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Comparative Study  
of Education  
Systems and  
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Services**



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# Education for Children with Special Needs: A Comparative Study of Education Systems and Parental Guidance Services

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## **ABSTRACT**

The general and universal right to education has been well established for some time. But despite international agreement, the commitment to education for all is not necessarily linked to obligatory mainstream education for all children with disabilities. The mature European countries have a history of segregating children with special educational needs in special schools and special schools continue to exist in many countries. In addition, initiatives towards more inclusive education systems are taken. So in many countries, children with special needs and their parents are able to choose between segregated special education and inclusive education. However, different factors influence this choice. Using existing research, country profiles and results of analyses on Flemish data, this paper compares the organisation of inclusive and special education systems in the Flemish community of Belgium, Norway, the Netherlands and England. We add a perspective to the existing comparative studies. We proceed from the Network Episode Model developed by Pescosolido (and the importance of the social networks included within this model), focusing specifically on the guidance systems for the social networks of children with special educational needs within the education. The results describe that the choice for a certain school type is influenced by a number of factors, including the country's education system, the guidance and the characteristics and competences of the family and its social network. Social and socio-economic factors are relevant within the educational field of children with special educational needs. Policy-makers should consider the potential influence of these factors on the overall effectiveness of the measures introduced.

**Keywords:** child with special needs, special needs education, inclusive education, parental guidance, socio-economic position, comparative study, Europe

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## **1. Introduction**

Social policies aimed at people with disabilities have become a key feature of most modern welfare states. In these policies, a transition can be observed towards the social-theoretical citizenship model (Brett, 2002; Van Gennep, 2000). People with disabilities have legal, economic and social rights and obligations that enhance their ability to exercise control over their own existence (Van Puyenbroeck et al., 2001), and they must be granted the opportunity to participate in society. The development of the United Nations Convention on the Rights of Persons with Disabilities (UN, 2006) has enhanced the formal legal protections offered to people with disabilities. Children are highlighted within this rights discourse. Children with disabilities are at high risk of being excluded socially (Thompson and Emira, 2011; Dowling and Dolan, 2010). Education is an important instrument for realising the participation of people with disabilities in society. Access to education is a key means of placing people with disabilities on an equal footing with people without disabilities, while improving the social integration of children and the employment and work prospects of young adults with disabilities.

The general and universal right to education has been well established for some time. The UNESCO Salamanca Statement of 1994 affirmed international agreement regarding this principle, and it emphasises the principle that children with disabilities should be taught in the same mainstream schools attended by their peers without disabilities (Ebersold, 2011). Despite these agreements, however, the mature European countries have a history of segregating children with special educational needs in special schools. Although the first initiatives for inclusive education for children with disabilities were taken in the early 1960s, most of the changes in the education laws of most European countries did not begin until the late 1990s or the early years of the present century. The commitment to education for all is not necessarily linked to obligatory mainstream education for all children with disabilities. Special schools continue to exist in many countries, some of which even invest more resources in special schools. Some countries emphasise the principle right of parents to choose the schools in which their children are educated (Ebersold, 2011). The development of education and school systems has thus differed across countries, and many countries have experienced difficulty establishing inclusive education systems. Many factors are involved.

Children with special needs and their parents may or may not be able to choose between segregated special education and inclusive education. Factors affecting this choice include the country's education system and

the educational 'career'<sup>1</sup>, as well as the characteristics and competencies of the family and the social network. First, the type and development of the education system and the distribution of incentives (funding, transport, means, assessment) across schools and users affect the choice for particular types of education. Second, the choice of a school type is part of a multi-phase process that is influenced by decisions and experiences in the past. The process is also influenced by the assessment procedures of special educational needs, as well as by (parental) guidance and support services. Third, children with special needs are steered into particular types of education according to the characteristics and socioeconomic situations of their families. The influence of the latter two factors suggests that measures taken within the citizenship model could be inefficient for some families. This situation calls for insight into the patterns of care and school use by the families of children with special needs, along with the related determinants. This paper focuses on formal education systems and parental guidance services in Flanders, Norway, England and the Netherlands. We compare the organisation of inclusive and special education systems in these countries and add a perspective to the existing comparative studies. We proceed from the Network Episode Model developed by Pescosolido (and the importance of the social networks included within this model), focusing specifically on the guidance systems for the social networks of children with special educational needs within the education systems. In further research, in-depth qualitative research could be used to examine the educational 'career' (i.e. distinct phases and family context) and the tensions existing within them, as well as the effects of these processes and tensions on school choice.

We follow the OECD, recognising that 'Those with special educational needs are defined by the additional public and/or private resources provided to support their education (personnel, material and financial resources)' (OECD, 2005). We focus on students with disabilities or impairments that are considered organic disorders attributable to organic pathologies (in medical terms), as well as on those with behavioural or emotional disorders, or specific difficulties in learning. As described in this study, some school or policy initiatives for special educational needs also involve children with disadvantages arising primarily from socioeconomic, cultural and/or linguistic factors.

The four countries were selected for several reasons. First, we chose to focus on the more 'mature' European welfare states. Second, Norway, England, the Netherlands and the Flemish community of Belgium have different educational policies for inclusive and special education, and their education systems represent different positions with regard to the inclusiveness of the educational field, as shown in the table below (Table

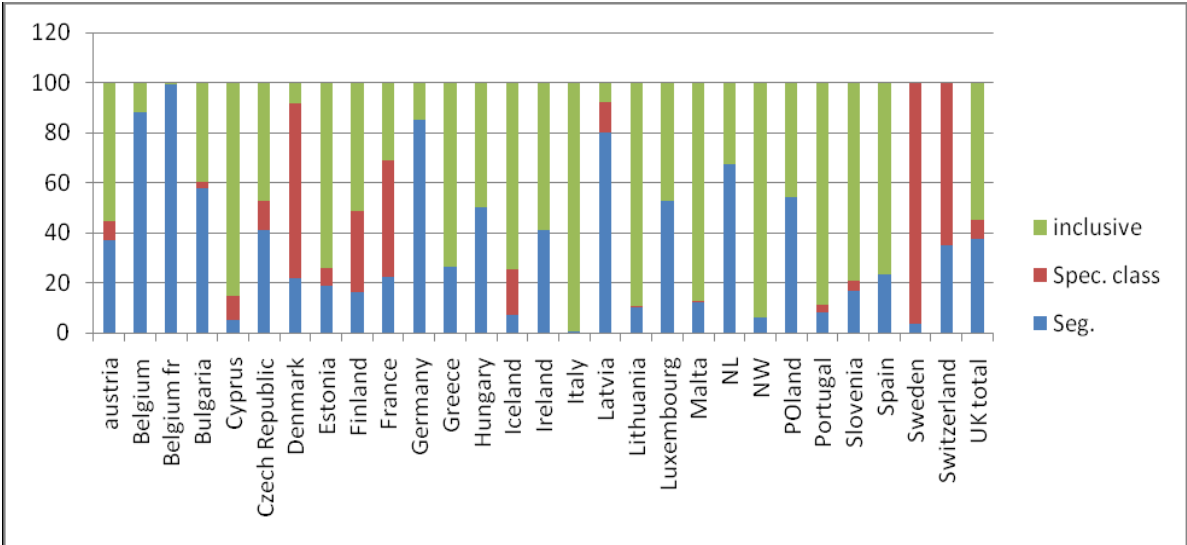
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<sup>1</sup> The use of education services is not a single, one-time yes/no decision; it fits within a pattern of practices and people consulted and is influenced by decisions in the past.

