024; Mergler et al., 2016; McFadden et al., 2017; Nwoko et al., 2022; Opie et al., 2017).

### **Evidence from England and UK general papers:**

- **Parental Concerns:** Many parents reported inconsistent practitioner competence in identifying and addressing SEND, with negative experiences dominating (Childs-Fegredo et al., 2021; Gray et al., 2021; 2023; Martin-Denham, 2022; McCarthy et al., 2022; O'Hagan et al., 2024; Russell et al., 2023). Common issues included failure to transfer support plans across settings and poor-quality IEPs (Kendall, 2019).
- **Student Perspective:** Mismatched teacher expectations often led to students with SEND being misunderstood, particularly in social communication and behaviour. Students felt their needs were not met, especially those with autism, ADHD, and sensory needs (Burnley et al., 2024; Dimitrellou & Dawn, 2020; Lithari, 2023; Mansfield & Soni, 2024; Myles et al., 2019).
- **Teacher Perspective:** Teachers expressed a lack of confidence and a strong desire for further CPD, but faced barriers such as funding, limited access to relevant training, and superficial content in available courses (Cook & Ogden, 2022; Gray et al., 2021; 2024; Hind et al., 2019; Ludlow et al., 2022; Martin & Alborz, 2014).
- **Subject-Specific Example:** One study highlighted low teacher expectations for SEND students in science, with assumptions that they should pursue easier subjects—posing risks to inclusion and academic equity (Essex, 2018).

### **Evidence from Finland:**

- **Inclusive Practice Enabler:** Finland stood out as a positive example. A co-teaching model was cited (Mihajlovic, 2020; Sundqvist et al., 2015; 2021) where teachers collaborated to share expertise and support diverse learners effectively. This approach fostered practical knowledge exchange and inclusive practices.
- **System Strength:** Finland's emphasis on mentorship and in-school training models was seen as a practical enabler of inclusive education, pointing to a more systematic and supportive professional learning culture (Mihajlovic, 2020; Sundqvist et al., 2015; 2021).

### **Evidence from Belgium (Flanders):**

- Parents highlighted disparities in practitioners' understanding of their child's needs and difficulties in accessing needs assessments or transferring successful support strategies between settings. This suggests a lack of systemic continuity and professional expertise (De Meulder & Murray, 2024).

### **Evidence from the Republic of Ireland:**

- Irish studies echoed issues seen in other Anglophone contexts. Students felt unsupported due to low teacher awareness of SEND needs (Stack et al., 2021). Teachers similarly identified gaps in their own knowledge and requested better training and support (Barry et al., 2024; Lynch & Davidson, 2024).
- Practitioners sought improved CPD but encountered similar constraints in availability, quality, and school-level support (Barry et al., 2024).

**Cross-Jurisdictional evidence:** Across all jurisdictions (apart from Belgium where no practitioner papers were retrieved), educators cited lack of funding (Barry et al., 2024; Gaona et al., 2024; Hind et al., 2019; Knight et al., 2022; Williams-Brown & Hodkinson, 2021), limited relevant CPD opportunities (Barry et al., 2024; Cumming et al., 2020; Gray et al., 2021; Martin & Alborz, 2014), and superficial training content (Cumming et al., 2020; Barry et al., 2024; Knight et al., 2022; Martin & Alborz, 2014) as major barriers which often led to an overwhelmed system where need exceeded support capacity. In terms of enablers, shared learning (e.g., mentoring, co-teaching), leadership support (Barry et al., 2024; Cumming et al., 2020; Doyle & Kenny, 2023; Martin & Alborz, 2014; Salter et al., 2017), and a whole-school approach to SEND training were reported as effective enablers for improving practitioner competence.

Under '[Inclusive Practices and Coordination of SEND support](#)' we explore how inclusion and SEND coordination vary across jurisdictions, highlighting both systemic barriers and effective practices in schools.

**Evidence from Australia:**

- Educators expressed uncertainty about supporting a wide range of needs in mainstream classrooms (Nwoko et al., 2022; Sulek et al., 2021). Parents often distrusted school provisions, reporting that schools failed to deliver what they viewed as ‘best practice’, sometimes turning instead to private tutors (Cumming et al., 2020; Smith et al., 20203).
- Mainstream settings were often perceived as ill-equipped for inclusion, particularly due to rigid curriculum and inequitable policies (Cumming et al., 2020; Smith et al., 2023; Sulek et al., 2021).
- Some schools showed inclusive success through flexible provision and leadership-driven approaches with effective stakeholder collaboration (Carter et al., 2022; Cumming et al., 2020).
- TAs played a central role but often operated without clear guidance, mirroring issues in other jurisdictions (Cumming et al., 2023).

**Evidence from England and UK (General):**

- High stakes testing and uniform expectations were seen as especially inequitable for students with SEND (Lithari, 2023; Mansfield & Soni, 2024; Williams-Brown, & Hodkinson, 2021).
- Parents reported variable quality and transparency in support provision (Gray et al., 2021; Lindsay et al., 2016), sometimes with limited awareness of what support their children received (McCarthy et al., 2022).
- Problems with delays, transferability between schools, and limited communication with agencies were common, reducing support effectiveness (Kiernan et al., 2019). Effective collaboration was linked to more favourable experiences of the identification and assessment process (Lindsay et al., 2016).
- TAs were heavily relied upon but often excluded from planning, reducing the consistency of support delivery (Pinkard, 2021; Salter et al., 2017).
- Senior leaders were identified as key to inclusive environments where flexibility and creativity in teaching were applied (Broomhead, 2018; Kendall, 2019).

**Evidence from Finland:**

- Educators questioned the feasibility of full inclusion (understood as placement), especially when general education teachers lacked the training of special educators (Mihajlovic, 2020).
- Supporting bilingual students with SEND was particularly challenging (Huilla et al., 2024).
- Co-teaching models enabled professional collaboration and inclusive classroom strategies; strong leadership again supported successful inclusion (Mihajlovic, 2020; Sundqvist et al., 2015; 2021).

- Transition processes and IEP coordination were inconsistent, though structured collaboration led to better outcomes (Sundqvist et al., 2021).

#### **Evidence from the Republic of Ireland:**

- Irish teachers showed uncertainty about inclusion in mainstream settings, often pointing to challenges with behavioural support (Lynch & Davidson, 2024).
- As elsewhere, high academic expectations conflicted with inclusive goals, complicating the implementation of reasonable accommodations.

