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Divergences in the framing of inclusive education across the UK: a four nations critical policy analysis

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ABSTRACT

Commitments to inclusive education have been articulated in policy across the UK, in the context of increasingly inclusive rhetoric in education policy globally over recent years. This paper uses a critical policy analysis approach to understand the framing of inclusion within national legislation, policy documents and associated key resources from across the four UK nations of England, Scotland, Wales and Northern Ireland. The paper seeks to understand how the four UK nations articulate and portray their inclusive education policies and the political and ideological motivations and priorities that are apparent within these policies. Through this analysis, we find not only divergence between the four nations, but also within the policy documents of each nation. While documentation from Scotland shows a clearer voice and fewer examples of problematising the learner, across all UK nations we see complicated messaging and a lack of coherence in inclusive education policy.

Introduction

Powerful social, cultural and economic arguments exist for inclusive education, ranging from the high cost of academic failure to the overall superiority of education systems in which inclusive principles are embedded (European Agency for Special Needs and Inclusive Education, 2016). Inclusion is seen as the best way of addressing the increasing diversity (across a variety of dimensions) of student populations and of creating more equitable, healthy, prosperous and sustainable societies for the future (Benavot, 2017). As a consequence, inclusive education has established itself as an increasingly prominent overarching aspiration of education policy and practice globally, with widespread support for the United Nation's Sustainability Development Goal 4 which ensures inclusive and equitable quality education that promotes lifelong learning opportunities for all learners (UNESCO, 2017).

It is notable that there has been uneven progress from these aspirations to practice in relation to inclusion around the world. Different amounts of access and attainment are evident globally (OECD, 2020), and discourses around inclusion vary greatly between countries (Hardy & Woodcock, 2015). This is likely explained by the fact that "inclusive education" is more than simply a technical legislative or policy matter and involves complex processes that engage a range of ideas, behaviours, practices and stakeholders (Allan, 2021; Cerna et al., 2021). Inclusion as a concept has been hard to define, and a number of different definitions currently exist. Prominent amongst these is the notion that inclusion refers to the placement of disabled children and young people and those who require additional support in mainstream schools, what is sometimes referred to as "mainstreaming" (Nilholm & Göransson, 2017). This notion of inclusion has been seen as too narrow, however, and continuing to support the marginalisation of some learners (Florian, 2008). It is challenged by other definitions that emphasise the dimensional nature of inclusion, including not only where someone is taught but also how they are viewed by others and whether they feel themselves to be included (Qvortrup & Qvortrup, 2018). Inclusion has been defined as a response to diversity and promotion of children and young people's democratic rights to a quality education (Florian, 2019). Recent theorising of inclusive education refers to the development of schools and communities as a way of increasing the capacity to educate all children and young people within a local area (Ainscow, 2020). This notion of inclusion emphasises listening to children and young people and removing barriers to their participation, with change seen as needing to take place within the school environment and culture rather than at the level of the individual learner (Barton, 1997). The challenge of inclusion is often described as a professional one that requires the development of teachers and leaders and the creation of cultural practices of acceptance (Hart & Drummond, 2013). According to this definition, inclusion requires reform of whole education systems, including a shared commitment to inclusive values and a shift of focus away from the individual and towards the communal (Ainscow, 2019).

The complexity of inclusion as a concept raises the importance of clear and consistent messaging (Mavropoulou et al., 2021; Osberg & Biesta, 2010). At the heart of the idea of inclusive education lie serious issues concerning human rights, equal opportunities and social justice (Armstrong et al., 2000). It is evident that education systems which are increasingly inclusive have high levels of awareness and good understanding of inclusion as a guiding principle (OECD, 2020).

Given the complexity of inclusion, Slee (2011) and others have drawn attention to the tactical importance of words and discourse to create confusion and misrepresent practice as a way of maintaining the status quo. Discourses may be employed that appear to endorse inclusionary principles, but actually serve to articulate inability and perpetuate exclusionary practice (Slee, 2019; Tomlinson, 2017). Indeed, some theorists have argued that obfuscation around inclusion is a deliberate feature of policy that ensures surveillance and control of the profession whilst keeping the commissioning of provision at arms-length (Allan & Youdell, 2017; Booth, 2016; Lehane, 2017).