1). Flanders has a long history of a segregated system of special schools. Beginning in 1970, the Flemish education system developed a completely autonomous system of special schools. In the past decade, the Flemish community has taken a leading position with regard to the education of pupils with special needs in segregated settings. The number of pupils with special needs attending regular schools is relatively small. Norway is situated at the other site of the educational-inclusion barometer. In Norway, most children with special educational needs are enrolled in mainstream schools. The proportion of pupils in special schools has never been very high.

England and the Netherlands occupy a position near the middle of the spectrum. The Netherlands has traditionally had a wide array of special schools, reflecting a characteristic trait of the Dutch educational system: the constitutional freedom of education. Both parents and schools are free to choose their own educational ideas, and schools can refuse to admit pupils whose parents do not subscribe to the beliefs or ideology upon which the school’s teaching is based (Smits, 2007). At present, however, the educational policies and funding structures of the Netherlands are undergoing a major reorganization that is targeted towards the promotion of inclusive education. In England, approximately 40% of children with special educational needs attend special schools, despite considerable policy changes calling for inclusive education. Although the general legal framework guarantees free access to compulsory schooling for all children, there is no guarantee that this education can be provided in mainstream schools. England reserves the right to educate children with disabilities in special schools, which may be located outside their local communities (UN Convention, 2006; Priestley et al., 2007).

Figure 1. Type of schooling for children with special educational needs, 2006



Source: Ebersold, 2011

The paper opens with a brief reflection on the applied concepts of 'integration' and 'inclusion'. This is followed by a description of the educational fields of the four countries in terms of current educational policy, assessment procedures and the funding, as well as the incentives of transport and personal assistance. We then outline the Network Episode Model developed by Bernice Pescosolido, which emphasises the importance of social interaction and social networks in decision-making and the use of services. Decisions and choices are socially constructed. The choice to attend a certain school type is influenced by assessment procedures, as well as by formal and informal support systems. We outline these structures for each of the four countries. The paper further explores the impact of the family situation on decisions regarding the choice between inclusive mainstream schools and segregated special schools in the Flemish community of Belgium. We conclude by presenting the most important findings from our explorative literature study and by formulating hypothesis for further research.

## **2. A debate on concepts**

Within the literature concerning the promotion of the rights of people with special needs, researchers and politicians juggle with such concepts as 'integration', 'inclusion' and 'mainstreaming'. Within the field of education, a general shift can be observed away from integration and towards inclusion. While integration had been the primary issue until the late 1980s (OECD projects), inclusion became prominent in the 1990s. The concept of integration centres on the idea that children with disabilities should have the opportunity to be educated in mainstream schools, while inclusion focuses on mainstream schools as the most appropriate school for every child. When mainstream schools integrate children with disabilities, they try to fit these children within the dominant school culture. The notion of integration was developed against the background of the European history of segregating people with disabilities. It was formulated as a programmatic principle for new societal practice and institutional reforms (Vislie, 2003). Inclusion scholars argue that schools should adapt such that every child could attend a mainstream school, with diversity as the prevailing norm (Van Hove, 1999). Since its adoption by 92 countries and 25 international organisations in 1994, the Salamanca Statement and Framework for Action on Special Needs Education has been regarded as a powerful instrument for innovations in the field (Unesco, 1994). With this document, inclusion became the global descriptor, although the debate between integration and inclusion has continued. Some researchers argue that both terms are being used to express comparable processes and outcomes (Pijl, Meijer and Hegarty, 1997), while others argue that each notion has a different focus and that the two terms should not be combined (e.g. by linking integration to system reform and inclusion to quality of integrated provision; Vislie, 2003). The

focus of this paper is on permanent and full-time inclusion in mainstream education. For the remainder of this paper, we discuss inclusive education without making any statement regarding the issue of terminology.

### **3. The education systems in the four countries as an indicator of school choice**

Table 1 presents current data (2008-2010) with regard to the percentage of children (with special educational needs) in segregated special schools in the four selected countries. As indicated by these figures, the greatest proportion of children with special educational needs being served in special schools is found in the Flemish community of Belgium, followed by the Netherlands and England. In Norway, only 4% of children with special educational needs attend special schools. In contrast, Norway has the greatest proportion of school-aged children with special educational needs, followed by the Flemish community, the Netherlands and, finally, England (note that different countries apply different definitions and different age ranges<sup>2</sup>). In comparison with data from 2000-2001, an increase of 0.4% can be observed in the proportion of children attending segregated special schools in the Flemish community and Norway, with an increase of 0.9% in the Netherlands and no change in England. Besides, the proportion of school-aged children with special educational needs increased by 1.2% in the Flemish community, by 2.3% in Norway and by 2.2% in the Netherlands, while this proportion decreased by 0.4% in England. The trends show only very moderate change, although the percentage of children with special educational needs has increased in Flanders, Norway and the Netherlands.

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<sup>2</sup> Age ranges covered by compulsory education: Flemish community, 6-18; Norway, 6-16; Netherlands, 5-18; and England, no specific age range, children younger than 5 and older than 16 are also included.

Table 1. Current country-level data on special needs education (2008-2010)\*

	<b>Flemish community (Belgium)</b>	<b>Norway</b>	<b>Netherlands</b>	<b>England (UK)</b>
% of school-aged children with SEN	6.2	7.9	4.3	2.8
% of school-aged children with SEN attending segregated special schools	85	4	62	43
% of children attending segregated special schools	5.3	0.9	2.7	1.2
% of school-aged children with SEN attending segregated special classes	Not applicable	11	Not applicable	7

\* All data refer to pupils officially identified as having special educational needs (SEN), as defined in the country in question; all data presented in this document were collected according to the prevailing legal definition of SEN in each country.

