An international analysis of SEND policy and practice: ScopeSEND

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Executive Summary

Inclusive and equitable education systems are essential to support all children, including those with special educational needs and disabilities (SEND). There is an increasing interest in the development of inclusive policy and good practice to achieve inclusive and equitable education. 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 for England, with particular emphasis on addressing the longstanding SEND crisis[1] 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.

Our first report[2], published in July 2025, delivered a cross-country comparison of SEND policy and implementation across England, Wales, Scotland, Northern Ireland, Ireland, Switzerland, Belgium, Finland and Australia. This report extends our previous work across several additional jurisdictions, as a result of our partnership with the Centre for Education Systems (CES): Estonia, France, Japan, the Netherlands, New Zealand, Ontario (Canada), Poland, and Singapore. The aim of this phase of the ScopeSEND project is to provide a thorough understanding of elements of best practice and current challenges within the system of SEND provision and policy in these new jurisdictions. A third and final phase of the project, to be reported in spring/summer 2026, will involve qualitative interviews with practitioners, parents/caregivers and children with SEND to explore perceptions and experiences of their respective SEND systems. Together, the project findings will offer insights to inform ongoing SEND reform efforts in England as well as policy development in international contexts.

Using the same methods as in the previous report, this report details the findings from 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). This report presents analyses of the new jurisdictions and includes comparative tables showing results from the jurisdictions covered in our first report for reference.

Key findings resulting from the extended analysis are:

[1] The SEND crisis in England refers to the widespread structural issues within the SEND system resulting in resourcing issues and failure to provide students with adequate support.
[2] https://www.scopesend.com/outputs

1. These new jurisdictions are situated along a continuum in terms of their approach to defining SEND, determining children's eligibility for support, and providing statutory support, ranging from a medical diagnosis-based model (Poland and Japan) to a biopsychosocial model based on needs (Estonia). France, New Zealand, the Netherlands, Ontario (Canada), and Singapore all adopt a combined approach which incorporates elements of both models.
2. The new English-speaking jurisdictions (New Zealand, Ontario (Canada), and Singapore) were added to our previous corpus analysis with the original set of English-speaking countries (the 4 UK nations, Ireland, and Australia). Singapore, which adopts a combined approach to defining SEND but has a strong specialist-provision pathway based on a medical model, stands out as having a higher frequency of key terms in its policy corpus related to medicalised approaches to defining SEND (e.g., 'diagnosis'. 'ADHD', 'Autism' and 'deficit') compared to the other eight English-speaking jurisdictions.
3. Estonia and New Zealand appear to have the strongest policies aligning with Early Childhood Intervention (ECI) models[3] and extensive cross-sector collaboration (e.g., education, health and social care, etc). In the Netherlands, Poland, Ontario, and to some extent France and Singapore, ECI is somewhat embedded within Early Childhood Education and Care (ECEC) but is widely the responsibility of the healthcare sector or local authorities. France and Singapore have early intervention programmes operating mainly through medical or social frameworks, though they link with educational settings. Japan's ECI system is welfare-based and operates mainly through separate child development support centres, with some collaboration for the education sector.
4. Estonia, which has the most integrated early years and multi-agency system, has also adopted a needs-based definition of SEND in policy rather than a medicalised one, and offers extensive needs-based provision beginning early in a child's life.
5. Most of the additional jurisdictions have policies/programmes with a focus on general promotion of wellbeing and mental health, and/or anti-bullying. Mental health seems to have become a particular concern across jurisdictions in recent years, with these new policies and strategic guidance for schools now sitting alongside SEND policies.
6. France, Poland and Singapore are the only jurisdictions that legally require all trainee teachers to complete compulsory modules or credits in special or inclusive education as part of their initial teacher education. In contrast, other

[3] ECI is characterised by a holistic, family-centred approach, which integrates services across health, education, and social care sectors providing early and proactive support from birth onwards (Bruder et al., 2019; McCarthy & Guerin, 2022). While Early Childhood Education and Care (ECEC) typically focuses on general developmental and educational support for young children, ECI is a targeted, transdisciplinary form of provision.

jurisdictions typically embed SEND content across one or more modules, without the requirement for set credits. In-depth content on SEND is typically only offered through optional postgraduate studies in all jurisdictions.

7. The new jurisdictions differ in relation to: a) the extent to which Continuous Professional Development (CPD) is mandatory; and b) the extent to which the CPD offer is embedded in everyday practice versus mostly consisting of courses and workshops. Poland has mandatory CPD which is highly embedded in everyday practice with a flexible and wide range of initiatives. France also has mandatory CPD, but this is not as well-embedded. In Estonia, Japan, the Netherlands, New Zealand, Ontario, and Singapore CPD is non-mandatory although accountability practices often require evidence of engagement. However, schools in these jurisdictions are typically responsible for managing CPD depending on the needs of the school, therefore the level of embeddedness varies across schools.
8. Existing evidence on how stakeholders perceive SEND policy implementation shows that, across jurisdictions:
    a) Practitioners' attitudes towards the importance of inclusion varied across jurisdictions; some felt that they had a duty or responsibility to provide an inclusive education for all students, while others perceived that a level of segregation was inevitable, at least with respect to some types of need.
    b) A number of constraints were identified as limiting the extent to which schools could be truly inclusive. These ranged from a lack of funding, resources, knowledge and/or training to structural features of the system, such as class sizes, standard curricula and high-stakes exams.
    c) Reports of positive and communicative interactions between families and schools, as well as strong cross-sector collaboration between schools and external support services, were associated with more positive views about the extent to which a jurisdiction's education system was currently inclusive.
    d) Peer relationships were seen as key to supporting children with SEND by both parents and practitioners.
    e) Educators reported feeling underprepared for identifying and meeting the needs of students with SEND, highlighting gaps in both initial teacher education and professional development opportunities.
9. There were mixed views across stakeholders in terms of how inclusive their education systems were overall. Stakeholders in France, the Netherlands, New Zealand, and Ontario appeared to hold the most positive views. However, they still reported barriers which limited the extent to which they could address the needs of students, including a lack of training and confidence, a lack of resources, and a lack of sufficient time to implement effective practices.

Conclusion

As in our first report, we found variation in both the conceptualisation of SEND and the policies governing provision for students with SEND across the additional jurisdictions reviewed in this second ScopeSEND report. Overall, definitions and stakeholder views that reflect a broader understanding of SEND aligned 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 are typically associated with more positive stakeholder views. However, educators across these jurisdictions still report feeling underprepared to support children with SEND and implement inclusive practices. More evidence is needed to support these findings, which will be gathered in the forthcoming Part 3 of this research project.

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Context

Project Summary

The overarching ScopeSEND project aims to address the pressing need for current, internationally comparable evidence on policies governing the provision of services for children and young people 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. Our first report published in July 2025, delivered a cross-country comparison of SEND policy and implementation across England, Wales, Scotland, Northern Ireland, Ireland, Switzerland, Belgium and Australia. The present report extends this analysis to Estonia, France, Japan, the Netherlands, New Zealand, Ontario (Canada), Poland, and Singapore, resulting from the team's partnership with the Centre for Education Systems.

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 in England, with a particular focus on addressing the ongoing SEND crisis and enhancing the sustainability of the SEND system. 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.

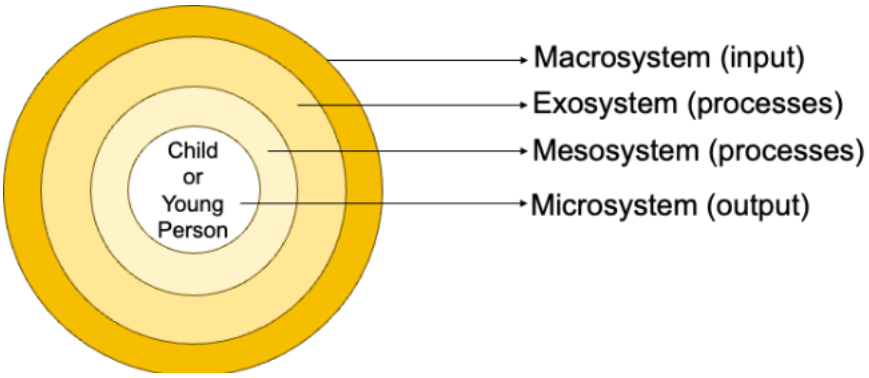
To this end, the project undertakes a comparative review of SEND policies, implementation practices, and user experiences in a selection of relevant countries. While these findings will highlight examples of good practice in SEND provision to inform policy in England, all countries will be given equal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

The IPO model - previously applied in policy analyses across education (Hosshan et al., 2020), public health and in 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). Whilst we recognise that processes are context-dependent, and their efficacy may vary across national and local systems, in this project we look to identify how patterns of policy regulation across countries are reflected in more positive subjective and objective 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 provided 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 researchers - 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.

A summary of each indicator is provided in Table 1. For a full account and detailed summary of each indicator please refer to our first report published in July 2025.

Table 1. Summary of indicators and definitions

Indicator	**Definition**
Definition of SEND or Equivalent	How SEND is defined across different educational systems and policies.
Eligibility Benchmarks and Process	The criteria used to determine whether a child qualifies for SEND support and the process of flagging for assessment.
Assessment for Eligibility	Methods and tools used to assess a child's eligibility for SEND support.
Education System	The structure of education provision, including mainstream and specialist settings.
Early Childhood Intervention	Availability and effectiveness of early interventions for young children with SEND.
Statutory Documents and Support Plans	The role of EHCPs, IEPs, or equivalent documents in structuring support.
Specific Programs, Modifications, and Arrangements	Types of programs, classroom modifications, and interventions used for SEND students.
Funding	How funding for SEND provision is allocated and accessed.
Workforce Training	The preparedness of educators and professionals to support SEND students.
Inclusion Policy or Guidance	Policies that promote or hinder inclusive education in mainstream settings.
Cross-Sector Provision	Collaboration between education, healthcare, and social services for SEND provision.
Data Records	Availability, reliability, and use of data on SEND students.
Inspections	Regulatory oversight and evaluation of SEND provision in schools.
Appeals Systems	Mechanisms for parents and carers to challenge decisions regarding SEND support.

Goals, Research Questions and Timeline

The main goal of this work in this report is to produce a comprehensive examination of policies regulating provision of SEND services in the Netherlands, Estonia, Japan, Poland, France, Singapore, Ontario (Canada), and New Zealand with reference to those jurisdictions previously examined included in table format, apart from the corpus analysis which analyses all new and original English-speaking jurisdictions.

Table 2 outlines how each research question will be addressed, using data collection methods mapped onto the Input–Process–Output model for policy analysis and informed by the Bioecological Model of Human Development.

Table 2. 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: *How do the Netherlands, Estonia, Japan, Poland, France, Singapore, Ontario (Canada), and New Zealand compare in terms of policies for SEND (against indicators of interest)?*	Input and Processes	Macrosystem Exosystem	Policy analysis (content and corpus analysis)
RQ2: *How are the different country policies reflected on current SEND outcomes within each country?*	Output	Exosystem Mesosystem Microsystem	Policy analysis (content and corpus analysis) and evidence review
RQ3: *How do the Netherlands, Estonia, Japan, Poland, France, Singapore, Ontario (Canada), and New Zealand compare in terms of stakeholders' perceptions of the success of their SEND system, across indicators?*			Evidence reviews of stakeholder perspectives
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?*	Link Input-processes-output	Cross-systems	Triangulation of data gathered by identification of patterns and interpretation against theory

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 methodology underpinning the ScopeSEND project is described in detail in our first report. Below, we provide a concise summary of the methodological approach used to answer each of the research questions.

Country selection

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 eight additional jurisdictions currently under review by CES. These are the Netherlands, Estonia, Japan, Poland, France, Singapore, Ontario (Canada), and New Zealand. This current report focuses exclusively on this additional set of jurisdictions, with reference to the findings from the first set of nine jurisdictions (the four nations of the UK plus Ireland, Freiburg (Switzerland), Flanders (Belgium) and Australia).

Procedure

To address the 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 3).

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) 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).

A list of policy documents consulted is available in Appendix C.

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 indictor. 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.

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).

This study uses a corpus linguistics approach to analyse SEND policy documents from English-speaking jurisdictions. Corpus analysis is a methodological approach that applies computational and linguistic techniques to the examination of large collections of texts, or *corpus*. It allows for the study of patterns of language use and lexical choices that might not be apparent through close reading alone. By quantifying linguistic patterns such as word frequencies, keyness and sentiment, corpus analysis provides an empirical basis for interpreting how concepts and ideologies are represented in policy texts (O'Keeffe and McCarthy 2022). We look at the frequency of key concepts, differences in keyness of these concepts between countries, and the sentiment of the documents used to define SEND in each country.

The *keyness* of a concept allows you to determine whether that concept is more likely to be seen in the *corpus* of one country than in another, or in other words, whether the representation of a concept is substantially different between countries

(Gabrielatos 2018). To determine keyness, a SEND concept dictionary was created which contained words relevant in SEND policy. These words resulted from an iterative process of familiarisation with the policies gathered and agreed between collaborators as relevant to understanding definitions of SEND. The *British National Corpus* 2014 - BNC (Brezina, Hawtin, and McEnery 2021), a collection of thousands of texts representing general English usage, was used, which enabled the comparison of frequency of words in each country's policy *corpus* with those in the British National Corpus (BNC), used as a reference corpus. This analysis identified words that occurred significantly more frequently in the selected countries policy *corpus* than in general English. We examined the top 500 keywords for each country and noted those related to SEND that were not already included in our dictionary. These additional terms were reviewed for relevance and suitability and subsequently incorporated into the concept dictionary, where relevant, to make this as comprehensive as possible. This process was repeated for each jurisdiction. To determine the difference in frequency of key terms across English-speaking jurisdictions, a likelihood-ratio version of the chi-square test was performed. From this, we calculated an effect size (Cohen's w) to show how strong the differences were. Following Cohen's (1988) guidelines, values of w were interpreted as small (0.1), medium (0.3), and large (0.5) effects. Effect sizes were reported in in addition to p-values, as the latter can exaggerate differences when sample sizes are large, such as the corpus analysed here (Coe, 2002).

The calculation of the *sentiment* of the documents in each country's corpus states what degree the policy documents concerning the definition of SEND or equivalent were positive or negative in tone (Young & Soroka 2012). To gauge the sentiment of each country's *corpus*, we used two established sentiment lexicons (i.e., pre-defined dictionaries of words attached to a coding signifying if the word should be treated positively, negatively or neutrally). In particular we used *AFINN* developed through the analysis of English language social media posts (Nielson 2011) and the *Lexicoder Sentiment Dictionary* developed through the analysis of political texts (Young & Soroka 2012). AFINN classifies words with a sentiment ranging from -4 (most negative) to +4 (most positive), while the Lexicoder Sentiment Dictionary codes words as either positive (+1) or negative (−1). Additionally, Lexicoder accounts for negations of both positive (e.g. "not good" is coded negatively) and negations of negative words (e.g. "not bad" is coded positively), allowing for a more nuanced analysis of sentiment. We use the Lexicoder Sentiment Dictionary to report the balance of positive vs. negative language (polarity), while AFINN measures the intensity of emotion (valence).

Rapid Systematic Evidence Review

A rapid qualitative evidence review was undertaken to address research question 3. Methods followed 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 terms were developed by the research team in collaboration with knowledge users and refined with a specialist librarian. 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 A. Two databases - Web of Science and EBSCO (ERIC) - were identified as the most likely to yield pertinent literature and were used to for our search. In addition to the systematic database search, experts from each jurisdiction contributed by identifying relevant grey literature to ensure a more comprehensive evidence base.

We included peer-reviewed articles published between 2014 and 2024, in English or in any of the relevant local languages. Studies were included if they reported on qualitative data capturing the views, attitudes, or perspectives on SEND policy or provision from either practitioners, caregivers, or young people with SEND. Qualitative methods included interviews, focus groups, ethnographic approaches, qualitative observations, as well as participatory or co-creation methodologies.

The quality and potential bias of studies was assessed using the Joanna Briggs Institute (JBI) Critical Appraisal Tool[4].

Data extraction was conducted by a single reviewer using a structured Excel template. Demographic data was extracted from each paper as well as the key qualitative findings (e.g., themes) reported by the authors. A framework synthesis approach was used to synthesise the data across papers. 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 3.

Table 3. Indicators included in the framework analysis

Indicator	Number of Codes
Definition of SEND or Equivalent	21

[4] The Joanna Briggs Institute Critical Appraisal Tools are available here: https://jbi.global/critical-appraisal-tools

Eligibility Benchmarks and Process	10
Assessment for Eligibility	43
Education System	216
Early Childhood Intervention	2
Statutory Documents and Support Plans	3
Specific Programs, Modifications, and Arrangements	1
Workforce Training	35
Inclusion Policy or Guidance	26
Cross-Sector Provision	14
Funding	2

Using this framework, qualitative data from the included studies were systematically coded and mapped 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

This section presents results obtained from the policy analysis conducted (content and corpus) and from the evidence review. Descriptions of all jurisdictions are provided in Table 4. However, only results from the additional jurisdictions (Estonia, France, Japan, the Netherlands, New Zealand, Ontario (Canada), Poland, and Singapore are presented in paragraph format below. For more detailed descriptions of the remaining jurisdictions (Australia, Belgium (Flanders), England, Finland, Ireland, Northern Ireland, Scotland, Switzerland (Fribourg) and Wales, please see our first report.

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 4 provides an overview of the Education Systems across jurisdictions.

Across the additional jurisdictions, the broad structure remains similar—early childhood, primary, secondary, and post-secondary—but differences emerge in governance, tracking, faith-based provision, and approaches to inclusion.

France, Japan, New Zealand, and Singapore function as centralised systems that are overseen by a Ministry of Education (or equivalent), and all have national curricula. Japan differs slightly in that, although governed by the national Ministry of Education, Culture, Sports, Science and Technology (MEXT), both prefectural and municipal governments play a role in administering education. The Netherlands, Poland, and Ontario combine national frameworks with provincial, regional, or municipal responsibilities. These countries also have national curricula, apart from Ontario which has a province-wide curricula, which may be considered equivalent to a national curriculum given that education is delivered entirely at the provincial level. Estonia represents a hybrid case, with a strong national curriculum but substantial autonomy for schools and municipalities.

Several systems adopt early academic tracking. The Netherlands streams students the earliest - from around age 12 - into general, technical, or vocational routes, while Estonia, Poland, France, Singapore and Japan also differentiate pathways from around age 15. By contrast, Ontario and New Zealand maintain more comprehensive structures where students choose among academic, applied, and vocational subjects within a single qualification framework.

Faith-based education plays a role in the Netherlands, where Catholic and Protestant schools are publicly funded on equal terms with secular schools. Ontario also has a publicly funded Catholic system alongside the public sector. In France, Catholic schools are significant but mostly private, while in New Zealand faith-based schools exist but occupy a more limited share. Estonia, Poland, Japan, and Singapore have broadly secular state systems, though cultural influences (such as Catholic traditions in Poland) shape aspects of provision.

