

Chapter 9

Global Dialogues on Inclusive Education: A Retrospective and Comparative Analysis of the *Salamanca Statement*, Article 24, and *General Comment #4*



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Abstract This critical book chapter describes, compares, and reflects on inclusive schooling for students with disabilities as detailed in three narratives produced by UNESCO and the UN General Assembly: the 1994 *Salamanca Statement*, Article 24 of the 2006 *Convention on the Rights of Persons with Disabilities*, and the CRPD Committee’s 2016 *General Comment #4*. Case studies that historicized and analyzed each document produced four main themes: models of disability, inclusive education as a right, classroom placement, and special education. When compared, the themes showed a shared forum on foundational issues but different policy intents relevant to education placement and special education. In terms of the present shading of the global inclusive map, inclusive schooling as represented by the Salamanca agreement persists as the main organizational form; Article 24’s central theme of fully inclusive environments is struggling to gain traction on the global stage.

Keywords Inclusive schooling · Full inclusion · Salamanca Statement · Convention on the Rights of Persons with Disabilities · Article 24 · General Comment #4 · School placement

9.1 Global Dialogues on Inclusive Education: Introduction

Inclusive schooling for students with disabilities debuted on the education reform map in the early-1980s.¹ At the global level, the socio-political-philosophical tenets are widely brokered by policy actors representing international organizations,

¹Europe, the UK, and other countries use the term *special education needs* in reference to children and youth perennially at risk of marginalization, exclusion, or underachievement. In line with the CRPD, this paper uses the term *disabilities*.

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primarily the United Nations and its agencies. Of the generated windstorm of pledges, documents, and legislation, three have been paramount in ushering inclusive schooling into the international theatre: the 1994 *Salamanca Statement on Principles, Policy and Practice in Special Needs Education* (UNESCO, 1994), Article 24 of the *Convention on the Rights of Persons with Disabilities* (CRPD; UN, 2006), and *General Comment #4* (UN-CRPD Committee, 2016; henceforth GC4). The *Salamanca Statement* is widely hailed as a paradigm shift that actively fabricated the global contours of the inclusive movement and continues “to guide the agenda of national and international inclusive policies” (Magnusson, 2019, p. 1). Article 24, the first explicit legal enunciation of the right to inclusive education for persons with disabilities, is framed as “a masterpiece” that is “universally celebrated for its comprehensive and visionary embrace of the inclusion principle” (Degener, 2014, p. 2; Heyer, 2021, p. 46). GC4, an authoritative evidence-based interpretation of Article 24, was produced by the CRPD Committee in 2016. Byrne (2019) eulogizes both Article 24 and GC4 as “the most comprehensive international policy in existence on inclusive education” (p. 5).

Such hyperbole may seem to imply broad consensus on the meanings, progress, and future course of inclusive schooling. Nothing could be further from reality. In fact, there is an established body of research reporting on the ways in which the meanings attached to inclusive schooling are, both in theory and operationally, highly complex, context specific, and inundated with internal contradictions (e.g., Florian, 2014; Nilholm, 2021; Slee, 2020). Arguably, understandings of education placement form the most enduring, unresolved, and emotional issues. Placement, simply defined as students’ school addresses, chiefly concerns whether students with disabilities are placed with their peers in general classrooms or in the segregated settings typical of special education. Berg (2007) characterized the options as “dueling polarities” (p. 4). He used the colloquial *partial inclusion* (also referred to as the multitrack approach, multiple option system, sometimes the special education model, and represented by the least restrictive environment) to describe processes in which students with disabilities are housed along a continuum of settings spanning general education to categorical special education placements. *Full inclusion* (also called the one-track system, occasionally true or absolute inclusion) is portrayed by the trope ‘All means all.’ Champions seek to transform schools and broaden access to general classrooms. All those with disabilities at all levels must be accommodated in general classrooms with access to general curricula at all times throughout their entire school careers: the type and depth of needs and abilities are not germane to decisions about education placement and provisions for instruction outside the general classroom are not possible.

9.1.1 Politics of Education Placement

The politics of education placement function as the theoretical and practical organizing construct of this critical book chapter. The overarching aim is fairly narrow.

