

## **A Small-Scale Comparative Study Inclusive Elementary School in Japan and Indonesia**

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**Abstract:** This research examines the implementation of inclusive education services in elementary schools in Japan and Indonesia using an extended case study method. Data were collected through policy analysis, in-depth interviews with school leaders, and classroom observations, then analyzed using thematic analysis to identify key patterns. Results reveals that school leadership and management play a crucial role in sustaining inclusive education implementation. In both countries school leaders leverage their knowledge of inclusive education policies, special needs education, teacher training support, and school management to ensure effectivity of implementation. This study highlights the importance of leadership-driven policies and professional development in strengthening inclusive education services, offering insights for educators, policymakers, and researchers.

**Keywords:** inclusive education; school management; elementary school; case study.

### **INTRODUCTION**

The United Nations Sustainable Development Goal (SDG) 4 aims to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all. Specifically, Target 4.5 of SDG 4 emphasizes “equal access to all levels of education, including for persons with disabilities” (UNICEF, n.d.). Inclusive education has been a critical global aim of education research, policy, and practice (Knight & Crick, 2022). The United Nations (UN) acknowledges inclusive education as a crucial aspect of the practice of Article 24 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), which explicitly address with education for persons with disabilities. Accordingly, the United Nations Sustainable Development Goal (SDG) for Education, Historically, the Salamanca Statement in 1994 initiated inclusion as a system in which all persons with disabilities can participate in all aspects of life within the mainstream school and provide them access to the same educational experience in an inclusive society (Armstrong et al., 2010).

Inclusion can be seen as an education reform program based on the belief that education is a fundamental human right and the foundation for society. SDG 4 requires renewed engagement with contested conceptual problems associated with inclusion and equity in education. The increasing number of countries promoting regulations to facilitate inclusive education reflects a significant recognition of the importance of addressing students' special educational needs (SEN) in the communities. Within and across these regions, there are numerous interpretations of inclusive education and a significant amount of variability in practice (Florian, 2019). As a result, school systems worldwide are adapting their practices to meet these community demands. Inclusive education requires implementing various components to address the diverse needs within schools effectively. Ainscow (2005) identifies several indicators that need to be considered, including the development of classroom practices, school development, teacher development, leadership practices, and systemic changes, particularly concerning the role of school districts. By emphasizing these specific areas, educational institutions could offer an ideal environment that promotes the inclusion of all students.

In exploring the implementation of inclusive education services, distinctions between Japan and Indonesia appear due to their unique histories and the influence of their ideology and philosophies. Comparative studies offer insights into the concept and development of educational systems. This field of research in comparative and international education not only presents new perspectives of reference but also challenges established national narratives, allowing the detailed evaluation of the current educational situation in each specific context (Powell, 2014). The inclusive education programs in Japan and Indonesia demonstrate how similar policy demands may lead to different methods and results (McNess, 2004). The focus is directed toward local conditions and facets to respond to transnational policy ideas and ideologies (Wahlström et al., 2018). Understanding these variations contributes to a more holistic comprehension of the challenges and opportunities of implementing inclusive education practices in diverse cultural and educational contexts. Analyzing the experiences in Japan and Indonesia provides valuable insights that may be obtained and applied to improve inclusive education services in both countries.

### **Definition of Inclusive Education**

Inclusive education is a systematic approach that seeks to meet all students' requirements by minimizing the obstacles in the environment. It involves ensuring that children attend their local school at an age-appropriate level with personalized support tailored to their needs (UNICEF, 2015). Chennat (2019) defines inclusive education as a practice that considers an individual's interests while considering the available material, financial, and human resources within the context. The fundamental transformation required to realize inclusive education systems is justified by the belief that developing an inclusive society requires an inclusive education system (Powell, 2014).

According to Ainscow (2005), inclusive education is a multifaceted concept. It is a process that embraces differences and fosters a learning environment where diversity is cherished, and lessons are drawn from these differences. It involves proactively identifying and removing barriers by collecting and analyzing information from various sources to improve policy and practice. Inclusion emphasizes the importance of every student, participation, and achievement. Furthermore, this concept highlights groups of learners vulnerable to marginalization, exclusion, or underachievement, ensuring they are not neglected. This holistic approach ensures a more inclusive and equitable education system for all.

Inclusion in education encompasses various aspects, from a comprehensive approach to Inclusion. This process aims to bring all students together in one classroom and school, regardless of their strengths and weaknesses in any domain, to utilize each student's capabilities. "It recognizes and appreciates the diversity within a group, valuing and respecting each individual for their unique worth. "Moreover, inclusion strives to ensure that diverse learners, including those with disabilities, different interests, and varied learning styles, receive instruction through teaching and learning strategies adapted to their needs.

Inclusion holds significant meaning for students with disabilities. It involves participating in school activities in the same way as their students with disabilities, fostering a sense of equality and inclusiveness. Within an inclusive school climate, students with disabilities have the opportunity to develop a strong sense of personal belonging and achievement. They would feel valued, recognized, and respected for their unique abilities and contributions. This inclusive environment cultivates empathy and sensitivity among students without disabilities, fostering an appreciation for diversity and differences among their peers. Inclusion ultimately ensures that children with disabilities are provided with

equal opportunities to thrive and significantly improve the diversity of the school community.

### **Inclusive Education Policy in Global Context**

In the Global Inclusive Education Policy context, the Salamanca Statement, and the United Nations' Sustainable Development Goal 4 (SDG 4) highlighted a collective commitment to implementing inclusive education and ensuring high-quality education globally. Implementing these principles in Japan and Indonesia showcases distinct perspectives, and their comparable policy stipulations lead to various approaches and results. Salamanca significantly advanced inclusive education at various levels, emphasizing the importance of training teachers and collaborating with parents, NGOs, and community agencies. The Salamanca Framework and UNESCO's initiatives have influenced the adoption inclusive education policies worldwide.