#### **Evidence from Wales:**

- Teachers in Wales also shared doubts about the feasibility of inclusion, especially under systemic pressures to meet performance metrics (Knight et al., 2022).
- Similar issues were seen around IEP development, often carried solely by special educators, with minimal collaboration (Knight et al., 2022).

#### **Evidence from Belgium (Flanders):**

- Parents reported varied support quality, with communication gaps between families and schools (De Meulder & Murray, 2024; De Schauwer et al., 2023).
- Families faced difficult decisions between limited specialist school options and inconsistent mainstream inclusion, echoing concerns in other jurisdictions (De Meulder & Murray, 2024; De Schauwer et al., 2023).

#### **Common cross-country Findings:**

- **Rigid Curriculum & Assessment:** Across all jurisdictions, national exams and standardised teaching methods were widely viewed as incompatible with the needs of SEND students (Cumming et al., 2020; Huilla et al., 2024; Lithari, 2023; Mansfield & Soni, 2024; Saggars, 2015).
- **Parental Involvement:** Lack of communication between schools and families was a recurring issue; better outcomes were linked to strong school-family partnerships (Broomhead, 2018; Cumming et al., 2020; De Meulder & Murray, 2024; De Schauwer et al., 2023; Gray et al., 2021; Murphy et al., 2024; Smith et al., 2023).
- **Support Planning & Transitions:** Formal IEP meetings were infrequent, and stakeholder involvement varied widely; informal monitoring lacked standardisation (De Meulder & Murray, 2024; De Schauwer et al., 2023).
- **Student Perspectives:** Students – especially those with Autism – wanted support without stigma. Inflexible accommodations, lack of discreet help, and avoidance behaviours were reported (O’Hagan et al., 2024).

- **Assistive Technology:** Tools like iPads were helpful but inconsistently implemented, with limited teacher training undermining their effectiveness (Ramirez & Lynch, 2024; Sulek et al., 2021).
- **Role of Teaching Assistants:** Teaching Assistants were both praised and criticised, valued by students for support, but often excluded from structured planning (Cumming et al., 2020; Nwoko, 2022; Peltomäki et al., 2021).
- **Successful Models:** Some schools successfully applied inclusive practices through leadership support, co-teaching models (notably in Finland), creative use of technology, and collaborative support plans (Carter et al., 2022; Cumming et al., 2020; Martin & Alborez, 2014; Salter et al., 2017; Sundqvist et al., 2015; 2021).

‘**Relationships and Communication**’ describes how collaborative relationships between students, families, educators, and specialists shape the quality and coordination of SEND support, according to the evidence available.

#### **Evidence from Australia:**

- Parents reported challenges in maintaining regular communication with schools due to internet access limitations and scheduling conflicts. This was particularly true in rural communities, where parents felt socially and geographically isolated (Dettman et al., 2022; Smith et al., 2023; Sun et al., 2024; Tait & Hussain, 2017).
- Aboriginal and Torres Strait Islander and Somali families often lacked familiarity with formal SEND concepts. While tight-knit community ties provided support, limited cultural awareness around SEND hindered broader understanding and engagement (Green et al., 2018; Lilley et al., 2020; Smith et al., 2023).
- Australian caregivers highlighted bullying and social stigma, which undermined inclusion and well-being for children with SEND (Carrington et al., 2017; Green et al., 2018; Smith et al., 2023).
- Families valued educators who communicated flexibly (e.g., through school apps or diaries), showing respect and attentiveness to individual student needs (Cumming et al., 2020; Dettman et al., 2022).

#### **United Kingdom (England, UK General)**

- There was inconsistency in how schools communicated with families (ranging from phone calls to apps), sometimes leading to misunderstandings or gaps in support (Moyse & Porter, 2015; Potter, 2016).
- As in other countries, UK-based caregivers and students reported peer stigma, especially in secondary school settings, with traits like confidence or kindness influencing inclusion (Lithari, 2023; O’Hagan et al., 2024; Tomlinson et al., 2022).

- Students in the UK responded positively to teachers who were humorous, fair, and approachable, enhancing classroom participation and emotional security (Gray et al., 2023; O’Hagan et al., 2024).

#### **Evidence from Finland:**

- Finnish children and families stressed the importance of peer relationships in shaping feelings of inclusion. Social norms such as verbal skills and confidence influenced perceived belonging, especially among female students.
- Social stigma around SEND was raised as a significant challenge to forming inclusive peer relationships (Pesonen et al., 2016).
- As in other countries, student-teacher connection was key to individualised support, with teachers who showed flexibility and empathy being most appreciated (Pesonen et al., 2016; Rautamies et al., 2021).

#### **Evidence from Republic of Ireland:**

- Students and parents emphasised the importance of teachers treating children as individuals, with respect and understanding of both strengths and challenges (Brien, 2019; Stack et al., 2020).
- SEND students frequently encountered bullying and peer stigma, affecting their confidence and school engagement (Brien, 2019).

#### **Common cross-country sub-themes:**

- **Teacher-Student Relationships:** Strong relationships with teachers were consistently seen as central to inclusive practices in Australia (Cumming et al., 2020; Devi & Ganguly, 2024; Saggars, 2015), Ireland (O’Brien, 2019; Stack et al., 2020), Finland (Pesonen et al., 2016), England (Gray et al., 2023; O’Hagan et al., 2024), and Belgium (Flanders) (De Meulder & Murray, 2024; De Schauwer et al., 2023). Teachers who took time to understand students holistically were better equipped to deliver personalised support (Ramirez & Lynch, 2024).
- **Family Involvement:** Across jurisdictions, practitioners welcomed family insight and initiative, particularly in identifying student needs, supporting planning and transitions (Broomhead, 2021; Gray et al., 2021; Kendall, 2019; Murphy et al., 2024) and supporting interventions at home (Broomhead, 2018; Cumming et al., 2020; Dettman et al., 2022; Gray et al., 2021; McFadden et al., 2017; Peltomäki et al., 2021; Reupert et al., 2015; Richards, 2024).
- **Peer Belonging:** Friendship and social acceptance emerged as critical for emotional well-being and school engagement but were often compromised by bullying and stigma toward SEND students (O’Hagan et al., 2024; Stack et al., 2020).

- **Communication Methods:** A variety of tools were used (texts, emails, meetings, diaries), but their effectiveness varied widely, often depending on staff capacity and parent access (Cumming et al., 2020; Dettman et al., 2022).
- **Barriers to Collaboration:** Rurality, cultural misunderstanding (notably in Australia), and lack of coordinated systems impeded consistent collaboration and trust between stakeholders (Barry et al., 2024; Burnley et al., 2024; Cumming et al., 2020; Huilla et al., 2024; Ramirez & Lynch, 2024; Smith et al., 2023).