Source: Authors' calculations using country-level data reported in Watkins (ed.), 2010

The distribution of children with special educational needs across mainstream and special schools is determined by the existing educational systems and the methods that are used to identify and assess the needs of children. The percentage of children with special educational needs attending separate schools may therefore reflect differences in assessment procedures and funding arrangements rather than differences in the actual incidence of special educational needs across countries (Eurodyce, 2005). The different percentages of school-aged children with special educational needs also reflect the differences in assessment procedures. Shifts in the relative proportions of mainstream and special schools are linked to specific characteristics of special schools that are considered desirable by schools, educators and parents, like for example more support by the authorities. This part of the paper provides insight into the formal education systems of the four countries, along with information on the relative distribution of incentives and disincentives. We consider school policies, assessment procedures, funding structures, the arrangement of transport and the presence of disability-related incentives involving personal assistance in schools.

### **3.1. Three types of school policy**

In addition to factors as population density and cross-national variations in the prevalence of particular categories of disabilities, policy differences could affect differences between countries with regard to educational forms. Countries can be grouped into three categories according to their policies regarding the education of children with special educational needs: the one-track approach, the two-track approach and the multi-track approach (see Table 2). As elaborated in the following paragraphs,



current trends suggest that countries with a clear two-track system of special needs education are developing a continuum of services between mainstream schools and segregated schools.

Table 2. Educational policy approaches of the countries addressed in this study

Educational policy approach	Country
Clearly two-track	Belgium (Flanders)
Two-track but in transformation	Netherlands
Multi-track	England
Clearly one-track	Norway

Norway is an example of a country with a one-track policy approach. Since the 1975 integration of the legal and administrative systems in this country, no specific legislation has emerged regarding the field of special education. In Norway, municipalities bear responsibility for providing education to all children residing within their boundaries. Children are registered in their local schools. Until 1992, Norway had 40 national schools for special education. The policies and ideology of inclusion have gradually gained strength, however, and reorganizations since 1991 have resulted in the closure of 20 of these schools. The other 20 schools have been transformed into resource centres that work with local educational-psychological service agencies to provide support to mainstream schools. The Norwegian education act provides certain rights to children with special educational needs in relation to their impairments. The act requires schools to ensure that the physical, social and educational environment is suited to all children. It further specifies that children who do not or cannot receive adequate benefits from ordinary adapted education are entitled to special education. While exclusion from mainstream schools as such is thus unusual, special education may be provided 'out of class' within the mainstream setting (11%, as you can read in table 1 in 2009-2010 (Meijer (ed.), 2003; Magnus, Wendelborg and Tøssebro, 2010).

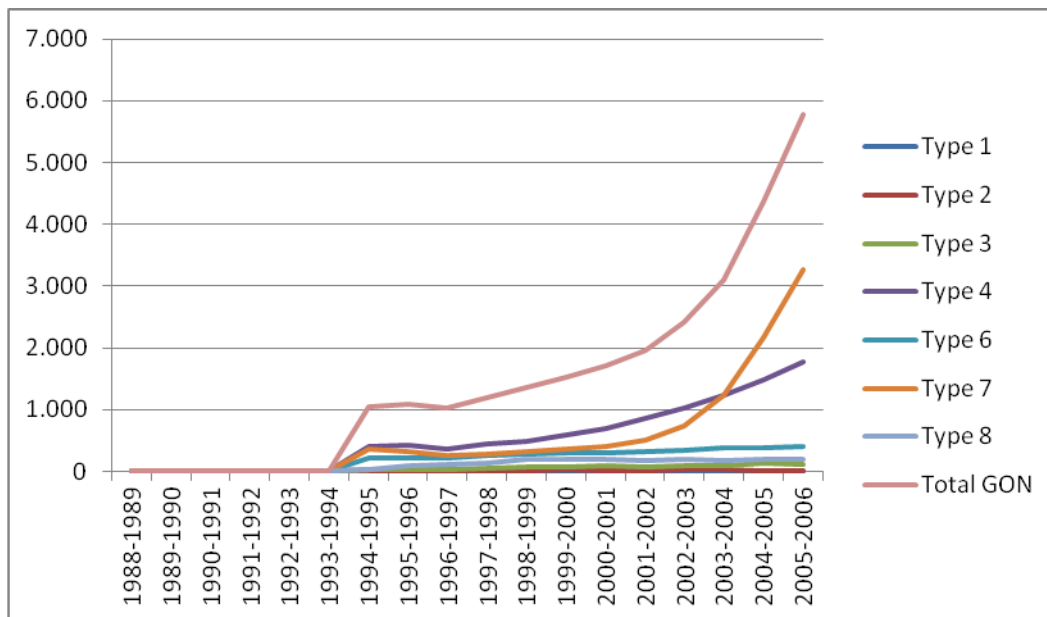
The Flemish community of Belgium has a clear two-track system. Since 1970, the Flemish educational system has developed a completely autonomous system of special schools for children with special educational needs. Before that time, Belgium had been one of the first countries to operate a system of separate special classes within mainstream schools for children with special educational needs in addition to its system of segregated special schools. In 1970, the legislation for special needs education put an end to these separated classes (Van Rompu et al., 2007). Special needs education was removed out of the mainstream

school. The law of February 1997 on primary education incorporates mainstream and special education within the same legal framework, in which special primary education is described as education that offers adapted education, care and therapy to pupils whose personal development cannot be ensured by mainstream education, whether temporarily or permanently. Under the impulse of the integration movement, the option for integrated education was established in Flemish legislation in 1980. As a form of cooperation between regular and special schools, teachers and other professionals within the special school provide additional support to pupils with special needs within mainstream schools (in a system known as 'integrated education' [*Geïntegreerd onderwijs*] or GON). Access to such inclusive support is based on the typology used within the special-education system. Based on the types of special education,<sup>3</sup> it applies primarily to children and adolescents with physical, visual or auditory impairments. Students with socio-emotional disorders, learning disabilities and moderate intellectual disabilities are eligible for such inclusive support only after having been in the special-education system for at least nine months. The nature and amount of additional aid that children receive depends upon the nature and severity of their disabilities. Most pupils receive two hours of additional support per week for two academic years at each educational level. In recent years, an increase has been observed in the number of pupils with special needs attending mainstream schools. In the last decade, the number of pupils within the integrated education system has increased significantly (see Figure 2), although the overall number of children with special educational needs has remained small (Internal affairs of the Flemish government, 2008).

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<sup>3</sup> Type 1: children with mild mental disabilities; Type 2: children with moderate or severe mental disabilities; Type 3: children with serious emotional and/or behavioural problems; Type 4: children with physical disabilities; Type 5: children admitted to hospital or in quarantine for medical reasons; Type 6: children with visual impairments; Type 7: children with hearing impairments; Type 8: children with serious learning difficulties.