The Salamanca Statement's advocacy of inclusive education has gained widespread acclaim, igniting discussions about the function of a parallel Special Needs Education (SEN) system in addressing the challenge of providing equitable education for diverse learning students. In the specific field of Special Needs Education (SNE), goals encompass short-term targets of integrating students into mainstream settings and longer-term objectives of promoting equity and inclusion while respecting the diverse educational needs of individual students. According to the OECD (in Brussino, 2020), the regulatory framework governs the inclusion of students with Special Educational Needs (SEN) in educational systems by involving national legislation and frameworks in all OECD member countries. All the efforts align with the principles outlined in the Salamanca Statement and the UN Convention on the Rights of Persons with Disabilities (CRPD).

The language and definitions of inclusive education vary based on local contexts and the terminology used by international experts (Armstrong et al., 2010; Sari et al., 2022), emphasizing the importance of social learning processes within specific contexts. Countries may have different policies and arrangements of Special Educational Needs (SEN) policies, impacting the effectiveness of system- and school-level approaches to inclusive education practices. The United Nations Sustainable Development Goal (SDG) 4, focusing on inclusive and equitable quality education, highlights the significance of evidence-based strategies, experimentation, and collaboration within and between schools and communities. SDG 4, notably Target 4.5.1, conceptualized as plural right, identifies 'inclusion' as a solution for the marginalized, requiring nation-state inclusive and equitable quality education and promoting lifelong learning opportunities for all (Wulff, 2020).

### **The Role of Inclusive School**

Schools catering to young children are designed and constructed to ensure accessibility for all students. However, students with special needs require additional support to participate fully in the educational system. This support is often organized through special needs education services, which are tailored to meet the diverse needs of students across different levels of requirements. Inclusive education plays a crucial role in the positive development of children with disabilities, acknowledging their unique abilities and providing them with equal opportunities. However, it is essential to recognize that children with disabilities form a highly heterogeneous group, and the continuum of educational settings should be considered to determine the most suitable placement based on their individual needs (Chennat, 2019).

For prioritizing inclusive systems, it is necessary to adopt inclusive education as a fundamental policy. In addition to fostering inclusive philosophies and practices within educational institutions, there is a need to raise awareness and sensitize employers and employees to ensure the inclusion of individuals with disabilities at all levels. The current philosophy of educating children with and without disabilities in regular schools marks a significant milestone in the history of inclusive education. While integration was an initial step in this direction, it often resulted in inadequate arrangements for children with disabilities and brought about minimal overall change (Armstrong et al., 2010).

Constantly facing the intricate realities of their students may instigate a subtle yet inherent inclination within school communities towards more inclusive understanding and practices (Ainscow et al., 2006). The relationships between schools and the local and national policy environment are intricate, given that policy interpretation relies on school communities, acting as a resource for them to clarify and elaborate their understanding of the educational task. Schools must project a positive image of children with disabilities, ensuring their valued integration among peers. The underlying principle is that authorities should adopt policies to enable students with disabilities to become more self-reliant and integrated into society.

Achieving inclusive education requires more than accessibility, it demands equitable resources allocation, curriculum adaptation, and teacher training (Wulff, 2020). To attain inclusive education, providing support to teaching staff is crucial, and special needs education training should be incorporated not only into specialization. However many systems will separate specialized training from mainstream education, leading to inconsistencies (Rosyidi, 2023). In Japan, structured teacher training enhances inclusive practices, while Indonesia struggles with teacher preparedness (Ou et al., 2024; Rosyidi, 2023). Moreover, school leadership plays a key role in sustaining inclusive education through policy enforcement, teacher training, and resource management (Naeemy & Yoneda, 2024). Strengthening these areas is crucial for achieving truly concept of inclusive learning environments.

## **METHOD**

### **Research Design**

This research focused on findings from a small-scale comparative study comparing the implementation of inclusive education services in elementary schools in Japan and Indonesia. Ainscow (2005) stated that research findings about inclusive school development have to be seen concerning broader factors that either facilitate or hinder progress and lead to sustainable development. An extended case study design suggested by McNess (2004) is the methodology that best suits this research. An expanded case study approach to link the macro-concerns of both national policies with a micro-analysis of schools that implement inclusive education services. In this research methodology, the research design combines a cross-cultural analysis of past and present national policy findings from related research, empirical data drawn from multi-case studies, and a process of constant, iterative reflection supported by an ongoing relationship with key informants (McNess, 2004).