Based on the interface of inclusive schooling, placement issues, and the selected UN documents, we undertake an analysis, comparison, and reflection on how the *Salamanca Statement* and Article 24, along with GC4, its interpretative guide, frame full and partial inclusion. Critical engagement with the polarized paradigms of placement related to the education of students with disabilities is anything but novel. However, addressing the issues through the lenses of international documents is timely and instructive on a number of levels. Broadly, the global slant contributes to the growing body of international work dedicated to tracking the inclusive agenda as a function of global governance. More pointedly, while scholars have produced a solid and robust body of comment, first reporting on the *Salamanca Statement*, later adding Article 24 (e.g., Ainscow, Slee, & Best, 2019; Anastasiou & Kauffman, 2019; de Beco, 2014; Winzer & Mazurek, 2017, 2019, 2020), the recent *General Comment #4* is barely explored. Examining its terrain and comparing it to antecedent texts significantly expands conversations about the global inclusive agenda. Importantly and immediately, tensions between proponents of partial models that take a cautious view of the wisdom of ‘All means all’ and opposing stances that systematically identify with fully inclusive paradigms have never been as pronounced and in conflict as they are today. A popular strand in the present discourse emphasizes how the suite of actors promoting full inclusion increasingly views their field as a distinct and thriving domain of theorization, practice, and research that is abandoning any gravitational pulls to its ancestry in special education (e.g., Hardy & Woodcock, 2015; Slee, 2020). A certain set of beliefs shape their thoughts: the moral rightness of full inclusion; faith in general classrooms as the optimum setting for all children with learning difficulties; hopes of refashioning domestic education policy by persuading sites with established special education systems to move to fully inclusive systems; and inclusive programs as key to overcoming the perceived discrimination and deviations associated with special education. Advocates of fully inclusive systems confront a long-established special education fraternity. Powerful actors assert that special education is not a place but a set of services individualized to students’ learning needs, argue that the fixation on full inclusion is currently the most controversial idea in policy and practice for students with disabilities, and view any proposal to dismiss special education as “a totally nonsensical and impractical notion” (Kauffman & Hornby, 2020, p. 10; also Anastasiou & Kauffman, 2019; Kauffman & Badar, 2014).

9.1.2 *Organization and Methods*

This book chapter has three main components. First, independent case studies historicize the drafting history, policy orientation, and embedded ambiguities of each selected text and provide context to identify major theoretical and substantive processes. Second, we compare and contrast the nature and function of the processes and map both interconnected vantage points and discontinuities. Following, the data serve as the basis for a brief discussion about which document has established the

key concepts, created the most acceptable processes, and is impacting on the current global progress of the inclusive agenda. Two caveats are in order. First of all, decades of energetic professional debate have not resolved issues of placement and this piece is not intended to prescribe or proscribe different visions of inclusive schooling; rather, it is conceptual and reflective. Second, the international library on inclusive schooling holds far more than three documents. While this paper is bookended by the Jomtein conference and GC4, we recognize that later offerings such as the CRPD Committee's Concluding Observations and the 2030 Agenda for Sustainable Development will reshape the implementation of inclusive schooling yet again (e.g., Byrne, 2019; Mazurek & Winzer, 2022; UN, 2018).

9.2 Global Policy Context

As part of their strategic plans for international education development, the UN and its agencies have created, highlighted, and monitored the ideological underpinnings and formal policy commitments of the global inclusive agenda. They declare in favour of the inclusive approach and over the past three decades have endorsed and aired the principles and practices in multiple policy texts and purport the ideas as the international norm and standard (e.g., UN, 2018; UNESCO, 2018, 2020). Scholars have grappled with describing and theorizing the links between global education governance and the inclusive agenda elsewhere (e.g., Kiuppas, 2014; Magnusson, 2019; Winzer & Mazurek, 2016). Using the case studies below and the later comparisons, the present paper interrogates how inclusive education is constructed in the *Salamanca Statement* crafted under the aegis of the United Nations Educational Scientific and Cultural Organization (UNESCO) and in Article 24 and GC4 from the UN General Assembly.