Consideration of inclusion, therefore, requires thinking about how education policy (and indeed, cognate policy areas) is formulated and its relationship, not only to practice, but also to the context out of which it is developed. Policy is more than simply text, and is more accurately described as a set of processes that are multi-dimensional, value-laden

and related to what at the time is viewed as important (Taylor et al., 1997). Policy draws on ideas and values and appropriates discourses in order to recontextualise them for specific political purpose (Bernstein, 1971). The relationship between policy and practice, moreover, is not a straightforward one but involves bi-directional movement that results in both intended but also unintended consequences (Bowe et al., 1992). As a result, policy outcomes from what was originally intended or envisioned can vary (Cairney, 2020), and policy analysis is important as a way of focusing on the underpinning political purpose of any policy, but also on its emergent relationship to practice. In particular, it is important to distinguish between different types of policy, for example, whether policy is material or merely symbolic in the extent of its commitment to implementation by those formulating the policy (Hardy & Woodcock, 2015). As Taylor et al. (1997) note, the material nature of policy can be judged by attention to three factors; namely, the clarity of the goals of the policy, the complexity with which the implementation process is envisaged, and the amount of resource allocation.

We thus aim to critically explore these factors in this paper with reference to education policy on inclusion across the four nations of the United Kingdom (UK): England, Scotland, Wales and Northern Ireland. Since political devolution in the late 1990s, education policy in the UK has been devolved to separate legislatures and national parliaments, yet the differences in school systems across the UK are longstanding through history, including explicit and implicit differences in national curricula (Ball, 2021; Priestley et al., 2021). For example, Scotland has long maintained a separate set of policies, school structures and national assessments compared to other UK nations (Humes & Priestley, 2021). The Northern Ireland school system has been mostly segregated across communities (Perry, 2016), maintaining a largely selective secondary school system whilst the rest of the UK mostly abolished grammar schools. Historically, England and Wales have shared a common set of school structures (Sibieta & Jerrim, 2021) and, until recently, were largely similar in many aspects of school institutions, structures and governance (Evans, 2022; Lewis & Crick, 2022).

As a result of the full devolution of education policy to Scotland, Wales and Northern Ireland, there has been increasing divergence across the four UK nations in their approach to education "partly reflecting different policy motivations and priorities" (Sibieta & Jerrim, 2021, p. 5). It is notable that there are substantial differences in compulsory education systems across the four nations, alongside differing approaches to designing and implementing policy. This policy divergence has been further accelerated by major curriculum, qualifications and wider education system-level reforms in England, Scotland, Wales and Northern Ireland over the past 10 years (Priestley et al., 2021). There is also some evidence of variance between the four nations in terms of the materiality of policy, for example, greater policy "traction" on social and emotional well-being in Wales, Scotland and Northern Ireland compared to England (Donnelly & Brown, 2022). This article, therefore, uses critical policy analysis to understand how policy on inclusion is framed across the four UK nations of England, Wales, Scotland and Northern Ireland.[1]

Methodological approach

This paper draws upon the principles of critical policy analysis. In contrast to more traditional forms of policy analysis which view policymaking as a linear process to "solve"

a problem (Harman, 1984), critical policy analysis centres the "problem" as intrinsic to the policy document. This paper thus explores how the four education systems of the UK have articulated and portrayed their inclusive education policies. It explores how differing political and ideological motivations and priorities are signposted and acknowledged in inclusive education policy, and hence how learners with additional needs are addressed and problematised within wider policy framing.

Bowe et al. (1992) discuss the notion of a continuous "policy cycle", which consists of "significantly different arenas and sites within which a variety of interests are at stake" (p. 84). Importantly, different educational stakeholders may interpret polices differently through a process of policy recontextualization. Bowe et al. (1992) therefore argue that various complex contextual aspects may "confound a model of change that assumes a simplicity of process" (p. 85) from policy conception through to enactment. Looking at these processes, Taylor et al. (1997) describe three key components to policy analysis: context, text, and consequence. The critical policy analysis approach taken within this paper foregrounds the policy "text" in understanding the policy cycle while not dismissing the importance of the different contexts that the policies are enacted within. It thus also acknowledges the text as a component in a larger complex policy implementation cycle. Our work, therefore, addresses the following research questions:

(i) How do the four UK nations articulate and portray their inclusive education policies?
(ii) How are differing political and ideological motivations and priorities signposted and acknowledged in inclusive education policy in the four nations of the UK?