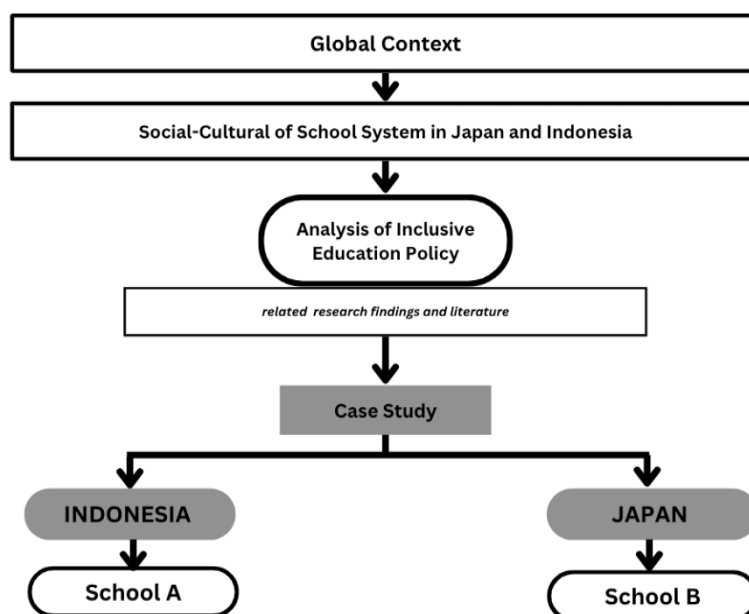


Figure 1. An Extended Case Study Design

One of the roles of comparative methodologies is to conduct research focusing on schools as the unit of analysis, thereby examining the specific communities that comprise these schools (Bray et al., 2014). This approach allows for a deeper understanding of the factors and dynamics within each school community. The analysis of two schools from different nations using a cross-case study identifies similarities and differences in the variables that impact the implementation of educational policies (Bray et al., 2014). This comparison highlights the importance of considering the contextual differences between the units. Furthermore, a nationwide comparison of schools within a centralized education system demonstrates that centralization can accommodate diversity and pluralism. These findings emphasize the significance of understanding the specific contexts in which schools operate and the various factors that influence their policies and practices.

### Participant

The selection criteria for schools participating emphasizes their commitment to implementing inclusive education services at the elementary school level. Two distinct regions were chosen for this study: Kato, Hyogo, Japan, and Metro, Lampung, Indonesia. Researchers can gain insights into each school's characteristics and challenges by studying schools individually, contributing to a more comprehensive understanding of inclusive education practices. Data were collected between August and November 2023.

In Kato Hyogo, Japan, schools were identified based on their focus on inclusive education practices. The criterion included their experiences accommodating students with special educational needs (SEN) in regular classrooms—the school with established programs, resources, and dedication to accessibility for students in an inclusive setting. Similarly, schools in Metro Lampung, Indonesia, were selected based on their proactive stance toward inclusive education. The criteria included schools that actively included children with special educational needs (SEN), demonstrated an inclusive teaching style, and offered crucial support systems.

## Data Collection

Comparative studies in education have traditionally focused on examining educational phenomena in different locations. Regarding epistemology, comparative research can be classified into two main directions: positivism and interpretivism. McNess (2004) employed an interpretative approach in her research design, explicitly utilizing an extended case study design. Interpretive studies aim to understand educational phenomena better (Bray et al., 2014). These approaches heavily rely on naturalistic methods such as interviews, observation, and analysis of existing texts (Khakpour, 2012). Through these methods, researchers can discover facts and issues related to educational systems in other countries. Furthermore, comparative studies can contribute to establishing and developing cultural relationships between different countries, promoting peace and friendship among people, and collecting the latest information about education to identify common problems and find solutions.

**Table 1. The Relationship between the Micro-Meso-Macro levels and the Inputs-Processes-Outcomes Model**

Level	Inputs	Processes	Outcomes
Macro	Policy	Climate	Participation
	Staff PD & Teacher	School Practice	Student Achievement
	Resources & Finances	Collaboration & Shared Responsibility	Post-School Options
	Leadership	Role of Special Schools	
Meso	Policy	Climate	Participation
	Staff PD & Teacher	School Practice	Student Achievement
	Resources & Finances	Classroom Practice	Post-School Options
	Leadership	Collaboration & Shared Responsibility	
Micro	Curriculum	Role of Special Schools	
	Resources & Finances	Climate	Participation
	Leadership	School Practice	Student Achievement
	Curriculum	Collaboration & Shared Responsibility	Post-School Options
		Support to Individuals	

Loerman (Loerman, 2014; Loerman et al., 2014) developed indicators for measuring inclusive education outcomes that were used for this research. Loerman et al. (2014) propose that the assessment of effective inclusive education could be diversified based on inputs, processes, and results. It may also be conceptualized from a national perspective (macro) at the level of school practices (meso) and classroom practices (micro). (Loerman et al., 2014). Relevant disciplines would like to connect concept of the macro, meso, and micro level to understanding comprehensive landscape of the current reforms of special needs education and inclusive education services and the consequences for educational achievement, equity, and attainment (Powell, 2014). These approaches focus on engaging with various form of evidence that would create space and encourage discussion in implementation of inclusive education and practices in the school.

The interview for this research focuses on the leadership role in inclusive schools. The first author and interpreter performed the interviews individually using a semi-structured interview guide using 16 indicators by Melloy et al. (2022). These indicators cover areas such as understanding special needs education laws, hiring and supporting special needs teachers, implementing Individual Educational Plans (IEPs), managing inclusive schools, implementing co-teaching models, curriculum, and assessment related to special needs

education, behavior interventions, disciplining students with disabilities, supervising service providers and paraprofessionals, working with school counselors, and understanding the Multi-tiered System of Support (MTSS). These indicators provide a comprehensive understanding of the roles and responsibilities of school leaders in inclusive education. Both interviews lasted about 30 – 60 minutes. After completing the interviews, the first author completed the transcription within three days, and all authors discussed and analyzed the transcripts of both school leader's experiences.