9.2.1 *The Salamanca Statement, 1994*

The internationalization of the inclusive schooling movement can be dated from the 1990 World Education Conference held in Jomtein, a town on the Gulf of Thailand. The meeting spurred Education for All (EFA), an ambitious program that defined education within a global development agenda and nurtured aspirations for universal education (UNESCO, 1990). Limited co-operation among multilateral institutions during the 1990s hindered tangible action following the Jomtein conference. Still, the dominant themes that included a focus on underprivileged groups and universal primary and secondary education resonated with notions of inclusive schooling. The Jomtein resolutions sparked global diffusion of the inclusive agenda and provided strong intellectual antecedents to the 1994 World Conference on Special Needs Education organized by the then Special Needs Education department at UNESCO's Paris office in conjunction with Spanish educators. Held in Salamanca, the

conference maximized the opportunities created by the agreements made at Jomtein and, by UNESCO's own account, "proved a watershed for the global agenda" of inclusive schooling (UNESCO, 2018, p. 2). Within the theme of 'Access and quality' a host of paradigmatic changes created a conceptual coup that delineated "a world-wide consensus on future directions for special educational needs education" (UNESCO, 1994, p. iv).

Participants forged alignments with Jomtein's visions of EFA, revisited UN soft laws such as the *Standard Rules for the Equalization of Opportunities for Persons with Disabilities* (UN, 1993), and incorporated a host of resolutions and recommendations from multiple sources, bolstered by telling practices from world experiences. The gathered data underlined how the existing value framework no longer fit social realities. It was equally clear that the special education paradigm needed more than a simple reorientation: a refreshed vision erected on "new thinking" was more in order (UNESCO, 1994, p. 10). After considerable discussion, the meeting reached consensus under the rubric of inclusive schooling. The brief *Salamanca Statement* articulated the core theoretical issues; the accompanying *Framework for Action* detailed a purposeful and deliberate set of activities to direct the agenda (UNESCO, 1994). Despite their "clear and forceful policy on inclusion" (UNESCO, 1994, p. 21), the Salamanca participants failed to tender a working definition; rather, they presented what Magnusson (2019) described as "an amalgam of ideals." One thread linked inclusive schools to a broader campaign to create welcoming communities and inclusive societies. Another circumvented the commonplace practice of identifying inclusive schooling with students with disabilities: it expanded the constituency to encompass all those deemed different, disadvantaged, or with unmet learning needs. Important to the purpose of this paper, delegates discarded the medical model that reduces disability to individual bodily pathology and consequently creates a perceived need for protection and care. Instead, they claimed new paths that view disability as a socially produced injustice and shifts the balance toward challenging and eliminating disabling barriers.

Conversations about the methodological and organizational facets of inclusive schooling distilled into a set of interwoven thrusts predicated on the social model. One addresses the inability of education institutions to accommodate all students, directly resulting in marginalization, discrimination, and exclusion. Delegates demanded "major reform of the ordinary school" to remove the barriers that hinder access so that all children could "learn together, wherever possible, regardless of any difficulties or differences they may have" (UNESCO, 1994, pp. 6, 11). A parallel theme sought to move students with disabilities from outsider to participant status. The text echoed the *Standard Rules* and repeated the Jomtein recommendation that "Steps need to be taken to provide equal access to education to every category of disabled persons as an integral part of the education system" (UN, 1993, Rule 6; UNESCO, 1990, Article 3; UNESCO, 1994, p. 4).

The *Salamanca Statement* is at once idealistic, vague, and replete with ambiguities and redundancies. A third theme plays a straddling role. The drafters largely abandoned the assumption propagated by medical models that persons with disabilities need shelter, welfare, and the help provided by specialized disciplines. Even so,

they retained the separate, segregated placements found in special education. The text stipulated that a child with a disability should attend the neighborhood school “that would be attended if the child did not have a disability” but also noted that special arrangements may be necessary as “the most suitable education for a relatively small number of children with disabilities who cannot be adequately served in regular classrooms or schools” (UNESCO, 1994, pp. 12, 17). Upon, for example, clear demonstration that a general setting is inadequate to meet a child’s needs or if the welfare of the child or other children requires separation. Special placements are especially apt for students with sensory disabilities, those deaf, blind, and deaf blind.

9.2.2 Article 24 of the CRPD, 2006

After almost 5 years of intense work by the Ad Hoc Committee (the body charged with drafting the treaty) the UN General Assembly unanimously adopted the *Convention on the Rights of Persons with Disabilities* at its 61st session in 2006. Unlike the Salamanca agreement that was written in the moral grammar of the international community, the CRPD is a core UN human rights tool with the force of binding international law. To date, it represents the clearest expression of rights for persons broadly described in the text as “those who have long-term physical, mental, intellectual or sensory impairments” (Article 1). The negotiations that produced the CRPD were effusively praised for inviting disabled persons’ organizations (DPOs) to play prominent roles. DPOs actively embedded the social model as a foundation for disability policy: they used it to underpin agreement among that the medical model of disability had to be abandoned and that significant social transformation be undertaken. Degener (2014) observed that the ensuing movement from segregation to inclusive modes provoked little controversy and eventually wove through numerous treaty articles such as living independently and participation in political and public life. In two areas, however, the debate was protracted and contentious: the right to work (Article 27) and, our interest here, the right to education (Degener, 2014; Degener & Begg, 2017; Kayess & Sands, 2020).