To better understand how inclusion is constructed through recent education policy reforms across the UK, we identified and analysed national legislation, policy documents and associated resources. The research draws upon the additional needs codes, curriculum guidance and teaching standards for each of the four UK nations, along with associated texts produced by the respective governments which refer to inclusive policy and practice. Table 1 shows the primary list of documents included; these documents were identified as the most recent versions from each country, as of February 2023. These policies were analysed in keeping with the principles of critical policy sociology (Ozga, 2021) to identify how inclusion is framed. References to inclusion and learners with additional needs were identified and coded in relation to the research questions. Key quotes from the texts, which we feel best exemplify the policy documents, are included below. These have been chosen to highlight distinct national approaches to these topics, along with the significant similarities and differences across texts.

Results

How do the four UK nations articulate and portray inclusion in their education policies?

To initially understand how the four nations portray inclusion we looked at the definition of additional needs they provide. England (SEND), Wales (ALN) and Northern Ireland (SEN) define additional needs using variations of the definition set out in the 1996 UK Education Act:

Table 1. Policy documents included in analysis.

Country	Citation	Document title
England	Department for Education & Department of Health and Social Care (DfE/DOH) (2015)	*SEND code of practice: 0 to 25 years*
	Department for Education (2014a)	*National curriculum in England: framework for key stages 1 to 4*
	Department for Education (2014b)	*SEND: guide for schools and alternative provision settings*
	Department for Education (2011) (updated 2013/2021)	*Teachers' Standards: Guidance for school leaders, school staff and governing bodies*
Scotland	Scottish Government (2017)	*Additional support for learning: statutory guidance*
	Education Scotland (2019a)	*Refreshed Curriculum for Excellence Narrative*
	Education Scotland (2019b)	*Curriculum for Excellence: Experiences and outcomes*
	General Teaching Council for Scotland (2021)	*The Standard for Full Registration*
	General Teaching Council for Scotland (2022)	*National Framework for Inclusion (3rd Edition)*
Wales	Welsh Government (2021a)	*The Additional Learning Needs Code for Wales*
	Welsh Government (2018)	*Additional Learning Needs and Education Tribunal (Wales) Act*
	Welsh Government (2020)	*Curriculum for Wales Guidance*
	Welsh Government (2021b)	*Curriculum and Assessment (Wales) Act*
	Welsh Government (2017)	*Professional Standards for Teaching and Leadership*
Northern Ireland (NI)	NI Department of Education (1998)	*Code of Practice on the Identification and Assessment of SEN*
	NI Department of Education (2005)	*Supplement to the Code of Practice on the Identification and Assessment of Special Educational Needs*
	Council for the Curriculum, Examinations & Assessment (2007) (updated 2019b)	*The Statutory Curriculum at Key Stage 3*
	Council for the Curriculum, Examinations & Assessment (2007) (updated 2019a)	*The Northern Ireland Curriculum – Primary*
	Council for the Curriculum, Examinations & Assessment (2019c)	*The "Big Picture" of the Curriculum at Key Stage 4*
	General Teaching Council for Northern Ireland (2011)	*Teaching: The Reflective Profession*

> A child has "special educational needs" for the purposes of this Act if he has a learning difficulty which calls for special educational provision to be made for him if
>
> (a) he has a significantly greater difficulty in learning than the majority of children of his age,
> (b) he has a disability which either prevents or hinders him from making use of educational facilities of a kind generally provided for children of his age in schools within the area of the local education authority, or
> (c) he is under the age of five and is, or would be if special educational provision were not made for him, likely to fall within paragraph (a) or (b) when of or over that age. (Education Act, 1996, p. 178)

Small changes are made in each in the pronouns and the phrasing of point (c) however, the overall definition remains virtually unchanged, despite legislative changes in additional needs education in all three of these countries since this definition was originally used. Runswick-Cole and Hodge (2009) argue that this definition "emphasises individual deficits and, therefore, plays a part in constructing and sustaining exclusionary practices" (p. 200). Indeed, this definition shows a classic deficit understanding of additional needs. Suggesting that a child needs to have "significantly greater difficulty" implies that a form of standardised testing is needed to identify those who require additional support, while suggesting that there is a "norm" of children at the same age

for which to compare against. Furthermore, the pejorative words "difficulty", "prevents", and "hinders" are used to define learners with additional needs.