During the research, classroom observations were included in both schools, focusing on the teaching and processes in an inclusive setting. Special attention was given to understanding how students with special educational needs (SEN) were integrated and supported in the regular classroom setting. This observational approach allowed for a comprehensive understanding of the strategies employed by teachers to facilitate inclusive education practices in both countries. The observation indicators developed by Villa & Thousand (2005) focused on the Universal Design Process as a systematic decision-making method in a differentiation setting, utilized in an inclusive education classroom setting. The indicator focused on facts about the student, the learning content, the teaching process, and the teaching product. The classroom observations were conducted during the school visits in both schools and lasted about 15 – 30 minutes. The subject lessons and grades of the class were picked by the availability of Special Educational Needs (SEN) students in the classroom. The scale rating was used to assist the researchers in observing of teaching and process in inclusive teaching. The scale was using for this observation is amount of use, which the interpretation of the score is as follows; 1 (Never Use), 2 (almost never), 3 (Sometimes), 4 (Almost Every Time), and 5 (Frequently Use). The last part of the instrument requires the observer to write general comments about what transpired during observations that was not captured by the instrument items. Each of indicators that were listed would be checked with formula.

$$\text{Indicator} : \frac{X \text{ (checklisted)}}{\text{All scale in Indicator}} \times 100\% = \dots\%$$

**Figure 2. Formula of scoring in Classroom Observation Checklist**

### **Reliability and Validity Analysis**

According to Yin (in Quintão et al. (2020)), the case of study was used for two primary purposes: exploratory and descriptive perspective. The descriptive approach intended to help understand the events comprehensively. The analysis of the cases identifies patterns, providing elements for constructing hypotheses and the development of theories in the research. In some situations, multiple analyses are appropriate, often with additional units of analysis as sub-sets of primary units. Several indicators needed to be analyzed in the same case as an extended case study. Based on Judd (in Taylor et al., (2009a)), most empirical social research relies heavily upon four tests: construct validity, internal validity, external validity, and reliability. In this research, all of them were included in the analysis process.

Construct validity establishes correct operational measures by utilizing multiple sources of evidence, creating chains of evidence, and reviewing draft case results with crucial participants (Taylor et al., 2009). In this research, multiple cases involved several participants: school leaders, teachers, in-school practices (meso), and classroom practices (micro). This intention is to have multiple perspectives on implementing inclusive education policies in schools (macro). In the triangulation process, Fusch (in Quintão et al., (2020)) refers to the importance of using different data sources from different evaluators.

Internal validity is establishing credible causal relationships that would assure the researcher for acceptable results based on the research design methodologies. It is important in the explanatory case studies when researcher is looking to understand and demonstrate cause- and effect of the variables relationships in the research. This research established by internal validity between policymakers and schools to understand the impact of the school leaders' interpretations in school practices (in meso position) and classroom practices (in micro position).

External validity establishes the domain where results may be generalized, which strongly depends on the established cases and the protocol. This practice ensures external validity, including presenting the reasons and context for the case study selection and identifying patterns that allow the subsequent generalization of the results obtained. In this research, two case studies were compared in two different countries, Japan and Indonesia. The focus is on understanding comparative studies that schools offer based on their specificities from socio-cultural perspectives in Japan and Indonesia.

Reliability means the operational procedures can be repeated to produce the same results. This process included some techniques for recording the interviews, coding the responses, or employing analytical data analysis methods. This research used school leaders' interviews and classroom observations in Japan and Indonesia for data collection. The thematic analysis based on the conceptual framework identified similar and contradictory themes between the two case studies.

## **FINDING AND DISCUSSION**

### **Findings**

#### ***School Leadership Perspectives in Inclusive Educational Environments***

##### ***School Involvement***

According to findings from an OECD investigation into school leadership policies and practices, a recommended policy framework aims to enhance school leadership by offering clear role definitions for school leaders, concentrating on improving school outcomes (Brussino, 2020). Unlike the structural approach to school improvement, this framework recognizes that decisions regarding school improvement always involve ethical, political, and technical considerations. ISOGAI (2017) underscores the importance of a stable school organization to support and educate disabled children effectively. Some educational institutions cultivate an "inclusive culture" where adults have a shared commitment to respect differences and ensure all students have equal access to learning opportunities (Ainscow & Sandill, 2010). Incentives provided through grants encourage local governments to strengthen support systems in mainstream schools, including kindergartens. Special needs education assistants play a crucial role in addressing the needs of children with disabilities, including those with developmental disorders. Inclusion encompasses two interconnected processes: increasing students' involvement in mainstream school cultures and curricula while minimizing their exclusion from these environments. Booth (in Skidmore (2008) highlights the conflicting pressures within school culture and curriculum that promote exclusionary or inclusive practices. He advocates for a comprehensive interpretation of inclusion beyond merely focusing on disabled or special needs students. Principals may face significant obstacles, particularly in districts or schools that have not traditionally prioritized inclusive education, depending on the prevailing working conditions and policy context (Billingsley et al., 2021).

### *The Perspective of School Leader*

Several comparative research reports show on how different countries have their own system in selecting, recruiting, and developing on role of school leaders. These reports are now published on in train, increasingly, commonalities are emerging concerning the focus of how they are delimiting discourse concerning school leadership policy formation (Billingsley et al., 2021; Brussino, 2020; McLeskey et al., 2016). Leadership aspect has been seen as the critical factors in school culture building and transformation. The leader role had to inspire organizational movement and transform culture when needed, especially related to the quality of educational processes, the student matters, and the staff need such cultural change (Ruairc et al., 2013).

School leadership plays a fundamental role in translating policy into practice and is critical for developing inclusive education. Policies influence and regulate the work style of institutions. School principals are pivotal in establishing and maintaining effective educational institutions that cater to the diverse needs of every student. The findings from the School Leadership perspectives give informative observations into how Mr. D from Indonesia and Mr. F from Japan approach the establishment of inclusive educational settings for students with various needs.

Both leaders exhibit a firm grasp of special needs education laws. Mr. D emphasizes Indonesian laws, acknowledging their crucial responsibility in leading inclusive education efforts within the school. Meanwhile, Mr. F extends his knowledge to encompass international and Japanese laws, understanding their influence in providing essential resources and support for inclusive education endeavors. Due to policy had to be given meaning by school communities and embodies especially related to comprehension of the educational task, it can also act as resources for those communities through clarify and elaborate on the understanding (Ainscow et al., 2006). Effective school leaders who able to create and sustain high-performing inclusive schools will rely upon their knowledge of disabilities studies, special needs education policies, and exploring inclusive practices to improve management conditions and the professional capacity of the other to meet the needs of all school members, including students with special educational needs (SEN) (Billingsley et al., 2021).