## Conclusion and Policy Recommendations

The main conclusion from this preliminary report is that there seems to be a link between more positive outlooks of SEND policy implementation and countries where policies have a more positive sentiment in the language adopted, broader definitions of SEND that align with biopsychosocial views of development (rather than medicalised approaches), in-depth and embedded in-service training for the SEND workforce, interdisciplinary and/or transdisciplinary collaboration in SEND provision and effective early years support. This conclusion stems from qualitative and quantitative analysis of policy documents and a systematic review of current existing evidence. More evidence is needed to support these findings, which will be gathered in Part 2 of this research project.

Based on the conclusion above, recommendations for policy makers wishing to introduce a more inclusive SEND system are:

- a) Policies should be clear about how inclusion and SEND are defined, aligned with biopsychosocial and needs-based models.
- b) Policy language should be inclusive, aligned with the models above.
- c) Specialist inter-departmental taskforce groups should be set up to support local authorities in implementing effective needs-based assessment and classifications, using widely regarded needs-based assessment systems.
- d) Specialist inter-departmental taskforce groups should be set up to support local authorities in implementing effective early years assessment, support and identification, channels and hubs for effective communication with schools and families and oversight of workforce training.
- e) A reform of CPD to turn inclusion into an everyday practice in schools, embedded in routines, reflective and with oversight of key high specialists.

## Limitations and mitigation

This report is based solely on the content of existing SEND policies, and as such, the findings should be interpreted with caution and understood within the framework of the IPO (Input-Process-Output) model, focusing specifically on the 'input' stage only. Later stages of the project will add more detail to the process and output stages.

### *Challenges in policy identification and interpretation*

A step-by-step process for identifying policies in each jurisdiction has been laid out and followed. However, the extent of replicability of this procedure may be debatable, leading to caveats in policy interpretation. In the case of Northern Ireland, for example, several policies have not yet been fully implemented. Consequently, analysing policy inputs particularly in this context may offer limited insight into actual practice or outcomes. Moreover, policies are evolving in all countries. Where possible, we will look to capture these changes throughout the life of the project. Therefore, more perceptions of good practice may emerge from any and/or all the jurisdictions under analysis. For example, Irish policy has been changing rapidly, and therefore it is likely that up-to-date views on the new policies are needed. Similarly, Flanders is undergoing significant policy change for early years and SEND. The findings of this report should not be considered static, but rather a snapshot of a particular moment in time. In these jurisdictions, complementing this data with up to date primary data via interviews with stakeholders will be essential for a full understanding of the changing policy landscape.

### *Methodological challenges*

While the study integrates qualitative and critical analysis with quantitative corpus analysis to strengthen validity, no method is entirely without limitations. Minor inaccuracies in policy interpretation may persist. Risk has been mitigated through a member-check process involving collaborators from each jurisdiction. However, findings presented for the corpus analysis are indicative only. Due to the small numbers of policies available for some countries under certain themes, the inclusion of additional policies might substantially change the results. Additionally, crude p-value analysis has been used to look at differences between countries in sentiment analysis, and due to the size of the data being analysed there is an increased likelihood of differences being significant, when actual effects might be smaller. Effect size calculations will be presented as this study continues.

### *Challenges in reviewing evidence available*

The evidence base reflects a predominance of negative stakeholder perceptions. To ensure a more balanced view, further research should explicitly seek out and document examples of good practice. We will pursue this in the next stage of the project, via interviews with stakeholders, in particular in those jurisdictions where evidence is likely to be published in local languages other than English.

Additionally, some perspectives captured in the evidence review may relate to outdated or superseded policies. Therefore, these findings must be triangulated with current and primary data collection to accurately assess whether stakeholder views have evolved over time. Further primary data will be collected with stakeholders across jurisdictions in 2025/2026.

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## Appendix A – Algorithm for selection of jurisdictions

Three criteria were used select Jurisdictions: a) analysis of PISA data 2022; b) Indicators of the UNESCO Global Education Monitoring (GEM, 2020); and c) feasibility of data collection. Countries were weighted against the criteria through a decision tree Figure (A1).

### a) Analysis of PISA 2022, performed in 5.12.2023 for this application:

<b>PISA 2022</b>		
<b>Top 5 countries in SEND indicators</b>		
<b>Likelihood of transferring to another school because of SEND</b>  (This could be because resources are made available for pupils to remain where they are, or because there are no resources available in other settings)	<b>Less likely</b>  <b>More likely</b>	New Zealand; Australia; Portugal; Sweden; Finland Netherlands; Austria; Belgium; France; Switzerland
<b>Class size reduced due to pupils with SEND</b>  (Lower rated could be because class sizes are already small and pupil teacher ratio already high, or it could be an indicator of a less inclusive approach; here, reasons may vary from inadequate policies to lack of staffing).	<b>Higher %</b>  <b>Lower %</b>	New Zealand; Canada; Switzerland; Australia Austria; Finland; France; Germany; Netherlands
<b>Reported % of students with SEND</b>  (Given mixed definitions and understandings of SEND, higher could indicate broader understandings and lower could indicate more restrictive, perhaps diagnostic based understandings).	<b>Higher</b>  <b>Lower</b>	Belgium; Canada; Netherlands; Switzerland; Italy Austria; Germany; Spain; New Zealand; France



- b) **Indicators of the UNESCO Global Education Monitoring** (GEM, 2020) report on inclusion to support interpretation of PISA data, and c) other evidenced examples of good inclusive practice against SEND indicators of interest, such as expenditure in education and in early childhood intervention and education (OECD Family Database).

**Australia:** Australia is one of the top 5 countries less likely to transfer a child to another school due to special educational needs, and one of the top 5 countries more likely to have a reduced class size because of a child with SEND, suggesting good inclusive practice. Australia is not linked to any indicators or low inclusivity and the reported proportion of students with SEND is placed around the median of the distribution of countries in PISA who answered this question (5<sup>th</sup> centile, most schools reporting between 8 and 10% of pupils with SEND in PISA 2022), despite a very broad definition of inclusive education as ‘inclusive and accessible educational culture based on the principle of universality will assist students of all abilities’ and allow teachers to ‘meet the diverse educational needs of all students. Australia’s has one of the highest expenditure rates in pre-primary state funded education (higher than New Zealand), well above OECD average.

