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






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From policy to practice: a comparative study on inclusive and special education for students with SEND across Europe

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ABSTRACT

This comparative study investigates how seven European countries – Austria, Finland, Greece, Italy, Malta, Spain, and Switzerland – organise and implement educational systems to support students with special educational needs and/or disabilities. Using data collected through the CASES (Comparative Analysis of Special Education School systems) template, the paper offers a cross-national analysis of structural and curricular components of inclusive and special education from early childhood to upper secondary levels. Although all countries formally endorse international commitments to inclusive education under the United Nations Convention on the Rights of Persons with Disabilities, findings reveal a wide variation in how these commitments are interpreted and applied. The results highlight key differences in teaching models and curriculum adaptation across countries. These findings underscore the dynamic and context-dependent nature of inclusion, suggesting it should be understood not as a fixed model but as a continuum shaped by national priorities, policy frameworks, and resource allocation. The study contributes to the field by offering a structured and replicable approach to cross-country analysis, and by identifying both commonalities and divergences in inclusive and special education legislation, policy, and practice.


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Introduction

The Salamanca Statement (UNESCO 1994) was endorsed by 92 governments and 25 international organisations at the World Conference on Special Needs Education over thirty years ago. This foundational document emphasised the rights of all children, including those with special educational needs and/or disabilities (SEND), to receive quality education within the mainstream education system. It also marked a significant international shift towards inclusive education, advocating for children with SEND to be educated within mainstream classrooms rather than in segregated special education settings (Nilholm 2021). Another key policy document promoting the realisation of inclusion was the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD; United Nations 2006). The UN CRPD provided a rights-based approach to the rights of individuals with disabilities and emphasised education for all (Schwab 2020). Article 24 stated that individuals with disabilities have the right to education that is free from discrimination and provided on an equal basis at all levels. More recently, a guide was published by UNESCO (2017) on ensuring inclusion and equity in education, providing practical support for countries working towards the goals outlined in the 2030 Agenda for Sustainable Development (United Nations 2015). Adopted by the United Nations in 2015, this Agenda provides a global framework for addressing major social, economic, and environmental challenges through 17 Sustainable Development Goals (SDGs), including SDG 4, which calls for inclusive and equitable quality education and lifelong learning opportunities for all.

While the concept of inclusive education is widely discussed in international policy and academic literature, less attention has been paid to examining how inclusive principles are translated into national education policies and implemented in practice across different contexts. This limited focus can be attributed to a range of factors, including the different conceptualisations of inclusive education, the methodological challenges in operationalising it (Love and Horn 2021; Watkins and Meijer 2016), as well as the difficulty of collecting consistent data across countries and comparing systems that use different terminology, policy frameworks, and educational structures (D'Alessio and Watkins 2009; Weedon and Lezcano-Barbero 2021). Moreover, a recurring challenge in inclusive education research concerns the alignment between policy and practice. On the one hand, there is a widespread gap between these two domains: while policies may articulate strong commitments to inclusion, their translation into everyday practice in schools and classrooms is often inconsistent or incomplete (Watkins and Meijer 2016). Contributing factors include resource constraints, structural limitations (e.g. large class sizes), and a lack of adequate training for educators supporting students with SEND. On the other hand, the distinction between policy and practice is often blurred, with policy sometimes interpreted as evidence of implementation. This conflation limits our ability to critically assess how inclusion is implemented in different settings.

Available data on the implementation of inclusive education suggest that it is interpreted and applied differently across countries and over time (European Agency for Development in Special Needs Education 2003; Ramberg and Watkins 2020). While there are some studies examining the inclusive and special education systems of specific countries (for example, Anastasiou, Kauffman, and Di Nuovo 2015 for Italy and Price 2018 for Ethiopia), relatively few comparative studies have systematically

investigated their differences and similarities. For example, Powell (2016) offered a comparative analysis of special education in Germany and the USA, highlighting how different cultural, political, and institutional contexts shape the definition and implementation of inclusive education. Popov (2012) presented a comparative study of the structure of 100 national school systems, categorising them into six models based on the distribution of primary and secondary stages. This study highlighted key differences between the countries, especially between centralised and federal systems.

Finally, the European Agency for Special Needs and Inclusive Education (EASNIE) publishes shadow cross-country reports annually (European Agency for Special Needs and Inclusive Education 2025b). While the EASNIE reports offer valuable statistical data on the distribution of students with SEND across educational settings in Europe, they do not provide a comparative analysis of national policies and their implementation. In fact, although EASNIE collects quantitative and qualitative background information from participating countries, this information is presented in individual country reports rather than in the cross-country comparative reports. The most recent comparative overview of inclusive education dates back to 2003 (European Agency for Development in Special Needs Education 2003). This report categorised 29 national systems into single-track systems of mainstream education, dual-track systems of special and mainstream education, or multi-track approaches to inclusion, and highlighted significant variations in definitions, classification rates, and the use of segregated settings. Finally, a recent report by (Castro-Kemp et al. 2025) examined SEND policies across UK, Ireland, Finland, Flanders (Belgium), Fribourg (Switzerland), and three Australian states. The findings highlighted that education systems adopting needs-based and non-medical models supported by early intervention, cross-sector collaboration, and professional development tend to demonstrate more positive policy implementation and stakeholder experiences.