Inclusion has been a prominent reform focus across all eight additional jurisdictions, though the way this is implemented varies. The Netherlands, Ontario, Poland, New Zealand, Estonia, and France have strong commitments to mainstream

placement, backed by legal obligations or dedicated support services, while Japan and Singapore encourage mainstream integration but assign a stronger role to specialist schools. All countries still retain some special schools, particularly for children with complex needs.

Table 4. Overview of Education Systems across all jurisdictions covered in ScopeSEND, considering types of setting and phases of education

	Types of Settings				Phases of Education & Age Ranges		
Jurisdiction	**Types of Settings (State Funded)**	**Private**	**Faith-based**	**Specialised versus mainstream settings**	**Early Years**	**Primary**	**Secondary & Post-16**
Australia (NSW, QLD, VIC)	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/Prep to Year 6 (5–12ya)	Years 7–12 (12–18), culminating in HSC (NSW), QCE (QLD), or VCE (VIC)
Belgium (Flanders)	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 high participation	Lager onderwijs (5–12ya)	Secundair onderwijs (12–18ya), with various tracks
England	Community schools, academies (majority), grammar schools (minority)	Independent fee-paying schools (5.9%)	Voluntary aided schools (part of maintained sector)	Specialised (<10%) and mainstream provision (majority)	Nursery (3–4ya), Reception (4–5ya), non-compulsory	Years 1–6 (5–11ya)	Years 7–11 (11–16ya), GCSEs; Years 12–13 (16–18ya), A-levels or vocational
Estonia	Municipal schools (majority)	Private schools (minority)	Minimal	Inclusive mainstream with some specialised options	Pre-school education (from 18 months to 7ya) non-compulsory	Grades 1–6 (7–13ya)	Grades 7–9 (13–16ya); Gymnasium or vocational (16–19ya)
Finland	Municipal schools (majority)	Fee-paying (but state supported) private schools (<3%)	Minimal	Inclusive mainstream (0.7% in special schools, 2.1% in special support tier)	Early Years (up to 6ya), non-compulsory but nearly universal	Pre-primary (6–7ya), primary (7–12ya)	Lower secondary (13–15ya), upper secondary/vocational (16–18+)
France	Majority of schools are state-funded public institutions under the Ministry of Education.	Private fee-paying schools (~20% of pupils). Some are under contract with the state (sous contrat); a minority	Predominantly Catholic private schools form the bulk of the *sous contrat* sector.	Mainstream provision is the norm. Specialised pathways exist: ULIS within mainstream,	École maternelle (pre-elementary) is compulsory for children aged 3 to 6 (cycle 1).	École élémentaire (elementary school) for children ages 6 to 11 (cycles 2–3), Collège (lower secondary	Lycee (age 15-18) Is non-compulsory. Pupils are streamed to attend either a general and technological (lycée

		are fully independent (hors contrat).		SEGPA/EREA in collèges/lycées, Les réseaux d'aides spécialisées aux élèves en difficulté (RASED), and UE (Unités d'Enseignement) within IME (Institut médico-éducatif)		education) for children ages 11 to 15 (cycle 4).	général et technologique) or vocational lycées (lycée professionnel)
Ireland	National Schools	Fee paying schools	Predominantly Catholic patronage	Specialised (2.3%), with specialised classes in mainstream common	ECCE Scheme (3–5ya), non-compulsory	Junior & Senior Infants, 1st–6th Class (5–12ya)	Junior Cycle (12–15ya), Transition Year (optional), Senior Cycle (15–18ya)
Japan	Municipal schools (majority)	Private schools (c.30% of upper secondary)	Some Buddhist and Christian schools	Mainstream is default, special schools exist for significant disabilities	Kindergarten (3–6ya), non-compulsory	Elementary school (6–12ya)	Lower secondary (12–15ya), Upper secondary (15–18ya), with academic/vocational options
The Netherlands	Public and special schools (state funded)	Private schools (including fee-paying elite schools)	Catholic and Protestant schools (freely established, state funded)	Specialised schools under 'cluster' system; mainstream majority	Preschool and playgroups (2–4ya) and ‘voorschoolse educatie’ (VVE) progrmmes	Primary (4–12ya)	Secondary beginning at age 12ya, and finishing depending on the chosen track, including VMBO (4 years), HAVO (5 years), VWO (6 years) tracks
New Zealand	State schools including Māori-	Private schools (5%)	State-integrated (faith-based) schools (10%)	Mainstream with resourced specialist support; Residential	ECE from birth to 5ya	Years 1–6 (5–11ya)	Years 7–13 (11–18ya), National Certificate of Educational

	medium education (majority)			special schools exist for students with SEN owing to vision and/or hearing impairments or social, behavioural and/or learning difficulties. Charter schools also exist.			Achievement (NCEA) Levels 1–3
Northern Ireland	Controlled Schools (c.49%)	Independent fee-paying schools (minority)	Maintained-Catholic schools (c.40%)	Specialised (9.3%) and mainstream provision (majority)	Nursery (3–4ya), Reception (4–5ya), non-compulsory	P1–P7 (5–11ya)	Years 8–12 (11–16ya), GCSEs; Years 13–14 (16–18ya), A-levels
Ontario (Canada)	Public schools (majority)	Private schools (6%)	Catholic schools (publicly funded, separate system)	Inclusive mainstream is the goal; special education classes exist	Kindergarten (4–5ya), compulsory from 6ya	Grades 1–8 (6–14ya)	Grades 9–12 (14–18ya), leading to OSSD
Poland	Public schools (majority)	Private schools (growing but small share)	Catholic schools exist, both public and private	Inclusive mainstream preferred; specialised schools for severe needs (1.6% of pupils)	Preschool (3–6ya)	Primary (7–15ya), grades 1–8	Secondary (15–19ya), general, technical, or vocational paths
Scotland	Local authority schools (majority)	Independent schools (minority)	Denominational schools (mainly Catholic)	Specialised (6.8%) and mainstream provision (majority)	Nursery (3–5ya), non-compulsory	P1–P7 (5–12ya)	S1–S6 (12–18ya), with National Highers and Advanced Highers
Singapore	Government and Government-aided schools	Private international schools	Religious-based schools allowed	Mainstream is default; special education schools for moderate/severe needs	Kindergarten (4–6ya)	Primary 1–6 (7–12ya)	Secondary 1–5 (13–17/18ya), multiple academic/vocational tracks

Switzerland (Fribourg)	Public schools (c.88%)	Government-dependent private (4%), independent private (8%)	Limited	Mainstream and specialised settings co-exist	Kindergarten (4–6ya), 2 years compulsory	Grades 1–6 (6–12ya)	Grades 7–9 (12–15ya), academic/vocational (15–18/19ya)
Wales	Community schools, Voluntary controlled/aided, Foundation schools, All-through (3–16/18)	Independent fee-paying schools (2%)	Church in Wales or Catholic schools (maintained)	Mainstream (majority); special schools, PRUs, EOTAS exist	Funded early education from age 3	Years 1–6 (5–11ya)	Years 7–11 (11–16ya), Years 12–13 (16–18ya), A-levels or vocational

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

Key findings:

1. Analysis of these new jurisdictions reveals that they are situated along a continuum in terms of their approach to defining SEND, determining children's eligibility for support, and providing statutory support, ranging from a medical diagnosis-based model (Poland, and Japan) to a biopsychosocial model based on needs (Estonia). France, New Zealand, the Netherlands, Ontario (Canada), and Singapore all adopt a combined approach which incorporates elements of both models.

2. Singapore, which adopts a combined approach to defining SEND alongside a strong specialist-provision pathway, stands out as having a higher frequency of key terms in its policy corpus related to medicalised approaches to defining SEND (e.g., 'diagnosis'. 'ADHD', 'Autism' and 'deficit') compared to the other eight English-speaking jurisdictions covered by the ScopeSEND project.

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

Among the new jurisdictions, Japan, and Poland appear to define SEND within their policies according to approaches that are closer to the medical model. In France and Poland, special education is provided on the bases of a statement of needs and eligibility, and support for services is typically tied to diagnostic categories. Formal identification in Poland is undertaken by qualified professionals in Counselling and guidance centres (Poradnia psychologiczno-pedagogiczna; PP-P). Similarly, in Japan, while the definition of SEND is grounded in medical and diagnostic categories, and eligibility is typically also tied to diagnostic categories, there is increasing involvement from schools in identifying children who may need educational support even without a formal diagnosis, particularly within mainstream settings.

France, New Zealand, the Netherlands, Ontario (Canada), and Singapore's systems operate on a combined (medically grounded and needs-based) approach to

defining need and allocating support. In France, the Loi n° 2005-102 du 11 février 2005 (loi handicap) defines disability and outlines some educational rights of people with disability defined. However, the Code de l'Éducation, Articles L.112-1 to L.112-5 considers support for disabled students, students with language and learning difficulties, students with long term educational difficulties, and gifted students. The 2019 law "École de la confiance", reflects a shift towards a more needs-based understanding of special needs, moving away from a purely medical approach. However, identification is often based on a specialist assessment completed by schools and specialists in the departmental house for disabled people (MDPH), apart from in the RASED (Réseaux d'aides spécialisées aux élèves en difficulté), which focuses on pupils' learning difficulties regardless of the existence of a diagnosis. Support is also typically organised through a tiered system of plans, enabling schools to implement appropriate measures without necessarily requiring MDPH involvement. In New Zealand, the Ministry of Education typically frames support for learners under needs-based language such as 'inclusion' or 'learning support' as is seen in the Learning Support Action Plan 2019–2025. Eligibility for school-based support is often based on school-based assessments sometimes with input from specialists. The criteria used for access to Ongoing Resourcing Scheme (ORS) funding for high needs learners (approximately 1%) use some needs-based language, but retain elements of medicalised language (e.g., reference to "severe disorder" categories). Ontario (Canada) operates a hybrid definition and eligibility system linked to both functional needs and diagnostic categories. A child may be formally identified as exceptional by an Identification, Placement, and Review Committee (IPRC), which considers specialist assessments, but this formal identification is not needed to access support. In the Netherlands, the Appropriate Education law emphasises the school's duty of care for their pupils meaning they need to provide a suitable educational place for their pupil (passende plek) rather than defining groups by diagnostic or categorical criteria. This could be a place outside the school where they are registered such as a neighbourhood school or special education school. Eligibility is based on school assessment with support from specialists. In Singapore, within mainstream schools, the Ministry of Education identify children who need support by their needs. However, eligibility for special education (SPED) placement requires formal diagnosis and specialist assessment.

Finally, the policy language of Estonia emphasises that schools should support the development of all learners and schools should create opportunities for identifying needs. Where is becomes clear that there is a need, a pedagogical-psychological evaluation of the student is organised by the school and supported by specialists where necessary.

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

Table 5. Cross-country comparison of SEND definitions; assessment for eligibility; eligibility criteria for support services; and statutory plans across all jurisdictions covered in ScopeSEND.

Jurisdiction	Definition of SEND	Assessment Process	Statutory Documentation and Support Plans
Australia – NSW	'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)
Australia – QLD	'Students with disability' under state policy; aligned with national standards.	School-based assessment with support from Department of Education psychologists and specialists.	Individual Curriculum Plan (ICP) or Individual Education Plans (IEPs)
Australia – VIC	'Students with disability' under state policy; aligned with national standards.	Functional behaviour assessments and school-based planning; input from therapists. Eligibility through assessments reviewed by the Department of Education.	Individual Education Plans (IEPs)
Belgium (Flanders)	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).
England	'Special Educational Needs and Disabilities' (SEND); Based on the Children and Families Act 2014; SEND includes learning	Multi-professional assessment; led by Local Authorities.	Education, Health and Care Plan (EHCP)

	difficulties/disabilities requiring special educational provision.		
Estonia	Children with 'special educational needs' (erivajadustega lapsed). Defined in the Basic Schools and Upper Secondary Schools Act (Põhikooli- ja gümnaasiumiseadus).	Schools conduct assessments; support from counselling centres and educational psychologists where necessary.	Estonia uses two core pupil-level instruments that are mandatory in practice and link directly to referral, eligibility and placement decisions: the Individual Development Monitoring Card (Õpilase individuaalse arengu jälgimise kaart, IAJK) and the Individual Curriculum (Individuaalne õppekava, IÕK).
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.
France	The Loi n° 2005-102 du 11 février 2005 (loi handicap) defines disability as "any limitation of activity or restriction of participation in life in society suffered by a person due to a substantial, lasting or permanent alteration of one or more physical, sensory, mental, cognitive or psychological functions, a multiple disability, or a disabling health condition". However, the Code de l'Éducation, Articles L.112-1 to L.112-5 considers support for disabled students, students with language and learning difficulties, students with long term educational difficulties, and gifted students.	Assessment completed by the school with support from a specialist team MDPH: Departmental House for Disabled People using a specialist assessment tool, the GEVA-sco.	There are three main support plans. The PPRE (Programme personnalisé de réussite éducative) for pupils with temporary or specific academic difficulties that risk hindering progress (not necessarily due to disability). The PAP (Plan d'accompagnement personnalisé) for pupils with long-term learning difficulties caused by specific learning disorders (dyslexia, dysgraphia, ADHD, etc.). The PPS (Projet personnalisé de scolarisation) for pupils recognised as disabled by the CDAPH under the 2005 law.
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.
Japan	Defined under the School Education Act as persons with visual impairment, persons with hearing impairment, persons with intellectual disability, persons with physical disability, or persons with health impairment (this includes persons with constitutional weakness).	Municipal boards and schools coordinate assessments; includes medical and educational perspectives.	Individualised Educational Support Plan (IESP) for coordination; Individualised Instruction Plan (IIP) for teaching.
The Netherlands	Appropriate Education Act (Wet op het passend onderwijs, 2014) – all schools have a duty of care for their pupils, meaning that	Assessment involves school-based support teams; external assessment for complex needs.	Development Perspective Plan (OPP) required for any student receiving extra support.

	they have to find a suitable place for their pupil.		
New Zealand	No formal definition in New Zealand policy documents, but the Ministry of Education uses needs-based language such as 'inclusion' and 'learning support'	School-based assessment supported by Learning Support Coordinators and specialists.	Individual Education Plan (IEP) or Learning Support Delivery Plan. Ongoing Resourcing Scheme (ORS) provides specialist support for ākonga/students with the highest levels of ongoing need.
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
Ontario (Canada)	Students with exceptionalities including behaviour, communication, intellectual, physical, and multiple exceptionalities defined in the Education Act, R.S.O. 1990, c. E.2.	Assessments, Identification, Placement, and Review Committee (IPRC) process with educational assessments.	Individual Education Plan (IEP), legally mandated within 30 days of placement.
Poland	Defined in the *Law on School Education* (*Prawo oświatowe*, 2016, Art. 127). Children are considered for support when they are found to require "special education" (*kształcenie specjalne*) due to disability, social maladjustment, or risk of maladjustment.	Special education is provided on the basis of a statement of needs. Specialist assessments are carried out by Counselling and guidance centres (Poradnia psychologiczno-pedagogiczna / poradnia PP-P).	Individual Educational and Therapeutic Programmes (IPETs) for students with statements of need.
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
Singapore	Formal definition from the Ministry of Education: students who require additional support to access the curriculum and participate meaningfully in school due to learning, behavioural, sensory, physical or communication needs.	School-based and external assessments; conducted with support from Ministry of Education.	Individual Education Plan (IEP) used in SPED schools
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)
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)

This conceptual interpretation of policy content was triangulated with findings from corpus analysis. We report here on this corpus analysis for all English-speaking jurisdictions from our first report (Australia, England, Ireland, Northern Ireland, Scotland, and Wales) and the new jurisdictions (New Zealand, Ontario, and Singapore).

Table 6 shows the frequency (as a percentage) of key terms within the SEND concept dictionary across all policy documents gathered for all nine English-speaking jurisdictions. Of note is the higher frequency of key terms related to medicalised approaches to defining SEND in Singapore, compared to the other eight jurisdictions (e.g. 'diagnosis'. 'ADHD', 'Autism' and 'deficit'). Differences between countries were calculated using effect size (see methodology section above). When looking at the size of the effect of these differences between countries (Figure 3), we see that the frequency of 'deficit' is much higher in Singapore than in any other countries (large effect size). 'Autism' is also higher in Singapore than in others, except when comparing to Ontario (where the frequency is the same) and with Ireland (where the difference is only small, but Singapore still has statistically significant higher frequency). The size of the effect for the difference in frequency of 'diagnosis' (higher in Singapore) is also large when comparing to all other countries. 'ADHD' is mentioned more frequently in Singapore than in all other countries with mostly large effects (see Figure 3).