Figure 2. Evolution of integrated education in the Flemish community of Belgium



Source: Internal affairs of the Flemish government, 2008

Although this form of cooperation between special and regular schools was initiated as a means of integrating students with special needs without making changes in the curriculum, a smaller program designed to include students with moderate to severe intellectual disabilities in regular schools ('Inclusive Education' [*Inclusief Onderwijs*] or ION) was established and made available to a limited number of pupils in 1999. The severity of the disabilities required adaptations to the mainstream curriculum (based on the equivalence principle), which is one of the key themes in the inclusion debate. A new Decree on Equal Opportunities in Education has been in effect since 2002. This legislation stresses the rights of parents to have their children enrolled in the school of their choice. The reasons for which schools may refuse to serve children with special needs are very clearly defined and based on a description of the school's carrying capacity (Meijer (ed.), 2003).

The Netherlands has traditionally operated a wide array of special schools in primary and secondary education. Its inclusion policies have been intended to shift away from a clear two-track system of special needs education towards a continuum of services between mainstream schools and segregated schools. To date, however, it continues to be a clear two-track system. As reflected in the figures cited in table 1 and above, policy changes have not led to any decrease in the number of children with special educational needs being served in separate special schools. Two major developments have taken place. First, effects of the funding system have served to increase the number of children with special educational needs in special education. This development is outlined further in this paper. Second, in 2003, two acts had potential implications for inclusion in

education: the Equal Treatment Act for People with Disabilities and Chronic Illness (WGBH/CZ) and Expertise Centre Act. Under the first act, schools are required to admit children with special educational needs if they can meet the academic requirements and if the necessary adaptations are within reason. The act regarding expertise centres introduced eligibility criteria for special education, along with a fixed pupil-bound budget for children who were eligible for special education and who chose to remain in or transfer to a mainstream school in primary or secondary education. In theory, the pupil-bound budget increased the options available to students with special educational needs, thus allowing them to choose a more inclusive setting. In practice, however, statistics have shown that the budgets have been used primarily to provide additional assistance to students who are already attending mainstream schools. Of all children with a pupil-bound budget, 60% have autism spectrum disorders (Minne, Webbink and Van der Wiel, 2009), the definition of which has been expanded, thus increasing the number of students with such a diagnosis. The budgets are also used to satisfy latent care needs. The new proposal for legislation (i.e. 'appropriate education') aims to reduce the costs of special education and to improve the quality of education for children with special educational needs (primarily in mainstream education). The government of the Netherlands apparently supports a shift towards a multi-track system in which inclusion in mainstream primary education is the norm. The choice between mainstream and special schools remains a possibility, however, and both schools and parents retain the right to choose the educational system they prefer (Smits, 2010).

England's education system is operated under a 'multi-track policy approach'. Its policies involve a multiplicity of approaches to inclusion, offering a variety of services between the mainstream and special needs education systems. The majority of children with special educational needs are educated within mainstream schools. It are primarily those with emotional and behavioural disorders who attend special schools. The current system guarantees free schooling for all and provisions in both mainstream schools and special schools, and it assigns overall responsibility for assessing and determining individual needs and school placements for most children to local education authorities. Since 1988, there has been a national curriculum, which all children have the right to follow. An unprecedented number of education-inclusion policies for children with disabilities have been passed since the accession of New Labour in 1997. Laws and policies have tended to favour mainstream school placements where possible, although provisions for parental preferences and appeal are available. No legislation has been passed that would lead decisively to the elimination of segregated schooling. The continued strong belief in parental choice has thus far preserved the existence of special schools, as many parents continue to value the concept of segregated schooling. Moreover, the current government has confirmed proposals for legislation that would guarantee the right of

schools to apply for greater self-governance and financial autonomy from their local education authorities. Concerns have been expressed that proposed budget cuts are likely to result in the reduction of local capacity to provide specialised disability-support and advice services to mainstream schools (Priestley et al., 2010).

To summarize, the one track policy approach in Norway is oriented towards inclusive education for children with special needs. However, special education may be provided 'out of class' within the mainstream setting. In contrast to Norway, the Flemish community of Belgium evolved from a system with special classes towards a completely autonomous educational system of special schools. Inclusive education became legally an option, but the number of pupils in this system remains very small. In the Netherlands, the government supports a shift towards a multi-track system in which inclusion in mainstream primary education is the norm. But to date, the Dutch educational policy continues to be a clear two-track system and policy favours education of children with special needs in special schools. England's educational policy have tended to favour mainstream school placements where possible, although no legislation has been passed that would lead decisively to the elimination of segregated schooling. The continued strong belief in parental choice has thus far preserved the existence of special schools, as many parents continue to value the concept of segregated schooling.

Differences in the school policies of the four countries addressed in this study can also be ascribed to differences in the values upon which their education systems are based, as reflected in their education policies. In some countries, education focuses on stimulating development of the entire person, with the goal of preparing students for life in society, while other countries focus primarily on the acquisition of knowledge. The extent to which schools must follow the curriculum can vary, as can the obligation to produce specified results within the context of mainstream education.

### **3.2. Assessment**

The number, as illustrated in Table 1, the labelling and definition of categories of disability vary widely by country, and the types of provisions that have been developed in relation to special educational needs are therefore different for each country. In most countries, needs assessments are conducted by multidisciplinary teams, and they depend upon the type and level of education. Assessments of the support to be allocated to young people with disabilities are often formalised within individual education plans (IEPs), which specify academic targets.

In the Flemish community of Belgium, the right to special needs education (whether in a segregated special school or in a mainstream school) is established in two documents from the Pupil-Guidance Centre: 1) a certificate stating that the pupil is entitled to special education and 2) a multidisciplinary report confirming the pupil's need to attend special education. In theory, special needs education is a right and never an obligation. Mainstream schools may reject the enrolment of a child with special educational needs due to inadequate carrying capacity. The certificate of acceptance for inclusive education refers to an 'inclusion plan', which is the result of consultation among all parties concerned (e.g. schools, child, parents, guidance centre; Meijer, 2003).

In the Netherlands, the Standing Committee on Student Care assesses the appropriateness of special primary education for children needing minor special educational support. This standing committee is embedded within a collaboration known as 'Back to school together (again)', in which mainstream and special primary schools are regionally clustered. Although legal responsibility for requesting additional services rests with the parents, mainstream schools can support parents in such requests. Regional expertise centres maintain commissions that conduct assessments for children needing major special educational support. A positive indication from such an assessment is accompanied by the right to enrol in a mainstream school along with an individual, student-bound budget or 'backpack' (Den Dulk and Van Petegem, 2006).