The aim of this study was to describe and compare how seven European countries organise their educational systems to support students with SEND across different educational levels. To structure this analysis, we operationalise inclusive and special education policy through three components: (1) educational settings, (2) teaching models, and (3) the educational curriculum. Based on this framework, the study addresses the following research questions:

- (1) How do different European countries organise their educational systems to support students with SEND in terms of educational settings, teaching models, and curriculum?
- (2) How is inclusive and special education legislation implemented through policy and practice in these countries, with respect to educational settings, teaching models, and the curriculum?

This study aims to contribute to a broader understanding of how inclusive education legislation is interpreted and implemented across different contexts by identifying patterns and divergences among seven European countries. As one of the few comparative studies focusing on the implementation of inclusive education, this paper seeks to address a substantial gap in the existing literature. In addition, the study aims to support

researchers, educators, and policymakers in critically reflecting on the inclusive legislation and policies in place within their own countries by drawing on comparative insights. Ultimately, this study aims to advance the understanding and implementation of inclusive education globally by supporting the development of more responsive and equitable policy and practice across diverse settings.

Methods

Countries included in the analysis

An expert sampling approach was used to select the countries included in the analysis. Austria, Finland, Greece, Italy, Malta, Spain, and Switzerland were chosen based on the availability of researchers within the EARLI SIG 15¹ network who contributed to this study on a voluntary basis (Figure 1).

All the included countries are committed to the 2030 Agenda for Sustainable Development (United Nations 2015). Although culturally and linguistically diverse, these countries share key commonalities: they are high-income nations with well-established public education systems and are part of the broader European education policy landscape. Among the countries included in this study, Switzerland and Spain have comparatively more decentralised systems of educational governance. In Switzerland, responsibility for education lies with the 26 cantons (the member states of the federal republic), each of which defines its own policies regarding students with SEND. Spain also



Figure 1. Map of the countries included in this study.

follows a decentralised model, where the autonomous communities hold substantial authority over the design and implementation of support for students with SEND.

Materials

To understand how inclusive education is implemented across the included countries, this study used the CASES (Comparative Analysis of Special Education School systems) template (Ranzato et al. 0000). This structured, context-sensitive tool was developed and piloted through an international collaboration to support cross-country analysis of special and inclusive education policies and their implementation (Ranzato et al. [under review](#)). The CASES template aims to provide detailed, up-to-date, and comparable information on the educational system supporting students with SEND. The CASES templates for all included countries are publicly available on the project's Open Science Framework webpage (Ranzato et al. 0000), in line with the principles of Open Science (Center for Open Science 2025).

While the CASES template consists of nine sections (refer to Ranzato et al. ([under review](#)) for a detailed description) this study draws on a subset of them corresponding to three components: educational settings, teaching models, and curriculum. Educational settings are categorised into two main approaches: (1) a predominantly mainstream setting with limited special schools, and (2) a dual setting, in which mainstream and special schools coexist. Teaching models are defined according to five categories, adapted from the co-teaching framework originally described by Cook and Friend (1995): (1) One teach, one assist – whole class; (2) One teach, one assist – targeted SEND support; (3) Small-group instruction within the classroom; (4) Teaching outside the regular classroom; and (5) Other, referring to any arrangement not captured by the preceding categories. Finally, the analysis of curriculum focuses on whether students with SEND follow the national curriculum or are provided with individualised adaptations. This component captures the extent to which curricular content and learning objectives are standardised or adapted to meet the needs of diverse learners. [Table 1](#) presents the

Table 1. Questions of the CASES template included in the current analysis.

Component	Questions
Educational setting	How is the national education system structured? What is the distribution of students with SEND across different educational settings?
Teaching models	What is the teaching model used in public mainstream schools to support students with SEND? 1. One teach, one assist - whole class 2. One teach, one assist - targeted SEND support 3. Small-group instruction within the classroom 4. Teaching outside the classroom 5. Other What is the teaching model used in special educational settings to support students with SEND? 1. One teach, one assist - whole class 2. One teach, one assist - targeted SEND support 3. Small-group instruction within the classroom 4. Teaching outside the classroom 5. Other
Educational curriculum	Do students with SEND attending mainstream schools follow the national curriculum or is there an individual adaptation to the content of the curriculum? Do students with SEND attending special educational settings follow an adapted version of the national curriculum compared to the mainstream setting?

relevant sections of the CASES template and the specific questions included in the current analysis.