For both member states and DPOs, the application of the right to education created fractious negotiations. When the Chair of the Ad Hoc Committee introduced the first draft of what would become Article 24 at the third session in December of 2003, the circulating principles of social transformation prioritized inclusive schooling. Yet even a shared imagining in favour of inclusive modes did little to temper the spirited and ongoing debates. The basic question of what to do about special education emerged as “one of the most difficult and debated questions regarding the right to education of persons with disabilities” (de Beco, 2014, p. 284). The drafters were constantly preoccupied with whether inclusive schooling and special education were close cousins, separate options, natural antagonists, or totally incompatible, together with the embedded issue of whether students had a right to choose between special and general schools. So intense was the issue that it was debated

over 3 days with more than 100 interventions from member states and other delegates (Kayess & Sands, 2020). Some countries and DPOs argued for the maintenance of multifaceted and flexible systems that balanced inclusive education and the continuance of special education. Amplifying the debates at Salamanca, others sought to make inclusive education the norm, special education the exception. An opposite faction championed whole-system inclusive approaches with all schooling for all students with disabilities grounded in general classrooms.

As we expand on below, ongoing drafts of Article 24 attempted to find compromises but, in the end, failed to achieve equilibrium. A delicate consensus calls on State Parties to “ensure an inclusive education system at all levels” so that “persons with disabilities are not excluded from the general education system on the basis of disability” (Article 24, 2). It is noteworthy that the drafters echoed the *Salamanca Statement* and accorded persons deaf, blind, and deaf blind a dispensation. Referred to as the *sensory exception*, it allows education in special schools delivered in appropriate languages and modes such as sign language and braille (Article 24, also Article 30). The message of full inclusion broadcast by Article 24 seems clear; in reality, it continues the legacy of elastic concepts noted in the *Salamanca Statement*. Not only does it omit a definition of inclusive schooling but it muddies the intersection between full and partial inclusion. Another primary shortcoming lies in attempts to neutralize, but not entirely abandon, special education. Despite extensive lobbying from those wanting to retain alternative placements, explicit references to special education were removed during the sixth session of the Ad Hoc Committee, although alternate support measures in exceptional circumstances were still allowed. By the seventh session, agreement on the education article was close, but the lingering options for alternate settings remained problematic. At the eighth and final Ad Hoc Committee working meeting in August, 2006, compromises on CRPD articles related to legal capacity, the integrity of the person, and education were all forged in the last hours. For Article 24, the final compromise eliminated caveats about alternate measures and exceptional circumstances. Still, the formal version neither expressly permits nor excludes separate education. It does not argue that special schools violate the Convention, prevent States from establishing special schools or compel them have them, and does not explicitly state that all students must be placed in fully inclusive settings (de Beco, 2014; Degener & Begg, 2017; Kayess & Sands, 2020; McCallum, 2020; UNESCO, 2020).

9.2.3 CRPD Committee, 2009

To conform to the UN monitoring process, each major UN human rights convention has an attached committee that essentially tracks progress and conformity to the prescribed goals in ratifying countries. The CRPD Committee, created in 2009, interprets, clarifies, and elaborates the meanings of the principles and provisions of the CRPD, guides implementation in ratifying countries, produces general comments on specific themes, and undertakes a complicated monitoring cycle to evaluate

the legislative, judicial, policy, and associated measures that ratifying countries pursue in compliance with the treaty.² Between the first session in 2008, its first report in 2011, and 2015, the CRPD Committee amassed more than 30 country reports. It acknowledged that progress had been made in international legislation for, and policies on, inclusive schooling but also identified “profound challenges” facing State Parties (UN-CRPD Committee, 2016, para. 3). Based on the widely reported lack of access to inclusive education and the dominance of segregated schooling worldwide, education placement was the chief issue. Evidence that many ratifying countries violated the right to education of their children with disabilities then spurred the fourth general comment titled *Right to inclusive education*, adopted by the UN General Assembly on August 26, 2016.