Table 6. Proportion of SEND-related concepts in policy texts by English-speaking jurisdiction

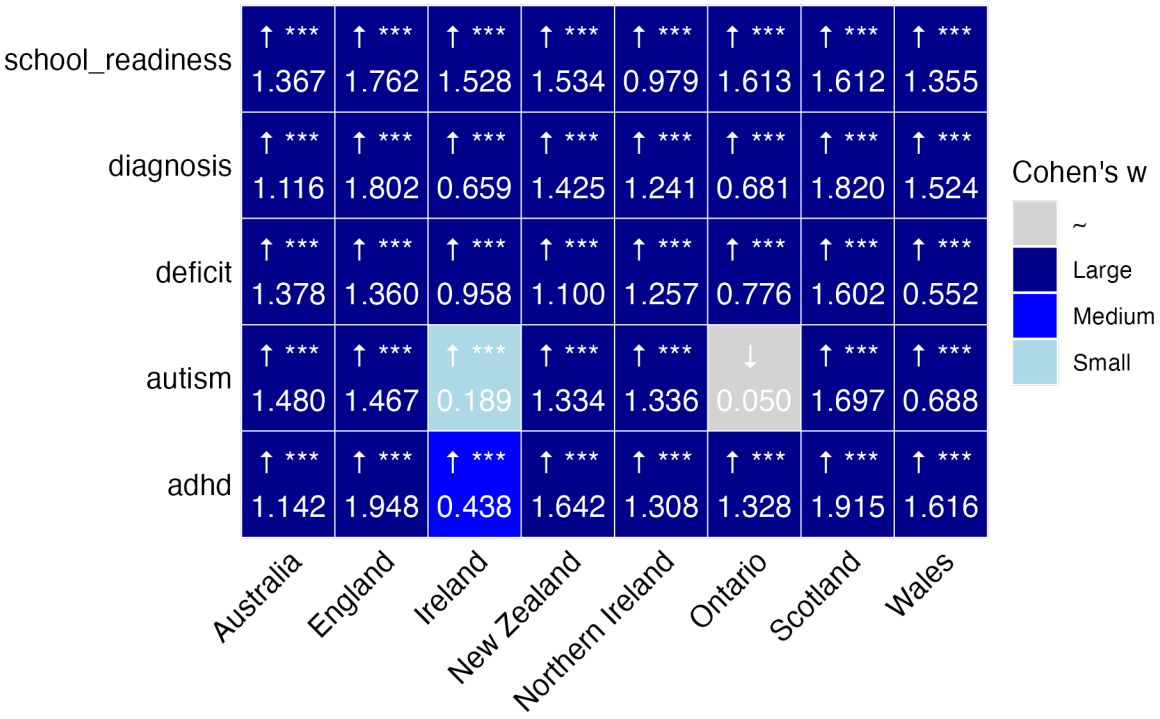
concept	Australia	England	Ireland	New Zealand	Northern Ireland	Ontario	Scotland	Singapore	Wales
ableism	.0026	-	-	.0002	-	-	-	-	-
adhd	.0018	-	.0068	-	.0010	.0010	-	.0198	.0002
adoption	.0036	.0634	.0116	.0019	.0419	.0020	.0225	.0075	.0291
at_risk	.0100	.0048	.0083	.0112	.0017	.0060	.0066	.0089	.0134
attention	.0102	.0051	.0239	.0079	.0086	.0163	.0061	.0382	.0182
autism	.0060	.0063	.0860	.0062	.0062	.1635	.0027	.1446	.0354
behaviour	.0855	.0127	.1325	.0340	.0236	.2068	.0286	.1910	.1273
belonging	.0260	.0008	.0026	.0141	.0005	.0032	.0082	.0014	.0026
blind	.0013	.0004	.0077	.0031	.0012	.0256	.0003	.0177	.0061
bullying	.1027	.0014	.0097	.0036	.0007	.0468	.0316	.0034	.0119
care	.3922	.3541	.0919	.0696	.3032	.0841	.3123	.4134	.3727
collaboration	.0187	.0016	.0291	.0117	.0090	.0121	.0101	.0607	.0067
crossdepartment	-	-	.0001	-	-	-	-	-	-
crossdisciplinary	.0004	-	.0001	-	-	-	-	-	.0002
deafblind	-	-	-	-	-	-	-	-	-
deafness	.0026	.0008	.0091	.0280	.0012	.0458	.0006	.0075	.0850
deficit	.0071	.0074	.0166	.0124	.0076	.0268	.0036	.1303	.0415
delay	.0051	.0078	.0079	.0036	.0112	.0079	.0033	.0348	.0067
deprived	.0010	.0117	.0016	-	.0019	-	.0029	.0007	.0018
diagnosis	.0146	.0018	.0334	.0041	.0093	.0373	.0014	.1501	.0032
disabled	.6151	.1431	.2109	.2363	.1718	.0558	.0808	.2115	.0573
dyscalculia	-	.0001	.0005	.0002	-	-	-	-	-
dyslexia	.0012	.0006	.0101	.0074	.0012	.0002	.0011	.0205	.0016
early_childhood	.0746	.0002	.0126	.1090	.0067	.0443	.0040	.0307	.0004
early_years	.0430	.0612	.0623	.0017	.0307	.0028	.0365	.0082	.0273
exceptional	.0052	.0031	.0089	.0026	.0088	.0941	.0024	.0068	.0059
family	.1550	.0717	.0158	.0201	.0278	.0236	.0863	.1890	.0275
foster	.0083	.0267	.0125	.0096	.0331	.0093	.0221	.0109	.0146
genetic	.0012	-	.0020	.0002	.0005	.0010	.0014	.0014	-
gifted_talented	.0022	-	.0013	.0143	-	.0067	.0002	-	.0010
health	.2846	.2009	.0661	.0753	.1697	.1685	.1601	.5157	.1487
iep	.0372	.1752	.1188	.0297	.0262	.2719	.0288	.3540	.1093
inclusion	.1346	.0096	.5357	.0959	.0452	.0294	.0165	.0171	.0504
intellectual	.0186	.0003	.0106	.0038	.0010	.0117	.0006	.0744	.0034
interdisciplinary	.0004	-	.0019	-	.0007	.0006	.0076	-	.0012
learning	.4789	.0748	.4937	.3754	.1485	.4497	.5376	.3063	.4943
life_skills	.0010	.0001	.0033	.0007	-	.0014	.0008	.0082	.0010
literacy	.0757	.0164	.0962	.0433	.0376	.1121	.1274	.1126	.1214
mainstream	.0139	.0216	.1686	.0055	.0259	.0002	.0028	.0798	.0380
medical_needs	.0193	.0251	.0096	.0031	.0502	.0468	.0088	.0880	.0138
mental_health	.1173	.0278	.0086	.0215	.0059	.0568	.0146	.3663	.0204
motor	.0022	.0005	.0053	.0022	.0021	.0089	.0035	.0593	.0061
multiagency	.0003	.0124	.0012	-	.0012	-	.0052	.0034	.0032

concept	Australia	England	Ireland	New Zealand	Northern Ireland	Ontario	Scotland	Singapore	Wales
needs	.1272	.1835	.3528	.1389	.2173	.2705	.1805	.4366	.3773
neurodiversity	.0008	.0001	.0002	.0005	.0005	-	.0002	-	-
numeracy	.0454	.0034	.0580	.0127	.0093	.0349	.0842	.0225	.0726
parents	.0812	.0937	.2113	.0873	.1414	.2078	.1404	.1692	.1916
participation	.0431	.0071	.0431	.0198	.0114	.0143	.0177	.0130	.0156
peers	.0172	.0039	.0277	.0132	.0036	.0101	.0052	.0300	.0160
physical	.0610	.0158	.0348	.0385	.0188	.0514	.0503	.0771	.0467
play	.0695	.0098	.0402	.0395	.0107	.0333	.0687	.0553	.0524
school_readiness	.0005	.0001	.0004	-	.0014	-	.0002	.0109	.0004
SEND	.0047	.1938	.5278	.0517	.6853	.0222	.0049	.1930	.1671
social_care	.0002	.0648	.0012	-	.0647	-	.0069	.0027	.0210
socioemotional	-	.0004	-	-	-	-	.0001	-	-
specialist	.0135	.0237	.0489	.0416	.0093	.0038	.0157	.0136	.0413
support	.5032	.2055	.7858	.3513	.2161	.3424	.5367	.7019	.3808
tiered	.0030	.0002	.0269	-	-	.0109	.0001	.0171	.0002
transition	.0783	.1339	.0590	.0873	.0992	.1359	.0819	.1344	.0277
vulnerable	.0141	.0038	.0020	.0019	.0083	.0014	.0046	.0014	.0038
welfare	.0096	.0350	.0186	.0050	.0255	.0018	.0245	.0082	.0134
wellbeing	.2167	.0324	.0342	.0847	.0176	.0216	.1174	.1037	.1558

Note. Dark blue = highest, light blue = lowest frequency per concept.

For each concept we constructed a heat map of the Cohen w values between countries, either L for large, M for medium, or S for small effect sizes, with an arrow pointing towards the country that had a higher likelihood of using that concept within its corpus. Where the effect size was negligible, we plotted a tilde ~, and where both countries were missing the concept entirely, we plotted a blank square.

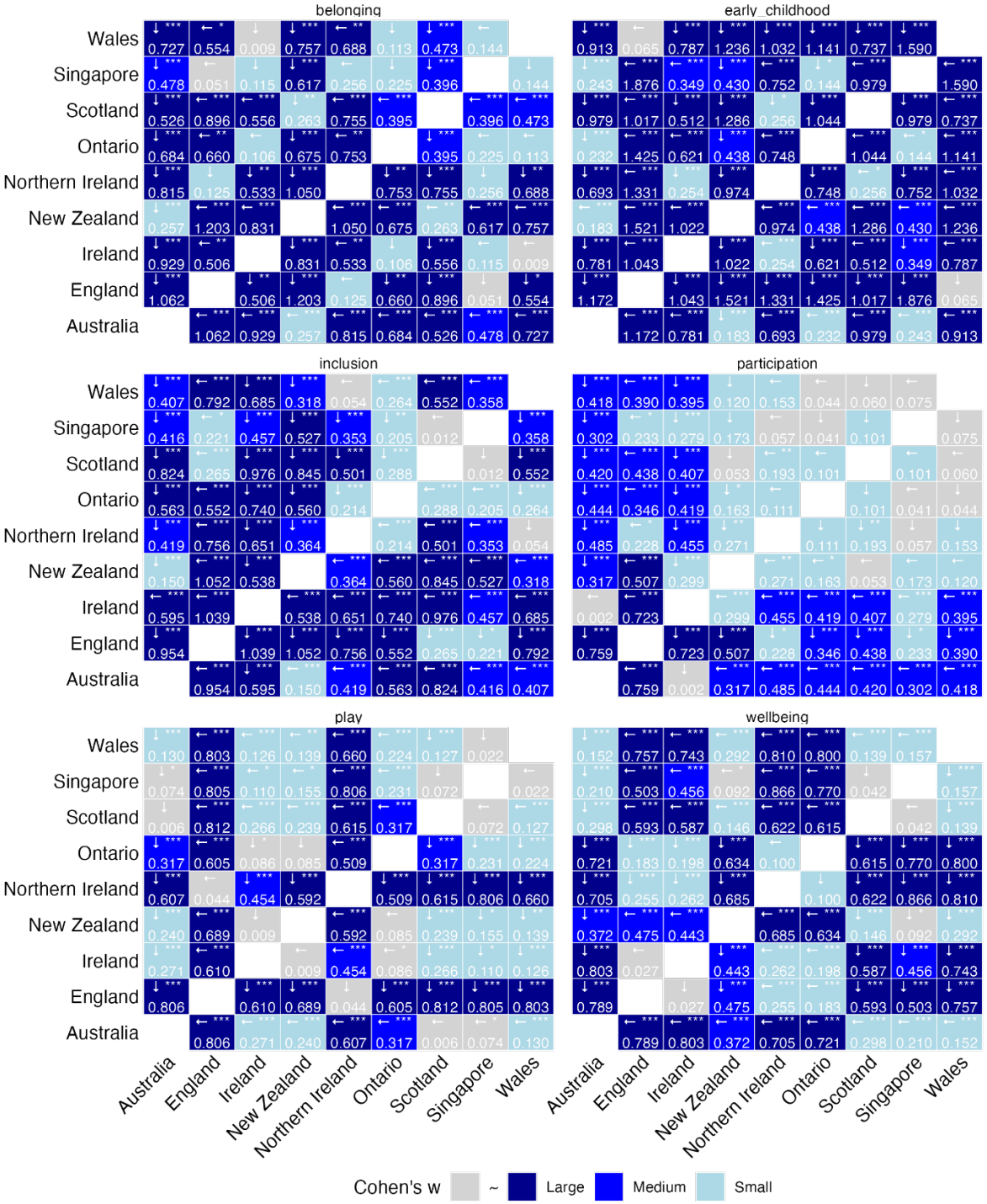
Figure 3. *Keyness* of concepts associated with a medical model of SEND in Singapore compared with other English-speaking jurisdictions



Note. Cohen's *w* effect size, direction of effect (arrows point towards Singapore, or country with higher occurrence of concept), and *p*-values are shown ($p < .05$ = *, $p < .01$ = **, $p < .001$ = ***).

Looking at concepts traditionally associated with a more preventative and biopsychosocial approach to SEND (see Figure 4), Australia's and Scotland's policies mention 'Play' more frequently, with England and Northern Ireland mentioning this less than others, with large effects. 'Wellbeing' is more frequent in Australia (small effect when compared to Scotland, Singapore and Wales, medium effect when compared to New Zealand and large effects for other countries). Of note is also the term 'inclusion', more frequent in Ireland with large to medium effect sizes when comparing to others, and 'belonging', more frequent in Australia, with mostly large effect sizes compared to other countries, except for New Zealand where the effect is small. 'Participation' is more frequent in Australia with mostly medium effect sizes and no difference when comparing to Ireland. 'Early childhood' is more frequent in New Zealand, with mostly medium to large effect sizes, except when comparing to Australia where effects are small.

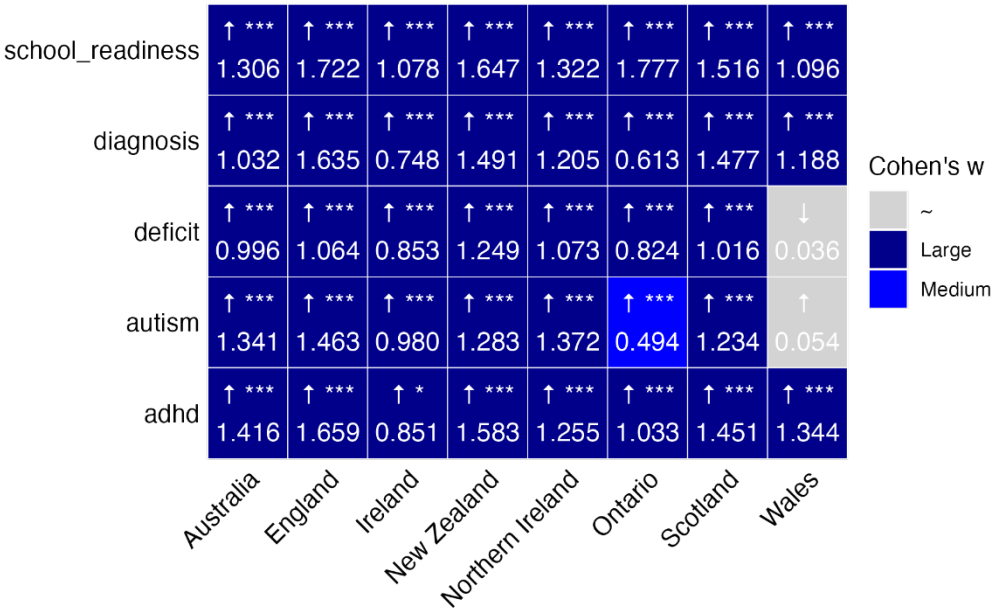
Figure 4. *Keyness* of example concepts related to a needs-based, biopsychosocial approach to SEND ('belonging', 'inclusion', 'participation', 'play' and 'wellbeing') and 'early childhood' in all English-speaking jurisdictions



Note. Cohen's *w* effect size, direction of effect (arrows point towards country with higher occurrence of concept), and *p*-values are shown ($p < .05$ = *, $p < .01$ = **, $p < .001$ = ***).

The above results refer to the whole set of policies from all the English-speaking jurisdictions, on the basis that the way in which SEND is defined and conceptualised may be reflected in many policies and regulations, not only in those aiming specifically to define SEND. However, when performing the same analysis exclusively on those policies aiming to define SEND, similar effects are observed. In particular, the higher frequency of medical-model related words in Singaporean policies is clearer in this analysis, as these are more frequent than in any other jurisdiction (Figure 5). As examples. 'Early childhood' continues to be more frequent in New Zealand than others, and 'play' remains especially frequent in Australia compared to others. 'Wellbeing' is less frequent in Wales than any other jurisdiction, 'Belonging' more frequent in Scotland compared to others with large to medium effects, 'Inclusion' in Australia and Ireland, and 'Participation' in Australia.

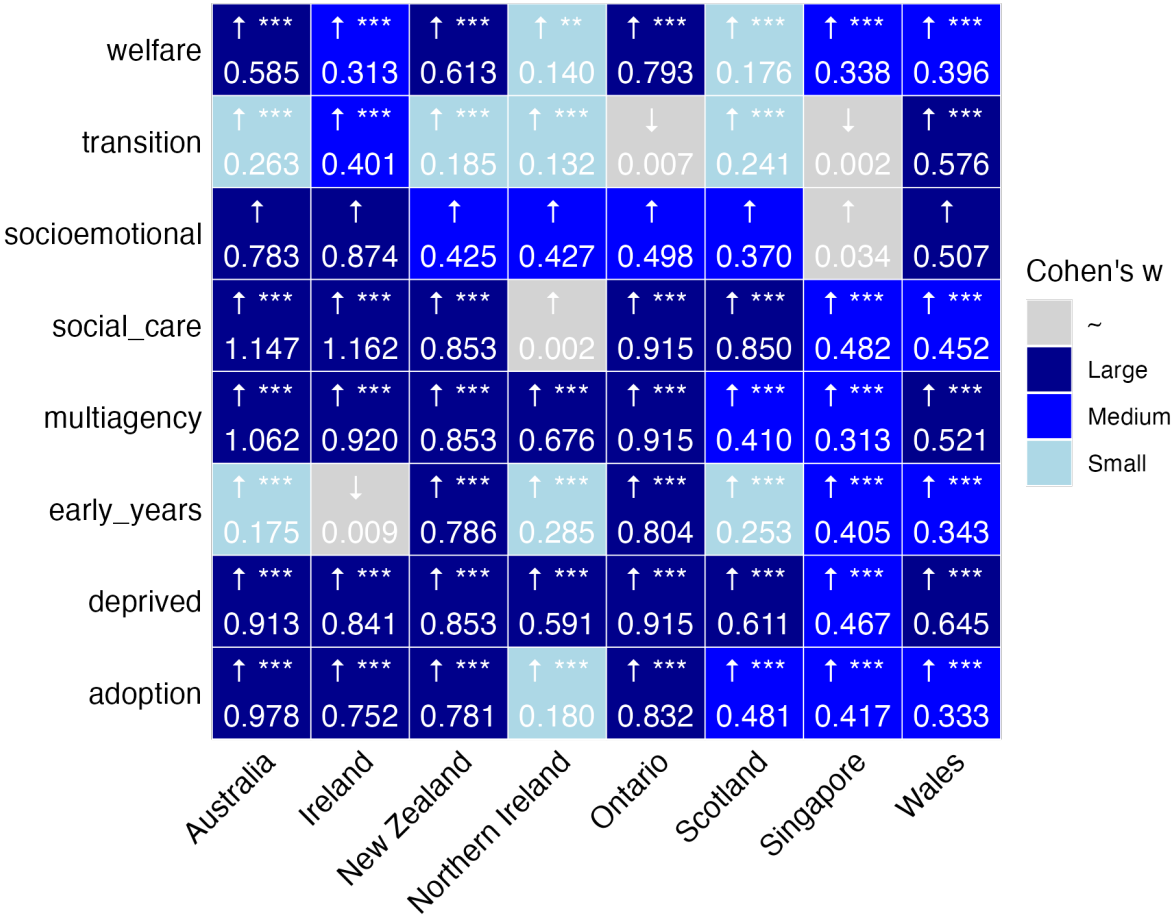
Figure 5. *Keyness* of example concepts related to a medical model approach to SEND in Singapore compared to other English-speaking jurisdictions and focusing on a limited number of policies aiming to define SEND



Note. Cohen's *w* effect size, direction of effect (arrows point towards Singapore, or country with higher occurrence of concept), and *p*-values are shown ($p < .05$ = *, $p < .01$ = **, $p < .001$ = ***).

Figure 6 shows the highest frequency concepts in England's policies. Here, there is a higher frequency of references to the concepts 'adoption' (medium to large effect except when comparing to Northern Ireland, where effects are small), 'deprived' (alongside Ontario), 'early years' (with large effect sizes), 'multiagency' (especially when compared to New Zealand, Ontario and Scotland), 'socioemotional' (similar to Scotland and term not found in other jurisdictions), 'social care' and 'transition' (especially differing from Wales), and 'welfare' (with wide range of effect sizes).