The CASES templates for the countries included in this study were completed and reviewed between February 2024 and January 2025, and on average, this process took 7 months per country. Each template was completed by expert members of the EARLI SIG 15 group, either independently or with input from close collaborators. Once completed, each template was reviewed by an independent reviewer with a background in either research or professional practice and expertise in SEND and education, followed by a consensus meeting, when necessary, with the team who completed the template to resolve discrepancies, as described in Ranzato et al. ([under review](#)).

Contributors were provided with clear instructions on where to find relevant information and how to review the template (Ranzato et al. [under review](#)). They were instructed to rely primarily on the official websites of the European Agency for Special Needs and Inclusive Education ([2025a](#)) and Eurydice (European Union [2025](#)). Moreover, in instances where the required information was missing, outdated, or incomplete, contributors were asked to supplement the available information with reliable sources, such as national government documents or scientific publications. When completing the template, contributors were instructed to provide references for all the sources cited and to specify the access date. These measures were designed to standardise the data collection process, ensuring consistency, transparency, and reproducibility, and allowing end users to assess the currency of the reported information.

The data used for the current study is limited to information from the public school system, except for Malta, where aggregated data is provided for the public, church, and independent school sectors. The data is presented for the International Standard Classification of Education (ISCED) levels 0 to 3², which refer to early childhood (level 0), primary (level 1), lower secondary (level 2), and upper secondary education (level 3).

The quantitative data refer to the year 2021, as this was the most recent year available at the time of completing the CASES templates, based on the EASNIE website.

The authors worked in small groups (2–3 people), each assigned to a specific section of the CASES template. For each section, the groups conducted a cross-country analysis of all seven templates, drawing on the quantitative and/or qualitative data available within the template. Where further clarification was required, the groups consulted the references cited in the templates and, when necessary, contacted the authors of the template. The analytical process involved the systematic identification of similarities and differences across countries, collective discussion and interpretation of the data, and the production of section-specific synthesis reports. Throughout all phases of the process, methodological guidance and coordination support were provided by the lead authors (ER and NGM). The section-specific reports were subsequently integrated and harmonised by the lead authors to ensure internal consistency and methodological coherence and were then circulated among the full author team for collective review, discussion, and agreement prior to finalisation.

Results

We will first describe the general characteristics of the countries analysed and then present separate findings for each of the components under study. A summary table of the results is provided in Appendix.

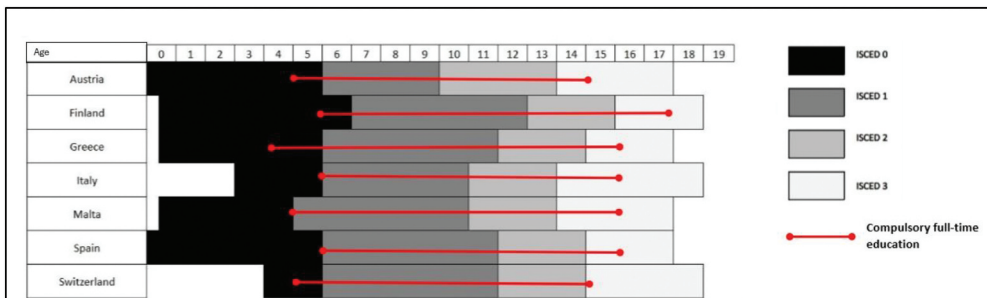


Figure 2. Structure of the formal educational programmes and duration of full-time compulsory education in each country. Data source: European Union (2025).

General characteristics of the included countries

Structure of the educational system for students with SEND

Figure 2 illustrates the educational system structure for each country. Five countries begin ISCED 0 between the ages of 0 and 1, except Italy (age 3) and Switzerland (age 4). The transition to primary education (ISCED 1) typically occurs at the age of 6, with Malta starting earlier (at age 5) and Finland later (at age 7). ISCED 2 begins earlier in Austria, Italy, and Malta (ages 10–11), and later in Finland (age 13). Compulsory education ranges from 10 to 12 years, beginning as early as age 4 (Greece) and ending as late as 18 (Finland). In Italy, Malta, and Spain, compulsory education starts at ISCED 1, making pre-primary education non-compulsory. All countries except Switzerland include part of upper secondary education (ISCED 3) in their compulsory schooling.

It is important to note that Figure 2 presents the compulsory school entry age and leaving age applicable to the general student population rather than specifically to students with SEND. Regulations for students with SEND are often more flexible, with numerous exceptions based on individual needs and contextual factors. For example, in Austria, decisions regarding the education of students with SEND are guided by the principle of ‘reasonableness for both the child and the caregiver’, which ensures that educational arrangements are appropriate for the student’s needs while also being feasible and manageable for the family and there is no legal entitlement in ISCED 0 (Federal Chancellery of Austria n.d). In Finland, students with SEND have the right to start pre-primary education earlier (age 5) if early support is considered beneficial, allowing for a more gradual transition into formal schooling (Ministry of Education and Culture, Finland n.d).