Scotland uses a different definition for Additional Support Needs (ASN):

> A child or young person has additional support needs for the purposes of this Act where, for whatever reason, the child or young person is, or is likely to be, unable without the provision of additional support to benefit from school education provided or to be provided for the child or young person. (Scottish Government, 2017, p. 9)

By defining the needs as "support" needs as opposed to "learning" or "education" needs the Scottish terminology places the emphasis on support in the environment, as opposed to within the individual. Scotland is the only UK nation that does not use the word "difficulty" in their definition of an Additional Support Need (ASN).

In addition, Scotland's definition of ASN is much broader than the other three nations and goes beyond those with learning needs or disabilities to any learner who "require(s) additional support, in the long or short term, in order to help them make the most of their school education and to be included fully in their learning" (Scottish Government, 2017, p. 11). In the examples of learners who may need additional support they include groups such as those who "are being bullied", "have experienced bereavement" or "are not attending school regularly". Scotland's ASL Code of practice provides case study examples of how additional support can be provided. For example:

> Anna comes from a bilingual background and is fluent in her first language. She attends a mainstream primary school where she also receives additional language support from a visiting EAL [English as an Additional Language] teacher once a week. The teacher works directly with Anna in class and offers advice and support to her class teacher and other teachers and staff who support Anna. (Scottish Government, 2017, p. 21)

However, the examples provided tend to focus on supporting the individual, as opposed to changes within the learning environment.

Three of the four nations set out a commitment to inclusion in their codes for learners with additional needs. England calls for "a focus on inclusive practice and removing barriers to learning" (Department for Education, 2014a, p. 20). Northern Ireland states: "The Department of Education and the Education and Training Inspectorate are committed to promoting inclusive practices" (NI Department of Education, 2005, p. 40). Finally, the Welsh ALN Code says that the principles underlying the code "aim to support the creation of a fully inclusive education system where all learners are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning" (Welsh Government, 2021a, p. 38).

The SEND Code of Practice in England identifies the removal of barriers as good practice: "Where a pupil is identified as having SEN, schools should take action to remove barriers to learning and put effective special educational provision in place" (DfE/DOH, 2015, p. 100). While this is acknowledged in the Code in England, it is more prominent within Scotland's documentation which, interestingly, does not provide any direct statement about inclusion within their ASN code. Identifying barriers within the environment is foregrounded in the ASN code in Scotland: "The Education (Additional Support for Learning) (Scotland) Act 2004 ("the Act") provides the legal framework for identifying and addressing the additional support needs of children and young people who face a barrier, or barriers, to learning" (Scottish Government, 2017, p. 6).

Wales set out five principles which underpin the ALN system: a "rights-based approach", "early identification, intervention and prevention", "collaboration and integration", "inclusive education" and "a bilingual system" (Welsh Government, 2021a, p. 37). Within the code in Wales the focus is much more on learners with additional needs, as opposed to the more comprehensive list specified in the code in Scotland. When defining inclusive education, the code in Wales states that it is:

> where the majority of children and young people with ALN are supported to participate fully in mainstream education and a whole setting approach is taken to meeting the needs of learners with ALN. (Welsh Government, 2021a, p. 37)

This definition equates mainstreaming with inclusion but acknowledges a whole setting approach to inclusion is needed. Within this definition, and within the Code, there is little acknowledgment of including diversity beyond those with learning needs. Yet, the code goes on to state that in practice inclusion "where all pupils access common opportunities in ways relevant to their needs, and which ensures that they fully belong to the school community, is of benefit to all" (Welsh Government, 2021a, p. 40), thus valuing difference explicitly.

In Wales, while the ALN system uses individualised person-centred provision to support learners it is also acknowledged that:

> Meeting the needs of learners with ALN ought to be part of a whole school or institution approach to school or institution improvement. […] Consequently, improvements in the teaching and learning of children and young people with ALN cannot be isolated from improvements in the teaching and learning for children and young people across a school or FEI [Further Education Institution] as a whole. (Welsh Government, 2021a, p. 40)

Yet while this is set out, there is no clear guidance on how "improvements in the teaching and learning" should be made or what an inclusive learning environment looks like. Thus, a simplistic view of inclusion is communicated without clarity or clear resource allocation indicating it may be "symbolic" in its commitment to inclusion (Taylor et al., 1997).