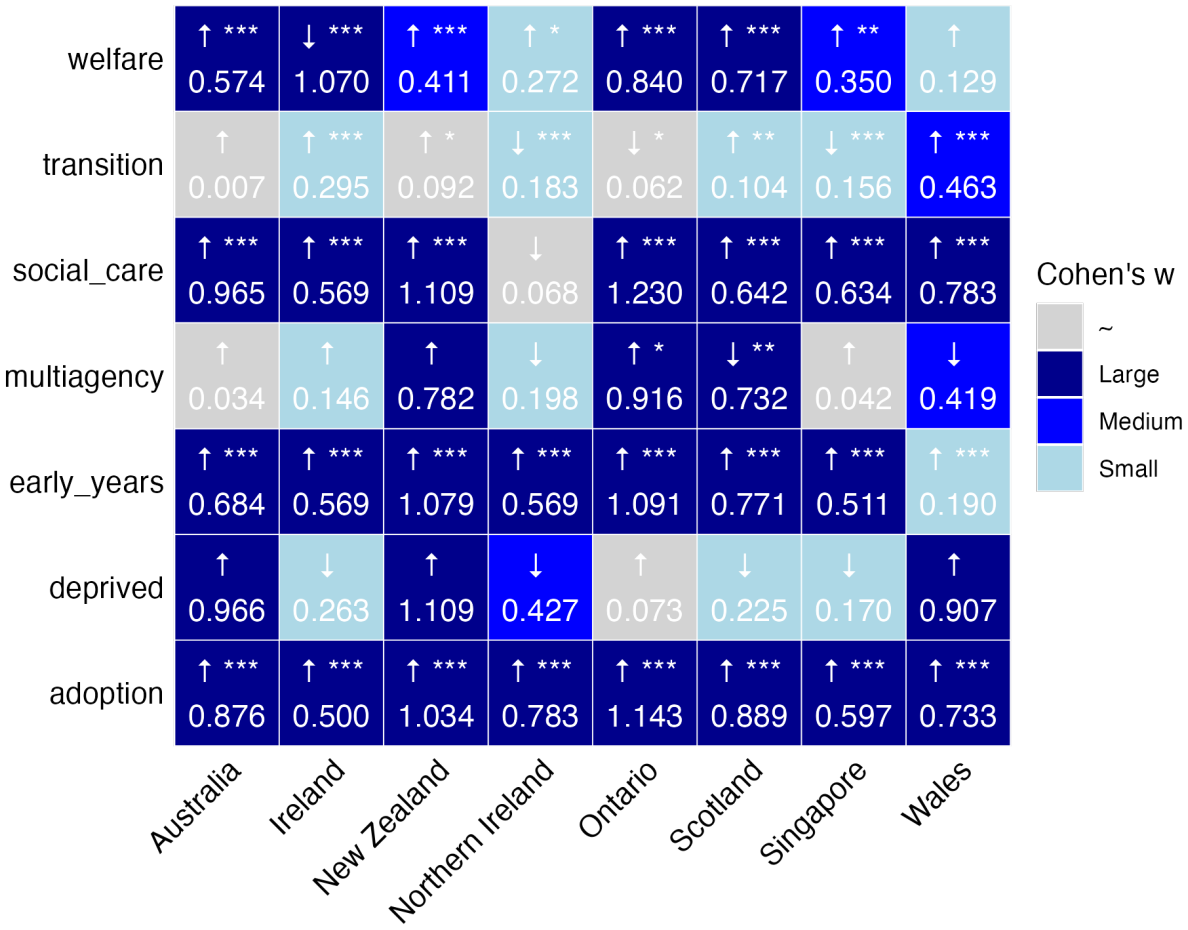
Figure 6. *Keyness* of most frequent concepts in England compared to all jurisdictions, across all policies



Note. Cohen's *w* effect size, direction of effect (arrows point towards country with higher occurrence of concept), and *p*-values are shown ($p < .05$ = *, $p < .01$ = **, $p < .001$ = ***).

Of note is the fact that although the concept 'multiagency' seems to be adopted more widely in English policy than anywhere else, the term 'interdisciplinary' is frequent in other jurisdictions, such as Ireland and Northern Ireland (see Table 6). Therefore, this should not be interpreted as England's policies having more regulations around cross-sector work, as similar terms have been adopted across jurisdictions. 'School Readiness' is only used in Singaporean, Australian and Welsh policies, though much more frequent in Singapore (with large effects regardless of whether we consider the full set of policies or only those aiming to define SEND, as per Table 6).

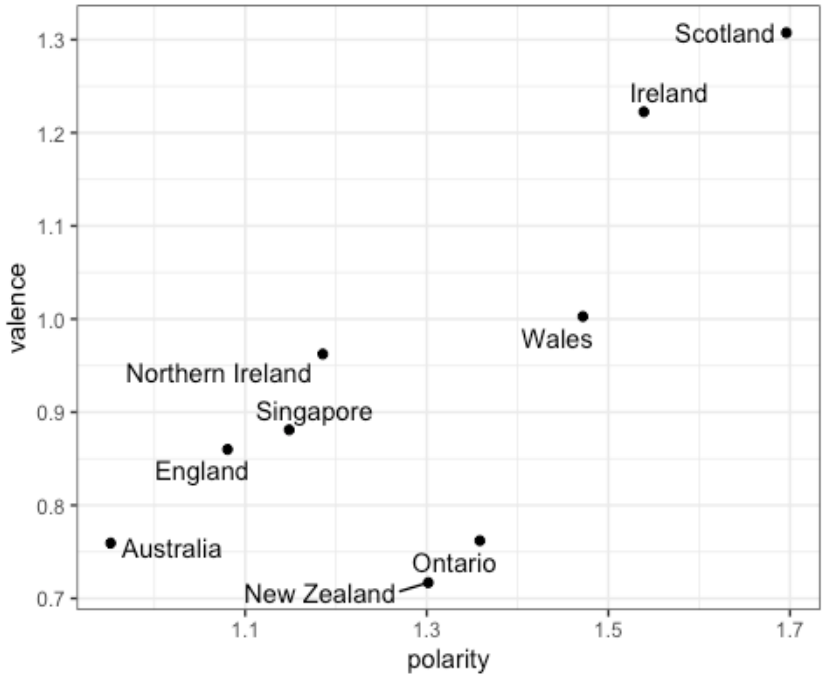
Figure 7. *Keyness* of most frequent concepts in England, compared to other jurisdictions and focusing on policies aiming to define SEND and eligibility



Note. Cohen's *w* effect size, direction of effect (arrows point towards country with higher occurrence of concept), and *p*-values are shown ($p < .05$ = *, $p < .01$ = **, $p < .001$ = ***).

Sentiment analysis of the whole set of policies across jurisdictions shows all countries have positive tone in their policies' corpus. Scotland has the most positive tone of all jurisdictions, against both sentiment databases (polarity and valence), followed by Ireland, followed by Wales. Australia, England and Singapore have the least positive tone in terms of polarity and New Zealand, Australia and Ontario have the least positive tone on valence (see Figure 8).

Figure 8. Sentiment analysis of all policy corpus



Note. Polarity sentiments were worked out for each country using the Lexicoder lexicon, reporting the logit scale which is the log of (positive / negative). Valence sentiments were worked out for each country using the AFINN lexicon (Lowe et al. 2011)

Key findings:

1. Estonia and New Zealand appear to have the strongest policies aligning with Early Childhood Intervention (ECI) models and extensive cross-sector collaboration (e.g., education, health and social care, etc). In the Netherlands, Poland, Ontario, and to some extent France and Singapore, ECI is somewhat embedded within Early Childhood Education and care (ECEC) but is widely the responsibility of the healthcare sector or local authorities. France and Singapore have early intervention programmes operating mainly through medical or social frameworks, though they link with educational settings. Japan's ECI system is welfare-based and operates mainly through separate child development support centres, with some collaboration for the education sector.

2. Estonia, which has the most integrated early years and multi-agency system, has also adopted a needs-based definition of SEND in policy rather than a medicalised one and offers extensive needs-based provision beginning early in a child's life.

Early Years provision and cross-sector collaboration

Jurisdictions vary in terms of the extent to which they provide early years provision which is more aligned with Early Childhood Intervention (ECI) systemic models rather than Early Childhood Education and Care (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). Early years provision in the additional jurisdictions analysed for this report is described below, and they are grouped in terms of their alignment with ECI models. Table 7 provides an overview of model of early years provision and extent of multi-agency work in all 17 ScopeSEND jurisdictions.

Estonia has an education-led ECI system integrated within ECEC. Municipalities are obliged to provide places in childcare and preschool (ECEC) from age 1.5, including for children with SEND such as physical, speech or intellectual disabilities. From birth, children undergo health screening from primary care physicians and continuous developmental assessment is mandated as part of the educational process in educational settings. Teachers carry out observations of children and interviews with families. Children attending pre-primary childcare institutions have guaranteed access to speech therapists and specialist teachers. According to the Early Education Act, based on their individual needs, a child will be provided with the appropriate teaching and the necessary support in co-operation with teachers, support specialists, assistant teachers and other specialists. This demonstrates a strong interagency practice embedded within ECEC rather than separate ECI.

Similarly in New Zealand, all children aged 3-5 can receive up to 20 hours of early childhood education a week funded by the government and ECI is education-led with cross-disciplinary support. The Learning Support Action Plan 2019–2025 sets out a national, cross-sector approach to identification and support from the early years through school, with a single-entry pathway. Children from birth to age six with identified developmental delays, disabilities, or behavioural and communication needs can access Early Intervention Services (EIS), coordinated and funded by the Ministry of Education and delivered by multidisciplinary teams. Support is typically delivered within ECEC representing an integrated system similar to Estonia.

In Poland, there is a formal system of early support for child development (wczesne wspomaganie rozwoju) set out in education regulations and delivered by multidisciplinary teams, which is close to an ECI model. Early childhood and school provision can occur in both mainstream and special settings, with early development support and rehabilitation classes available, indicating collaboration across education and health sectors, but not a fully unified ECI system.

In The Netherlands some educational support is embedded in ECEC, but specialist intervention falls within the healthcare sector. The Ministry of Social Affairs and Employment (SZW) and the Ministry of Education, Culture and Science (OCW) are responsible for organising and funding early years services, including childcare and early childhood education (Voor-en Vroegschoolse Educatie; VVE) programmes for children up to age six. There are a number of different childcare facilities which support children from the time they are 6-weeks old to the end of primary school including daycare and out-of-school care. Early childhood education programmes (VVE) are subsidised support measures offered in childcare centres and primary schools aimed at preventing or reducing educational disadvantages. Support for children with disabilities, however, falls mainly under the Inclusive Education Act (Passend Onderwijs) and municipal youth care services governed by the Youth Act (Jeugdwet, 2015). Coordination between education, health, and social care occurs at the municipal level, but the degree of integration varies locally.

France has an ECI structure governing the care of young children aged 0 to 6 who have special needs. The early medical-social action centres (Centres d'action medico sociale precoce; CAMSP) are medical-social institutions who manage disabilities in children aged 0 to 6. These centres consist of multidisciplinary teams including psychologists, specialist physicians, rehabilitation staff, medical assistants, social workers, and educators. CAMSP provides prevention, assessment and early intervention for children. Prevention, screening and treatment or support services are carried out in partnership with nurseries and schools, Maternal and Infant Protection (Protection Maternelle et Infantile) centres, hospital services and private doctors. From a legislative point of view, it is the orientation law n°75-534 of June 30, 1975, which

provided for the creation of CAMSPs, while Annex XXXII bis added by Decree n°76-389 of April 15, 1976 to Decree n°56-284 of March 9, 1956 sets the technical conditions for their approval.

In Ontario (Canada) ECEC and ECI are parallel but coordinated systems. ECEC is education-led while ECI services are administered through the Ministry of Children, Community and Social Services (MCCSS) and the Ministry of Health. Policy at the providence level dictates early identification and intervention across ministries, including Preschool Speech and Language, with EarlyON Child and Family Centres offering integrated family support and referral pathways.

In Japan, ECEC is nationally framed by curriculum guidelines for kindergartens, day nurseries and centres, with duties to provide individual support and to collaborate with municipalities and related agencies for children with disabilities. However, unlike the more integrated Estonian system, in Japan ECI is primarily welfare-based and delivered through separate child development support centres, while ECEC institutions collaborate with these services but are not structurally integrated within the same framework. Broader disability support for young children is organised through local support centres and measures under the Child Welfare Act and the Act on Support for Persons with Developmental Disabilities, reinforcing multi agency collaboration.

Singapore has a formal state-funded ECI system, implemented under the Early Childhood Development Agency (ECDA). The approach is tiered, and referral to these programmes is typically initiated by the healthcare sector. The Early Intervention Programme for Infants and Children (EIPIC) provides centre based early intervention for infants and children with developmental needs, alongside expansion plans to increase places and provider networks, and KidSTART coordinates supports for low-income families from pregnancy through age six. There is explicit policy to guide transition into school.

Table 7. Extent of ECI and sustained models of cross-sector collaboration across all jurisdictions covered in ScopeSEND

Jurisdiction	Alignment with an ECI Family Centred Model	Cross sector provision across education phases[5]
Australia - New South Wales Australia - Queensland	Implements programs like Families NSW and Best Start, focusing on service coordination and early intervention, though with varying degrees of integration	Multidisciplinary to interdisciplinary
Australia - Victoria	Adopts the Early Years Learning Framework (EYLF), emphasising a focus on belonging, and supports transitions through coordinated services.	Interdisciplinary to transdisciplinary
Belgium (Flanders)	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.	Multidisciplinary to interdisciplinary
England	Multi-agency provision is considered as part of SEND support and statutory provision, but early years provision is not aligned with systemic ECI models.	Multidisciplinary to interdisciplinary
Estonia	Preschool law guarantees access and support, with special groups and multidisciplinary specialists in ECEC settings, which is close to an ECI approach. (Riigi Teataja)	Interdisciplinary to transdisciplinary: municipalities coordinate preschool, with specialist support from education and health services that continues through school. (Eurydice)
Finland	Emphasises multi-professional teams in early childhood education and care (ECEC), integrating special education teachers to support individual needs.	Interdisciplinary to transdisciplinary
France	CAMSP network provides state funded multidisciplinary early identification and intervention for children 0 to 6, linked to families and mainstream settings. (Anecamsp)	Interdisciplinary to transdisciplinary: CAMSP work with health, social and education services, supporting transitions to preschool and school. (Anecamsp)
Japan	No single ECI act but welfare laws fund child development support and MEXT policy provides special needs education from early years, forming a de facto ECI system. (MEXT)	Interdisciplinary: municipal welfare services link with public health surveillance and with education for transition to primary. (MEXT)
Netherlands	VVE programmes target disadvantage in early childhood and Passend Onderwijs guarantees a suitable place, but there is no unified ECI system. (Government.nl)	Multidisciplinary to inter disciplinary: coordination is local through municipal youth care, school partnerships and public health checks. (Government.nl)

New Zealand	National Learning Support Action Plan sets a state funded, needs based pathway from early years into schooling with a single coherent approach. (web-assets.education.govt.nz)	Inter disciplinary to transdisciplinary: education led with formal links to health and social services across phases.
Northern Ireland	Evolving situation with new policy frameworks which are well aligned with ECI principles but short of funding and workforce. Policies only partially approved.	Multidisciplinary to interdisciplinary
Ontario Canada	Province funds EarlyON family centres and Preschool Speech and Language, establishing an early help ecosystem that functions like ECI. (earlyonsec.com)	Inter disciplinary: education, health and community services coordinate identification and referral from early years into school. (Ontario)
Poland	Early support for child development is defined in education regulations and delivered by multidisciplinary teams, close to ECI models. (Eurydice)	Inter disciplinary: collaboration across education, psychological counselling, health and social care with pathways into preschool and school. (Eurydice)
Republic of Ireland	The Access and Inclusion Model (AIM) provides targeted supports, including expert advice and additional staffing, to ensure inclusive early years provision.	Interdisciplinary to transdisciplinary
Scotland	The 'Getting It Right for Every Child' (GIRFEC) framework exemplifies a holistic, child-centred approach, emphasising integrated services and early intervention.	Interdisciplinary to transdisciplinary
Singapore	State funded EIPIC and EIPIC-P Care provide structured early intervention with caregiver training alongside ECEC, clearly aligned with ECI principles. (ECDA)	Inter disciplinary to transdisciplinary: coordinated by ECDA with health and education partners, supporting transition to preschool and primary. (ECDA)
Switzerland (Fribourg)	Clear alignment with family-centred ECI frameworks through their emphasis on integrated services, family partnership, early intervention, and culturally responsive bilingual support.	Interdisciplinary to transdisciplinary
Wales	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.	Interdisciplinary to transdisciplinary

[5] Note the definition of multi-, inter- and transdisciplinary provision provided in the section 'Indicators of Interest'.

When looking at the whole set of policies selected across the nine English-speaking jurisdictions, we see that 'early childhood' and 'early years' are most frequently mentioned in New Zealand and Australia, as per Table 6.

For a more specific analysis of SEND input in early years provision, we performed the same corpus analysis on a limited number of policies across the English-speaking jurisdictions that aim specifically to define early childhood services (early childhood education and care and/or early childhood intervention). We used the same concept dictionary across that limited set of policies.

Findings show that Singapore appears again as the jurisdiction adopting concepts more closely aligned with a medical model approach to SEND in early childhood policies (see Table 8 and Figure 9). For example, medical-model related words such as 'deficit', and 'diagnosis' are statistically significantly more frequent in Singapore. It is also the country with more references to 'school readiness', a concept that has been highly criticised in England's scientific literature and policy in recent years for reflecting an over-focus on academic attainment scores (literacy and numeracy) rather than other elements of early years life, such as play, friendships, and overall participation and engagement (Robert-Holmes, 2015; Evans, 2013). This may reflect cultural differences in expectations from the education system. However, Singapore early years policy also very frequently mentions other concepts of importance for early years provision, such as 'peers', 'parents', and 'family', potentially showcasing a policy where the value of prevention via early years support and identification is central. 'Play', a key concept in early years provision and considered a fundamental pillar of learning in western early years scientific literature (e.g., Skene et al., 2022), is referenced more often in Australia than in the other English-speaking jurisdictions. Interviews with stakeholders in the Australian jurisdictions are necessary to help understand whether the value of play is seen as a pedagogical tool in early years, as opposed to a more academic approach concerned with school-readiness; here, it may be relevant to compare stakeholder perspectives in Australia and Singapore, as the latter presents high frequency of 'school-readiness' as a key concept in their policy. Our final report will address this knowledge gap.

Concepts in our dictionary that relate to working across departments or sectors, considered key for effective provision in the early years (Kambouri et al., 2021; Mason et al., 2023) include 'collaboration', 'cross-department', 'cross-disciplinary', 'interdisciplinary' and 'multiagency' (and variations of these). Here, Australia, Scotland and Ireland stand out as the jurisdictions that mention some of these concepts more frequently.