Distribution of students with SEND

Figure 3 shows the percentage of students with SEND as a proportion of the total student population in each of the seven countries examined, across ISCED levels 0 to 3 and inclusive of all school placement setting.

The percentage of students with an official SEND decision varies widely across the countries analysed in this study (Figure 3). Spain reports the highest percentage (14.7%), followed by Finland (11.1%) and Greece (10.2%). Malta, Italy and Switzerland fall within

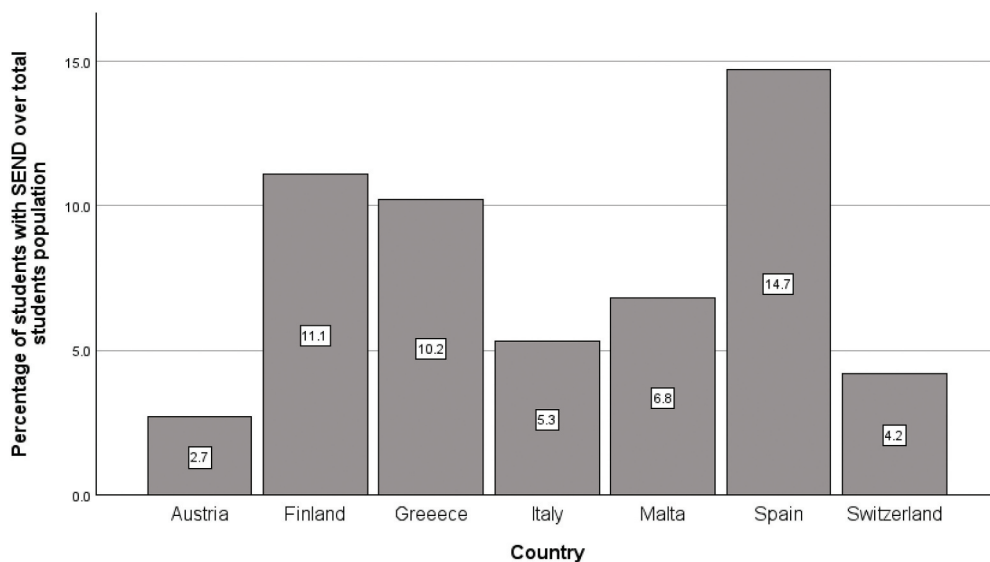


Figure 3. Percentage of students with send as a proportion of the student population across ISCED levels 0 to 3. Data source: Eurostat (2025) and European Agency for Special Needs and Inclusive Education (2025a).

the mid-range, with percentages between 4.2% and 6.8%. Austria has the lowest proportion of students with an official SEND decision, below three percentage points (2.7%).

The observed variations may reflect differences in national policy frameworks regulating the definition of SEND and/or in the assessment and identification criteria used, rather than underlying differences in the prevalence of special educational needs. In fact, across national contexts, the identification of SEND may be based on different categorical diagnostic models, functional assessment approaches, or eligibility criteria linked to entitlement to additional support, each of which shapes both the size and the composition of the population classified as having SEND. Moreover, the different allocation of resources to support these processes can further influence the size of this population. Also, in decentralised education systems, identification practices may vary across regional levels, further complicating the interpretation of aggregate national data. Hence, cross-national differences in the proportions of students identified with SEND should be interpreted with caution. A systematic comparative examination of assessment processes and identification criteria is beyond the scope of the present contribution and is addressed in a separate, ongoing study.

Table 2 presents for each country and across ISCED levels 0 to 3 the number of students with SEND and the number and proportion of students with SEND placed in special education settings. The proportion of students with SEND in mainstream settings at each ISCED level corresponds to the complementary percentage.

As shown in Table 2, the proportion of students with SEND educated in special school settings varies substantially across different educational levels and countries. In Malta, there is a noticeable trend towards increased exclusion from mainstream settings as students advance through the educational system. While no data are reported for early

Table 2. Population and proportion of students with send in special settings across ISCED levels 0–3 for each country.