**Belgium (Flanders)** is more likely to transfer a child to another school due to special educational needs, but it reports one of the highest proportions of children with SEND in secondary school (according to PISA 2022 data). This could be due to a broader, more inclusive definition of SEND (*‘Children/learners with special educational needs are those with long-term, significant participation problems owing to the combination of one or more functional impairments at the intellectual, psychological, physical or sensory level, restrictions in the performance of activities, and personal and external factors’*), and school transfers in Belgium are not rare, for all children, including typically developing. It has one of the highest expenditures in pre-primary state funded education, well above OECD average (with hardly any investment in private education, compared to OECD partners). Belgium has various legislation documents stating that mainstream comes first – students should be supported in mainstream with special schools as an exception. Belgium is a member of the European Union (EU). Secondary education completion rates are below OECD average.

**Switzerland:** Switzerland is much more likely than other countries to transfer a pupil to another school due to SEND but has one of the highest reported proportions of pupils with SEND, suggesting a broader understanding. It also has one of the highest levels of expenditure in education, well above OECD average, and higher than most OECD countries in primary education. Switzerland is also one of the top 5 countries reporting likelihood of reducing class size due to having children with SEND (PISA 2022 data). Switzerland uses the International

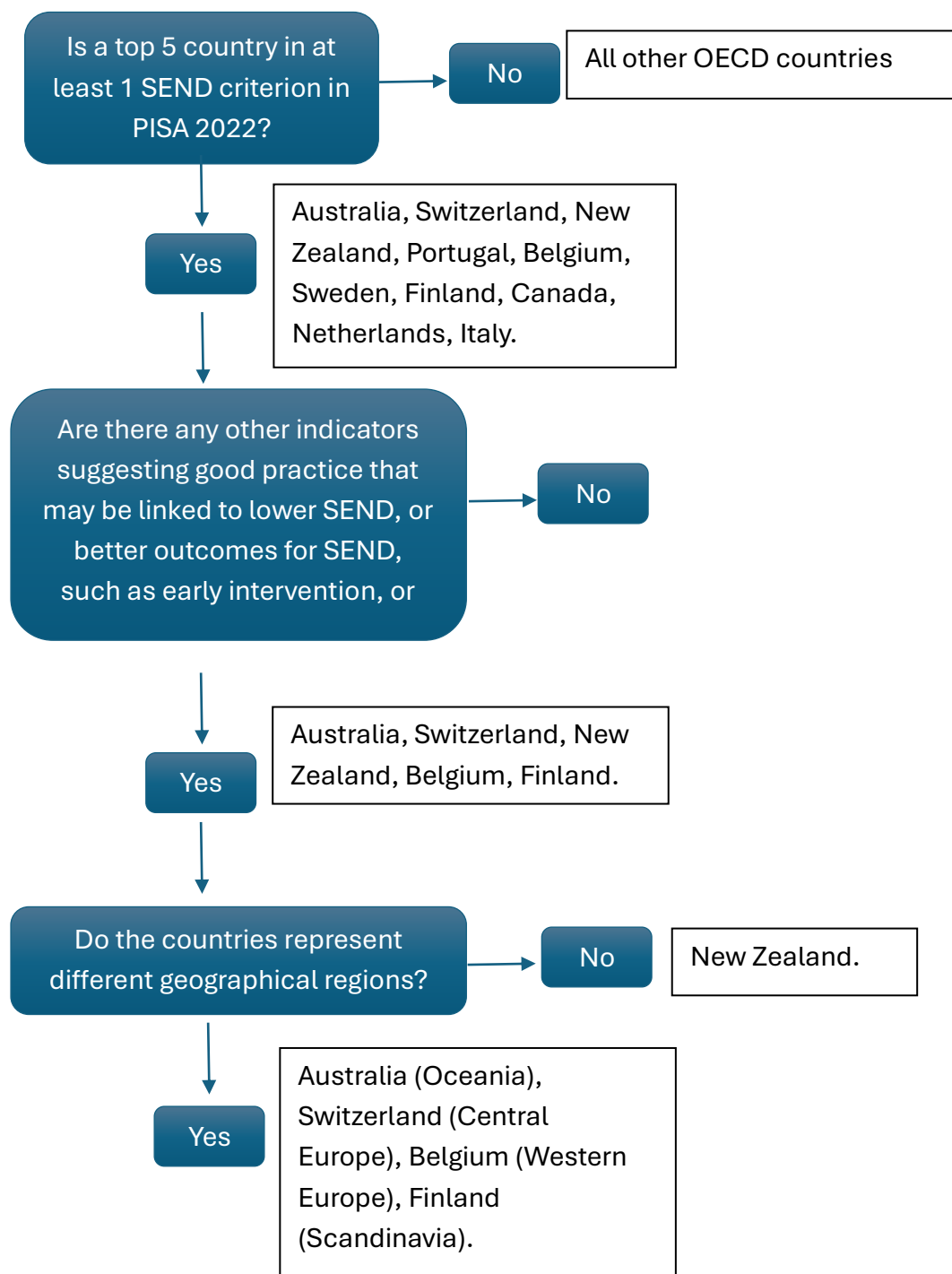
Classification of Functioning Disability and Health to support the work of multi-disciplinary teams in decision-making regarding SEND service provision.

Switzerland has unique political circumstances, as a non-member of the EU (like the UK) with various bi-lateral agreements. Secondary school completion rate is well above OECD average.

**Finland:** In PISA 2022, Finland is one of the top 5 countries unlikely to transfer a child to a different school because of SEND, but one of the least likely to have a class size reduced to having children with SEND – however this may be due to already lower teacher/pupil ratios compared to other countries (close to OECD average). Secondary completion rate is well above OECD average. Education expenditure is one of the highest in OECD, including for pre-primary (well above OECD average). It has a 3-tiered system to allocating support services for children and special education curricula were abolished. Finland is a member of the EU.

- c) **Feasibility of data collection:** The team has professional connections in all countries resulting from the decision tree algorithm presented in figure 1 and consider that data collection in a total of 8 countries as described above will be feasible and provide a good illustration of good practice in SEND provision from a wide range of settings.