Their approaches to hiring special needs education teachers vary significantly. This was influenced by national policy related to teacher training in both countries. Mr. D showcases flexibility in hiring practices, prioritizing empathetic understanding over specific qualifications due to the scarcity of applicants. A significant challenge is the lack of training for teachers in inclusive schools in Indonesia (Hata et al., 2021). Special Needs Education was not available due to the regulations related to employment and salaries. Conversely, Mr. F emphasizes stringent requirements, focusing on candidates with special needs education teaching licenses to ensure expertise in special needs education settings, but at the same time letting teachers who do not have special needs education licenses participate in collaboration. Japanese teacher can transfer their teaching profession from regular to special needs education if they are passed with a Special Needs Education (SNE) teaching license (Mitchell, 2005).

Mr. D and Mr. F actively determine eligibility criteria for special needs education. Mr. D emphasizes coordination and fairness within the school, while Mr. F collaborates extensively with educational boards and special schools for comprehensive evaluations. In addition to these leaders, school principals are crucial in preparing schools to address students with Special Educational Needs (SEN). They must understand and adapt to the local context to support teachers, students, and families. Furthermore, educational assessment is critical in understanding and judging students' learning progress. The curriculum reform will

require schools to focus on developing and assessing new skills and competencies for their students (OECD, 2018). These assessment processes can provide data for evaluating teaching effectiveness and the effectiveness of educational programs, including the curriculum and the organization of learning experiences (Forlin & Loreman, 2014).

Regarding individual educational plans (IEPs), both leaders contribute to their development. Mr. D focuses on reflective practices and collaboration, while Mr. F emphasizes assessments and collaborative efforts with teachers and social workers to develop effective teaching and learning programs aligned with the IEPs. Their approaches to implementing IEPs and determining placement options also differ. Mr. D fosters collaboration among staff, ensuring reflective sessions and inclusive teaching practices. In contrast, Mr. F highlights collaboration between teachers and continuous learning for appropriate student placements based on observations and external collaborations. The principals play a vital role to create and sustaining effective schools that meet the diverse needs of all students. To plan an individualized educational program (IEPs) and Individual support were expected to become mandatory for students in special needs education setting and tsukyu classroom, as well those in special needs schools, for facilitating inter-school and multi-sectoral cooperation (ISOGAI, 2017).

Managing inclusive schools and implementing co-teaching models showcase a contrast in their approaches. Mr. D adapts curricula flexibly to integrate special needs education, while Mr. F emphasizes effective human resource management and collaborative teaching models, emphasizing constant discussions for effective teaching strategies. In Japan, there are significant differences between elementary schools, on the one hand, and junior high and high schools, on the other, in their approaches to inclusion (Mitchell, 2005).

Adapting to evolving instruction, curriculum, and assessment practices is another area where their leadership styles diverge. Mr. D invests in teacher development and collaborates to adapt to evolving practices, while Mr. F acknowledges the need for flexibility and collaboration among stakeholders to implement regulations effectively. School principals should set goals for improving student engagement and achievement in learning and teaching based on identification and assessment by classroom teachers, with the range of student proficiency in these core skills. Assessment process was needed to acquire the data for evaluating teaching effectiveness. It was needed for evaluating effectiveness of educational programs, including the curriculum and the organization of learning experiences.

In supporting behavioral interventions and discipline, Mr. D prioritizes balanced teaching and management within an inclusive environment, while Mr. F emphasizes reflective practices and collaboration among educators to manage challenging behaviors effectively and maintain a supportive learning environment. Their approaches to working with school counselors and leveraging the Multi-tiered Systems of Support (MTSS) also showcase distinct yet complementary styles. Mr. D aligns practices within the school through collaboration, ensuring inclusive education implementation. Mr. F comprehensively supports diverse student needs by collaborating effectively with school counselors and understanding the Multi-tiered System of Support (MTSS). The school culture from such a process is specific and quite different from other cultures.

Building school culture was the core task of school leaders. It was orders to create the conditions for educational processes and determine the quality of learning, teaching and the progress and development of students in school. School-level interventions are important in policy areas to promote inclusive education services in adapted for students with and without special educational needs (SEN) (Brussino, 2020). A successful approach in planning and evaluating instructional efficacy by using multi-tiered systems of support (MTSS)

framework. This framework was systematically implemented to build, deliver, and assess education services for improvements in students' outcomes. Multi-tiered systems of supports (MTSS) framework support in flexibility of instruction (e.g., goals, group size, and frequency of progress monitoring), for allowing instruction to be tailored to the individuals needs of students (Cusumano & Preston, 2021).

Finally, Mr. D and Mr. F are committed to continuous learning, feedback, and professional development for teachers and related service providers. Their leadership styles, while distinct, converge on the common goal of fostering inclusive educational environments that cater to the diverse needs of their students. Within high-performing systems, principals adopt the position of instructional leaders, actively working on improving the quality of teaching and learning within their schools, resulting in notable improvements in student achievements.

Mr. F's leadership perspectives offer a glimpse into his concerted efforts to navigate challenges and foster an inclusive educational setting in an elementary school. His approach underscores adaptability and collaboration as cornerstones in addressing the varied needs of students. Mr. D emphasizes the importance of improving specialized qualifications and continuous learning to create an inclusive educational environment. Mr. F reflects a dedication to collaborative practices and reflective approaches in implementing an inclusive educational environment. His leadership insights stress the significance of ongoing learning, specialized qualifications, and collaborative efforts in ensuring an inclusive educational framework.