	Level 0		Level 1		Level 2		Level 3	
	Population of students with SEND	Students with SEND in special setting (% over total population of students with SEND)	Population of students with SEND	Students with SEND in special setting (% over total population of students with SEND)	Population of students with SEND	Students with SEND in special setting (% over total population of students with SEND)	Population of students with SEND	Students with SEND in special setting (% over total population of students with SEND)
Austria	n/a	n/a	9,121	4,320 (47.4%)	15,726	6,830 (43.4%)	2,272	1,244 (54.8%)
Finland	n/a	n/a	32,868	1,779 (5.4%)	19,548	1,446 (7.4%)	37,164	n/a
Greece	4,883	725 (14.8%)	36,334	4,343 (11.9%)	29,477	3,835 (13.0%)	26,005	3,585 (13.8%)
Italy	32,314	143 (0.4%)	113,545	616 (0.6%)	76,226	176 (0.2%)	81,931	142 (0.2%)
Malta	356	n/a	1,713	95 (5.5%)	609	n/a	690	117 (17.0%)
Spain	85,828	n/a	313,316	41,521* (5.7%)*	253,234	41,521* (5.7%)*	51,814	6,005 (8.0%)
Switzerland	5,036	2,190 (43.5%)	23,730	9,910 (41.5%)	12,330	6,476 (52.5%)	n/a	n/a

Note: The percentage is calculated based on the total number of students within the population of students with SEND in each country at each ISCED level. n/a: data not available. *Spain provides a combined statistic for Levels 1 and 2. Data source: European Agency for Special Needs and Inclusive Education (2025a).

childhood education, 5.5% of students with SEND are included in special educational settings at the primary level, and the percentage rises to 17% at the upper secondary level. This suggests that Malta's approach to inclusion may become more selective as students progress through their education. Similar to Malta, Spain exhibits an upward trend in the number of students with SEND in special education settings, particularly at higher ISCED levels. However, the extent of this increase is comparatively smaller (from 5.7% to 8.0%). Austria and Switzerland show a greater reliance on special schools across all educational levels. In both countries, nearly half of the students with SEND are educated in special settings, with proportions exceeding 50% at ISCED levels 2 and 3, meaning that approximately one in every two students with SEND is placed outside mainstream education. In Greece, the proportion of students with SEND educated in special schools remains relatively consistent and low across all ISCED levels (between 12% and 14%), and there is no clear pattern of increased exclusion from mainstream settings as students advance through the educational system. A similar pattern is observed in Finland, where available data indicate that the percentage of students with SEND in special school settings at ISCED levels 1 and 2 remains stable, ranging between 6 and 8% points. Italy shows a comparable trend, but with substantially lower percentages (ranging from 0.2 to 0.6%).

Educational setting

Mainstream setting with limited special schools

The guiding principle of this approach is to include students with SEND within mainstream schools, ensuring their participation until the completion of compulsory education. Special schools exist, but their numbers are extremely limited across countries that adopt this model. They are also restricted to specific disabilities and are found only in certain regions. The countries adopting this approach are Italy, Finland, and Malta. As shown in [Table 2](#), in these countries, the number of students with SEND attending special schools is considerably lower than that attending mainstream education schools.

In Italy, the education system is characterised by a strong emphasis on inclusion. Students with SEND are enrolled in mainstream schools until the end of compulsory education. This means that, apart from specific exceptions, students with SEND share the school environment with their peers on a daily basis, thereby fostering socialisation, active participation, and overcoming cultural and social barriers. Information and data regarding special schools, which are restricted to specific disabilities and regions, are currently insufficient for a comprehensive evaluation. Parents ultimately decide whether to enrol their child in special education provision.

The Finnish system presents some distinct features, particularly in the pre-primary phase. In Finland, in some instances, pre-primary education for students with SEND is provided in special schools. The model is implemented flexibly in ISCED levels 1 and 2, where some students with SEND attend support classes within mainstream schools, while others are placed directly in special schools. This allows for tailoring educational interventions to individual needs while preserving the connection with the mainstream school environment.

In Malta, the education system for students with SEND employs a model that acknowledges the importance of inclusion while incorporating specialised facilities for those with complex and multiple disabilities. Students with conditions such as multi-sensory impairments, complex communication challenges, intellectual disabilities, significant social-emotional issues, autism spectrum disorder, or challenging behaviour are accommodated in special schools. These settings are designed to offer highly personalised and targeted support that meets the needs of students requiring specialised and intensive interventions and equipment that are not always available in mainstream settings.

Dual setting

This approach allows students with SEND to follow two distinct educational paths. On the one hand, they may attend mainstream schools or inclusive classes. Alternatively, if they require more intensive support, they may be placed in special schools. The countries adopting this approach are Austria, Greece, Spain, and Switzerland.

In Greece, educational legislation provides a flexible framework for students with SEND. They may attend mainstream schools or inclusive classes, which facilitate integration within the mainstream environment. If the necessary support cannot be provided in a mainstream setting, students may be placed in special schools. These are categorised by educational level and include early years facilities, primary and secondary schools, as well as specialised vocational schools. This structure enables education to be tailored to the individual needs and abilities of each student.

The Spanish system is characterised by a model which enables students with SEND to pursue distinct educational paths from those of mainstream schools. This solution is only indicated for those instances where the students' needs cannot be adequately met within the mainstream setting. It is important to emphasise that the implementation of this approach varies considerably across the different autonomous communities. This variability results in substantial differences in both the quality and delivery of educational support provided.