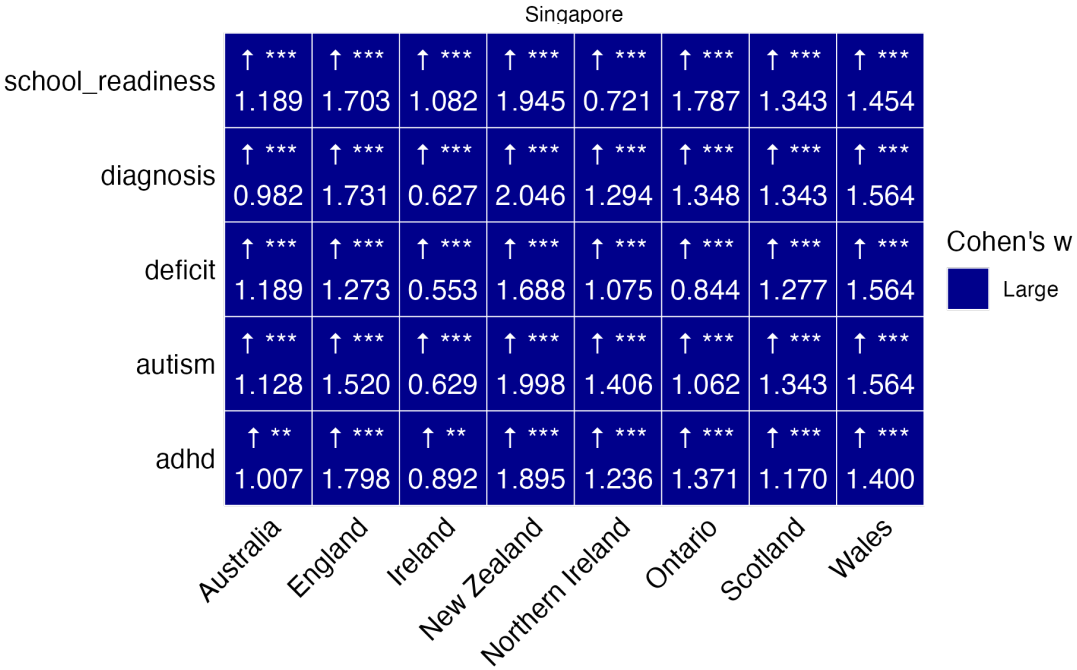
Table 8. Frequency of SEND-related concepts in policy texts for early years provision by jurisdiction

concept	Australia	England	Ireland	New Zealand	Northern Ireland	Ontario	Scotland	Singapore	Wales
ableism	-	-	-	-	-	-	-	-	-
adhd	-	-	-	-	-	.0009	-	.0233	-
adoption	-	.1741	-	.0020	-	.0019	.0096	.0047	.0097
at_risk	.0091	.0020	-	.0062	.0041	.0038	.0303	.0093	-
attention	.0454	.0127	.0088	.0043	.0041	.0080	.0112	.0653	.0234
autism	.0023	.0061	.0381	.0003	-	.0193	-	.1726	-
behaviour	.0477	.0143	.0176	.0128	.0304	.0376	.0112	.2613	.0058
belonging	.2814	-	-	.0115	.0014	.0023	.0207	.0023	.0019
blind	-	-	.0088	.0003	-	.0235	-	.0210	-
bullying	-	.0025	-	.0007	-	.0216	-	.0047	-
care	.1952	.5193	.3901	.0766	.6913	.0479	.1673	.6882	.0584
collaboration	.0386	.0041	.0117	.0043	.0028	.0042	.0080	.0070	.0010
crossdepartment	-	-	.0029	-	-	-	-	-	-
crossdisciplinary	-	-	-	-	-	-	-	-	-
deafblind	-	-	-	-	-	-	-	-	-
deafness	-	.0016	.0088	.0020	-	.0437	-	.0070	-
deficit	-	.0102	.0411	.0033	.0111	.0254	.0016	.1470	-
delay	.0113	.0160	.0059	.0026	.0069	.0061	.0048	.0863	-
deprived	-	.0004	-	-	.0055	-	.0032	.0023	-
diagnosis	.0136	.0033	.0499	-	.0041	.0127	-	.2239	-
disabled	.0749	.2568	.7831	.0141	.3719	.0291	.0335	.1820	.0175
dyscalculia	-	.0004	-	-	-	-	-	-	-
dyslexia	-	.0025	-	-	-	-	-	.0140	-
early_childhood	.5514	.0008	.0821	.1302	.0387	.0597	.0016	.0933	-
early_years	.4153	.1884	.4693	.0020	.1189	.0047	.1880	.0233	.0049
exceptional	-	.0045	.0176	.0013	.0028	.1015	.0016	.0047	.0049
family	.2156	.0491	.0528	.0135	.0097	.0094	.3282	.2986	.0088
foster	.0295	.0188	.0088	.0072	-	.0023	.0127	.0070	.0058
genetic	.0023	-	-	.0003	-	-	.0112	.0047	-
gifted_talented	.0045	-	-	.0016	-	.0070	-	-	.0010
health	.1952	.3456	.1672	.0358	.1355	.0559	.2039	.1750	.0740
iep	.0227	.5697	.0264	.0250	.0138	.2711	.0462	.0677	.2999
inclusion	.1180	.0131	.5895	.0654	.0041	.0061	.0143	.0210	.0039
intellectual	.0227	-	.0117	.0030	.0014	.0099	-	.0630	.0010
interdisciplinary	.0023	-	.0029	-	-	-	-	-	-
learning	1.9267	.1196	.0469	.1821	.1424	.1743	.1673	.2333	.9688
life_skills	-	.0004	-	.0007	-	.0009	.0016	.0023	-
literacy	.0953	.0213	-	.0394	.0484	.0507	.0159	.0886	.1830
mainstream	-	.0405	.1525	.0007	-	-	.0032	.1470	.0185
medical_needs	.0023	.0209	.0147	.0023	.0194	.0249	.0064	.1470	.0019
mental_health	.0113	.0164	.0088	-	.0028	.0038	.0143	.0257	.0058
motor	.0272	.0020	.0029	.0016	-	.0047	-	.1050	.0039
multiagency	.0023	.0020	-	-	-	-	.0207	.0023	-

concept	Australia	England	Ireland	New Zealand	Northern Ireland	Ontario	Scotland	Singapore	Wales
needs	.0567	.3223	.4840	.0450	.1618	.1668	.3681	.6532	.6962
neurodiversity	.0045	-	-	-	-	-	-	-	-
numeracy	.0794	.0066	-	.0056	.0111	.0099	.0032	.0210	.0604
parents	.0204	.2035	.3285	.0680	.0346	.1339	.1514	.3243	.0234
participation	.0454	.0176	.1173	.0145	.0083	.0113	.0382	.0210	.0185
peers	.0204	.0070	.0117	.0036	.0041	.0023	-	.0350	.0068
physical	.1407	.0152	.0381	.0342	.0346	.0230	.0446	.0723	.0292
play	.4107	.0143	.0205	.0424	.0152	.0061	.0653	.1026	.0935
school_readiness	-	.0004	-	-	.0083	-	-	.0373	-
SEND	.0023	.4488	.0733	.0697	.2475	.0216	.0175	.1866	.0652
social_care	-	.1085	.0176	-	.0512	-	.0048	-	.0029
socioemotional	-	-	-	-	-	-	-	-	-
specialist	.0159	.0442	.2170	.0233	.0124	.0009	.0271	.0140	.0010
support	.5719	.4136	1.1439	.1150	.1175	.2048	1.0229	1.0218	.0740
tiered	-	-	.0029	-	-	.0014	-	-	-
transition	.2179	.1421	.0675	.0996	.0111	.1240	.0462	.2309	.0088
vulnerable	.0045	.0033	-	.0007	.0290	.0009	.0127	-	-
welfare	.0091	.0307	.0088	.0069	.0069	.0023	.0080	.0023	.0029
wellbeing	.3540	.0270	.0088	.0362	.0180	.0052	.2964	.0093	.0292

Note. Dark blue = highest, light blue = lowest frequency per concept.

Figure 9. Frequency of example medical-model related concepts in Singapore, compared to another jurisdictions in policies for early years provision



Note. Cohen's *w* effect size, direction of effect (arrows point towards Singapore, or country with higher occurrence of concept), and *p*-values are shown ($p < .05$ = *, $p < .01$ = **, $p < .001$ = ***).

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

Key findings:

1. Most of the additional jurisdictions have policies/programmes with a focus on general promotion of wellbeing and mental health, and/or anti-bullying. Mental health seems to have become a particular concern across jurisdictions in recent years, with these new policies and strategic guidance for schools now sitting alongside SEND policies.

2. None of the additional jurisdictions provide specific policies for inclusion. Rather, guidance on inclusion is embedded in other legislation, though the extent to which this is defined and specified differs across the jurisdictions.

Most of the eight additional jurisdictions have 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 9 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. Estonia, France, the Netherlands, New Zealand, and Poland have anti-bullying programmes operating nationally or school-based anti-bullying initiatives. None of the new jurisdictions analysed have Inclusion-specific policies, rather inclusion is typically embedded within broader education policy.

Table 9. Policy initiatives/programmes identified alongside SEND policies across all jurisdictions covered in ScopeSEND

Jurisdiction	Other programmes modifications and policy arrangements for SEND	Focus on Inclusion
Australia: educational outcomes, mental health and wellbeing	• 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. • Be You is a universal mental health and wellbeing program for children that can be delivered in schools and early childhood	Inclusive Education-specific policies: • In Queensland, The *Inclusive Education Policy* (2021) outlines the Department of Education's commitment to an inclusive state education system, ensuring all students can access and participate in learning. • Victoria's *Inclusive Education for Students with Disabilities* policy (updated in 2024) provides schools with resources and guidance to support the inclusion of students with disabilities.

	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. • 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. • 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 to a needs-based proactive system.	• In New South Wales the *Inclusive Education for Students with Disability* (updated in 2024) policy provides direction and guidance on supporting the inclusion of students with disabilities in NSW public schools.
Belgium (Flanders)	• 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. • 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	• Not specific.
England: anti-bullying and mental health	• DfE Guidance on Preventing and Tackling Bullying (2017): Provides non-statutory advice for schools. • Mental Health Support Teams (MHSTs): Rolled out nationally as part of the Transforming Children and Young People's	• Not specific.

	Mental Health Provision green paper (DfE & DHSC, 2017). MHSTs support pupils with mild to moderate mental health needs and work closely with schools.	
Estonia:	• The Ministry of Social Affairs has issued a Mental Health Action Plan 2023–2026, aimed at strengthening mental health services across workplace, community and educational domains. • Free of Bullying is a pedagogical anti-bullying programme aimed at creating an inclusive and safe environment in education settings.	• No single inclusion act, but inclusion policies are spread over several pieces of legislation including The Education Act and the Basic Schools and Upper Secondary Schools Act.
Finland: Equality, mental health and anti-bullying	• The equality plan • 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. • 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.	• Highly embedded in the system's ethos and practice.
France:	• Since Covid-19, France has implemented various mental health initiatives such as *The Child Guarantee National Action Plan (2022)* which prioritises children's mental health and includes expanding care services up to age 21. • Bullying for children with special educational needs was is addressed in the 2019 law "École de la confiance" • France has implemented successive Autism Plans (e.g. from 2005 onward) that establish regional Autism Resource Centres (Centres Ressources Autisme, CRA) aimed at improving diagnosis, training, support for families, and inclusive schooling. • In 2023, the French government launched a comprehensive interministerial plan to combat bullying and cyber harassment in schools.	• No specific policy, inclusion in education is embedded in law, primarily through the Law No. 2005-102 of 11 February 2005 (loi pour l'égalité des droits et des chances, la participation et la citoyenneté des personnes handicapées). This law established the principle of "école inclusive", defining the right of all children, regardless of disability, to attend mainstream schools with appropriate support. The 2019 law "École de la confiance", is a general law on education but also addresses inclusion.
Ireland: Anti-bullying, children with disabilities, and early years specific initiatives for	• Anti-Bullying Procedures for Primary and Post-Primary Schools (2013) from the Department for Education guides anti-bulling 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	• 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

deprived communities	prevention, requiring schools to take proactive steps to foster a positive school climate, including curriculum-based interventions and awareness-raising activities. • 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. • 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. • 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 Department of Education and Youth 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 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.	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. • The AIM policy implementation is guided by an Inclusion Charter.
Japan	• The Ministry of Education, Culture, Sports, Science and Technology (MEXT) aims to realise an inclusive society where everyone, regardless of disability, can respect each other's personalities and individuality. To this end, MEXT promotes	• Inclusion is embedded within policy primarily through the Basic Act on Education (revised 2006) and the Act on the Elimination of Discrimination against Persons with Disabilities (2016).

	'exchange and collaborative learning' in schools, where children with and without disabilities learn together, based on the Curriculum Guidelines and other relevant documents. This initiative seeks to promote understanding of disabilities and advance 'mental barrier-free' education in schools. • The Act on the Elimination of Discrimination against Persons with Disabilities, which came into effect on 1 April 2016, requires reasonable accommodations tailored to the characteristics of each disability and social barriers to ensure that persons with disabilities can participate equally in social life. • There are also various guidance documents providing information related to hearing impairments, sign language, and braille reading.	
The Netherlands	• Anti-bullying initiatives through the Education Amendment Act of 4 June 2015 which requires schools to improve school safetyThere are also a series of anti-bullying programmes; KiVa, GREAT, and Task game • Gezonde School' (Healthy School), which allows schools to work on diverse themes such as nutrition, nature, well-being and aims at teaching students to make healthy choices • Money from the National Education Fund (NP Onderwijs) was allocated to primary and secondary schools and municipalities to help students address learning delays, social-emotional development, and well-being caused by the coronavirus pandemic	• No single inclusion act, but inclusion policies are spread over several pieces of legislation.
New Zealand	• There are various programmes with the goal of improving mental health and wellbeing in New Zealand. The Mental Health and Wellbeing Commission Act 2020 establishes the Mental Health and Wellbeing Commission (Te Hiringa Mahara) as a Crown entity. There are also some initiatives such as the Mana Ake, school-based mental health services, and broader wellbeing in schools programmes. • The *Health of Disabled People Strategy (2023–2033)* sets priorities for improving equity in health and wellbeing outcomes	• No single inclusion act, but inclusion policies are spread over several pieces of legislation including the national curriculum, and the Education and Training Act 2020.

	for disabled people, developed with community engagement. • New Zealand Sign Language (NZSL) is one of the three official languages of New Zealand, formally recognised through the New Zealand Sign Language Act 2006. This Act provides a legal foundation for Deaf New Zealanders to access government and public services in NZSL, including the education and justice systems. The New Zealand Sign Language Strategy 2018–2023 further addresses the county's language planning. • The New Zealand Disability Strategy 2016-2026 guides the work of government agencies on disability issues in the workplace, community, and education. • There are also anti-bullying initiatives in New Zealand, and every school is required to have an anti-bullying policy to cover response and prevention. • The government is also launching the Expanded New Zealand Curriculum (NZC)	
Northern Ireland: Autism, Nurture Groups	• The Autism Strategy (2013-2028) is an updated comprehensive, cross-departmental initiative aimed at enhancing support for autistic individuals and their families. • Nurture Groups[6] were recently funded and established by the Department of Education.	• Not specific.
Ontario (Canada)	• Students with autism in Ontario can receive support through the Ontario Autism Program (OAP), which provides needs-based funding for services, and through their local school boards, which offer educational supports. There is also guidance for the education of autistic students through the Effective Educational Practices for Students with Autism Spectrum Disorders. • Caring and Safe Schools in Ontario is a framework that promotes a school environment where students feel emotionally, physically, and socially secure, respected, and included. It involves policies and practices that focus on bullying prevention, mental health, positive behaviour, conflict resolution, and emergency preparedness.	• Ontario does not have a single policy solely regulating inclusion in education but a framework of interrelated policies. The main document is the Equity and Inclusive Education Strategy (2009, updated 2014), which requires all school boards to embed inclusion and equity principles in local policy. However, inclusion is defined broadly.

[6] 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.

	• The Accepting Schools Act 2012 amended the Education Act to improve anti-bullying policies and safe school environments for children.	
Poland	• The Mental Health Act promotes mental health and aims to prevent mental health disorders and discrimination. There have also been various programmes implemented for youth and for adults aimed at improving mental health outcomes. • The School Law (Prawo oświatowe) requires schools to prevent bullying and ensure student safety and well-being.	• No single inclusion policy, but Poland embeds inclusion within its general and special education laws rather than through a single dedicated inclusion policy. The Law on School Education (2016) guarantees access for all learners, allowing children with disabilities or special educational needs to attend mainstream, integrative, or special schools. Inclusion is framed as adapting schools to pupils' needs.
Scotland: Anti-bullying, school climate, looked after children	• 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. • 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. • 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.	• Inclusion policy is 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.
Singapore	• SADeaf (Singapore Association for the Deaf) runs Itinerant Support Services (ISS) to support students with hearing loss in mainstream schools. ISS provides case	• Not through a single act, but this is embedded within the education system.

	management, learning support, speech-language therapy, and counselling. • Social Service Agencies (SSAs) may assess students for visual, hearing, or physical needs. • The National Mental Health and Wellbeing Strategy (2023) aims to improve mental health services and reduce stigma including support for youth mental well-being.	
Switzerland (Fribourg)	• 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.	• Highly embedded in country's policy for SEND.
Wales: Mental health	• 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 for mental health services, emphasising a rights-based approach and the elimination of stigma and discrimination. • 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.	• 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 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.

Workforce training

Key findings:

1. Initial teacher education: most jurisdictions analysed have policy frameworks outlining professional standards and requirements for primary and post-primary teaching. France, Poland and Singapore are the only jurisdictions that legally require all trainee teachers to complete compulsory modules or credits in special or inclusive education as part of their initial teacher education. In contrast, other jurisdictions typically embed SEND content across one or more modules, without the requirement for set credits. In-depth content on SEND is typically only offered through optional postgraduate studies in all jurisdictions.

2. The new jurisdictions differ in relation to: a) the extent to which Continuous Professional Development (CPD) is mandatory; and b) the extent to which the CPD offer is embedded in everyday practice versus mostly consisting of courses and workshops. Poland has mandatory CPD which is highly embedded in everyday practice with a flexible and wide range of initiatives. France also has mandatory CPD, but this is not as well-embedded. In Estonia, Japan, the Netherlands, New Zealand, Ontario, and Singapore CPD is non-mandatory although accountability practices often require evidence of engagement. Since schools in these jurisdictions are typically responsible for managing CPD depending on the needs of the school, the level of embeddedness varies across schools.

Table 10 provides an overview of the pre-service, in-service, and continuous professional development (CPD) offer for teachers working in SEND across all ScopeSEND jurisdictions.

Most jurisdictions have policy frameworks outlining professional standards and requirements for primary and post-primary teaching. Initial teacher training programmes across these jurisdictions typically include both coursework and practical elements through placements, demonstrating clear links with schools and early years settings. While most programmes across the ScopeSEND jurisdictions offer some degree of taught content related to teaching students with SEND, France, Poland and Singapore are the only ones that mandate delivery of content on SEND as part of initial teacher training. In other jurisdictions SEND related content is often delivered across various modules but may vary across programmes or regions within a jurisdiction in terms of depth and scope. Substantial specialised content is typically only offered through optional postgraduate studies.