Within England's Special Needs Code of Practice, a deficit perspective is apparent in places: "Potential areas of difficulty should be identified and addressed at the outset. Lessons should be planned to address potential areas of difficulty" (DfE/DOH, 2015, p. 194). England's Code of Practice also refers to a learner's "areas of weakness" (DfE/DOH, 2015, p. 95). More so than in the other nations, in England there is an emphasis on equality for those with and without special educational needs: "Our vision for children with special educational needs and disabilities is the same as for all children and young people" (DfE/DOH, 2015, p. 11). However, examples of the "othering" of learners with additional needs are apparent within a code that places a large emphasis on the need for "specialists" and "expertise" to support these learners. In her review of the 2015 SEND code, Lehane (2017), drawing upon Allan and Youdell (2017), argues that "the effect of the 2015 documentation, by dint of its sheer size and business approach, 'both ghosts' and assumes the 'othering' of learners with SEND" (p. 64). As in the code in Wales, there is a lack of sense of what inclusive practice looks like, and little acknowledgement of diversity beyond SEND: "A key assumption is of SEND as a given, a set of needs to be serviced" (Lehane, 2017, p. 62).

In Northern Ireland, while steps are being set out to ensure that learners with a disability are not disadvantaged, the emphasis of the provision is targeted towards the learner, as opposed to towards the environment. Furthermore, modifications or disapplication of good practice are written into the documentation. For example, the code states "a duty not to treat pupils who have a disability less favourably, *without justification*, for a reason which relates to their disability" (NI Department of Education, 2005, p. 10) [emphasis added]. There is also a lack of commitment to full inclusion or even aiming towards learners not experiencing disadvantage. In fact, it states that there is a "a duty to make reasonable adjustments so that pupils who have a disability are *not put at a substantial disadvantage* compared to pupils who do not have a disability" (NI Department of Education, 2005, p. 10) [emphasis added]. Within the code in Northern Ireland there is an also an unclear picture of what this provision should look like with a large emphasis on a teacher's "duty" to enact the provision.

In Wales, the professional standards regularly refer to meeting the needs of "all learners". For example, at Qualified Teacher Status (QTS) level, a teacher should "demonstrate a knowledge and understanding of the needs of all learners in planning, preparation and teaching" (Welsh Government, 2017, p. 29) and they should also "demonstrate knowledge, understanding and experience of high expectations and effective practice in meeting the needs of all learners, whatever their different needs" (Welsh Government, 2017, p. 35). However, in places, a more diagnostic-prescriptive (Florian, 2008) understanding of additional needs is presented; for example, it is suggested that a qualified teacher should show, "examples of improvement in outcomes for learners following the teacher's seeking and adoption of advice" (Welsh Government, 2017, p. 46). This suggests a practice of seeking intervention should learners not be meeting the proposed outcomes.

Scotland's teaching standards highlight the benefits of teachers recognising diversity and "valuing, as well as respecting, social, ecological, cultural, religious, and racial diversity and promoting the principles and practices of sustainable development and local and global citizenship for all learners" (General Teaching Council for Scotland, 2021, p. 4). The theme of removing barriers is also reiterated within the teaching standards stating that teachers must be "taking account of specific learning needs and seeking to reduce barriers to learning" (General Teaching Council for Scotland, 2021, p. 4).

How are differing political and ideological motivations and priorities signposted and acknowledged in policy on inclusion and additional needs in the four nations of the UK?

The policies portray differing ideological priorities around inclusion and additional needs. Within the teaching standards, societal values that have been highlighted by the UK Government as important (Crawford, 2017) are communicated in the teaching standards in England which state that "Teachers [should] not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs" (Department for Education, 2011, p. 14). In Northern Ireland, emphasis is placed on the role of the teacher to deliver an education for individual learners' needs:

> Teachers will have developed: a knowledge and understanding of the factors that promote and hinder effective learning, and be aware of the need to provide for the holistic development of the child. (General Teaching Council for Northern Ireland, 2011, p. 13)

Furthermore, the rhetoric within the teaching standards in Northern Ireland sets out a "moral imperative" for teachers, stating that a teacher is "an educator and moral agent" (General Teaching Council for Northern Ireland, 2011, p. 9) and that the standards outline "a comprehensive discourse which sets out the ethical basis and moral purposes of our work, as well as a clear understanding of the practice of teaching" (General Teaching Council for Northern Ireland, 2011, p. 6).