In Austria and Switzerland, the educational pathway for students with SEND follows a dual approach, with some similarities between the two countries. For ISCED levels 0 to 2, students may attend specialised educational facilities or follow alternative educational tracks distinct from those offered by mainstream schools. A common feature in both countries is the absence of specialised schools at ISCED level 3. Students with SEND who wish to complete an educational pathway leading to a qualification required for access to higher education must do so in a mainstream setting. This structure underscores a normative progression. While specialised interventions are available to address specific needs at the initial levels, the later stages emphasise the provision of a comprehensive education aimed at preparing the student for further education or entry into the workforce.

Overall, this analysis distinguishes between a mainstream setting with limited special schools and a dual setting where mainstream and special schools coexist more substantially. It should be noted, however, that even within countries, inclusive provision varies, depending on governance arrangements, local regulations, and the availability of specialist settings.

Teaching models

Teaching models in mainstream schools

In mainstream public schools, we find different teaching models depending on the ISCED level. For ISCED 0, all reviewed countries have two teachers in the classroom, where one educator leads the classroom and another educator either assists the whole class (Model 1) or only the student with SEND (Model 2). The latter appears to be the most common model. For ISCED 1 and 2, all included countries apply Model 2. The same model is generally expected to continue for ISCED 3. However, this is not always explicitly stated in education laws or policy documents, such as in Finland (European Agency for Special Needs and Inclusive Education 2025c). Nonetheless, the implementation of these models remains flexible, with potential variation across regions, particularly in countries such as Austria and Spain.

In addition to the teaching models mentioned above, the examined countries report using various teaching strategies, including co-teaching, Universal Design for Learning, open teaching, and cooperative learning. For example, in Greece, students with mild SEND can be supported by the classroom teacher under the guidance of inclusive education coordinators. Students with more severe SEND can have a second teacher supporting them in the classroom (Model 2) or may attend special education classrooms taught by a special needs teacher ('pull-out' programme; Model 4), where they receive support in language and mathematics in small groups for a few hours per day (Eurydice 2025). This 'pull-out' system is also commonly implemented in Malta (Muscat 2024). Similarly, in some communities in Spain, teachers implement a multi-tiered system of support (Jimerson, Burns, and Mathany VanDerheyden 2016), where students with SEND receive different levels of support depending on their needs, ranging from school resources (Tier 1) to individual intervention or curriculum adaptation (Tier 4). Classroom interventions (Tier 2) and small group interventions (Tier 3) fall in between.

Finally, across countries, schools provide services as needed, such as sign language interpreters for students who are deaf or hard of hearing.

Teaching models in special schools

In special school settings, there are many similarities in teaching models across countries at ISCED levels 1 and 2, with the greatest variation at ISCED levels 0 and 3.

At ISCED level 0, Austria has no national-level guidance of how early childhood education groups should be organised, as these decisions are made independently by municipalities. In contrast, Finland, Malta, and Switzerland report the use of all four teaching models to support students with SEND. In Finland, support is provided within the child's Early Childhood Education and Care or family daycare groups through diverse and flexible arrangements. In Malta, one teacher holds primary responsibility for the classroom, while Learning Support Educators provide additional assistance (Model 2). Model 3 (which involves small-group instruction within the classroom) is the most common teaching model across the countries, and is the only model used in Greece and Italy. However, this model is not used in Spain, where the other three models are implemented instead.

The teaching models implemented at ISCED levels 1 and 2 are very similar across all countries. All four teaching models are used in Austria, Finland, Malta, and Switzerland. In Austria, a second teacher must be provided for students with SEND at ISCED 2. As at ISCED 0, Spain uses all models except Model 3. In contrast, this is the only model used in Greece and Italy to support students with SEND.

At ISCED 3, Greece, Italy, Malta, and Spain employ similar teaching models to those used at ISCED levels 1 and 2. However, in Austria, Finland, and Switzerland, there are some differences between ISCED level 3 and earlier ISCED levels. In Austria, there are no special schools at this level. In Finland, special schools exist only within vocational education at this level and not in upper secondary education. In Switzerland, provision at ISCED level 3 most commonly follows Model 4, which involves teaching outside the classroom.

Educational curriculum

Educational curriculum in mainstream schools

Finland, Greece, Italy, Spain, and Switzerland use the national curriculum as a starting point, ensuring that students with SEND follow the national educational framework with adaptations. Malta adopts a flexible approach that allows modification or adaptation to the national curriculum to support the needs of students with SEND. In contrast, Austria is less anchored to the national curriculum and dispenses students with specific types of SEND (e.g. intellectual disability) from certain subjects (e.g. language, mathematics, foreign language). Depending on the ISCED level, these students may also receive targeted support, such as language training.