In Estonia, initial teacher training is delivered by universities and is regulated by the Framework requirements for teacher training. Subject and class teachers in general education schools are trained at the Master's level, while preschool teachers and vocational teachers are trained at the Bachelor's level. Teachers are required to meet a set of core competencies to receive a qualification which serve as a basis for curriculum design. 'Supporting learners with special educational needs' is an optional competency that is not compulsory for basic qualification but can be added to a teacher's professional profile to demonstrate advanced expertise. Teachers can also receive specialist training through further education and in-service provision.

In France, initial teacher training is provided by *Instituts Nationaux Supérieurs du Professorat et de l'Éducation* (INSPE, National Higher Institutes of Teaching and Education), which are part of universities. All teachers complete *a Master's in the Professions of Teaching, Education and Training* which also includes school placements. All teachers must undergo a compulsory component (at least 25 hours) on inclusive pedagogy (école inclusive). CAPPEI (Professional Certificate of Aptitude for Inclusive Education Practices) is an additional certification that can be taken either during initial education or in-service for further training on inclusive education practices.

Pre-service teachers in Japan normally complete a university programme that includes both academic study of the subjects that teachers will later teach (such as mathematics or Japanese) and courses on how to teach effectively (pedagogy). To obtain a teaching certificate (license), they must complete a specified "teacher training" curriculum (教職課程 kyōshoku katei). There is no mandated curriculum for content on inclusion or special needs, however, content is typically included in modules on inclusive education, but this may vary across programmes.

Teacher education in the Netherlands is structured through three main teaching qualifications: primary, second-degree 'tweedegraads; (for lower secondary/vocational education), and secondary first-degree 'eerstegraads' (for all secondary levels). To become a primary school teacher there are several options. Three common paths are (1) through a Bachelor of Education programme at a university of applied sciences (HBO) for primary education (PABO), (2) through an academic teacher training programme with courses both at a university of applied sciences and at the university (resulting in two degrees: a Bachelor of Education and a Bachelor of Science) or (3) through a 2-year Master programme (Educatieve Master Primair Onderwijs (EMPO) to obtain a Master of Science and a teaching degree. For a second-degree qualification, pre-service teachers can follow a 4-year programme at a university of applied sciences (HBO). For a first degree, pre-service teachers can complete a Bachelor and Master in a relevant subject and then follow a 1-year teacher education programme. There is no nationally prescribed curriculum for teacher education. Therefore, the extent to which

teachers are taught content on SEND varies per teacher education programme. Mainstream teachers can work with their degree in special education. All mainstream teachers, whether they work in special or mainstream education can follow part-time postgraduate training focused on specific needs (e.g., behavioural or intellectual disabilities, master's degree Special Educational Needs).

In New Zealand, pre-service teachers complete initial teacher education programmes approved by the Teaching Council (Matatū Aotearoa), delivered through universities and other private training providers. Inclusive education and content related support for SEND are not explicitly mandated but generally addressed through inclusion-oriented modules. However, content may vary across programmes. Teachers who wish to specialise can pursue optional postgraduate study.

In Ontario (Canada), all teachers must complete a two-year initial teacher education programme accredited by the Ontario College of Teachers (OCT). These programmes include taught modules and placements. Like most other jurisdictions, there is no mandated curriculum related to special education, rather content may be delivered through various modules covering inclusive education. Specialist training in SEND is obtained post-qualification through the OCT's Additional Qualification (AQ) framework which leads to formal roles such as resource teacher or special education coordinator.

Initial teacher education in Poland is provided by higher education institutions (HEIs). There are a few different degree programmes (first-, second- and long-cycle programmes) and non-degree postgraduate programmes that cover nursery, primary and post-primary school teacher training. Poland requires all teachers to complete coursework on "working with learners with special educational needs" (praca z uczniami o specjalnych potrzebach edukacyjnych) as mandated by the Regulation of the Minister of Science and Higher Education of 25 July 2019 on the standards of education preparing for the teaching profession (Dz.U. 2019 poz. 1450). However, the content can vary across programmes. There is also optional specialist training available for teachers who wish to work as support teachers or in specialist schools.

Singapore has one institute for teacher training, the National Institute of Education (NIE), where all trainee teachers must complete compulsory modules covering foundational knowledge about SEND (typically around 36 hours of training). In schools, staff have the additional option to complete the Certificate in Special Needs Support at NIE (approximately 130 hours) to become Teachers Trained in Special Needs (TSNs), who lead case management and support inclusive practice. Specialist teachers in Special Education (SPED) schools are required to complete specialist training (e.g., the Diploma in Special Education (DISE) at NIE) after initial appointment.

Requirements for continuous professional development (CPD) vary across jurisdictions, particularly in terms of whether it is mandatory and whether it is embedded in daily practice or delivered through taught courses. CPD is a mandatory requirement in France and Poland, however the amount required, and methods of delivery vary. In France, 18 hours of annual CPD (formation continue) is mandatory for primary teachers and encouraged for secondary teachers, offered through academic training plans coordinated by the by the *rectorats* (Ecoles académiques de la formation continue(EACF))and L'Institut national supérieur du professorat et de l'éducation (Inspé). In Poland, CPD is mandatory and typically offered by in-service teacher training institutions and through school policy. There are no statutory minimum hours required, but CPD is included in the total working time of teachers in accordance with the Teachers' Charter (Karta Nauczyciela). CPD is also linked to career progression contributing to 'performance appraisal'.

CPD in Estonia, Japan, the Netherlands, New Zealand, Ontario, and Singapore is more flexible and framed as a professional requirement included in teachers' career progression rather than legally mandated. CPD courses are typically offered through university or other providers, but these may vary across regions or local authorities. Schools may also offer in-service training depending on their needs and national policy. However, in New Zealand, CPD is effectively mandatory as it is required after initial qualification to maintain teaching certificates. Practising teachers must renew their certification every three years, demonstrating ongoing participation in professional learning through the Professional Growth Cycle. There is no set number of hours required in New Zealand.

Figure 9. 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.

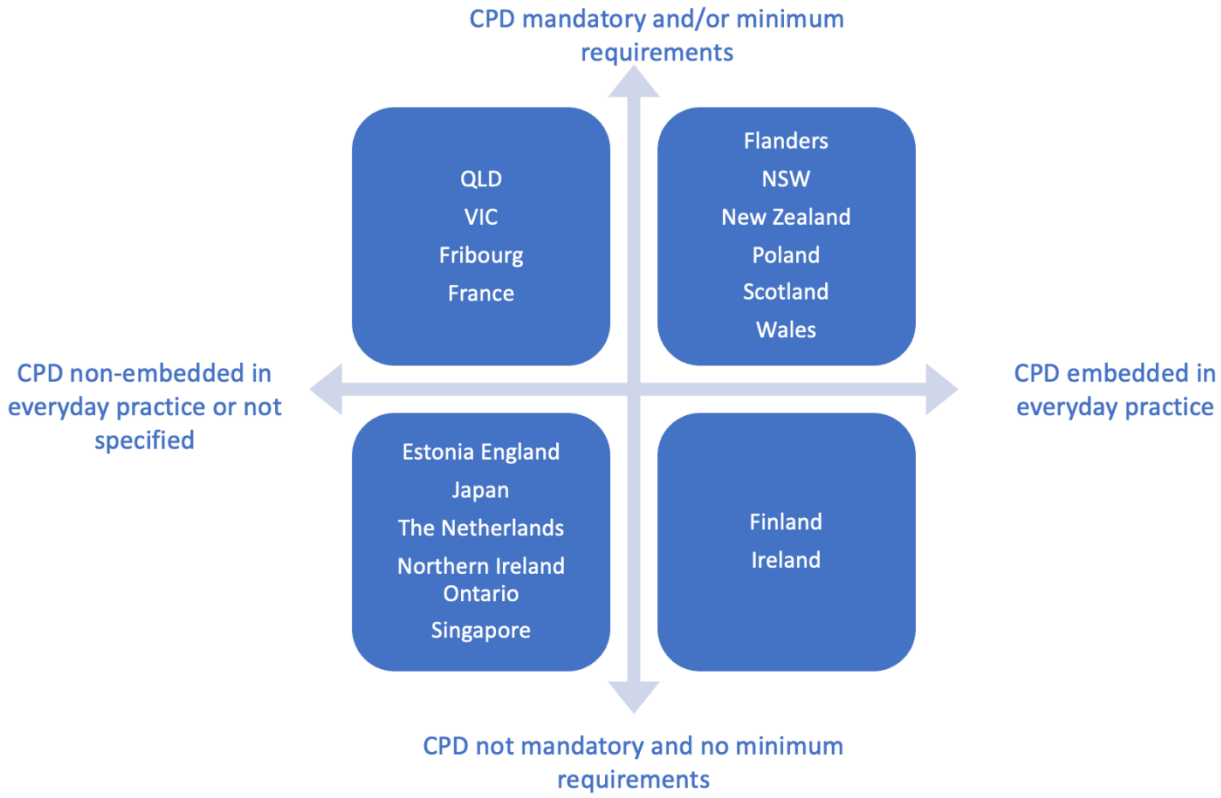


Table 10. Workforce training requirements for working in SEND and CPD models across all jurisdictions covered in ScopeSEND

Jurisdiction	Pre-service requirements	In-service and CPD
Australia (NSW)	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). There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education. 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 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.	There is a 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. 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 according to the NESA professional development framework. The wider range of activities now provided includes 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 **a more embedded experience**.
Australia (QLD)	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). There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education. 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.	Fully registered teachers must engage in annual CPD activities aligned with the Australian Professional Standards for Teachers. CPD encompasses workshops, webinars, and school-based initiatives. 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. Although the range of activities is broad, they seem to be required to **not be embedded** in everyday life practice.
Australia (VIC)	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	Teachers must undertake 20 days of professional practice within the registration period.

	with the Victorian Institute of Teaching (VIT) is mandatory. There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education. Qualified teachers can undertake additional postgraduate studies in special education to work in specialist settings and register with VIT.	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 all professional learning activities used as evidence to be formal and/or informal learning experiences 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.

Belgium (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
	
	There is no mandated curriculum for inclusion in initial teacher education.
		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.

	Instead, this is embedded to some extent through modules on inclusive education. 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. 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.	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.
England	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), 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 the minimum entitlement for trainee teachers. Trainees must also meet literacy and numeracy competencies and pass safeguarding checks. There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education. 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). A PGCert, PGDip, or Master's in SEND/Inclusion is optional for teachers looking to specialise further.	There is no statutory minimum number of CPD hours nationally, but: • Schools are expected to provide regular CPD as part of staff development (refer to Teachers' Standards, Part 2). • Ofsted inspects the effectiveness of professional development during school inspections. CPD delivery is often **course- and workshop-based**, especially through: ○ National Professional Qualifications (NPQs). ○ School-led or MAT-organised training. ○ Specialist providers (e.g. National Association for Special Educational Needs). Any embedded CPD Practices will vary significantly between schools. The **Early Career Framework (ECF, 2021)** mandates a 2-year CPD induction for new teachers, with funded training and mentoring.

	Special schools may require or prefer additional qualifications or significant experience with SEND.	
Estonia	The initial training of teachers is carried out at the higher education level in universities and is regulated by the as specified in the *Framework Requirements for Teacher Training* (Government Regulation No. 89, 11 June 2015; amended 2019). Preschool teachers and vocational teachers are trained at the Bachelor's level (180 ETCS, 3 years). Class teachers (primary education) are trained through an integrated five-year Master's programme (300 ECTS) combining Bachelor and Master studies. Subject teachers (lower and upper secondary) require a Master's degree (120 ECTS, 2 years) following a relevant Bachelor's degree. Curricula are developed based on the Higher Education Act, the Standard of Higher Education and the Framework Requirements for Teacher Training. The professional qualification standards require a set of core competencies for teachers. Supporting learners with special educational needs is an optional competency. However, all pre-service teachers are expected to take modules on working with pupils with special educational needs, though this is not clearly mandated. There is also a dedicated Master's programme (Eripedagoogika / Special Education) is offered for prospective special education teachers (120 ECTS, 2 years).	CPD requirements **do not appear to be explicitly mandated by law**, but in-service teachers have a professional obligation to continue to develop their professional skills. Development plans may be organised within schools according to their needs and national priorities. CPD opportunities are organised centrally through universities and training providers. CPD can be embedded in daily practice or delivered through one-off courses. Since CPD opportunities are managed by schools, the extent of embedded delivery varies.
Finland	To become a class teacher (primary), individuals must complete a **master's degree in education** (typically 5 years), including **pedagogical studies**, **subject studies**, and **teaching practice**. 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. Admission to teacher education is competitive, with candidates undergoing academic tests and interviews to assess teaching aptitude.	There is **no statutory obligation** for CPD in Finland, but it is **strongly encouraged and professionally expected (contractually obligated) to participate in CPD every year**. The number of required days ranges from 1 to 5 is related to the type of educational organisation in which one works at (e.g., in schools a teacher must spend 3 days in development and learning activities during a school year). CPD is **embedded in the culture** of lifelong learning and professional responsibility. To sustain this embeddedness, CPD is locally driven, often via partnerships with universities, and it includes, in addition to specific workshops and courses,

	There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education. 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. 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.	**collegial collaboration, self-directed learning, pedagogical innovation, lesson study and peer mentoring and professional learning communities.**
France	In France, initial teacher education (formation initiale) is provided by ***Instituts Nationaux Supérieurs du Professorat et de l'Éducation*** **(INSPE, National Higher Institutes of Teaching and Education**), which are part of universities. All teachers complete the two-year *Master Métiers de l'Enseignement, de l'Éducation et de la Formation* (MEEF, Master's in the Professions of Teaching, Education and Training) which also includes school placements. Since the ***Loi pour une école de la confiance*** **(2019)** inclusive education (école inclusive) is a mandatory component of training for all teachers which includes modules on special educational needs. However, specialisation is optional and requires the additional CAPPEI (Professional Certificate of Aptitude for Inclusive Education Practices) qualification.	In France, CPD (formation continue) **is mandatory for primary teachers** (18 hours annually) and encouraged for secondary teachers, offered through academic training plans coordinated by the *rectorats* and INSPE.
Ireland	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. There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education.	While CPD is not legally mandated for all teachers, it is strongly encouraged and supported by various initiatives through two statutory organisations: • **OIDE:** 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 Centre

	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. 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.	for School Leadership (CSL), Junior Cycle for Teachers (JCT), the National Induction Programme for Teachers (NIPT) and the Professional Development Service for Teachers (PDST). • **National Council for Special Education (NCSE):** 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. • **National Educational Psychological Service (NEPS):** Provides direct educational psychological support to primary, post-primary and special schools in Ireland via consultation and assistance with implementing, monitoring and reviewing support. CPD is therefore **embedded and non-mandatory**. The **Teaching Council** 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 **school-based initiatives**, such as peer collaboration, reflective practice, and participation in professional learning communities.
Japan	In Japan, initial teacher training (ITT) is provided primarily through universities, where students complete teacher education programmes combining subject knowledge, pedagogy, and practicum placements. To obtain a teaching certificate (license), they must complete specified "teacher training" courses (教職課程 kyōshoku katei). There is no mandated curriculum for special educational needs and disabilities (SEND). Content is typically included through modules on inclusive education but there is no set curriculum and content may vary across programmes.	CPD in Japan is **embedded in teachers' career progression rather than mandated nationally**. CPD programmes are offered through municipal and prefectural boards of education, but these may vary across regions or local authorities.

	Special education teachers in Japan are trained either through specialised undergraduate or postgraduate programmes in special needs education or by obtaining an additional special education teaching licence after completing general teacher training.	
The Netherlands	Teacher education in the Netherlands is structured through three main teaching qualifications: primary, second-degree 'tweedegraads; (for lower secondary/vocational education), and secondary first-degree 'eerstegraads' (for all secondary levels). To become a primary school teacher there are several options. Three common paths are (1) through a Bachelor of Education programme at a university of applied sciences (HBO) for primary education (PABO), (2) through an academic teacher training programme with courses both at a university of applied sciences and at the university or (3) through a 2-year Master programme (Educatieve Master Primair Onderwijs (EMPO) to obtain a Master of Science and a teaching degree. For a second degree qualification, pre-service teachers can follow a 4-year programme at a university of applied sciences (HBO). For a first degree, pre-service teachers can complete a Bachelor and Master in a relevant subject and then follow a 1-year teacher education programme. There is no nationally prescribed curriculum for teacher education. Therefore, the extent to which teachers are taught content on SEND varies per teacher education programme. Teachers can typically enter special education roles with general teaching qualifications or undertake a two-year part-time supplementary training while employed, which covers content related to special educational needs.	CPD is **not mandatory** but framed as a professional obligation. There are no set requirements for the number of hours needed. However, primary school teachers are entitled to 123 hours per year for professional development and sustainable employability (PDI hours), in proportion to their working hours. Courses may be offered privately or in the public domain and many are provided by teacher training institutions (HBO institutions and universities with teacher training departments). Schools may also organise in-service training for their workforce. Therefore the level of embeddedness will vary. The Teacher 2020 Action Plan has been introduced to improve professional development for in-service teachers.
New Zealand	In New Zealand, pre-service teachers complete ITE programmes approved by the Teaching Council (Matatū Aotearoa), delivered through universities, colleges of education, or other tertiary providers. ITE is offered at different levels: undergraduate bachelor's degrees, graduate diplomas, or master's-level programmes. ITE programmes consist of traditional taught components as well as a practicum.	In New Zealand, continuing professional development (referred to as professional learning and development) is **effectively mandatory** for maintaining teacher certification. The Teaching Council of Aotearoa New Zealand requires all practising teachers to demonstrate evidence of ongoing professional learning as part of the Professional Growth Cycle (PGC) to renew their practising certificate

	Content delivery for inclusive education and support for SEND is not explicitly mandated, but training is embedded within programme standards and generally addressed through inclusion-oriented modules. However, content may vary across programmes. Teachers may specialise post-qualification in special or inclusive education fields via postgraduate qualifications (e.g., postgraduate diplomas, master's degrees).	every three years. This system is established under the **Education and Training Act 2020** and aligned with the **Standards for the Teaching Profession.** While there is no set number of hours required, teachers must show sustained participation in PLD and professional conversations over time, verified by their professional leader or principal.
Northern Ireland	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. Specific and additional training for SENCOs (Special Educational Needs Coordinators) is required, but no mandatory training is required for mainstream teachers. Both qualifications include practical elements.	The Education Authority (EA) in Northern Ireland offers a Training Hub that provides **Continuous Professional Development (CPD) opportunities for teachers and classroom assistants**. This platform offers a range of **courses** and **resources** designed to enhance the skills and knowledge of educational staff, including areas pertinent to SEND. The Special Educational Needs Capacity Building Programme is designed to train teachers and staff in inclusive education practices via **workshops, collaborative learning communities, resource provision, and initiatives to promote parental and community engagement**. **CPD is non-mandatory** but strongly encouraged in professional expectations set out by the Department of Education and the General Teaching Council for Northern Ireland (GTCNI).
Ireland	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. There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education. 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.	While CPD is not legally mandated for all teachers, it is strongly encouraged and supported by various initiatives through two statutory organisations: • **OIDE:** 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 Centre for School Leadership (CSL), Junior Cycle for Teachers (JCT), the National Induction Programme for Teachers (NIPT) and the Professional