Differences between the four nations are also clear in the discussion of economic constraints. England's SEND Code of Practice states that:

> Local authorities and CCGs have a statutory duty to consider the extent to which children and young people's needs could be met more effectively through integrating services and aligning or pooling budgets in order to offer greater value for money, improve outcomes and/or better integrate services for children and young people with SEN or disabilities. (DfE/DOH, 2015, p. 47)

Similarly, Northern Ireland refers to "efficiency" in its discussion of leaners with additional needs, highlighting the importance in "ensuring the efficient use of resources" (NI Department of Education, 2005, p. 40). In contrast, Scotland's Code of Practice states "cost should not be the primary consideration in determining what provision is to be made" (Scottish Government, 2017, pp. 46–47). Biesta (2007) argues that we should be moving away from words like "efficient" in the area of additional needs and should instead be focusing on the "educational value" of practices (p. 10). Furthermore, Thomas and Loxley (2022) suggest that terms like efficiency " … so beloved of legislators looking for get-out clauses to the high financial costs of inclusion, should perhaps be expunged from our vocabulary entirely" (p. 239).

Within the curriculum documents, it is clear that there are growing and diverging differences both in the overarching educational aims and ambitions of individual nations, and how they portray and understand an inclusive curriculum. The language used in Scotland's curriculum appears to embrace diversity and sets out aims to be "responsive to the diverse needs of individual learners and which reflects the uniqueness of their communities" (Education Scotland, 2019a, p. 4). It is highlighted in the ASN Code that "Curriculum for Excellence is a curriculum for all and this includes explicitly children and young people with additional support needs. In Curriculum for Excellence every child is entitled to the support they need in order to progress" (Scottish Government, 2017, p. 7). Scotland states that they take a values-based approach to curriculum design: "The Scottish approach to the curriculum is values based. Wisdom, justice, compassion and integrity define the values for Scottish society" (Education Scotland, 2016, p. 5). As in the ASN Code, the Scottish curriculum guidance looks at learning needs in the terms of the environmental barriers that a leaner may face:

> To ensure that Curriculum for Excellence is a curriculum for all children and young people, it is essential that support is provided to remove barriers that might restrict their access to the curriculum because of their circumstances or short- or longer-term needs. (Scottish Executive, 2008, p. 17)

In England, the theme of equality also runs through the curriculum documentation, stating that "teachers should set high expectations for every pupil" (Department for Education, 2014b, p. 9). Furthermore, while equitable provision is acknowledged, there appears to be a preference for equality:

> With the right teaching, that recognises their individual needs, many disabled pupils may have little need for additional resources beyond the aids which they use as part of their daily life. Teachers must plan lessons so that these pupils can study every national curriculum subject. Potential areas of difficulty should be identified and addressed at the outset of work. (Department for Education, 2014b, p. 9)

Within this extract there is also an underlying economic imperative communicated about whether additional resources are needed. This is reinforced by stating that "minority of pupils will need access to specialist equipment and different approaches" (Department for Education, 2014b, p. 9). Yet, as in Scotland, there is also awareness of removing barriers to learning in the environment in the curriculum documents in England: "Lessons should be planned to ensure that there are no barriers to every pupil achieving" (Department for Education, 2014b, p. 9), with the emphasis here on equal access to meritocracy.

Northern Ireland's curriculum states that it:

> moves away from a one-size-fits-all towards greater flexibility to customise learning within an agreed entitlement. The Northern Ireland Curriculum focuses more on the learning needs of individuals and the relevance of learning for life, work, society, the economy and environment. (Council for the Curriculum Examinations and Assessment, 2019a, p. 1)

This highlights a more person-centred approach to curriculum design and delivery in Northern Ireland. Yet, emphasis is also placed on equal opportunities and the primary curriculum also highlights that teachers should have:

> high expectations for all pupils, including pupils with special educational needs, pupils with disabilities, pupils from all social and cultural backgrounds, pupils of different ethnic groups including travellers and those from diverse linguistic backgrounds. (Council for the Curriculum Examinations and Assessment, 2019b, p. 3)