General Comment #4 includes a “powerful educational, social, and economic case” in support of the inclusive agenda. Adding to its overarching motif that inclusive schooling is first and foremost “A fundamental human right for all learners,” GC4 defines the core features (UN-CRPD Committee, 2016, paras. 2, 10). It asserts that inclusive schooling is the only means to ensure the right to education for persons with disabilities, is vital in taking action against structural injustices and inequalities, protects the rights and equality of persons with disabilities, maintains norms of nondiscrimination, and provides all students parallel social and education experiences and benefits. Another key claim contends that inclusive schooling contributes to human capital formation: not only can it provide the quality education, social development, and economic status necessary for full participation in political and public life, but it is the primary means by which persons with disabilities can lift themselves out of poverty and be safeguarded from exploitation.

A primary issue for the CRPD Committee lay in clarifying what Article 24 did not: that is, whether inclusive education requires State Parties to dismantle and abolish segregated forms of education in favour of access to general education for all. To animate the argument, GC4 traces the boundaries between *exclusion*, *segregation*, *integration*, and *inclusion*. Important to this discussion, segregation is described as occurring “when education is provided in separate environments designed or used to respond to a particular or various impairments, in isolation from students without disabilities” (UN-CRPD Committee, 2016, para. 11). The text restates prohibitions on discrimination drawn from human rights documents such as the UNESCO *Convention Against Discrimination in Education* (1960) and defined as a key term in Article 2 of the CRPD. It articulates the widely-accepted view that as the right to non-discrimination includes the right not to be segregated, segregation for any reason is a denial of human rights. With schooling in the mix, anything short of full inclusion is segregation and an infringement of the right to non-discrimination.

²Including GC4, there are now seven thematic studies. Article 12 on equal recognition before the law was the first. Following were themes on accessibility (Article 9), women with disabilities (Article 6), living independently (Article 19), equality and non-discrimination (Article 5), and participation by disabled persons in monitoring the treaty (Article 33). A thematic comment on work and employment (Article 27) is currently under consultation.

Special education is indicted as an intractable problem of discrimination and marginalization. GC4 insists that processes by which students are routinely separated operationalize and sustain systemic institutional inequality; conflict with established human rights decrees; are stigmatizing and inherently discriminatory; perpetuate the medical model; and do little to undo the structures that maintain hierarchies of ability and disability. Special schools are educationally bankrupt: students are “isolated from their peers and receive an inferior quality of education” (UN-CRPD Committee, 2016, para. 3). The best hopes to curtail segregation and effectively attain inclusive goals are predicated on what Byrne (2019) describes as a “rights-compliant transition from segregated to inclusive education” (p. 1) that will eventually serve to delimit, restructure, or eliminate special education settings.

GC4 was drafted against the backdrop of Article 24 but substantially expands the core rights. At the very least, it broadens the scope of the right to education for those with disabilities from only requiring State Parties to ensure the right to education to explicitly requiring inclusive education and consequently adds complicated nuances to the inclusive conversation. Given its rigorous and non-negotiable set of precepts, it is perhaps not surprising that the characterization by Anastasiou and colleagues of GC4 as “a controversial interpretation of the CRPD” (2020, p. 3) captures a wealth of critiques. Common disputes centre on GC4’s narrow interpretation of the right to education, over-interpreting what the drafters of Article 24 intended, and contradictions between Article 24’s directives and the norms and obligations of prior UN documentation. As examples, some countries simply dismiss GC4: they see it as a useful source of guidance on Article 24 but “not a legally binding source of State Parties obligations on the right to education” (McCallum, 2020, para 4). Others warn that GC4’s promotion of schooling as solely a question of rights attaches too much weight to location. In making general classroom placement the sole option, it diminishes sensitivity to instructional parameters: not only is appropriate instruction forsaken for equality of experience, but it overlooks the individual needs of special learners (Anastasiou & Kauffman, 2019; Kauffman & Hornby, 2020).

9.3 Comparison of Key Themes

The previous case studies historicized three documents vital in the global pursuit of inclusive schooling; thematic analysis of the dialogue shook loose an array of issues. In the following section, we are parsimonious in the units addressed and focus on four themes relevant to expectations about education placement. Sub-plots ripe for additional development such as reasonable accommodations, teacher training, and fiscal considerations are beyond the scope of this paper.