In England, local authorities are responsible for the assessment of special education needs. Under the law, all state schools must do their best to ensure the provision of special help to all children with special needs, and mainstream schools are capable of meeting most of these needs (in some cases, with assistance from external specialists). If a child still does not seem to be making enough progress, the school or the parents can ask the local authorities to assess the child's educational needs, based on specialised advice. A statutory assessment (multidisciplinary) is then made, and a statement of special educational needs is prepared. Although parents retain the right to choose a school (i.e. mainstream or special), the carrying capacity of the school is of importance. Special schools usually accept children with particular types of special needs (Department for Children, Schools and Families, 2009).

In Norway, the municipal educational-psychological service centre can write a multidisciplinary expert report about a pupil's needs, with the written approval of the parents. This report contains the reason why the pupil needs special education, in addition to describing the extent and content of the special education, as well as how it should be organized. The mainstream school then works out an individual plan (Meijer, 2003).

The information presented above thus shows that, in the Netherlands and in Belgium, schools have a strong voice in the assessment of educational

needs. In most cases, recommendations for referral to special education (in segregated schools) are issued by the school. In England and Norway, the local authorities are responsible for such assessments, at the request of the parents (with help from the school).

### ***3.3. The funding system as an important indicator for inclusive education***

Meijer (1999) differentiates three funding indicators that determine the school-financing systems of various European countries: input-funding, throughput funding and output funding. In the first category, the funding is based on needs (e.g. number of special-needs pupils in a school, referral rates, number of disadvantaged children). The second model is based on the functions or tasks to be undertaken or developed (e.g. services provided by a school, municipality or region). The output-funding model allocates finances according to specified outputs (e.g. achievement scores).

The Flemish community in Belgium has an input-based funding system at the school level. Most of the resources for special needs education are used within the separate system of special education. Each of the eight types of special needs education and the four educational forms has its own coefficient for converting the number of pupils into a certain amount of funding. The coefficient is most favourable for pupils with visual or hearing impairments. The funding of the inclusive education is organised such that the mainstream school receives funding for a few extra hours support of teachers and therapists, although only full-time and permanent integration translates into substantial additional resources. Pupils attending integrated education attract only a very small amount of additional resources relative to what they would cost within special education (given that the entire package is offered in special schools, e.g. therapists, nurses, pedagogical, psychological and social staff, transport, technical equipment). The financing system thus stimulates the segregation of pupils with special needs, and referral to special schools is rewarded financially (for the school as well as the family).

The funding system in Norway is quite different. There is no separate national funding system for special needs education. Municipalities are responsible for all pupils within their own boundaries. They receive a lump sum that includes all central-government subsidies for education and culture, as well as for health services (decentralised special-needs funding). The municipal authorities allocate these subsidies, taking into account the number of children with special educational needs in the previous school year. This kind of funding system, which is based on the principles of equivalency and which covers all pupils in compulsory education, can be considered favourable to integration. Differences

between municipalities are more likely to involve the way in which special needs education is organised than they are to involve the amount of money spent on education.

The funding of special needs education in the Netherlands was modified in 2003. Before that time, the primary funding system was straightforward, based on input funding. Each type of special school was allocated a certain amount of teacher minutes according to the number of pupils. Different types of special schools received different budgets, and working budgets were provided. Funding for special needs education in mainstream schools was limited (Meijer, 1999). Since 2003, the system has shifted from supply-oriented financing to a system in which means are forwarded to the person requiring the services (i.e. the model of pupil-bound budgets). This system is known as the 'backpack' policy: pupils meeting the criteria for the budget take their funding with them to the schools of their choice, whether special or mainstream (EADSNE, 2010). For primary education, the budgets, which are financed by the Ministry of Education, range from € 12 000 to € 18 000, depending upon the type of school and disability. A new policy proposal seeks to replace these budgets with lump-sum subsidies for schools. The current system encourages growth in the number of pupils in special education, as both mainstream and special schools stand to gain financially by identifying children with learning difficulties and behavioural disorders (Smits, 2010). The current funding of special needs education in the Netherlands is similar to the Belgian system, in that it also stimulates segregated special education. In financial terms, it is more advantageous for a mainstream school to refer pupils to special schools than it is to refer them to special primary education (which must be provided from the mainstream school's own budget) (Minne, Webbink and Van der Wiel, 2009).

As in Norway, the funding of special needs education in England is the responsibility of the local authorities. The municipalities receive funding for their schools in the form of a Dedicated Schools Grant. The local authorities retain a portion of this grant to cover such expenditures as fees for independent special schools and support services for special educational needs. Another portion of the grant is allocated to schools. The governing body of each school is free to determine how to spend the available resources and how much will be spent on services for special educational needs. In some cases, the local authorities spend its share in order to ensure the necessary provisions in the schools (EADSNE, 2011). In theory, the budget for special schools is determined by the number of places that it offers. The place element is determined by a formula, and it usually refers to the type and level of need (Meijer, 1999).

In conclusion, the input-based funding system at the school level stimulates the segregation of pupils with special needs in the Flemish community of Belgium because only a small amount of the additional resources for special needs education go to the regular schools. But also



the model of pupil-bound budgets in the Netherlands encourages the growth in the number of pupils in special education. When the funding of special needs education is the responsibility of the municipality as in Norway or England, resources can be better directed towards inclusive special needs education, but differences between municipalities can disrupt an overall educational inclusion.

### ***3.4. Transportation as an incentive for specific education types***

One important incentive or disincentive for choosing inclusive education involves the transportation of children with special educational needs to and from school. The way in which pupil transport is organised can either facilitate or discourage particular educational choices. The inclusivity of the mobility landscape depends upon the extent to which it considers the diversity in human abilities and conditions, including physical, sensory and cognitive abilities. The way in which inclusivity is perceived is affected by the type of mobility service, the purpose of the trip and the tasks that must be performed (e.g. buying a ticket, waiting in line, boarding a vehicle). Both the physical accessibility and the usability of the system are thus critical. The realisation of seamless door-to-door services for vulnerable passengers is part of the European Union's Urban Mobility Action Plan. The manner in which a country organises its pupil-transport systems for children with special needs can guide the families of these children toward certain school types. In general, the inaccessibility of the public transport system necessitates the organisation of special pupil transport for children with special needs. The systems for funding and organisation of such transport differ by country, however, and these differences affect the educational landscape.