Figure A1: Decision Tree for country inclusion in sample outside the United Kingdom



## Appendix B – Search terms for Rapid Evidence Review according to PICOS criteria

PICOS Criteria	
<b>Population</b>	<p>child* OR "young people" OR adolescent* OR student* or youth OR teen* OR pupil</p> <p>OR caregiver* OR parent* OR guardian* OR family OR carer*</p> <p>OR practitioner* OR teacher* OR educator* OR "support staff" OR SENCO OR "special education needs coordinator*" OR "school staff" OR principal* OR "mental health and wellbeing coordinator" OR MHWC OR TA OR "teaching assistant*" OR SLT or SLP or "speech and language therapist*" OR "speech and language pathologist*" OR "speech therapist" OR "speech pathologist" OR "health visitor" OR HV* OR "ed psych" OR counsel* OR "mental health support workers" OR "child and adolescent mental health service" OR CAHMS OR psychologist* or therapist* OR "learning support assistant" OR LSA OR "communication support worker" OR QTOD OR QTMSI OR QTVI OR "co-production" OR "joint working" OR "healthcare professional" OR "personal carer" OR "occupational therapist" OR "inter-professional collaboration" OR IPC OR expert OR clinician OR nurse OR SENDCO or paraprofessional OR "special needs assistant" OR SNA* OR "special education teacher" OR SET* or "inclusion coordinator" OR "behaviour support teacher" OR "special class teacher" OR "inclusion support assistant" OR interprofessional OR "school psych*" OR "teacher aid" OR "special education teacher"</p>
<b>Intervention</b>	<p>"additional learning need" OR disabilit OR disabilit* OR "equal educat*" OR inclusion OR "inclusive education" OR integrat* OR learning difficult* OR "learning disabilit*" OR "level* of support" OR SEN OR SEND OR "special educational needs" OR special needs* OR "additional educational needs" OR "AEN" OR ID* OR "additional needs" OR "three-tiered support" OR "special support" OR "intensi* support" OR "general support" OR "basic education" OR "early childhood education" OR "vocational education" OR "diverse learning need"</p> <p>AND</p>

	polic* OR provision* OR support* OR accomodat* OR "support service*" OR "education* polic*" OR "inclusion polic*" OR "education* provision" OR "service provision" OR "access arrangement*" OR "reasonable adjustment*" OR "inclusive education" OR "special education" OR adapt* OR "reasonable accommodation*" OR "early intervention" OR "co-teaching" OR care OR "learning plan" OR "education plan" OR "universal design" OR differentiat*
<b>Comparison</b>	n/a
<b>Outcome</b>	perception* OR view* OR attitude* OR experience* OR satisfaction OR feedback OR perspective* OR barrier* OR challenge* OR facilitator* OR impact OR effective* OR outcome* OR reflection* OR expectation* OR insight OR enabler
<b>Study Type</b>	qualitative OR "mixed-methods" OR "case study" OR interview* OR "focus group*" OR survey* OR "systematic review" OR ethnography OR observation*

## Appendix C – Study Characteristics for Rapid Evidence Review

Criterion	Characteristic	Number of studies <i>n total</i> = 160
Year published	2014-2019	66
	2020- 2024	94
Country	England	51
	Scotland	3
	Wales	2
	Northern Ireland	2
	UK General	29
	Republic of Ireland	21
	Finland	13
	Switzerland	0
	Belgium	2
	Australia all	20
	Australia Victoria	4
	Australia New South Wales	8
	Australia Queensland	7
Study Design	Qualitative with interview or focus groups	98
	Qualitative with participatory methods	3
	Qualitative with other	11
	Quantitative survey	6
	Mixed methods	42
Participants	Practitioners	64
	Parents or families	35
	Children/young people	25
	Families and children/young people	11
	Practitioners and children/young people	4
	Practitioners and families	21
Area of SEND Studied	All SEND	43
	Communication and social interaction	3
	Cognition and learning	12
	Social, emotional, and mental health	8
	Physical disabilities	6
	Sensory disabilities	7
	Genetic disabilities	1
	Autism	56
	ADHD	4
	Dyslexia, Dyscalculia	6
	A combination of the above	14

Educational Phase	Early Years	4
	Primary	29
	Secondary	41
	FE / HE	6
	Early Years and Primary	12
	Primary and Secondary	49
	Secondary and FE / HE	2
	Not specified	17

## Appendix D – List of Policies consulted for document analysis



Document Number	Country	Title of Document
1.	Australia	Australian Education Act 2013 No. 67, 2013
2.	Australia	Australian Professional Standards for Teachers
3.	Australia	Australian Student Wellbeing Framework
4.	Australia	Australian Youth's Policy Framework
5.	Australia	Australia's Disability Strategy 2021 – 2031
6.	Australia	Children and students with disability policy
7.	Australia	Disability Discrimination Act 1992 - No. 135, 1992
8.	Australia	Disability Services and Inclusion Act 2023 - No. 107, 2023
9.	Australia	Disability Standards for Education 2005
10.	Australia	Disability Standards for Education 2005 - 2020 Review
11.	Australia	Guide to the National Quality Framework
12.	Australia	Improving Outcomes for All
13.	Australia	Inclusive Victoria State Disability Plan 2022-2026
14.	Australia	Inclusive education, employment and housing - Summary and recommendations
15.	Australia	NATIONAL SAFE SCHOOLS FRAMEWORK
16.	Australia	NURTURING WONDER AND IGNITING PASSION - Designs for a new school curriculum
17.	Australia	National Safe Schools Framework RESOURCE MANUAL
18.	Australia	National Standards for Disability Services
19.	Australia	Queensland: Australian Curriculum Version 9.0 in Queensland (ACiQ)
20.	Australia	Queensland: Education (General Provisions) Act 2006
21.	Australia	Queensland's Disability Plan 2022-27
22.	Australia	Queensland: Disability Services Act 2006
23.	Australia	Queensland: Equity and Excellence Realising the potential of every student
24.	Australia	Queensland: Inclusive education policy
25.	Australia	Queensland: QCE and QCIA policy and procedures handbook v6.0.
26.	Australia	State Disability Inclusion Plan Inclusive SA
27.	Australia	Student wellbeing data and measurement in Australia
28.	Australia	The Early Years Learning Framework for Australia v2.0
29.	Australia	The NDIS code of conduct
30.	Australia	The National Children's Mental Health and Wellbeing Strategy
31.	Australia	Victoria: VCE Administrative Handbook 2025
32.	Australia	Victoria: Charter of Human Rights and Responsibilities Act 2006
33.	Australia	Victoria: Curriculum Programs Foundation to Year 10: Policy
34.	Australia	Victoria: Education and Training Reform Act 2006 (Vic)
35.	Australia	Victoria: Equal Opportunity Act 2010
36.	Australia	Victoria: Inclusive Education Policy
37.	Australia	Victoria: Individual Education Plan Summary Guide
38.	Australia	Victoria: Marrung Aboriginal Education Plan 2016-2026
39.	Australia	Victorian Early Years Learning and Development Framework
40.	Australia	Victorian Teaching and Learning Model 2.0: Policy
41.	Australia	Western Australia: Disability Access and Inclusion Plan 2023–2027