The instruction was needed to develop education systems for teacher feel supported and would challenge the concern of their responsibility in exist for exploring effective ways of facilitating the learning of all students. This aspect has significant implications for school management, leadership, and implementation of educational policy. In order schools to develop more collaborative ways in implementation, this could impact how teacher perceive themselves and their work. It prioritizes the significant of social learning process in specific contexts. It is essential to utilize evidence to promote innovation and cooperation within and among school and between school, and the communities that school serves (Ainscow et al., 2006).

These diverse leadership perspectives from Japan and Indonesia illustrate the pivotal role of school principals in steering inclusive education. They highlight the multifaceted approaches these leaders adopt to address challenges, emphasizing collaborative strategies, adaptability, a commitment to ongoing learning, and specialized qualifications as crucial elements in creating and sustaining inclusive educational settings. School leader play vital roles in developing effective inclusive classrooms and and schools (McLeskey et al., 2016). This includes leadership aspects for implementation of inclusive education servicesto for building a shared vision with the community member and school-wide commitment to support inclusive education, redesigning the school system that able to support inclusivity and engaging others unders their leadership.

### ***Teaching in an Inclusive Classroom setting***

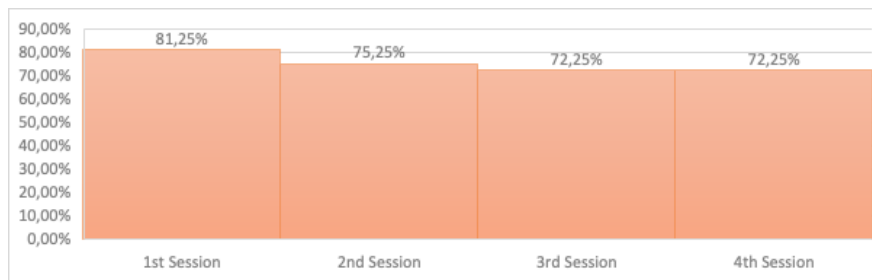
At the micro-level, student engagement holds central importance. Based on a literature review of teacher training, the results showed a widespread consensus among policymakers and educators regarding the significant impact of teachers' knowledge and actions on students' learning outcomes. Inclusive classroom arrangements vary widely to facilitate mastery of learning among diverse students. Some schools adopt inclusive practices through collaborative efforts among teachers in planning and delivering instruction and in preparing and utilizing instructional materials tailored to children with special needs. Specialized

teachers are designated to support these children inside and outside the classroom, ensuring their diverse learning needs are met.

Consequently, diverse approaches are employed in inclusive settings to foster mastery of learning among students with Special Educational Needs (SEN). These approaches involve various forms of interaction, such as teacher collaboration and student cooperation, diverse support, and flexibility in instructional and material adaptations. Students with Special Educational Needs (SEN) often lack awareness of their strengths, weaknesses, and skills in self-determination and advocacy. In supporting Special Educational Needs (SEN) students' needs, open communication is essential to the practices. Teachers are responsible for developing curriculum programs that accommodate the needs of all students with diverse requirements. Special Needs Education (SNE) services play a vital role in supporting all students with Special Educational Needs (SEN) within mainstreaming classes by developing instruction and implementing adaptations suited to the individual learning needs that were seen.

Classroom observations in Cahaya Bangsa Elementary School was conducted on August 2023, in 4 classes that have students with special educational needs (SEN) in classroom. The grade of students and subject of lesson are variative during observation. First session was conducted in 3rd grade classroom, with subject of lesson was Art during third period. There were two students with special educational needs (SEN) attended the classroom. Second session was conducted in 2nd grade classroom, with subject of lesson was Indonesian language during second period. There were three students with special educational needs (SEN) attended the classroom. Third Session was conducted in 4th grade classroom, with subject of lesson was Natural and Social Science during first period. There were two students with special educational needs (SEN) attended the classroom. And Fourth session was conducted in 6th grade classroom, with subject of lesson was Mathematics during first period. There was a student with special educational needs (SEN) attended in the classroom.

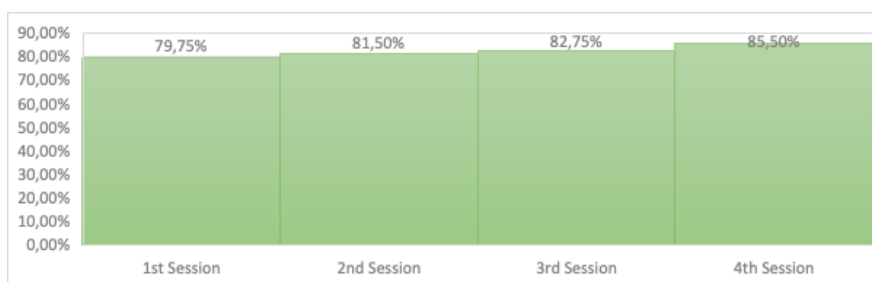
The overall performance in classroom observation in Indonesia ranges between 72.25% and 81.25%, showcasing variations across different assessment checklists. While certain areas demonstrate strong performance, specific indicators highlight areas needing improvement. There is a recognized need for targeted professional development and increased teacher collaboration to address these areas (OECD & Asian Development Bank, 2015). It emphasized that teachers should move beyond simply transmitting knowledge, and students should engage in more than just rote learning. Despite participating in various training levels, class teachers possess only basic knowledge and still face difficulties implementing inclusive education. Additionally, the absence of standardized guidelines or regulations for teachers in implementing education and learning steps for children with special educational needs (SEN) in inclusive classrooms was noted during the observation. This deficiency in training opportunities for inclusive teachers stems from a lack of standardized teacher training systems, combined with the limited capacity of local governments (Hata et al., 2021) is still a problem for teachers.