All four nations provide indications of expected performance levels for learners at different stages of their education. In Wales, progression steps are outlined for each of the six statutory areas of learning and experience in the new Curriculum for Wales (Lewis & Crick, 2022). These include a number of "I can" statements; for example, "I can interact with others, talking and writing about my thoughts, feelings and opinions showing empathy and respect" (Welsh Government, 2020, p. 148). Scotland also provides a number of statements that they expect learners to demonstrate at different levels of learning in the different areas, for example in the area of literacy and talking at the "early" stage: "As I listen and talk in different situations, I am learning to take turns and am developing my awareness of when to talk and when to listen" (Education Scotland, 2019b, p. 26). These statements provide a normative portrayal of how a child should interact and therefore do not acknowledge the complexity of individual differences. While in Wales and Scotland, the emphasis is on what the learner is able to do in Northern Ireland the emphasis is placed on the teacher's role in delivering the curriculum. For example, "Teachers should enable children to develop knowledge, understanding and skills in: […] following instructions" (Council for the Curriculum Examinations and Assessment, 2019b, p. 18). The curriculum

in England is much more prescriptive than the other three nations in what learners should study and achieve at each level. Assessment for each subject or area of learning is set out at each key stage including a "phonics screening check" at ages 5–6 and a "multiplication tables check" at ages 8 to 9 (Department for Education, 2014a).

However, alongside these outlined expectations both Wales and Northern Ireland refer to a "disapplication" (Knight & Crick, 2022; Welsh Government, 2020, p. 16) and "modification" (Knight & Crick, 2022; Welsh Government, 2020, p. 16) of the curriculum for learners with additional needs in Wales, or the provision of "differentiating tasks" (Council for the Curriculum Examinations and Assessment, 2019, p. 23) in Northern Ireland. Scotland's curriculum also suggests a disapplication of aspects of the curriculum stating that the "child and young person in Scotland is entitled to experience a broad general education […] as far as is consistent with each child or young person's needs" (Education Scotland, 2019b, p. 3). In England's curriculum documentation there is little acknowledgement of adjustment or modification of these standards for learners with additional needs. Therefore, across the curriculum documentation while we see a symbolic commitment to diversity there is an overriding rhetoric of normative expectations.

Discussion

All four nations of the UK show differing portrayals of additional needs in their education policies, yet, across the UK it is clear that steps are being taken towards a more inclusive rhetoric. England, Wales and Northern Ireland acknowledge the importance of inclusive education while Scotland places an emphasis on removing barriers.

However, it could be argued that across the UK the reference to inclusion is often "symbolic" in its nature (Taylor et al., 1997). While making reference to inclusion in England, Northern Ireland and Wales it is broad, vague and ambiguous. In these nations in particular it could be argued that there is less commitment to the implementation of inclusion, as evidenced above. Furthermore, while aspirations of an inclusive system are often articulated – both in policy documentation and political rhetoric – it is not made clear what this looks like in practice. By exception, Scotland provides appendices of examples of what their system should look like in practice, thus making the processes clearer. However, even here, the examples focus on individual provision as opposed to depicting an inclusive learning environment.

The definitions of learners with additional needs also distinguishes Scotland's approach as different to the other three nations. Scotland has a much broader understanding of learners who may fall in the category of having additional support needs. In contrast to England, Wales and Northern Ireland, the ASN documentation in Scotland goes beyond students with learning or physical needs to include a wide variety of needs. Within Wales, England and Northern Ireland there is an unwritten assumption that additional needs are a given and need "to be provided for" (Lehane, 2017).

While all nations include an inclusive education rhetoric within their policy, the emphasis remains on learners with additional needs. Florian (2019) states:

> The practical reality is that today, most national and supranational education policies promote the idea of educational inclusion while retaining a traditional special needs orientation to inclusion that relies on individualised approaches such as the identification and assessment of individual need, and specialist provision. (p. 701)

This clearly resonates with the education policies across the UK; even with an acknowledgment of the learners with additional needs in Scotland, the policies still function to perpetuate and differentiate those with additional needs.