	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.	Development Service for Teachers (PDST). • **National Council for Special Education (NCSE):** 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. • **National Educational Psychological Service (NEPS):** Provides direct educational psychological support to primary, post-primary and special schools in Ireland via consultation and assistance with implementing, monitoring and reviewing support. CPD is therefore **embedded, non-mandatory**. The **Teaching Council** 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 **school-based initiatives**, such as peer collaboration, reflective practice, and participation in professional learning communities.
Ontario (Canada)	Teachers in publicly funded schools must first be certified by the Ontario College of Teachers (OCT). Certification requires completion of a teacher education programme consisting of four academic semesters (i.e., two years). Programmes are required to include a practicum component as well as taught content by Regulation 182/20 (Accreditation of Teacher Education Programmes). There are core foundational courses that pre-service teachers must satisfy as stipulated by Regulation 176/10 (Teachers' Qualifications). Delivery of content related to special educational needs is not mandated. Some programmes offer this content across	In Ontario (Canada) CPD is guided by the Ontario College of Teacher's Professional Learning Framework but is not subject to mandatory hour requirements. However, teachers are expected to engage with Professional Activity (PA) days (typically three mandatory plus optional additional ones) for staff professional learning or administrative work.

	various programmes or modules, but this varies. After initial certification teachers can pursue additional qualifications (AQ) in special education. There is a special education AQ pathway for teachers wishing to qualify for formal roles such as resource teachers or special education consultants.	
Poland	Initial teacher education in Poland is provided by higher education institutions (HEIs). There are a few different degree programmes (first-, second- and long-cycle programmes) and non-degree postgraduate programmes that cover nursery, primary and post-primary school teacher training. • First-cycle (licencjat / bachelor's degree): Typically lasts three years (180 ECTS). Graduates may teach specific subjects in pre-primary (nursery) or primary education (grades I–III) or become teaching assistants, but cannot be main class teachers. • Second-cycle (magister / master's degree): Usually two years (120 ECTS) following a first-cycle degree. This qualifies teachers for upper primary and secondary education. • Long-cycle (jednolite studia magisterskie): Integrated five-year master's programmes (300 ECTS), mainly used in fields like special education, psychology, or early childhood education, where continuity of pedagogical and specialist preparation is considered essential. Initial teacher education programmes include training in working with children with special needs as mandated by law, however content may vary across programmes. There is also optional training available for teachers who will go on to work in specialist schools or as a support teachers.	In-service teachers are mandated by law to engage in continuous professional development. CPD is also linked to career progression. Teachers have a statutory duty under the under the *Teachers' Charter* (*Karta Nauczyciela*, 1982, consolidated text Dz.U. 2023 poz. 984, Art. 6 and Art. 70a) to engage in ongoing development rather than having a set number of CPD hours to complete. Schools are typically responsible for organising CPD and development plans for their workforce.
Scotland	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	In-service teachers in Scotland are **required** to engage in ongoing professional development to maintain their GTCS registration (minimum 35 hours annually).

	possible route into teaching (BA Ed or MA Education), particularly for those teaching primary. There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education. 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 minimum of 60 Scottish Credit and Qualifications Framework (SCQF) credit points, at SCQF level 9[7] 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.	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. While traditional CPD formats like workshops and courses do exist, the **core emphasis is on sustained, embedded professional learning** tied closely to a teacher's practice, school context, and personal development goals.
Singapore	Singapore has one institute for teacher training, the National Institute of Education (NIE). Diploma, bachelor's, and postgraduate diploma programmes are available and each combine taught elements with school-based practicum placements in partnership with the Ministry of Education (MOE). All trainee teachers must complete compulsory modules covering foundational knowledge about SEN (typically around 36 hours of training). In schools, staff may complete the Certificate in Special Needs Support at NIE (approximately 130 hours) to become Teachers Trained in Special Needs (TSNs), who lead case management and support inclusive practice. Specialist teachers in Special Education (SPED) schools, however, are required to complete specialist training (e.g., the Diploma in Special Education (DISE) at NIE) after initial appointment.	Teachers are entitled to up to 100 hours of professional development annually, and the Ministry of Education (MOE) requires schools to plan for ongoing teacher learning aligned with the Teacher Growth Model (TGM) and Skills Future for Educators (SFEd) frameworks. However, **participation is guided by professional norms and appraisal processes rather than statutory obligation**.
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	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 and seminars, but also school-based initiatives, and are often

[7] 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.

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.

There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education.

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 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 to bring together three departments active in training and research in the field of education and training. This faculty will cover training for primary, lower secondary, and special education teachers (i.e., specialist teachers , special education teachers and speech therapists).

funded by cantonal or communal authorities. **CPD typically occurs outside of everyday practice**, but it can also be integrated into the school setting.

Wales	Those aspiring to become teachers must obtain **Qualified Teacher Status (QTS)**, which is typically achieved through completing an **Initial Teacher Education (ITE)** programme. The most common route is the **Postgraduate Certificate in Education (PGCE)**, a postgraduate qualification that combines academic study with practical teaching experience. PGCE programmes in Wales are structured to align with the **Professional Standards for Teaching and Leadership.** There is **no statutory requirement** for teachers to hold a specific qualification to work in Additional Learning Needs (ALN) provision. There is no mandated curriculum for inclusion in initial teacher education. Instead, this is embedded to some extent through modules on inclusive education.	For in-service teachers, **Continuing Professional Development (CPD)** is a statutory requirement in Wales. The Welsh Government has implemented a **National Approach to Professional Learning**, which emphasises the importance of ongoing professional development to support the implementation of educational reforms such as the **Curriculum for Wales**. Furthermore, teachers engage in an annual **Professional Development Review (PDR)** process, which involves self-reflection, setting professional learning objectives, and aligning individual goals with school improvement plans. CPD is increasingly becoming **embedded in everyday practice**, though traditional courses and workshops still play a role. The Welsh Government has promoted a more **reflective, collaborative, and school-embedded model of professional learning** as part of its national reforms via the National Approach to Professional Learning (NAPL).

How do Estonia, France, Japan, the Netherlands, New Zealand, Ontario (Canada), Poland, and Singapore compare in terms of stakeholders' perceptions of the success of their SEND system, across indicators?

Key findings:

1. Existing evidence on how stakeholders perceive SEND policy implementation shows that, across jurisdictions:
    a) Practitioners' attitudes towards the importance of inclusion varied across jurisdictions; some felt that they had a duty or responsibility to provide an inclusive education for all students, while others perceived that a level of segregation was inevitable, at least with respect to some types of need.
    b) A number of constraints were identified as limiting the extent to which schools could be truly inclusive. These ranged from a lack of funding, resources, knowledge and/or training to structural features of the system, such as class sizes, standard curricula and high-stakes exams.
    c) Reports of positive and communicative interactions between families and schools, as well as strong cross-sector collaboration between schools and external support services, were associated with more positive views about the extent to which a jurisdiction's education system was currently inclusive.
    d) Peer relationships were seen as key to supporting children with SEND by both parents and practitioners.
    e) Educators reported feeling underprepared for identifying and meeting the needs of students with SEND, highlighting gaps in both initial teacher education and professional development opportunities.

2. There were mixed views across stakeholders in terms of how inclusive their education systems were overall. Stakeholders in France, the Netherlands, New Zealand, and Ontario appeared to hold the most positive views. However, they still

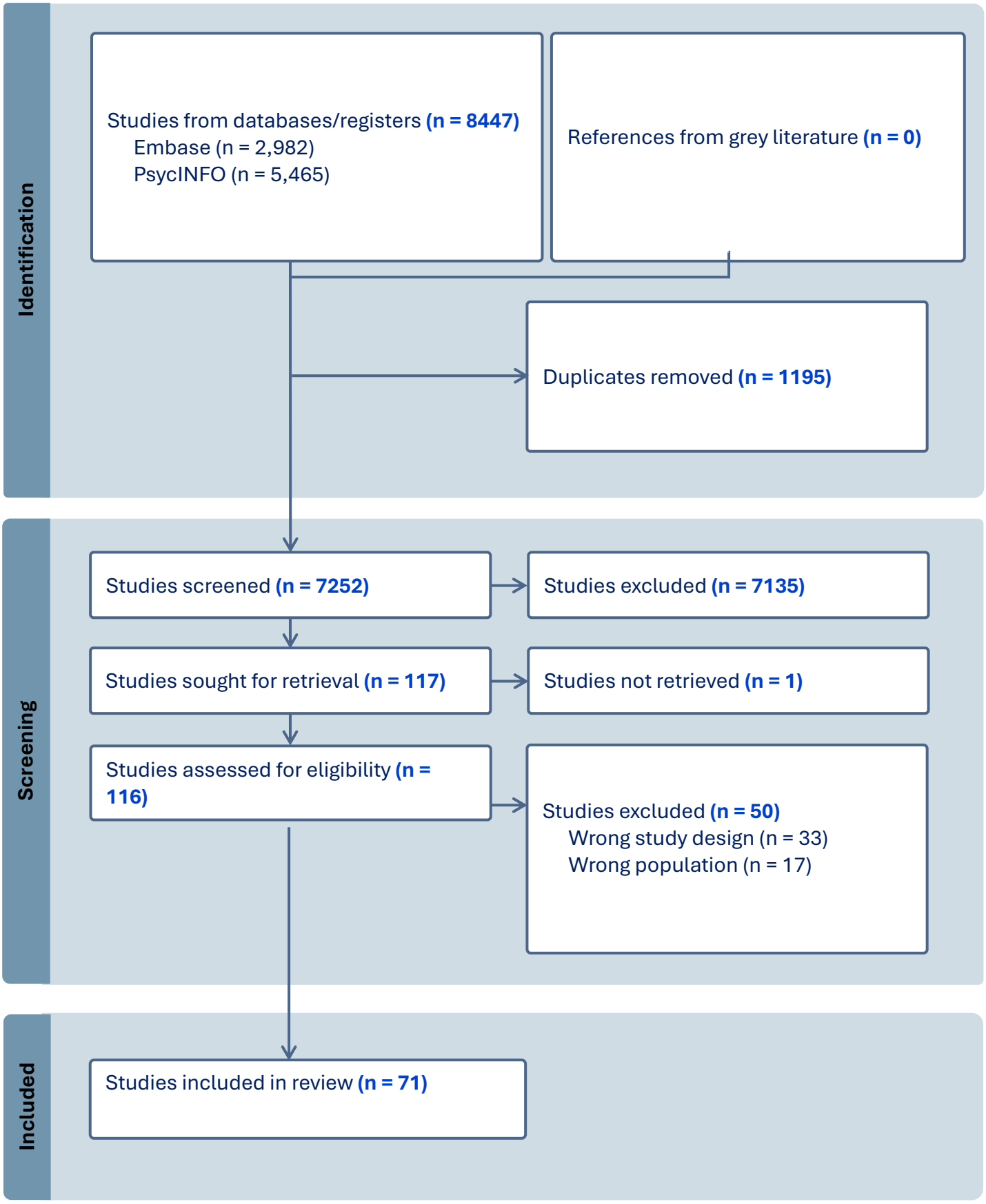
This strand of the project explored how policies and provision for children and young people with SEND are perceived by their users (i.e., practitioners, caregivers and children/young people) in Estonia, France, Japan, the Netherlands, New Zealand, Ontario, Poland and Singapore. Such a comparison will 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.

To address our research question, we conducted a rapid qualitative evidence review (Booth et al., 2024) to provide a focused, time-efficient synthesis of existing evidence, using a framework synthesis approach (Dixon-Woods, 2011) to organise and interpret findings systematically.

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 10 presents the PRISMA flow diagram.

Figure 10. PRISMA Flow Diagram for Rapid Systematic Review



The initial search identified 8,447 articles, which, after deduplication, resulted in 7,252 records for title and abstract screening. A total of 116 full-text articles were screened for eligibility, of which 71 studies met the inclusion criteria and were included in the synthesis (see Appendix B for study characteristics). A range of participants reporting on different areas of SEND were represented with the majority of views coming from practitioners (n = 47). Participants were from a range of school types (mainstream, specialist, alternative provision) and education stages (early years, primary, secondary). Study sample sizes ranged from 1 to 23,819. Most studies (n = 47) reported on qualitative interview findings and surveys while 18 used mixed methods and 6 studies used other techniques such as observations or narratives. The majority of studies reported on data from stakeholders in Ontario (n = 19), New Zealand (n = 17), the Netherlands (n = 16), and Singapore (n = 12) with few studies identified for Japan (n = 5) or France (n = 2) and none reporting on data from Poland or Estonia.

Overall, there were three overarching themes that cut across the different indicators, jurisdictions, and participant types. These themes were (1) 'Practitioner attitudes towards inclusion and their beliefs on the feasibility of it being implemented', (2) 'Relationships and collaboration' and (3) 'Initial teacher education, professional development opportunities and capacity building'. 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 that data from these countries did not fit the themes or were non-existent.

Theme 1 'Practitioner attitudes towards inclusion and their beliefs on the feasibility of it being implemented' emerged across 33 of 71 studies as a central theme across the additional jurisdictions. This theme captures variation in practitioner attitudes toward inclusion, their beliefs about how achievable it is in practice, and the perceived barriers and facilitators influencing its implementation. Some practitioners highlight the benefits of inclusion with some feeling they have a 'duty' or a 'responsibility' to provide inclusive education for all students. However, even in cases where participants want to be inclusive, they sometimes report feeling uncertain about the extent to which inclusion can be fully implemented, especially for children with certain types of needs such as physical disabilities, sensory needs, or behavioural needs. They cite barriers in their own ability to deliver inclusive education such as a lack of funding, resources or competence, as well as structural constraints such as a rigid curriculum, academic tracking, and high-stakes exams, which make full inclusion difficult to achieve.

Evidence from France:

- Interviews with 18 teachers in France find that half the sample hold favourable attitudes towards inclusion, citing it as valuable in promoting diversity and belonging. However, some teachers also cite barriers, such as limited resourcing

and lack of knowledge or training, to supporting children with SEND. Survey data from a large sample of teachers in France also suggests that the more teachers view the education system as a mechanism for sorting and separating students into different academic tracks (i.e., based on their academic ability), the less favourable their attitudes toward the feasibility of inclusion (Khamzina et al., 2021).

Evidence from Japan:

- In Japan, inclusion is often understood as specialist provision (i.e., small group or resource room) rather than transformation of mainstream environments. Flexible use of resource rooms is seen as offering psychological safety and opportunities for tailored teaching. Successful inclusion is described as emerging from positive interpersonal dynamics, leadership, rotation policies, and family collaboration (Maeda et al., 2020; Sanagi, 2016; Yada and Savolainen, 2019).

Evidence from the Netherlands:

- Educators reflected on inclusion reforms brought on by the 2014 Education Act, reporting that this change altered the student composition in schools and increased the complexity of addressing different needs (Willemse et al., 2023).
- Questionnaire data, scored according to the researchers' rating framework, indicate that teaching staff showed neutral to moderately positive attitudes towards the importance of inclusion and integration. Those who have more concerns about the feasibility of implementation tend to hold more negative views (Tenback et al., 2024).

Evidence from New Zealand:

- Educators in New Zealand generally view SEND as a 'difference' rather than a 'disorder' or 'deficit' (Tupou et al., 2024). They also view inclusion as a right for all students and feel a responsibility for delivering inclusive education (Dymock & Nicholson, 2023; Lin et al., 2024; Singh & Zhang, 2022).
- However, students report that teachers who label students, or perceive them as challenging and disruptive, may reinforce low expectations and treat them unfairly compared to other students, affecting opportunities for autonomy and participation (Hajdukova et al., 2014).
- Further, some evidence suggests that there is variance in how inclusive practices (e.g., Universal Design for Learning framework) are understood and applied by teachers, and inconsistency in how assistive technology is delivered to students (Mitchell, 2023).

Evidence from Ontario:

- Similar to New Zealand, educators feel that inclusion is a human right and report feeling a sense of responsibility to support all students and adopt a needs-based approach to inclusion (Danniels & Pyle, 2023; Lindsey et al., 2014; Robinson, 2018; Somma, 2022).

Evidence from Singapore:

- Early years teachers agree that children with SEND should receive the same services as their peers in the early childhood setting. However, some believe that implementing this is difficult (Nonis et al., 2016).
- Survey data indicate that school staff and pre-service teachers may have different attitudes (i.e., acceptance, comfort, and/or concerns) towards inclusion depending on type of need (Poon et al., 2016; Thaver & Lim, 2014).

Common Themes Across Jurisdictions

- Conceptual models of inclusion and feasibility of delivery: Practitioners in **Japan** (Maeda et al., 2020) and **Singapore** (Strogilos et al., 2023) tend to view inclusive measures as forms of segregation believing that full mainstream inclusion may not be feasible for certain groups. On the other hand, educators in **New Zealand** (Dymock & Nicholson, 2023; Lin et al., 2024; Singh & Zhang, 2022) and **Ontario** (Danniels & Pyle, 2023; Lindsey et al., 2014; Robinson, 2018; Somma, 2022) adopt a more needs-based approach to inclusion which is embedded in a rights-based ideology. Pre-service teachers in **Ontario** (Hutchinson et al., 2015) and **Singapore** (Thaver & Lim, 2014) and school staff in **Japan** (Yada & Savolainen, 2019) are least positive about the feasibility of inclusion for children with behavioural and high support needs.
- Barriers to inclusion: There were a number of contextual barriers to inclusion reported across jurisdictions. A lack of time and resources were cited as barriers to incorporating inclusive practices in **France** (Khamzina et al., 2021) and **Singapore** (e.g., Strogilos et al., 2023; Wong & Law, 2016). Stakeholders in **Singapore** also reported that class size, standardised curriculum, and national exams affected the types of support they could implement (Strogilos et al., 2023). Further, teacher beliefs or low expectations of students may be associated with less favourable attitudes towards inclusion as an objective as reported in **France** (Khamzina et al., 2021) and **the Netherlands** (Zweets et al., 2016).
- Teacher confidence and self-efficacy: Higher levels of confidence and self-efficacy were associated with more positive perceptions of the extent to which the system is currently inclusive in **France** (Khamzina et al., 2021), **Japan** (Yada & Savolainen, 2019), **New Zealand,** (Lin et al., 2024), and **Singapore** (Poon et al., 2016).

Theme 2 'Relationships and collaboration' describes how the quality of various relationships (e.g., between families, educators, and specialists, and among peers in educational settings) may either hinder or support inclusive practices. Across jurisdictions, stakeholders agreed that collaborative and communicative relationships were facilitators in meeting the needs of students with SEND by enabling a shared understanding of needs, coordinated support, and emotionally safe environments, while less positive relationships, characterised by poor or infrequent communication, lack of collaborative planning, and a lack of a shared understanding, could lead to poorer provision. This theme was evident across 28 of 71 studies.

Evidence from France:

- Autistic secondary students report that negative attitudes and 'teasing' from peers are barriers to inclusion (Aubineau et al., 2020).

Evidence from Japan:

- Inclusive education environments and positive relationships between parents and educators are perceived to have positive effects on learning and development (Fujino & Ikeda, 2023; Ishikawa et al., 2024).