Personalised adaptations and additional support are provided across all countries, though the form and intensity of this support vary. To tailor education to individual needs, Greece, Italy, Malta, and Switzerland implement Individual Education Plans (IEPs). Furthermore, curriculum adaptations are made based on each student's specific needs, with the level of modification depending on the ISCED level and their abilities and challenges, from minor modifications (e.g. additional time, work in small groups, pre-teaching) to comprehensive curriculum changes (e.g. modifications of the prescriptive elements of the mainstream curriculum).

Some differences were identified across the included countries. Austria offers specialised curricula for different disabilities (e.g. blindness, deafness). Finland provides all students with two different syllabi: one based on academic subjects, and another focused on functional domains. In addition, more personalised curricula are developed and implemented when needed. For example, students with severe intellectual disability may follow specific programmes targeting motor skills, social skills, cognitive skills, language and communication skills, or daily living skills. Italy and Greece try to resemble the national curriculum at all ISCED levels, integrating it with specialised support (e.g. parallel support, integration classes, pre-teaching, re-teaching) and personalisation. In Italy, since ISCED 3, the curriculum can be differentiated from the national one according to the student's needs. Malta provides diverse learning programmes and individualised educational plans in the mainstream schools and, like Austria, integrates them with curricular exemptions (e.g. reduction of the number of subjects) or targeted support (e.g. psychological or language support, additional time) according to students' needs. Spain provides substantial individual adaptations for students with significant learning

needs, ranging from modifications of the curriculum objectives to changes in subject areas and evaluation criteria. In Switzerland the extent and type of adaptations can vary between different ISCED levels, with primary education often requiring broader support and secondary education involving more targeted interventions.

Educational curriculum in special schools

All the analysed countries adapt their national curricula to accommodate the individual needs and abilities of students with SEND in the special school setting. However, the level of adaptation varies across countries depending on several factors, such as the type of disability and the type of special school. While some countries allow for greater levels of adaptation, others expect the national curriculum to be followed more strictly. In Finland, if a student struggles, an individualised syllabus can be developed. Similarly, in Austria, students with SEND generally follow an adapted version of the national curriculum. By contrast, in Switzerland, there is no official curriculum for special education settings; instead, requirements are tailored to each student's individual needs. IEPs are commonly developed and implemented to support students with SEND in this setting. Additionally, there is a shared focus on teaching fundamental skills, such as reading, writing, and mathematics, as well as essential competencies for independence and social skills.

Discussion

While reports often include valuable statistical data on the distribution of students with SEND across educational settings in Europe, they do not provide a comparative analysis of national policies and their implementation. The aim of this study was to describe and compare how seven European countries define and organise their educational systems to support students with SEND across different educational levels. To structure this analysis, we operationalised inclusive and special education policy through three components: (1) educational settings, (2) teaching models, and (3) the educational curriculum. Using the CASES templates, we found that the educational systems supporting students with SEND across Austria, Finland, Greece, Italy, Malta, Spain, and Switzerland reflect varied approaches to how inclusive education is defined and applied, showing clear differences in how countries respond to students' right to inclusive education (United Nations 2006). Our findings suggest that the organisation of inclusive and special education differs across countries in all these components, as well as how these components are combined – that is, choices made for one component (e.g. type of educational setting) do not necessarily correspond to predictable categories in the others (e.g. teaching models or curriculum). This highlights that inclusive education does not follow a uniform trajectory but rather emerges as a complex and context-dependent process. This is consistent with previous research documenting differences between countries in how inclusive education is interpreted and implemented (Ramberg and Watkins 2020).

When looking at how inclusive and special education is defined and organised, our findings show the use of a range of combination of educational settings and teaching models, reflecting different approaches to ensuring access and participation for students with SEND. In relation to the educational setting, our findings highlight a spectrum, ranging from systems that emphasise education within mainstream schools to those that rely more heavily on specialised educational tracks.

The European Agency for Special Needs and Inclusive Education (2019) frames special schools as complementary resources within a continuum of provision supporting inclusive education. This study suggests that countries differentially implement this approach, although it is important to emphasise that these findings are drawn exclusively from analyses of policy documentation and do not provide evidence regarding implementation processes or educational practice. Future research could examine their implementation through the involvement of teachers and families.

Within this spectrum, Italy appears as the one relying more on mainstream schools (where less than 1% of students with SEND attend special schools at any level), followed by Finland, Malta, Greece, Spain, Switzerland, and Austria (where the proportion of students with SEND educated in special settings approaches or exceeds 50% at several educational levels). These differences raise important questions about equity as defined in UNESCO, UNESCO Institute for Statistics and (2018), as students with similar needs may experience very different educational pathways depending on their national context. The pattern of teaching models across the included countries suggests a shared approach of how inclusion is enacted in mainstream schools, where teaching is consistently organised around two teachers in the classroom, where one educator leads the classroom and another educator either assists the whole class (Model 1) or only the student with SEND (Model 2). In special schools, by contrast, all four teaching models are used (i.e. those used in mainstream settings, small-groups, and teaching outside the classroom), but with substantial variation between countries. This uneven application indicates that the role of special schools, and the forms of teaching support they offer, are conceived differently across contexts. Finally, the duration of compulsory schooling ranges from 10 to 12 years across the countries examined. While this difference may seem relatively small, it has important implications for students with SEND, as access to formal support is often tied to the compulsory phase.