In Scotland and Wales, the new curriculum and additional support systems have been deliberately constructed in a way in which the curriculum should be tailored to the diverse needs of the classroom:

> Creating a curriculum which recognises the diverse culture of their society enables learners to celebrate the diverse nature of all societies. This promotes equality, inclusion, social cohesion and a feeling of being valued. (Welsh Government, 2020, p. 30)

while the ALN/ ASN systems use person-centred provision to support learners to meet the curriculum. This idea is summarised in Scotland:

> In particular, CfE [Curriculum for Excellence] is a curriculum for all and this includes explicitly children and young people with additional support needs. In CfE every child is entitled to the support they need in order to progress. The Act, with its focus on ensuring that children and young people receive the help they need to benefit from education, supports this inclusive ethos. (Education Scotland, 2019b, p. 7)

However, in Scotland there is a much clearer and more consistent "voice" running across all its policy documents. The emphasis on removing barriers in the environment is consistent across all documentation. Yet, in Wales, despite similar approaches to their curriculum and additional support systems, there appears to be a lack of coherence in the documentation in Wales which makes it unclear whether these policies were truly designed to work in tandem (Knight & Crick, 2022).

In Wales, there is a lack of clear "voice" communicated across the different policy documentation with different understandings of inclusion communicated in the various documentation, which has been supported by recent work with teachers (Knight et al., 2022). While all four nations discuss the role of the teacher, what stands out in policy in Northern Ireland is the emphasis of this role in all processes around additional support and inclusion. Given the importance placed on the teacher in Northern Ireland, there is a lack of emphasis on teachers having a positive attitude towards inclusion to support the inclusive education system referred to.

In England, we note that the language within the documentation is neutral and functional. There is confusion and mixed messaging around inclusive education and SEND definitions. Due to this there is a decentralised form of control which serves to keep the commissioning of provision unclear (Allan & Youdell, 2017; Lehane, 2017).

Within their respective curriculum guidance documentation, all four nations set out what should be expected of learners at different levels in different areas of learning. Yet, by articulating these expectations, the approach is naturally exclusionary in its nature as certain learners will be unable to meet these aims. Thus, throughout the UK curricula a "normality" is depicted through these statements, that is, an ideal developmental trajectory for learners. In Wales, Scotland and Northern Ireland, legislation provides an "adjustment" "modification" or "disapplication" of the curriculum for particular learners. Thus, exclusionary criteria are being set with an acknowledgement that some learners will not be able to achieve these. The particular emphasis and singling out of students with additional needs throughout the documentation also suggests a homogenising of

this group of students. Interestingly, England does not legislate for any modification of the curriculum for learners with additional needs.

Conclusion

From critically analysing the key inclusive education policy documents across the UK as a combined national-level case study, we find not only divergence between the four nations, but also within the policy documents of each nation. While policy documentation from Scotland shows a clearer voice and fewer examples of problematising the learner, across all four nations we see complicated messaging and branding of inclusive education. This leads to significant questions about the enactment and implementation of inclusive education policies from a practitioner perspective (more so in light of increased practitioner agency and autonomy across some of the nations as part of recent major reforms), as well as comparability for researchers across different nations and jurisdictions. Furthermore, this raises further challenges for policymakers around clarity of future policy processes and outcomes. This is further foregrounded in the context of significant recent and emerging education-system level reforms across the UK nations, especially in examining and addressing problems of equity and injustice in education policy (both in the UK, and internationally). While policies in each nation have arguably been developed to meet the specific needs and political priorities of each country, there is much that can be learned from understanding each country's approach and how it translates into practice. Indeed, this is a key priority on how to best harness educational research across the UK, especially in developing effective interventions, performing robust evaluation, and identifying the potential for tractable policy borrowing (Royal Society & British Academy, 2018). From looking across these policy documents, policymakers and educational stakeholders in each nation can develop a critical understanding of how their own approach to inclusion differs and how they might make changes to policy in order to create more inclusive education systems that support the needs of all learners.

Note

1. In the context of inclusive education policy, the four nations of the UK use overlapping but distinct terminology to define learners with additional needs: England - Special Educational Needs and Disability (SEND); Northern Ireland - Special Educational Needs (SEN); Scotland - Additional Support Needs (ASN); and Wales - Additional Learning Needs (ALN). Throughout this paper we will use the term "learners with additional needs" to refer to learners who need additional support.

Disclosure statement

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