- *Disability is a social construction.* By the time of the Salamanca conference, the medical model of disability had become unfashionable. Salamanca crystallized a trend to the development of disability policy founded on a shift from conceptualizations of disability as a negative condition that requires care and welfare to a

belief that disability exists because of social attitudes toward human differences, not because of difference itself. The CRPD larded the social model with meaning: it became “the most successful dictum” (Degener, 2014, p. 29) and an important rationale for action. Of note, but beyond the scope of this paper, after 2012 the documentation and rhetoric of the CRPD Committee consistently used the phrase *human rights model* rather than social model. (See Degener, 2016; Lawson & Beckett, 2020, for a discussion).

- *Inclusive schooling is a human right.* The discourses share a belief system derived from a script based on the right to education and tied to the precept of human dignity, described by Degener (2016) as “the anchor norm of human rights” (p. 3). The *Salamanca Statement* acknowledged the dignity and worth of people with disabilities; the concept of human dignity is recognized numerous times throughout the CRPD. Among its goals of education, Article 24 itemizes the full development of human potential and the sense of dignity and self-worth (Article 1); GC4 understands those with disabilities as citizens with equal rights and places them within the ambit of international human rights. Each document addresses schooling at the level of rights and values. Salamanca “reaffirmed the right to education of every individual” (UNESCO, 1994, p. vii); Article 24 recognizes inclusive schooling as a human right. GC4 refines and actively develops Article 24’s view of inclusive schooling: it interprets it as an overt expression of human rights and portrays full inclusion as indispensable in sustaining a positive spiral in pursuit of participation, equity, and non-discrimination.
- *The general classroom is primary.* Each text is defined by the centrality of inclusive schooling. Each nurtures the hope that inequality and exclusion can be overcome or at least ameliorated by school structural changes; all speak to the progressive removal of barriers and discriminatory practices that impede the right to education for persons with disabilities. In terms of implementation, each document sees inclusive education as primarily place related, premised on the general system as the norm or baseline, and postulate engagement with general systems and classrooms as the main criterion by which to gauge success. Each enjoins access to the regular curriculum. The Salamanca documents call for “additional instructional support” and curricula “adapted to children’s needs” (UNESCO, 1994, p. 22); under Article 24 (2, d), States must undertake to provide reasonable accommodations and effective support measures. GC4 insists that, compared to an education in a general setting, special education is pedagogically meaningless and ineffective. In a general classroom, flexible curricula and teaching and learning methods can be adapted to different strengths, requirements, and learning styles (UN-CRPD Committee, 2016, paras. 12, 72).
- *Special education and inclusive schooling cannot co-exist.* The tensions surrounding education placement are most clearly explicated in contentious debates about the co-existence of full inclusion and special education, amplified (but not clarified) by the puzzling ambiguities that pepper the texts. For example, the ambivalent boundaries of the Salamanca messages permit “a multitude of interpretations of what inclusion can mean” (Magnusson, 2019, p. 21), all largely shaped by the theoretical perspectives of the reader. Parties variously regard the

text as the key turning point in the disciplinary formation of a field of inclusive schooling or as the onset of a historic progression from segregation to full inclusion; others argue that the meanings attributed to inclusion no longer mean what was agreed at Salamanca or that the documents really mean full inclusion, only waiting for Article 24 to fill the void (e.g., Ainscow, 2016; Heyer, 2021; Hunt, 2019; Migliarini, Stinson, & D’Alessio, 2019). Still, a literal reading shows that using the texts to validate precepts of full inclusion steps beyond the precise textual messages and meanings. A truly inclusive policy would have seriously reduced or eliminated options for special schools. But the drafters did not propose a totally transformative agenda. They endorsed progressively reconfiguring special education to create wider access to general settings for students with disabilities but stopped short of disbanding it altogether in order to offer students the best opportunities for development within a range of settings.

Conspicuous silences and omissions in Article 24 allow ambiguous interpretations that complicate its central guarantee of fully inclusive education systems. It neither expressly permits or excludes special education and therefore fails to foreclose the possibility of multiple lenses. In contrast, GC4 disavows any leeway for State Parties built on its thinking that “Full inclusion is not compatible with two systems of education: mainstream and special/segregated education systems” (UN-CRPD Committee, 2016, para. 39). GC4 disparages policies formulated on the basis of difference and holds that education in any segregated settings is not inclusive education within the meaning of Article 24. Save for the general classroom, it disempowers all sites and frames them as illegitimate or inferior. Special placements, even as an exception, are an exercise in discrimination.