In the Flemish part of Belgium, children with special educational needs who are enrolled in special schools are entitled to free transport to the special schools closest to their homes. The transport is organised and financed by the Department of Education (regional). The school examines whether the child is entitled to free transport. Children with disabilities who attend mainstream schools (e.g. within the GON system) are required to use the primary form of pupil transport that is available (e.g. private or public transport), which is not free. The Flemish Agency for People with Disabilities can provide financial support for transport to and from mainstream school under the following conditions: (1) the child has limited options for walking to school or (2) the child is in a wheelchair. Another option for organising transport to mainstream schools for children with disabilities is to draw upon a personal assistance budget. This budget can be used to hire a personal assistant to take the child to and from school.

In the Netherlands, special transport to primary and secondary education is the responsibility of the municipalities. Based on the Municipal Regulation of Pupil Transport Act, the municipality decides whether a child is entitled to pupil transport or to a reimbursement in transport costs. The greatest share of pupils who are eligible for such assistance consists of pupils attending special schools (as opposed to mainstream schools), pupils attending special primary schools (as opposed to special secondary schools), pupils who must travel beyond the kilometre boundary (in most cases, 6km) for ideological reasons and children whose disabilities prevent them from using public transport. It is acceptable for municipalities to ask parents to pay for transport costs, although they may not do so for children whose disabilities prevent them from taking public transport. Municipalities are also responsible for providing special transport to recreational activities and to activities that enable general participation in society.

In England as well, municipalities are responsible for the organisation of pupil transport. Although they can decide whether transport is necessary, they are required to provide free home-to-school transport for pupils of compulsory school age who are attending their nearest suitable school, if that school is located beyond the statutory walking distances (two miles for pupils younger than eight years of age, and three miles for those aged eight years or older). They must also provide transport for children who are unable to walk because of special educational needs, disabilities or mobility problems. Children with special needs may also be eligible for the Mobility Component of the Disability Living Allowance, a cash benefit related to mobility, in addition to other disability-related benefits they may receive.

In Norway, pupils in primary school and both lower and upper secondary school are entitled to free school transport if the distance to the school is more than two to four kilometres (for pupils in primary school) or regardless of distance if the road is particularly dangerous or difficult. Pupils who need transport due to disabilities or temporary injury or illness are entitled to free transport regardless of the distance between home and school.

When inclusive education is set out as the norm, good and free special pupil transport for children with special needs to all school types has to be a basic component of the education system. Different arrangements for different school types influence the school choice of parents.

### **3.5. Personal assistance budgets**

Personal-assistance budgets emerged from within the humanistic ideals of the Independent Living Movement (e.g. choice, control and autonomy) as a part of the long-term care system. People with disabilities (or their care-giving parents) can use these budgets to arrange care and assistance services. Since these budgets emerged in the early 1990s, the number and types of budget formulas have continued to increase throughout Europe. This portion of the paper provides insight into the role of these personal budgets in the education of children with special educational needs in the four countries.

In the Flemish part of Belgium and in the Netherlands, personal-assistance budgets can be used to support inclusive education in mainstream schools. The Flemish personal-assistance budget (*persoonlijk assistentie budget* or PAB) can be used for material expenses, as well as to engage service providers to help the child at school. The resources cannot be used for pedagogic purposes but only for practical and organisational goals (e.g. assistance with personal hygiene at school). They are intended solely for social care. Such budgets can also be used to assist children with special needs after school hours (e.g. transport, homework). The waiting lists for such assistance, however, are quite long. In the Netherlands, the primary type of personal budget (*persoonsgebonden budget* or PGB) used by children is the personal budget for special illness expenses (*Algemene Wet Bijzondere Ziektekosten* or AWBZ), which can be used for personal care and nursing, as well as for supportive and/or activating counselling and short-stay accommodations. Forms of care that can be arranged at school using these budgets include personal care, nursing and supervision. This system thus allows more options for in-school support than are possible under the Flemish system. In the Netherlands, the costs of the pupil-bound budget are deducted from the personal-assistance budget. Only children with moderate to serious impairments are eligible for assistance through the PGB. These budgets cannot be used for supervision during lunchtime (De Bruijn, 2010). The future of the PGB in the Netherlands is uncertain.

In contrast to Flanders and the Netherlands, parents or children in England might be eligible for personal assistance funding (e.g. through individual budgets or direct payments), although such support is not intended for educational purposes. Even when children do have personal assistants, they do not accompany them at school. The practical support at school (like assistants) is provided and funded by the educational authority or school (Priestley et al., 2010).

In Norway, the local authorities assign assistants to mainstream schools according to the assessment of special needs in the school. A survey of the tasks performed by these assistants showed that they are primarily

used to provide personal and practical assistance to individual pupils (Norwegian Directorate for Education and Training, 2010). In addition to school assistance, personal-assistance schemes became a regular component of social services in 2000 (most personal assistants are employed by the municipality). Such services were initially restricted to people who were able to manage the assistance themselves. In recent years, however, they have also been granted to people with cognitive/intellectual disabilities. The personal-assistant can support the child with special needs outside the school hours.

In conclusion, In Flanders and the Netherlands, a personal assistant can support the child in school (funded by the care system and child-oriented). In Norway and England, school assistants are available to support children with special needs (funded by the education system and school-oriented). Personal assistants can give child and family support outside the school hours.

#### **4. Formal parental-guidance services and parental experiences**

Bernice Pescosolido (2001) uses the social-network perspective to provide insight into the ways in which people shape their everyday lives. People experience illness and live with their disabilities in communities (i.e. within social networks). In contrast to the rational choice perspective, the social organization strategy developed by Pescosolido considers social interaction as a factor that determines whether individuals have a choice to make, whether and how they are pushed in a particular direction and whether they recognise problems and see certain actions as falling within the range of acceptable possibilities. This idea forms the basis of the Network Episode Model, which indicates that coping with any health problem or physical disability is a social process that is managed through the contacts that individuals have in the community, the treatment system and the social service agencies. The ways in which people respond to disabilities are as much a process of social influence as they are the result of individual action. The Network Episode Model focuses on the 'career' of a person with special needs. The use of care and education services is not a single, one-time yes/no decision; it fits within a pattern of practices and people consulted. These 'careers' are embedded within personal lives and changing communities. In the model, the idea of 'community' is conceptualised as a dynamic social support system. The beliefs and experiences of individuals in the social networks guide people with disabilities in particular directions. The formal treatment system (systems of care, social and health systems) influences these social support systems, and it can play an important role in shaping network contacts for people with disabilities and their families. It is necessary for professionals and the social support network to have a common agenda. Within the framework of education, therefore, it is important to support and guide

this social network adequately in order to ensure that the child receives appropriate education in an adequate school. The family plays a pivotal role in the school career of a child. Good parental support enhances the possibilities for the child and for the school.