Document Number	Country	Title of Document
42.	Belgium (Flanders)	Decree on Basic Education
43.	Belgium (Flanders)	Decree establishing a framework for Flemish equal opportunities and equal treatment policy
44.	Belgium (Flanders)	Decree on equal educational opportunities-I
45.	Belgium (Flanders)	Decree on Primary Education
46.	Belgium (Flanders)	Decree of the Flemish Government establishing overarching rules for the central interpreting office for the policy areas of Education and Welfare, Public Health and Family
47.	Belgium (Flanders)	2023 Learning Support Model
48.	Belgium (Flanders)	Decree of the Flemish Government on the integrated support offer for equal educational opportunities in secondary education and amending various decrees of the Flemish Government, regarding study offer, study grants and project subsidies.
49.	Belgium (Flanders)	Decree on the Quality of Education
50.	Belgium (Flanders)	The equal educational opportunities policy for primary education
51.	Belgium (Flanders)	Equal educational opportunities policy for secondary education: the integrated support offer
52.	Belgium (Flanders)	Guidance Decree
53.	Belgium (Flanders)	M-Decree 2014
54.	England	Autism Act 2009
55.	England	Childcare Act 2016
56.	England	Children and Families Act
57.	England	Children Act 1989
58.	England	Early years foundation stage statutory framework
59.	England	Education Act 1996; 2002
60.	England	Equality Act 2010
61.	England	Mental Capacity Act 2005
62.	England	SEND Review: Right support Right place Right time
63.	England	Special educational needs and disability code of practice: 0 to 25 years
64.	England	Supporting pupils at school with medical conditions
65.	England	The Children and Families Act 2014
66.	England	Working Together to Safeguard Children 2023
67.	Finland	Act on Early Childhood Education and Care
68.	Finland	Act on the State Subsidy for Basic Municipal Services
69.	Finland	Act on Vocational Education and Training
70.	Finland	Early Childhood Education Act
71.	Finland	Basic Education Act
72.	Finland	Basic Education Decree

Document Number	Country	Title of Document
73.	Finland	Child Protection Act
74.	Finland	Compulsory Education Act
75.	Finland	Government Decree on Early Childhood Education
76.	Finland	Three-tiered support model and inclusive education country report
77.	Ireland	Action Plan for Education
78.	Ireland	NEPS A Continuum of Support for Post-Primary Schools (2010)
79.	Ireland	Anti-Bullying Procedures for Primary and Post-Primary Schools
80.	Ireland	An Inclusive Education for an Inclusive Society Policy Advice Paper on Special Schools and Classes
81.	Ireland	NEPS Behavioural Emotional and Social Difficulties - A continuum of support (2007)
82.	Ireland	Chief Inspector's Report September 2016-December 2020
83.	Ireland	Charting our education future
84.	Ireland	Circular: Masters in Special Educational Needs (MSEN) – 2007/2008
85.	Ireland	Circular: Payment of an allowance to recognised Post-Primary Teachers who hold a Graduate/ Higher Diploma in Special Educational Needs
86.	Ireland	Circular: Post-Graduate Certificate/Diploma of Teacher Professional Learning for Teachers working with Students with Special Educational Needs (Autism)
87.	Ireland	Circular: Post-Graduate Diploma Programme of Teacher Professional Learning for Special Education Teachers, 2024/2025
88.	Ireland	Commencement of the Education (Provision in respect of Children with Special Educational Needs) Act 2022 and Commencement of remaining sections of the Education (Admission to Schools) Act 2018
89.	Ireland	Commencement of the Education (Provision in respect of Children with Special Educational Needs) Act 2022 and Commencement of remaining sections of the Education (Admission to Schools) Act 2018
90.	Ireland	Céim: Standards for Initial Teacher Education
91.	Ireland	DISABILITY ACT 2005
92.	Ireland	EDUCATION (WELFARE) ACT, 2000
93.	Ireland	EDUCATION ACT, 1998
94.	Ireland	EDUCATION FOR PERSONS WITH SPECIAL EDUCATIONAL NEEDS ACT 2004
95.	Ireland	ETBI Submission to the DE on the Draft AON Process Documentation
96.	Ireland	Education (Admission to Schools) Act 2018
97.	Ireland	Educational Provision for Learners with Autism Spectrum Disorder In Special Clases Attached to Mainstream Schools in Ireland
98.	Ireland	Explanatory Notes Irish Policy and Legislative Context for Children and Young People with Special Educational Needs. Joh Fitzgerald 1.8.2024
99.	Ireland	Guidance for post-primary schools on the provision of resource teaching and learning support Circular No 0070/2014
100.	Ireland	Guidelines for Post-Primary Schools Supporting Students with Special Educational Needs in Mainstream Schools
101.	Ireland	Inclusion of Students with Special Educational Needs Post-Primary Guidelines
102.	Ireland	International Administrative Review of Specialist Provision for Students with Special Educational Needs