9.4 Discussion

The present study focused on the highly visible dimension of education placement as interpreted in three UN documents. The individual drafting histories indicate that each selected text implicitly signaled a new milestone and standard for inclusive schooling by changing assumptions about the right to education and the values, priorities, and policies necessary to develop and sustain appropriate learning environments for all pupils with disabilities. The *Salamanca Statement* introduced rights-based inclusive approaches as the priority but retained safeguards for individualized decisions for students with disabilities in cases where there are “compelling reasons” for doing so (UNESCO, 1994, p. 11). Article 24 is the first binding agreement to enshrine the principles of inclusive schooling into international human rights law. GC4 enhances and magnifies Article 24’s justification for full inclusion. It attempts to naturalize the idea of a one-track model to the exclusion of all other options and clearly anticipates the demise of special education.

Comparison of the themes show that foundational belief systems concerned with models of disability and inclusive education as a right are markedly consistent. Each

narrative draws authority from the social model of disability. All employ the language of rights; cement the human rights approach as a universal good; define the rights of persons with disabilities as an issue of human rights; call upon the global community to assure these rights; and regard inclusive schooling as a human right and social ideal. They further agree that the inclusive space must be constructed within the general education framework; demand reconstruction of entire education systems and school cultures to eliminate long-standing inequalities; theorize inclusive schooling as the primary and beneficial mechanism for educating those with disabilities; and involve an explicit assertion that the community of nations has an obligation to guarantee parity of participation for those with disabilities. Shared agreement about the ideological charter counterpoints different conceptual boundaries and continuing contestation of Berg's (2007) dueling polarities of full and partial inclusion. With the *Salamanca Statement* on one side and Article 24 joined to GC4 on the other, substantial divergence in cadence and stress surrounds the primacy of general classroom placement and the worth and longevity of special education.

The diverse ideological and operational identities of educational inclusion that emerged from our comparison of the selected documents is no small matter. It feeds into the well-established notion that inclusive education is a conceptual muddle beset by significant confusion about its fundamental tenets. Lacking a unity of purpose and universal processes, agreement on critical policy messages that include definitions, language, goals, programming, and student placement is far from firmly established within the research society and in the field (e.g., Hardy & Woodcock, 2015; Nilholm, 2021; Powell et al. 2015; UNESCO, 2018). This inevitably begs a final question. If the leading documents are divided on a world view of inclusive schooling, then what is the present scope and nature of the agenda on the global stage specifically related to education placement and Berg's (2007) dueling polarities?

By June of 2021, 182 of the 193 member states of the United Nations had ratified the CRPD and committed themselves to meeting its targets. However, a growing body of scholarly comment supports the view that the movement toward fully inclusive practice as enjoined by Article 24 and GC4 is not enjoying substantial policy traction on the global stage (e.g., Heyer, 2021; Human Rights, 2016; Hunt, 2019; UNESCO, 2018, 2020; Winzer & Mazurek, 2017, 2019). As examples only, there are strong doubts as to whether the articulated right to inclusive education has led to a new direction in policy making (de Beco, 2014). Ratifying countries have undertaken obligations to move as quickly and effectively as possible toward realizing Article 24 but many jurisdictions show little evidence of direct and powerful links between international policy and local practice (Mazurek & Winzer, 2022). Only a small minority of States have taken systematic legal steps and policy reforms to target the provisions of Article 24. Just 68 percent of countries delineate inclusive schooling in laws, policies, plans, or strategies (UNESCO, 2020).

The narratives under discussion hold schools complicit in building barriers to participation and draw attention to reforming and transforming the design of education systems. But the anticipated reshaping of systems is elusive: seminal ideals of

school restructuring rarely occur in practice (UNESCO, 2018). The hegemony of special education is relatively unscathed; dismantling, restructuring, or eliminating special education settings has not, to date, been markedly successful. In fact, the CRPD Committee concedes that for most persons with disabilities today, schooling is still available only in segregated settings (UN-CRPD Committee, 2016, para. 3). The rhetoric of policy making at the global level has outpaced change on the ground and accounts of success are seriously incomplete. Despite ongoing intervention from international bodies testifying to a growing understanding of the rights of those with disabilities, a stark gap lies between the CRPD's aspirational text and the realities of local and national contexts (Human Rights, 2016; Hunt, 2019; Slee, 2020; Winzer & Mazurek, 2017). In lieu of the fully inclusive systems pressed by Article 24 and GC4, present processes are consistent with the more open- textured understandings of partial inclusion articulated in the Salamanca documents.