Having a child with special needs poses additional challenges to parents with regard to cooperating with support services and schools. Good cooperation between the home and school is important to the pupil, parents and the teacher, particularly for cases in which a child needs special support. Article 59 of the Salamanca Statement describes the need for adequate educational guidance and support for the parents of children with special educational needs: "The education of children with special educational needs is a shared task of parents and professionals. A positive attitude on the part of parents favours school and social integration. Parents need support in order to assume the role of a parent of a child with special needs. The role of families and parents could be enhanced by the provision of necessary information in simple and clear language (...) Both parents and teachers may need support and encouragement in learning to work together as equal partners." (UNESCO Salamanca Statement, 1994).

It is important for a satisfactory system to be in place for early assessment, follow-up and effective coordination, as well as to achieve a smooth transition between the various school levels and to ensure proper coordination and interaction between the various support functions. Parents may need information from a variety of services. Parents have particular information needs at times of transition. Various national policies are aimed at stimulating good cooperation between home, school and other services; in most cases, a coordinating agency is responsible for this task.

In Belgium, Pupil-Guidance Centres provide multidisciplinary guidance to schools, as well as to their students and families. These centres provide assistance for dealing with pupils with special (educational) needs. For parents, however, the services provided by these centres do not always have positive effects. Research reveals a barrier between Pupil-Guidance Centres and the parents of the pupils that they assist. First, it is assumed that many parents face a relatively high barrier with regard to approaching the centre. Second, the school always acts as an intermediary in the contact between the centre and the parents, thereby creating a lack of continuity in such contacts. The amount and kind of contact and support depends upon the means of the centre and the engagement of the consultant. The recommendations provided by the pupil-guidance centre (e.g. referral to special education) are not binding for the parents, although the manner in which the consultants guide the parents (e.g. confrontation or referral to other services that confirm their recommendations) can impart an obligatory character to the recommendation (Ruelens et al., 2001). The inclusion of pupils with

special educational needs requires intense cooperation between the pupil-guidance centre, the school, the child and other services. It is therefore necessary to make changes in the operations of these centres in order to improve the effectiveness of their parental guidance.

Norway has also experienced problems with providing guidance services to the parents of children with special educational needs. Many of these parents feel that they do not receive the help and support they need. They state that transitional stages are difficult and that the coordination between the various institutions often fails, thus leaving the parents to take on the role of coordinators themselves. Parents should be better informed regarding the rights of their children, the support services that are available and the networks in which it might be beneficial to participate. Initiatives are being taken to improve the facilitation services provided to the parents of pupils with special needs. Such efforts include the development of improved training for parents, the establishment of an immediate response team within Statped (the Norwegian Support System for Special Needs Education, the expert centre) and improvements in the coordination of services. In addition, the local educational and psychological counselling service operates a family centre, which offers guidance to parents and provides coordination between the various services (Norwegian Ministry of Education and Research, 2010-2011).

In England, the local authorities have the duty to provide information, advice and support to parents of children with special educational needs. These services are provided by staff members working independently of the special educational needs team, thus assuring the impartiality of the advice and information that they provide. Such separation also ensures that the people who provide these services are not involved in the decision-making process concerning special educational needs. These authorities can offer access to Independent Parental Supporters (IPs), who are volunteers trained to provide individual support to parents.

In the Netherlands, the free choice of the parents to enrol their children in mainstream or special schools requires appropriate and adequate parental guidance, as does the system of pupil-bound budgets. Such support can be provided by the school, the regional expertise centres and/or parent organisations. In addition, pupil-bound budgets can be used to engage the services of ambulatory counsellors. These counsellors can play an important role in guiding parents of children with special educational needs. Expertise centres are charged by law with the task of providing guidance to parents and their children throughout the educational careers of these children. Research indicates, however, that many parents are not satisfied with the guidance provided by these centres. Many have experienced a lack of support in the process of assessment and school choice. In addition, the centres differ widely in terms of how they provide guidance to parents. Parents could benefit greatly from having standard

access to a professional representative when talking and negotiating with schools (Walraven and Andriessen, 2004).

## **5. Family characteristics and choices regarding special education: An initial exploration**

In addition to its social network, the social class of the family plays an important role in the use of social services by children with special needs and their families. Research indicates that socio-economic class continues to affect access to social services. For example, people with higher levels of education have more skills, finances and time available than people in the lower social classes do for acquiring the necessary information and finding the way to the necessary services. On the one hand, therefore, both the dynamic factor of social networks and the more static factor of social class can affect access to and the utilisation of certain services. On the other hand, both of these factors are linked to each other: people in higher social classes often have wider social networks than do people in lower social classes, who tend to have only basic networks (e.g. consisting of the school, the pupil-guidance centre and the general practitioner).

It is important to note current evidence suggesting children with disabilities remain more likely to live in weaker socio-economic contexts. A marked class gradient exists, with a much higher prevalence of children with disabilities in the three lowest categories of social class (Roulstone and Prideaux, 2012). Several factors contribute to this situation. In general, the parents of children with disabilities tend to have educational levels that are lower than average (OECD, 2010). Lower-than-average education leads to lower-than-average work intensity, which is a second factor contributing to weaker socio-economic circumstances. Third, children with disabilities are disproportionately more likely to live in single-parent households (Sebrechts and Breda, 2012). Finally, these families are confronted with substantial costs. The presence of all of these factors calls for creative solutions related to social capital and opportunities for the families of children with disabilities. Policy-makers should consider the potential influence of these factors on the overall effectiveness of the measures introduced. It is important to focus on the family as an entity, as many of the disadvantages faced by families supporting children with disabilities can be attributed to their reduced capabilities, as well as to their reduced access to social and material resources. Support that is not 'disability-specific' is needed in order to enhance the ability of these families to improve the life chances of children with disabilities (Emerson et al., 2009). The effects of socio-economic factors are reflected in the utilisation of special needs education.

Although integrated education was established by law as an option in 1980, special schools remain the primary educational institution for

children with special educational needs in the Flemish community of Belgium. Currently, parents are the ones to take the initiative in choosing inclusion in mainstream schools. Because parents are usually the asking party, it is important to ensure that they have the necessary social skills. Parents and their children should shop around in order to find schools that are willing to enrol their children with special educational needs. Research indicates that, in contrast to education in special schools, the family bears most of the costs of integrated education. It is therefore important for them to have the capacity to organise the practical aspects of integrated education, as the support services surrounding children with special educational needs are not structurally included within the school. This places pressure on the capacities of the families (Vloeberghs, 2008; Schraepen, Lebeer and Vanpeperstraete, 2010). The importance and influence of the existing skills of families and their access to social and material resources are also reflected in the intake in special schools. Research states that 25% of all disadvantaged students under the age of 12 are in special schools, as compared to 5% of the population as a whole (Groenez, Van den Brande and Nicaise, 1999; Reulens et al., 2001). Further, table 3 shows the correlation of the mother’s educational level with the use of special schools. As the educational level of the mother increased, the use of a special school for a child with special educational needs decreased. Other analyses on the FFCS<sup>4</sup> dataset indicate that children with special needs of single parents make significantly more use of special schools than children with special needs in general.