Document Number	Country	Title of Document
103.	Ireland	Irish Sign Language Act 2017
104.	Ireland	Key Features of the Education System in Ireland
105.	Ireland	NCSE Annual Report 2023
106.	Ireland	NCSE Delivery for Students with Special Educational Needs
107.	Ireland	NCSE Guidelines on the individual education plan process
108.	Ireland	NCSE INFORMATION BOOKLET FOR PARENTS OF CHILDREN AND YOUNG PEOPLE WITH SPECIAL EDUCATIONAL NEEDS 2019
109.	Ireland	NCSE Inclusive Education Framework 2011
110.	Ireland	NCSE Initial Teacher Education for Inclusion
111.	Ireland	NCSE Literature Review. relating to policy advice on. educational provision for students in special schools and special classes
112.	Ireland	NCSE Policy Advice on Special Schools and Classes
113.	Ireland	NCSE Project IRIS – Inclusive Research in Irish Schools
114.	Ireland	NCSE. Evaluation of In-School and Early Years Therapy Support Demonstration Project
115.	Ireland	Nursing pilot for children with complex healthcare needs pilot scheme
116.	Ireland	Participation Framework National Framework for Children and Young People's Participation in Decision-making
117.	Ireland	Policy on the Operation of the Access and Inclusion Model
118.	Ireland	Press release: Confirmation of location of two special schools in Kildare and Limerick
119.	Ireland	Press release: Establishment of an Educational Therapy Support Service
120.	Ireland	Press release: New structure for the National Centre for Special Education
121.	Ireland	Press release: establishment of a scheme to provide Irish Sign Language Support for children whose primary language is Irish Sign Language (ISL) and who are attending recognised schools
122.	Ireland	Report of Education Needs for the Purpose of the Assessment of Need Disability Act 2005
123.	Ireland	Review of Special Education Legislation: Reviewing the Education for Persons with Special Educational Needs (EPSEN) Act 2004, Section 37A of the Education Act 1998 and Section 67 of the Education (Admission to Schools) Act 2018
124.	Ireland	Revised Arrangements for the Provision of Resource Teaching Supports for the 2012/13 school year. Circular No. 0010/2012
125.	Ireland	MIC SENCO Forum 17th May 2024 Brendan Doody, Principal Officer, Special Education Unit, DEY: Special Education Updates
126.	Ireland	SPECIAL EDUCATION CIRCULAR SP ED 02/05
127.	Ireland	NEPS SPECIAL EDUCATIONAL NEEDS A Continuum of Support 2007
128.	Ireland	Special Education Teaching Allocation Circular No 0013/2017
129.	Ireland	Special Education Teaching Allocation Circular No 0014/2017
130.	Ireland	Student Support Teams in Post Primary Schools: A Guide to Establishing a Team or Reviewing an Existing Team (2021).
131.	Ireland	Supporting Access to the Early Childhood Care and Education (ECCE) Programme for Children with a Disability
132.	Ireland	The Special Education Teacher (SET) allocation model and the calculation of the SET allocation for each school from the 2024/25 school year until further notice. Circular 0002/2024

Document Number	Country	Title of Document
133.	Ireland	The Special Education Teacher (SET) allocation model and the calculation of the SET allocation for each school from the 2024/25 school year until further notice. Circular 03/2024
134.	Ireland	Wellbeing Policy Statement and Framework for Practice 2018–2023 Revised October 2019
135.	Northern Ireland	CONSULTATION ON DRAFT SPECIAL EDUCATIONAL NEEDS (SEN) CODE OF PRACTICE
136.	Northern Ireland	CONSULTATION ON DRAFT SPECIAL EDUCATIONAL NEEDS (SEN) REGULATIONS
137.	Northern Ireland	DATA PROTECTION IMPACT ASSESSMENT FOR PERSONAL LEARNING PLAN (PLP) AS PART OF THE NEW SPECIAL EDUCATIONAL NEEDS AND INCLUSION FRAMEWORK
138.	Northern Ireland	Day Care Settings Minimum Standards August 2021
139.	Northern Ireland	Draft Special Educational Needs Code of Practice - Advice and Information
140.	Northern Ireland	Draft Special Educational Needs Code of Practice - Annual Review of a Statement
141.	Northern Ireland	Draft Special Educational Needs Code of Practice - Children Under Compulsory School Age - Services, Assessments and Statements
142.	Northern Ireland	Draft Special Educational Needs Code of Practice - Children in Specific Circumstances
143.	Northern Ireland	Draft Special Educational Needs Code of Practice - Children over Compulsory School Age
144.	Northern Ireland	Draft Special Educational Needs Code of Practice - Co-operation between Education and Health
145.	Northern Ireland	Draft Special Educational Needs Code of Practice - Disagreements, Appeals, Mediation and Tribunals
146.	Northern Ireland	Draft Special Educational Needs Code of Practice - Glossary
147.	Northern Ireland	Draft Special Educational Needs Code of Practice - Identification, Assessment and Provision by School
148.	Northern Ireland	Draft Special Educational Needs Code of Practice - Inclusion of Children with Special Educational Needs (SEN) and or a Disability
149.	Northern Ireland	Draft Special Educational Needs Code of Practice - Introduction
150.	Northern Ireland	Draft Special Educational Needs Code of Practice - Making and Maintaining a Statement
151.	Northern Ireland	Draft Special Educational Needs Code of Practice - Statutory Assessment
152.	Northern Ireland	Draft Special Educational Needs Code of Practice - The Law, Roles, Rights and Responsibilities
153.	Northern Ireland	Draft Special Educational Needs Code of Practice - Transition Planning for a Child with a Statement
154.	Northern Ireland	Draft Special Educational Needs Code of Practice Annexes Index
155.	Northern Ireland	EA Plan of Arrangements for Special Educational Provision Stakeholder Consultation Report July 2023

Document Number	Country	Title of Document
156.	Northern Ireland	EQUALITY AND HUMAN RIGHTS POLICY SCREENING FOR DRAFT SPECIAL EDUCATIONAL NEEDS (SEN) REGULATIONS AND DRAFT SEN CODE OF PRACTICE
157.	Northern Ireland	Privacy Notice - Consultation on new SEN Regulations and Consultation on new SEN Code of Practice
158.	Northern Ireland	Research and Information Service Research Paper - Early years provision
159.	Northern Ireland	Rural Needs Impact Assessment (RNIA) - New Draft Special Educational Needs Regulations and Code of Practice
160.	Northern Ireland	Safeguarding Board Act (Northern Ireland) 2011
161.	Northern Ireland	School Age Act (Northern Ireland) 2022
162.	Northern Ireland	Special Educational Needs and Disability Act (Northern Ireland) 2016
163.	Northern Ireland	Summary Report of Consultation Responses Special Educational Needs (SEN) Code of Practice
164.	Northern Ireland	Summary Report of Consultation Responses Special Educational Needs (SEN) Regulations
165.	Northern Ireland	The Children (Northern Ireland) Order 1995
166.	Northern Ireland	The Education (Northern Ireland) Order 1996
167.	Northern Ireland	The Special Educational Needs and Disability (Northern Ireland) Order 2005
168.	Northern Ireland	The draft Special Education Needs (SEN) Regulations 202X - A Summary Guide for Parents and Young People
169.	Northern Ireland	The draft Special Educational Needs (SEN) Code of Practice 202X - A Summary Guide for Parents and Young People
170.	Northern Ireland	The draft Special Educational Needs (SEN) Regulations 202X
171.	Northern Ireland	children services co-operation act (Northern Ireland) 2015
172.	Scotland	A BLUEPRINT FOR 2020: THE EXPANSION OF EARLY LEARNING AND CHILDCARE IN SCOTLAND
173.	Scotland	A National Response to Improving Mathematics (NRIM) in Scotland
174.	Scotland	Achieving excellence equity 2025 national improvement framework
175.	Scotland	Briefing note for headteachers of schools and heads of early learning and childcare (ELC) settings
176.	Scotland	CfE Benchmarks: Frequently-asked Questions
177.	Scotland	Child protection and safeguarding: self-evaluation for schools and settings Part A
178.	Scotland	Children (Scotland) Act 1995
179.	Scotland	Children and Young People (Scotland) Act 2014
180.	Scotland	Developing a positive whole-school ethos and culture – Relationships, Learning and Behaviour
181.	Scotland	Developing the education profession
182.	Scotland	Education (Additional Support for Learning) (Scotland) Act 2004