**Figure 3. Classroom Observation Result in Indonesia**

Classroom observations in Yashiro Elementary School was conducted on November 2023, in 4 classes that have students with special educational needs (SEN) in classroom. The grade of students and subject of lesson are variative during observation. First session was conducted in 1st grade classroom, with subject of lesson is Physical Education during third period. There were two students with special educational needs (SEN) attended the classroom. Second session was conducted in 4th grade classroom, with subject of lesson is Natural science during second period. There was a student with special educational needs (SEN) attended the classroom. Third Session was conducted in 4th grade classroom, with subject of lesson is Music Art during fourth period. There was a student with special educational needs (SEN) attended the classroom. And fourth session was conducted in 6th grade classroom, with subject of lesson is Home Economics during third period. There were two students with special educational needs (SEN) attended in the classroom but both of them were absent.

In Japan, performance in classroom observation ranges from 79.75% to 85.5%, demonstrating relatively consistent high percentages. Overall, there is strong and consistent performance, with fewer areas identified for improvement. The emphasis lies in fostering knowledge-sharing among teachers, maintaining consistency, and cultivating a culture of peer collaboration (Ou et al., 2024). It is well known that Japan's school culture was strong with collectivistic culture. Elementary schools in Japan use a class teacher model in which students are placed in homerooms, and their teacher undertakes to teach the whole curriculum (Forlin et al., 2015). The current practices observed by the OECD (2018) in Japanese schools, especially in primary schools, already incorporate significant aspects of learning that promote reciprocal teaching and feedback, which are crucial to educational reform. However, there is a recognized issue where students without disabilities but facing difficulties in their classes risk being left behind (Song, 2016).



**Figure 4. Classroom Observation Result in Japan**

Comparison: Japan generally has a higher overall performance compared to Indonesia across the observed checklists. While both Indonesia and Japan show strengths and areas for improvement, Japan tends to exhibit higher overall performance percentages and greater consistency across observation checklists. On the other hand, Indonesia has specific areas

identified for improvement and may benefit from targeted professional development initiatives and collaborative efforts among educators. The comparison highlights opportunities for continuous improvement in teaching and learning programs in both countries.

## **Discussions**

### ***Inclusive Education Policies Impact***

Global trends have significantly impacted the landscape of inclusive education in Japan and Indonesia. Policy frameworks are pivotal in shaping and prioritizing specific discourses, impacting school operations concerning inclusion. These frameworks can potentially shape the trajectory of school leadership (Melloy et al., 2022). They emphasize their importance by examining these policies' ideological and political motivations.

Moreover, despite policies, laws, recommendations, and empirical support for inclusive education for students with disabilities, disparities in equity, achievement, and opportunities persist in our nation's public schools (Melloy et al., 2022). The review of inclusive education implementation can be facilitated through the inclusion index. This index comprises three dimensions: culture, policy, and practices. The cultural dimension is subdivided into sections focusing on community building and cultivating inclusive education values. The policy dimension involves establishing inclusive environments and implementing diversity support. Finally, the practical dimension encompasses sections on collaborative learning, play management, and resource mobilization.

The inclusive education frameworks in Japan and Indonesia illustrate how similar policy directives can lead to varied approaches and outcomes. The effects of inclusive policies on resources, teacher training qualifications, teaching methodologies, and collaboration significantly shape their implementation. Inclusive education curriculum policies extend beyond adaptations for students with special educational needs (SEN) to include modifications to the regular curriculum, fostering inclusion in mainstream classes. Educational curricula serve as crucial tools for advancing inclusive education policies and safeguarding the rights of SEN students.

It is common for educational systems to reflect each nation's unique historical, cultural, and economic contexts alongside global influences (Ruairc et al., 2013). Monitoring and evaluating inclusive education policies are essential for determining whether education systems align with inclusive education goals set at local, national, or international levels. However, many countries still lack robust monitoring and evaluation systems for SEN policies and statistics on students with SEN (Brussino, 2020). Prioritizing the comprehensive well-being of students through inclusive education policies and practices is crucial for promoting broader socio-economic development in increasingly complex and diverse societies.

### ***Acts and Regulations of Inclusive Education***

#### ***1) Implementation in Indonesia***

The Indonesian government commits in the rights of individuals with disabilities practices by signing the Convention on the Rights of Persons with Disabilities. The government subsequently mandated and supports inclusive education through the regulation of Minister of National Education of the Republic of Indonesia (Permendiknas) No. 70 of 2009. This regulation provides guidelines for students with disabilities and special education needs (SEN) to access Inclusive education services at mainstream schools. The mentioned

policy does not show consideration of other possible marginalized children under the circumstances of social, economic status, gender, religion, and ethnicity.

Recognizing the significance of inclusive education, Indonesia's Ministry of Education, Culture, Research, and Technology (Kemendikbudristek) issued a Charter of Appreciation for provinces, regencies, and cities that declared themselves as organizers of inclusive education. This initiative aims to promote adopting inclusive education at the local level. When province, district, or municipal administrations adopt inclusive education initiatives for children with special needs and support them with specific regulations at the governorship, regent, and mayoral levels, the crucial role of inclusive education in Indonesia becomes clear (Efendi, 2018). Moreover, the Disability Act of 2016 strengthened inclusive education policies, and the corresponding regulation reinforced this, Government Ordinance No. 13 of 2020, which addresses the appropriate accommodation of students with special needs and disabilities.