Table 3. Correlation between mother’s educational level and the use of a certain education type for their child with special needs.

	Mother’s educational level			
	Primary education or lower (n=74)	Lower secondary education (n=95)	Higher secondary education (n=173)	Higher education (n=148)
Child with special needs in regular school	31,1%	40%	47,4%	54,7%
Child with special needs in special school	68,9%	60%	52,6%	45,3%
<b>P chi-square = 0.005</b>				

Data: FFCS dataset, Flemish community of Belgium, 2005

<sup>4</sup> The FFCS (Flemish Families and Care Survey) database was realised as part of the ‘Care for young children in Flanders’ project, which involved a large-scale survey of more than 2800 families in 2005.



The lower costs, the transport arrangements, the greater accessibility and the more individual approach are elements that can stimulate parents in deprived situations to steer their children into special schools in Flanders. In this way, the education system and policy favours the choice for education in special schools. Figures from England and the Netherlands also support the relationship between social class and school exclusion. In England, schools with high exclusion rates also have high rates of eligibility for free school meals (a commonly adopted proxy for pupils from low-income families) (Roulstone and Prideaux, 2012; Smeets, 2007).

In a two-track or multi-track approach to educational policy, the consequence of all of these factors is that families who are already empowered are the most likely to find their way to and use inclusive education services. Initiatives that reinforce the position of families with high social status while failing to strengthen the situations of families with weaker capacities cannot be considered as evidence that equal opportunities are being promoted.

## **6. Conclusion**

The purpose of this paper was to outline the formal educational system and parental guidance services in the Flemish part of Belgium and to compare these systems and services to those in Norway, England and the Netherlands. This paper is part of a broader doctoral thesis about the educational-choice processes of families of children with special educational needs. Before it is possible to conduct in-depth qualitative research to examine the educational 'career' (i.e. different phases and the family context) and its influences on school choice, it is necessary to create an outline of the existing educational systems in order to determine whether a choice is reasonable. The following paragraphs highlight several current gaps in the system.

Children with special needs and their parents may or may not be able to choose a particular type of education: segregated special education or inclusive education. This choice is influenced by a number of factors, including the country's education system, the parental guidance and the characteristics and competences of the family and its social network.

Differences between the four countries addressed in this study with regard to the percentage of children with special educational needs that are attending separate schools may reflect differences in policies, assessment procedures and funding arrangements rather than differences in the actual incidence of special educational needs. Norway has a one-track policy approach, in which the municipality bears responsibility for assessment and in which the funding system is based on principles of equivalency. This system thus offers little school choice, and inclusive education is the

norm. Nevertheless, there appears to be a tendency towards more educational exclusion of children with special educational needs, largely at the request of the parents seeking additional specialised education for their children. This specialised education is given in a private school, mostly funded by the parents themselves (oral conversation Statped Oslo, 2012). Although the Flemish part of Belgium has a clear two-track policy approach, it occupies a leading position with regard to educating pupils with special needs in segregated settings. It operates according to an input-based funding system in which the majority of the resources for special needs education is used within the separate system of special education. The school has a strong voice in assessing the educational needs of the child, and it can refuse to admit children with special educational needs by appealing on a lack of carrying capacity. The Netherlands is undergoing a transition towards a multi-track system. Although the current two-track policy and funding system favours special education, the new proposal for legislation (appropriate education) and the current pupil-bound budgets support inclusive education. As in Flanders, the school has a strong voice in the educational needs-assessment process. The system in England operates according to a 'multi-track policy approach', and the existence of special schools is preserved through the importance placed on parental choice, as many parents continue to value the concept of segregated schooling. The task of assessment is assigned to the local authorities, as is the allocation of funding. The Flemish part of Belgium is the only country that has no free specialised services for transporting children with special educational needs to mainstream schools (except when organised by the Flemish Agency for People with Disabilities). The lack of such services acts as a major disincentive for inclusive education. In Flanders and the Netherlands, a personal assistant can support the child in school (funded by the care system and child-oriented). In Norway and England, school assistants are available to support children with special needs (funded by the education system and school-oriented).

The distribution of incentives thus varies between the countries. The policy and funding systems of Flanders and the Netherlands favour separate special education, while those in Norway favour inclusive education and those in England favour both. In most cases, the money and resources go to the schools (whether mainstream or special), although they are sometimes directed to the child (e.g. the pupil-bound budget in the Netherlands, the personal assistance budgets in Flanders and the Netherlands and the cash benefit related to mobility in England).

As observed by Pescosolido, the use of care and education is not a single, one-time, yes/no decision; it fits within a pattern of practices. Coping with any disability-related problem is a social process that is managed through the contacts that individuals have within the community and with the formal treatment system. The latter system influences the social support system, and it is therefore an important actor. Translated to the

educational field, school choices take place in multiple phases, and they are influenced by past decisions, as well as by the formal education system. Parental-guidance centres constitute an important actor in this regard. Research in Flanders, Norway and the Netherlands indicates that parents tend to experience problems with the guidance provided by these centres, which appear to be highly professionalised and to operate according to school-oriented logic. Parents feel that they do not receive the support they need and that it requires considerable confidence and fortitude to act counter to the recommendations of these centres. There is clearly tension between the supply of the schools, the guidance services and the parents. As observed in England, guidance services that are independent of the assessment service and support provided by 'hands-on' experts seem to work better.

In addition to the dynamic factor of social networks, access to and the utilisation of certain services is affected by the more static factor of social class. In Flanders (as well as in England and the Netherlands), the complex education system, the abundant supply of special segregated schools and the fact that the support services surrounding children with special educational needs attending mainstream schools are not structurally included in the school work together to increase the likelihood that families in lower socio-economic classes will choose special schools. This situation will be examined in greater detail through in-depth qualitative research.

This paper describes that social and socio-economic factors are relevant within the educational field of children with special educational needs. We hypothesize however that the direction of the effect is determined by the country context factors. In Belgium and the Netherlands, the complexity of the inclusive education system and the disincentives within create social inequality in the system. In Norway (and also partly in England), the special education system seems to create social inequality as well informed parents claim more specialized education for their child with special educational needs. Is the focus mainly on acquiring knowledge and skills or on integration and social competences? The system factors, the socio-economic factors and the social factors influence the search for a proper education type for a child with special educational needs. Further research is necessary to define more in detail the factors that influence the school choice of parents of children with special needs.

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