Document Number	Country	Title of Document
183.	Scotland	Education (Disability Strategies and Pupils' Educational Records) (Scotland) Act 2002
184.	Scotland	Education (Scotland) Act 1980
185.	Scotland	Education (Scotland) Act 2016
186.	Scotland	Equality Act 2010
187.	Scotland	Getting it right for every child - Practice Guidance 1 – Using the National Practice Model – 2022
188.	Scotland	Getting it right for every child - Practice Guidance 2 – Role of the Named Person – 2022
189.	Scotland	Getting it right for every child - Practice Guidance 3 - Role of the lead professional - 2022
190.	Scotland	Getting it right for every child - Practice Guidance 4 - Information Sharing - 2022
191.	Scotland	Getting it right for every child - policy statement - 2022
192.	Scotland	Growing the learning culture in CLD: A Strategy Statement and a Framework for Action - Part 1: Introduction
193.	Scotland	Growing the learning culture in CLD: The Next Stage - Part 2: The Strategy Statement
194.	Scotland	Growing the learning culture in CLD: The Next Stage - Part 4: The Framework for Action
195.	Scotland	How good is our early learning and childcare? Feb 2016
196.	Scotland	How good is our school - 4th edition
197.	Scotland	Independent care review - the pinky promise
198.	Scotland	Independent care review - the promise
199.	Scotland	Inspection - Brief self-evaluation summary form
200.	Scotland	Life Chances Act 2010
201.	Scotland	Plan 24-30 Analysis Reports
202.	Scotland	Plan 24-30 Reflect, Refocus, Reset
203.	Scotland	Plan 24-30 The Promise Progress Framework
204.	Scotland	Realising the ambition: Being Me - National practice guidance for early years in Scotland
205.	Scotland	Records management policy
206.	Scotland	Respect for All: The National Approach to Anti-Bullying for Scotland's Children and Young People
207.	Scotland	Sample pre-inspection questionnaires for early learning and childcare settings
208.	Scotland	Scottish Schools (Parental Involvement) Act 2006
209.	Scotland	Standards in Scotland's Schools etc. Act 2000
210.	Scotland	Supporting Children's Learning: Statutory Guidance on the Education (Additional Support for Learning) Scotland Act 2004 (as amended) Code of Practice (Third Edition) 2017
211.	Scotland	The Early Years Framework
212.	Scotland	The Pupils' Educational Records (Scotland) Regulations 2003
213.	Scotland	The Requirements for Community Learning and Development (Scotland) Regulations 2013



Document Number	Country	Title of Document
214.	Scotland	a curriculum for excellence building the curriculum 1 the contribution of curriculum areas
215.	Scotland	curriculum for excellence
216.	Scotland	curriculum for excellence building the curriculum 3 a framework for learning and teaching
217.	Scotland	curriculum for excellence building the curriculum 4 skills for learning, skills for life and skills for work
218.	Scotland	curriculum for excellence building the curriculum 5 a framework for assessment
219.	Scotland	curriculum for excellence building the curriculum 5 a framework for assessment: quality assurance and moderation
220.	Scotland	curriculum for excellence building the curriculum 5 a framework for assessment: recognising achievement, profiling and reporting
221.	Scotland	curriculum for excellence building the curriculum 5 a framework for assessment: reporting
222.	Scotland	curriculum for excellence building the curriculum 5 a framework for assessment: understanding, applying and sharing standards in assessment for curriculum for excellence: quality assurance and moderation
223.	Scotland	curriculum for excellence: responsibility of all practitioners
224.	Switzerland	Conférence suisse des directeurs cantonaux de l'instruction publique. (2007)
225.	Switzerland	Federal Constitution of Switzerland (Art. 62)
226.	Switzerland	Inter-Cantonal Agreement on Special Needs Education (2007)
227.	Switzerland	Law on Compulsory Education (Loi sur la scolarité obligatoire, LS)
228.	Switzerland	Law on Equal Rights for Persons with Disabilities (BehiG)
229.	Switzerland	Law on Specialised Pedagogy (Loi sur la pédagogie spécialisée, LPS)
230.	Switzerland	Plan d'études romand (PER) Cycle 1 - Cycle 2 - Cycle 3
231.	Switzerland	Special Education Act
232.	Switzerland	Special Education Concept
233.	Switzerland	Special Education Regulations
234.	Wales	Additional Learning Needs and Education Tribunal (Wales) Act 2018
235.	Wales	CHILDREN AND FAMILIES ACT 2014
236.	Wales	Curriculum and Assessment (Wales) Act 2021
237.	Wales	Curriculum for Wales Guidance
238.	Wales	FAIR ACCESS BY DESIGN Guidance for awarding organisations on designing high-quality and inclusive qualifications (July 2019)
239.	Wales	Foundation Phase Framework (Revised 2015)
240.	Wales	Inclusion and pupil support Guidance (March 2016)
241.	Wales	Social Services and Well-being (Wales) Act 2014
242.	Wales	Special Educational Needs Code of Practice for Wales
243.	Wales	Support for children and young people with Autistic Spectrum Disorder (ASD) in educational settings
244.	Wales	Support for children and young people with hearing impairment in educational settings



Document Number	Country	Title of Document
245.	Wales	Support for children and young people with multi-sensory impairment in educational settings
246.	Wales	Support for children and young people with vision impairment in educational settings
247.	Wales	The Additional Learning Needs (Wales) Regulations 2021
248.	Wales	The Equality Act 2010 (Disabled School Pupils) (Wales) Regulations 2021
249.	Wales	The Independent Schools (Provision of Information) (Wales) (Amendment) Regulations 2021