Evidence from the Netherlands:

- There is variance in the quality and the amount of communication between parents and educators (Leenders et al., 2019) and between parents and specialists (e.g., speech therapists, physicians, psychologists, occupational therapists, etc.) (Jansen et al., 2017). Poor coordination and limited communication between schools and external services restrict professionals' capacity to act and share knowledge about students' needs (Gerdes et al., 2021).
- Parents report facing challenging bureaucratic systems and difficulty navigating multiple laws and regulations to secure appropriate support for their children (Geuze et al., 2023).

Evidence from New Zealand:

- Across studies, collaboration among teachers, SENCos, learning assistants, and families is consistently seen as central to effective inclusion (Lin et al., 2024; Vincent, 2025; Singh and Zhang, 2022).
- Effective accommodations are seen to arise from joint planning between families and schools (Pine et al., 2024; Sainsbury et al., 2024).
- Accessing a diagnosis and support are both described as battles for parents (Sainsbury et al., 2024; Wallace-Watkin et al., 2023).

Evidence from Ontario:

- Inclusion coaches and teacher candidates observe that coordinated teamwork and shared responsibility among educators improve support for students with disabilities, while conflicting perspectives between staff and parents can impede inclusion (Bennett et al., 2021; Lindsey et al., 2014; Hutchinson et al., 2015).

Evidence from Singapore:

- Schools recognise parents as having an important role in the learning and development of children (Wong et al., 2015a). However, parents' knowledge and attitudes towards their children's needs can affect the quality of their collaboration with the school. Those with less knowledge tend to defer mostly to schools to lead the decision-making whereas those with more knowledge tend to be more assertive in directing the process (Wong et al., 2015b).
- Although friendships could have a positive effect on learning and development (Poon et al., 2014), participants with SEND report having poorer quality peer relationships that their typically developing peers (Yeo & Tan, 2018).

Common Themes Across Jurisdictions

- Family and school relationships: Parents, students, and educators report that positive and friendly interactions in the classroom (between peers and teachers) and frequent and informative communication between schools and families positively impact provision in **Japan** (Fujino & Ikeda, 2023; Ishikawa et al., 2024; Maeda et al., 2020; Sanagi, 2016; Yada & Savolainen, 2019), **the Netherlands** (Leenders et al., 2019), **New Zealand** (Lin et al., 2024; Pine et al., 2024; Sainsbury et al., 2024; Singh & Zhang, 2022), **Ontario** (Starr et al., 2016; Patey et al., 2023; Lindsey et al., 2014) and **Singapore** (Wong et al., 2015a). However, lack of parental knowledge is cited as a barrier in **the Netherlands** (de Boer & Munde, 2015; Singer et al., 2024).
- School-based coordination: Collaboration among school staff and supportive school regulations which provide detailed guidance on roles and responsibilities are found to be facilitators of inclusion in **Japan** (Maeda et al., 2020), **Ontario** (Bennett et al., 2021), and **the Netherlands** (Jaspers-van der Maten & Rommes, 2024).
- Cross-sector collaboration: Similarly, communicative relationships between schools, local authorities, and specialists are viewed as facilitators to timely support in **the Netherlands** (Gerdes et al., 2021; Singer et al., 2024) and **New Zealand** (Wallace-Watkin et al., 2023).
- Navigating cross-sector provision: Parents report difficulties in navigating assessment and support systems in **the Netherlands** (Geuze et al., 2023), **New**

Zealand (Wallace-Watkin et al., 2023; Sainsbury et al., 2024) and **Ontario** (Su et al., 2021).

- Peer relationships: Evidence from **France** (Aubineau et al., 2020) and **Ontario** (Montgomery & Snow, 2024; Patey et el., 2023) suggests that that positive social connections and engagement are important for the learning and development of children with SEND. Bullying and negative peer interactions can be barriers to inclusion.

Finally, theme 3 'Initial teacher education, professional development opportunities and capacity building' captures the perceived landscape of educator preparation and ongoing professional development. Across jurisdictions, educators often report feeling underprepared for identifying and meeting students' diverse learning needs, identifying gaps in both initial teacher education and professional development opportunities. Where professional development is available, it is typically delivered in short one-off courses, which were viewed as ineffective. Educators described also engaging in informal methods of capacity building which were commonly helpful but often not formally recognised. This theme was evident across 24 of 71 studies in **the Netherlands, New Zealand, Ontario, and Singapore**.

Evidence from France

- Teachers in France report a lack of training as a barrier to delivering inclusive teaching (Khamzina et al., 2021).

Evidence from the Netherlands:

- Educators report various preferences in building capacity for addressing the needs of children with SEND. Some report a desire for explicit guidance in working with children with SEND to help them feel more confident in their teaching while others called for more collaboration within the school or with specialists (Van Der Steen et al., 2020).

Evidence from New Zealand:

- Teachers in New Zealand report that initial teacher education is not sufficient in preparing teachers to support students with SEND and feel there is a lack of professional development opportunities in this area (Singh & Zhang, 2022; Topou et al., 2024).
- Survey data indicate that resource teachers who undertake professional development in the area of autism are more confident in implementing evidence-based practices in supporting autistic children than those who do not. Resource teachers also indicate that the most effective form of professional development is coaching from a specialist teacher (Singh, 2019).

Evidence from Ontario:

- Studies consistently show a strong commitment to professional development and increased self-efficacy following inclusion-related coursework or field experience, yet educators still call for further training in behavioural, academic, and social interventions and for more systematic support and resources (Peebles & Mendaglio, 2014; Lindsey et al., 2014; Hutchinson et al., 2015).

Evidence from Singapore:

- Educators report a lack of knowledge and confidence in identifying learning needs in a classroom (Nonis et al., 2016; Teo, 2021; Wong & Law, 2016) and also feel underprepared to support students with specialised resources such as assistive technology (Wong & Law, 2016).

Common Themes Across Jurisdictions

- Across **Singapore** (Nonis et al., 2016; Teo, 2021; Wong & Law, 2016), **the Netherlands** (Van der Steen et al., 2020; Willemse et al., 2023), **New Zealand** (Attwood et al., 2019; Dymock & Nicholson, 2023; Singh & Zhang, 2022; Topou et al., 2024), and **Ontario** (Hutchinson et al., 2015; Somma, 2022), educators consistently report lacking the training and confidence to identify and support students' needs. Initial teacher education rarely equips them with sufficient understanding of disability, legislation, or evidence-based strategies to support children with SEND.
- Teachers across jurisdictions describe engaging in informal methods of learning or capacity building by collaborating with colleagues or using online resources in **Singapore** (Wong & Law, 2016), **New Zealand** (Topou et al., 2024) and **Ontario** (Hutchinson et al., 2015), which they found to be helpful in improving their practice. However, engagement with these methods is inconsistent, they often lack structure, and they are not commonly afforded formal recognition as professional development opportunities.

Discussion

The current report shares findings from policy analysis and an analysis of stakeholder perspectives in relation to special educational needs and disabilities in eight jurisdictions; Estonia, France, Japan, the Netherlands, New Zealand, Ontario (Canada), Poland, and Singapore. This study is situated within a larger research programme seeking to triangulate policy analysis with stakeholders' experiences of policy implementation in relation to provision of services for children and young people with special educational needs and disabilities (SEND).

The findings show striking differences in language adopted between some of the jurisdictions under analysis. Of note is Singapore, where the policy corpus seems more aligned with a medical model approach to defining and conceiving SEND and eligibility to services. This is reflected in a higher frequency of concepts such as 'deficit' and 'diagnosis' and well as diagnosis-specific terms, such as 'autism' and 'ADHD', with statistically significant differences and large effects sizes when comparing to other countries. This was observed alongside a high frequency of terms related to an early years policy that seems to focus on early identification and support, aligned with a needs-based preventative approach. This places Singapore in a unique position, where mainstream education policy adopts very inclusive language and concepts but sits alongside a specialised medical model based strand for children with high-level needs associated with diagnoses. Focusing exclusively on linguistic elements of policy for the entire set of English-speaking jurisdictions covered in this report and the previous ScopeSEND report, Australia, New Zealand, Scotland and Ireland appear much more aligned with a biopsychosocial approach and/or a preventative/universal focus when compared to Singapore, although there is variation between these, depending on which concepts the analysis focuses on.

Literature on experiences of policy implementation by stakeholders in the different jurisdictions under analysis shows that overall, the new jurisdictions varied in terms of their attitudes towards the importance of inclusion and the extent to which they believed inclusion could be implemented given structural constraints, resources, and current training. Educators' views on the importance of inclusion varied with France, New Zealand, and Ontario having the more positive views, although still demonstrating a lack of a consistent approach to inclusion. Practitioners in Singapore appeared to have the least positive views about the importance of inclusion, which reflects the findings in the sentiment analysis of the policy corpora. Consistent and collaborative relationships between families and schools, and families and specialists, were viewed as enablers to inclusive practices and effective planning. Finally, the systematic review of the literature demonstrated that educators in the majority of the new jurisdictions feel underprepared to address the needs of students with SEND.

These experiences are likely to reflect the limited initial teacher education and continued professional development opportunities available in relation to SEND support and inclusive practices that is common across jurisdictions. However, it is notable that even in Singapore, one of just two jurisdictions where delivery of SEND content is a mandatory part of teacher training, educators report that they feel underprepared to support children with SEND.

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.

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. 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. 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 data 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. Only policies available in English were included in the corpus analysis, which excluded certain jurisdictions that may have offered important points of comparison. The concept dictionary used for the keyness tests was derived from the relevant literature for each concept. Although additional SEND related terms were sought within each country's corpus, it is still possible that some important jurisdiction specific terminology was not captured. Effect

sizes and p-values are reported and should be interpreted together: small p-values without correspondingly large effect sizes may reflect “false” significance arising from the analysis of a large dataset rather than meaningful differences in the texts; conversely, large effect sizes without small p-values may indicate patterns that are substantial but not statistically stable given the size or distribution of the data.

In addition, many of these policies across jurisdictions are under review and may be likely to change or evolve. Therefore, our analyses reflect policies as they currently are at the publication of this report.

Challenges in reviewing evidence available

The evidence base for this group of countries was limited compared to those in our first report and no relevant research was retrieved for Estonia or Poland. However, this does not necessarily imply that this evidence is not available, rather it may reflect the limitations of our rapid review methodology. Therefore, findings should be interpreted with caution as they may reflect minority perspectives or experiences within a country.

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.

Conclusion

Similar to our first report, there appears to be a link starting to emerge between attitudes towards SEND policy and the way in which SEND and inclusive practices are conceptualised and referred to in policy text. Definitions and stakeholder views that reflect a broader understanding of SEND aligned 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 are typically associated with more positive stakeholder views. However, educators across these jurisdictions still report feeling underprepared to support children with SEND and implement inclusive practices. 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 3 of this research project.

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

PICOS Criteria	
Population	child* OR "young people" OR adolescent* OR student* or youth OR teen* OR pupil OR caregiver* OR parent* OR guardian* OR family OR carer* 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"
Intervention	"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" AND

	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*
Comparison	n/a
Outcome	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
Study Type	qualitative OR "mixed-methods" OR "case study" OR interview* OR "focus group*" OR survey* OR "systematic review" OR ethnography OR observation*

Appendix B – Study Characteristics for Rapid Evidence Review

Criterion	Characteristic	Number of studies *n total* = *71*
Year published	2014-2019	32
	2020- 2024	39
Country	Estonia	0
	France	3
	Japan	2
	The Netherlands	2
	New Zealand	29
	Ontario (Canada)	21
	Poland	0
	Singapore	0
Study Design	Qualitative with interview or focus groups	32
	Qualitative with participatory methods	2
	Qualitative with other	9
	Quantitative survey	14
	Mixed methods	17
Participants	Practitioners	46
	Parents or families	9
	Children/young people	8
	Families and children/young people	3
	Practitioners and children/young people	1
	Practitioners and families	4
Area of SEND Studied	All SEND	37
	Communication and social interaction	1
	Cognition and learning	4
	Social, emotional, and mental health	4
	Physical disabilities	3
	Sensory disabilities	1
	Genetic disabilities	0
	Autism	14
	ADHD	1
	Dyslexia, Dyscalculia	1
	A combination of the above	8
Educational Phase	Early Years	7
	Primary	18
	Secondary	7
	FE / HE	0
	Early Years and Primary	4

	Primary and Secondary	18
	Secondary and FE / HE	1
	Not specified	18

Appendix C – List of Policies consulted for document analysis

Document Number	Country	Title of Document
1.	Estonia	Basic Schools and Upper Secondary Schools Act
2.	Estonia	Early Childhood Education Act
3.	Estonia	Education Strategy 2021-2025
4.	Estonia	Framework requirements for teacher training
5.	Estonia	Mental Health Action Plan 2023-2026
6.	Estonia	National Curriculum for basic schools
7.	Estonia	Pre-school Child Care Institutions Acts
8.	Estonia	Private Schools Act
9.	Estonia	Republic of Estonia Education Act
10.	France	Code de l'éducation
11.	France	Circular No. 2015-016 of 22 January 2015
12.	France	Circular No. 2006-138 of 25 August 2006
13.	France	Circular No. 2016-117 of 8 August 2016
14.	France	Decree no. 2005-1145 of 9 September 2005
15.	France	Decree no. 2005-1178 of 13 September 2005
16.	France	Decree no. 2014-1485 of 11 December 2014
17.	France	Decree no. 2015-1051 of 25 August 2015
18.	France	Decree no. 76-389 of April 15, 1976
19.	France	Decree no. 56-284 of March 9, 1956
20.	France	École de la confiance
21.	France	Law no. 89-486 of 10 July 1989
22.	France	Law no. 2005-102 of 11 February 2005
23.	France	The Child Guarantee National Action Plan (2022)
24.	Japan	Act for Eliminating Discrimination against Persons with Disabilities
25.	Japan	Basic Act on Education （Act No. 120 of December 22, 2006）
26.	Japan	Basic Act for Persons with Disabilities
27.	Japan	Basic Plan for the Promotion of Education
28.	Japan	School Education Act
29.	Japan	Second Basic Plan for the Promotion of Education
30.	Japan	Third Basic Plan for the Promotion of Education
31.	The Netherlands	Appropriate Education Act (Wet op het passend onderwijs, 2014)
32.	The Netherlands	Compulsory Education Act (*Leerplichtwet*, 1969, amended)
33.	The Netherlands	Childcare Act (*Wet kinderopvang*, 2005)
34.	The Netherlands	Childcare Act and Quality Requirements for Playgroups (2018) (Wet Kinderopvang en Kwaliteitseisen Peuterspeelzalen
35.	The Netherlands	Education Supervision Act (2002) (Wet op onderwijstoezicht)
36.	The Netherlands	Equal Treatment on the Grounds of Disability or Chronic Illness Act (2003) (Wet gelijke behandeling op grond van handicap of chronische ziekte)
37.	The Netherlands	Expertise Centres Act (*Wet op de expertisecentra*, WEC, 1998)
38.	The Netherlands	The law/policy on Strenghtening the Position of Parents and Student in Tailored Education (Wet versterking positie ouders en leerlingen in passend onderwijs'- 2025)
39.	The Netherlands	Primary Education Act (Wet op primair onderwijs 1998)

Document Number	Country	Title of Document
40.	The Netherlands	The Quality of (Secondary) Special Education Act (Wet kwaliteit (v)so, 2013)
41.	The Netherlands	School Participation Act (2006) (Wet medezeggenschap scholen)
42.	The Netherlands	Secondary Education Act (Wet op het Voortgezet Onderwijs, WVO, 1998, amended)
43.	The Netherlands	Youth Act 2015 (Jeugdwet)
44.	New Zealand	Disability Action Plan 2019 – 2023
45.	New Zealand	Education and Training Act 2020
46.	New Zealand	Inclusion of Children with Special Needs in Early Childhood Services
47.	New Zealand	Learning Support Action Plan 2019-2025
48.	New Zealand	Mental Health and Wellbeing Commission Act 2020
49.	New Zealand	Ministry of Education funded supports and services for learners with special education needs and disabilities as at April 2012
50.	New Zealand	New Zealand Disability Strategy 2016-2026
51.	New Zealand	New Zealand Sign Language Act
52.	New Zealand	Te-Whariki-Early-Childhood-Curriculum
53.	Ontario (Canada)	Accepting Schools Act, 2012, S.O. 2012, c. 5 - Bill 13
54.	Ontario (Canada)	Accessibility for Ontarians with Disabilities Act (AODA)
55.	Ontario (Canada)	Caring and Safe Schools in Ontario
56.	Ontario (Canada)	Education Act
57.	Ontario (Canada)	Policy on accessible education for students with disabilities
58.	Ontario (Canada)	Professional Learning Framework for the Teaching Profession
59.	Ontario (Canada)	Special Education in Ontario: Policy and Resource Guide, Kindergarten to Grade 12
60.	Ontario (Canada)	Support for Students with Autism
61.	Poland	Act of 14 December 2016, Law on School Education (Ustawa z dnia 14 grudnia 2016 r. – Prawo oświatowe)
62.	Poland	Act on Support and Resocialisation of Juveniles (Ustawa o wspieraniu i resocjalizacji nieletnich, 9 czerwca 2022
63.	Poland	Constitution of the Republic of Poland (Konstytucja Rzeczypospolitej Polskiej, 1997)
64.	Poland	Regulation of the Minister of National Education of 9 August 2017 on the conditions for organising education, upbringing and care for children and youth with disabilities, socially maladjusted or at risk of maladjustment (Rozporządzenie Ministra Edukacji Narodowej z dnia 9 sierpnia 2017 r. w sprawie warunków organizowania kształcenia, wychowania i opieki dla dzieci i młodzieży niepełnosprawnych, niedostosowanych społecznie i zagrożonych niedostosowaniem społecznym)
65.	Poland	Regulation of the Minister of National Education of 24 August 2017 on early childhood development support (Rozporządzenie Ministra Edukacji Narodowej z dnia 24 sierpnia 2017 r. w sprawie wczesnego wspomagania rozwoju dziecka
66.	Poland	Regulation of the Minister of National Education of 9 August 2017 on individual preschool preparatory year and individual teaching (Rozporządzenie Ministra Edukacji Narodowej z dnia 9 sierpnia 2017 r. w sprawie indywidualnego obowiązkowego rocznego przygotowania przedszkolnego i indywidualnego nauczania)

Document Number	Country	Title of Document
67.	Poland	Regulation on statements and opinions issued by public psychological-pedagogical counselling centres (Rozporządzenie w sprawie orzeczeń i opinii wydawanych przez publiczne poradnie psychologiczno-pedagogiczne):
68.	Poland	Teacher's Charter (Karta Nauczyciela, 26 stycznia 1982 r., z późn. zm.)
69.	Singapore	Comprehensive Needs Assessment Report Professional User Guide
70.	Singapore	Compulsory Education Act 2000
71.	Singapore	Curriculum in Special Education Schools
72.	Singapore	Education Act
73.	Singapore	Ministry of Education webpages
74.	Singapore	National Mental Health and Wellbeing Strategy Report 2023