It is important to recognize that this statement about the ongoing precedence of the *Salamanca Statement* contains several important dimensions. First of all, by no means are we suggesting that every country with a multilevel architecture of education has taken authority and inspiration from the Salamanca agreement. For example, the directives profoundly influenced legislation and policy in Australia and Europe, with a particularly strong emphasis in the group of states that form the European Union, but had little impact in North America (Winzer & Mazurek, 2020). However, in the sense that the *Salamanca Statement* contains the main features to attain and sustain agendas for inclusive schooling and do not greatly disrupt established systems and routines, they define reachable goals for many countries. It is common practice for local policy makers to take stock of both inclusive practice and special education so that inclusive models function alongside robust systems of categorical special schools.

Second, a number of observers reasonably argue that not a great deal of sustained progress toward full inclusion and the elimination of segregated education has actually been made since the international breakthrough at Salamanca (e.g., Boyle & Anderson, 2020; Nilholm, 2021; Slee, 2020). In the decade following the Salamanca conference, the appeal to the international community "to endorse the approach of inclusive schooling" (UNESCO, 1994, p. 10) created significant political and educational progress for the agenda. Considerable activity sought to draft laws, establish national plans, and define policy and operational frameworks. But enthusiasm waned and, as noted by Boyle and Anderson (2020) and confirmed other scholars (e.g., Entrich, 2020; Hunt, 2019; Winzer & Mazurek, 2019), many countries of the global North are "not really any closer to full inclusion than they were ten years ago" (p. 9). The loss of momentum means that countries with traditionally high inclusion rates continue to include students; in countries with more marginal rates, no improvement is visible. Some countries have become less inclusive in recent years; others see a marked backlash against inclusive schooling. The demand for non-inclusive settings has grown; exclusionary practices and segregated programs thrive (e.g., Ainscow, 2016; Boyle & Anderson, 2020; Entrich, 2020; Human Rights, 2016). 'All means all' has not expanded at the expected rhythm. Constant repetition by advocates to render the values and assumptions underlying the

paradigm as self-evident have remained somewhat unconvincing. Single education systems rarely exist- and seem unlikely to do so. Even ardent advocates wonder if Article 24 will fulfill its radical potential. Achieving fully inclusive systems of education, they say, is “no small feat, potentially even impossible” (UNESCO, 2020, p. 9).

This book chapter on the precepts and practices of education placement within the global inclusive schooling movement began with broad historical brushstrokes that painted the development and context of inclusive schooling in what are arguably the most important international texts related to the education of students with disabilities. UNESCO’s 1994 *Salamanca Statement* framed the ideologies, policies, and practices and crystallized into a foundation for discourse for governments, DPOs, education authorities, and others to advance the inclusive agenda. Article 24’s global model for participation and access proclaims inclusive education as human right, calls for inclusive education as the enabling strategy, and requires State Parties to achieve fully inclusive systems. The effects and outcomes of the treaty are promoted, controlled, and evaluated by the CRPD Committee. Its defining *General Comment #4* consistently interprets Article 24 to mean general educational environments and undertakes to delegitimize special education.

9.5 Conclusion

Comparison of the major themes drawn from the textual analysis revealed that the core ideals rooted in human rights are seen as a universal good and not the basis of dispute. However, little consensus exists on the attendant discourses and practices related to educational placement and special education. Despite the press by international organizations to elevate full inclusion to the governing ideology joined to the significant efforts to desegregate and deinstitutionalize students with disabilities, the inclusive agenda has not seen any great advances since the Salamanca agreement laid down the parameters. Different understandings of inclusive schooling translate into different implications and consequences for action. Full inclusion remains an advocacy priority, stalled at the level of discourse. Many countries appear unable or unwilling to undertake the obligations necessary to meet the targets of Article 24. Sites with established special education systems have not moved to fully inclusive systems; practice is far from deinstitutionalizing existing special education systems; special segregated programs remain an important part of policy and praxis. Many contemporary organizational forms align with the directions articulated at Salamanca and accommodate both general and special education. Overall, the model of partial inclusion remains axiomatic for reading the global inclusive landscape.

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