Our findings highlight a common issue across all countries: gaps in provision at the pre-primary (ISCED level 0) and the upper secondary levels (ISCED level 3), where implementing inclusive practices remains particularly challenging. These are pivotal educational stages – early childhood for laying the foundations of learning and inclusion, and upper secondary for preparing transitions into adulthood, further education, and employment. The recurrence of these gaps highlights how current system structures fall short of ensuring continuous inclusion and underscores the need for coordinated efforts to extend support both before and beyond compulsory schooling. This need is particularly pressing at the upper secondary level, where students with SEND may face limited educational and employment pathways, and the transition to mainstream settings can be especially challenging for those requiring continued specialised support (Grigal, Hart, and Migliore 2011). Policy makers across all countries examined in this paper should recognise these gaps so that appropriate funding is made available at all stages in the academic journey of children and young people with SEND.

Beyond how inclusive and special education is defined and organised at the legislative and policy level, our findings highlight marked differences in its implementation, particularly in relation to teaching models and the extent to which the national curriculum is adapted for students with SEND. Considerable variation was observed at the level of individual schools, shaped by factors such as the complexity of students' needs, type of disability, ISCED level, school type, and available resources. Such variation suggests that

even when inclusive intentions are widely shared, implementation remains highly context dependent. The level of educational governance appears to play a particularly influential role, with greater variability evident in systems characterised by decentralised decision-making. Future research describing and comparing regional contexts could provide a more fine-grained understanding of how inclusion is enacted in practice. Nevertheless, this study advances our understanding of how inclusive education is shaped at the national level across different systems and offers a foundation for next steps.

Limitations

The authors identified limitations in the reliability of some data reported in the CASES templates, as information drawn from government documents was sometimes incomplete or biased towards favourable reporting. Also, the reliance on single-source data limited the ability to cross-check information. This limitation should be considered when interpreting the findings. However, this issue reflects broader challenges in data availability and consistency, which have already been acknowledged in previous literature (D'Alessio and Watkins 2009; Weedon and Lezcano-Barbero 2021), rather than limitations of the tool used to conduct the cross-country analysis. Another limitation of this study is that the information included in the CASES templates is time sensitive, reflecting national policies and practices as they existed at the point of data collection. As education systems continue to evolve, some details may become outdated and will require updating to remain relevant. However, this also represents a major strength: the dataset created to complete this study provides a valuable longitudinal resource, capturing how systems evolved and enabling future analyses of change across countries. Finally, the choice of the countries included in this study was determined by the availability of researchers within the EARLI SIG 15 network who volunteered to contribute. As a result, some regions of Europe are underrepresented, limiting the ability to provide a fully comprehensive account of inclusive education across the continent. Nevertheless, as a first application of the CASES template, this study demonstrates its feasibility and value for cross-country analysis. Future work can build on this foundation by extending the approach to a wider and more diverse range of countries.

Conclusion

This study compared educational legislation, policy, and practice supporting students with SEND across seven European countries and highlighted the dynamic and context-dependent nature of inclusion. It provides an important starting point for mapping the support available for students with SEND in these countries and highlights both existing gaps and the need for continued comparative work in this area. It also opens the way for future work that identifies best practices in inclusive education and examines the implications of adopting diverse inclusive and special system models to support students with SEND. As the CASES template is open and accessible, future studies should include additional countries as well as updates on the included ones. This would enhance our understanding of the diverse policies and practices that enable or hinder the effective

inclusion of students with SEND, offering valuable lessons for cross-country learning and informing the development of more equitable education systems.

Notes

1. EARLI SIG15 is an international scientific research group with a focus on research on education and special educational needs (European Association for Research on Learning and Instruction 2025). This interest group is part of the EARLI organisation, which started in 1985 and promotes and supports research actions and networking between international researchers working in the field of learning and instruction.
2. ISCED is the result of an international agreement which was formally adopted by the General Conference of UNESCO (2012). The ISCED classification ranges from level 0 (early childhood education) to level 8 (doctoral or equivalent level) (UNESCO 2012).

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Author's contribution

Conceptualisation, Methodology, and Project administration: ER, NGM. Formal analysis: NB, BDL, RE, TL, LM, CP, FP, TMS, KS, ZS, MT, ER. Visualisation: ER. Writing – Original Draft and Review and Editing: all authors.

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