The concept of inclusive education varies in interpretation and implementation, often leading to misconceptions such as equating it solely with special curriculum provisions for individuals with disabilities, commonly referred to as special schools (SLB). Across provinces, significant disparities exist in the provision of special needs education, contributing to unequal opportunities for students. Enrollment policies at the district level further show these disparities, perpetuating inequities in educational outcomes by favoring schools with the best teachers and students. Despite efforts to promote inclusive education through collaborative initiatives between schools and local governments, challenges persist, including a lack of qualified teachers and adequate school support.

The government has not provided a precise construction of inclusive education as one of the approaches and principles in implementing education in Indonesia. Consequently, the implementation of inclusive education remains incomplete, emphasizing the need for dedicated attention to ensure that children with special needs receive appropriate educational services that accommodate their diverse conditions and respect societal realities (Efendi, 2018). Notably, only a tiny fraction, approximately 11%, of schools in Indonesia with inclusive provisions have fully implemented comprehensive learning approaches (Sari et al., 2022). At the district level, superintendents and administrators may not consistently prioritize special needs education or actively support inclusion efforts for students with disabilities. The number of inclusive schools is not proportional to the number of persons with disabilities who have not been treated in Inclusive schools (Hata et al., 2021; Rosyidi, 2023) Furthermore, while legislation requires at least one inclusive school for each educational level in every jurisdiction, the total number of inclusive schools is still inadequate and poorly divided across various local governments.

## *2) Implementation in Japan*

MEXT (Monbukagakushō) defines inclusion as "a system that allows people with disabilities to study as much as possible collaboratively. "Indeed, the project's goal was to bring best practices in social integration, create cooperative learning platforms, and utilize resources for appropriate educational assistance (Furuta, 2019). The most significant component of this amendment was the 2007 revision to the School Education Act, which established the transition from "special education" to "special needs education" on an administrative level.

After the 2007 Special Needs Education reform, there were several significant changes to education for students with disabilities, which are related to the appointment of SNE coordinator in school, employment of Shadow Teachers in regular schools, additional roles of Special Schools as resources center to give advice and supports to local regular schools,

and hearing parents' opinion by local education board and lastly comprehensive special needs education certificate system for the teachers (Furuta, 2019). The move toward inclusive education in Japan was promoted through teacher collaboration and support. Japanese schools are often characterized by their collectivistic culture (Futaba, 2016). A collectivistic culture makes collaboration possible to ensure children's rights and inclusive practices.

Japan's government has transitioned its legal and regulatory approach to disability in education from a medical model to a social one. This new approach emphasizes rights, social justice, and inclusion. (Ree, 2015). The School Education Act stipulates that the goal of the Japanese education system is to seek and ensure that a standard curriculum is secured among a diverse range of learning settings (Yoneda, 2019). In this action, Monbukagakusho, or MEXT (Japan's Ministry of Education, Culture, Sport, and Technology), has put inclusive education as a notion into practice as part of the Developing Inclusive Education System Projects. The primary objective of the Japanese inclusive education curriculum is to promote independence and integration of individuals with disabilities into society.

Underlying this transformation is the principal authorities' need to adopt policies facilitating the self-reliance and societal integration of students with disabilities (Mitchell, 2005). These changes respond to various global influences, including globalization, migration patterns, and technological advancements in computerization, robotics, and artificial intelligence. The Central Council for Recommendations is the foundation for the Second Basic Plan, which outlines four primary policy directions for curriculum reform and school organization. These directions include fostering social competencies for survival, developing human resources for innovation and leadership, ensuring accessibility to diverse learning opportunities, and nurturing vibrant communities where society supports individuals and vice versa. While curriculum reform and school organization are at the forefront of these policy directions, ongoing policy discussions also address lifelong learning and the affordability of tertiary education.

### ***Education Provision of School Systems***

The enrollment of students identified with Special Educational Needs (SEN) within education systems and the decisions made by these students and their families regarding school selection play a significant role in shaping SEN policies and practices across OECD countries (Brussino, 2020). The European Agency for Adapted and Inclusive Education (in Brussino, 2020) has presented various approaches to address this issue:

- The One-track approach emphasizes mainstreaming as the standard practice, with only a few specialized facilities catering to students with SEN. Within mainstream schools, tailored programs are implemented to address individual students' Special Educational Needs (SEN), supported by various services.
- Two-track approach: In this scenario, a considerable number of specialized facilities exist, leading to two separate education systems for students with and without special educational needs (SEN).
- Multi-track approach: This system amalgamates elements from single-track and dual-track approaches, offering a spectrum of inclusion methods. This may include specialized facilities, dedicated classrooms, and integration into mainstream classrooms.

Based on the European Agency for Adapted and Inclusive Education (in Brussino, 2020), we can see that Indonesia and Japan take different approaches to implementing inclusive education provision in their school systems. Indonesia takes a two-track approach, and Japan takes a multi-track approach.

Indonesia has adopted a two-track approach in practical settings, allocating significant resources to specialized structures and establishing separate systems for students with and without Special Educational Needs (SEN). Despite suggestions from the Ministry of Education advocating for a multi-track system, Indonesia has not fully embraced inclusive education, with notable schools remaining the predominant form of special needs education. This trend is expected to continue, as plans involve establishing a public special school in every district or municipality. Obstacles to implementing inclusive education include the lack of clarity in setting up inclusive classrooms, the continued existence of segregated educational methods, and divergent viewpoints among instructors and parents on its appropriateness. However, strategies are in place for promoting inclusive education, such as a decree that designates certain schools with the obligation and authority to educate children with special needs.

Moreover, training programs have been implemented for special assistant teachers (shadow teachers or GPK) to enhance their competence in inclusive education (Hata et al., 2021). However, many local governments lack specific regulations to enforce inclusive education despite national regulatory frameworks mandating their implementation. The limited accessibility and quality of inclusive schools can be attributed partly to the ambiguity of roles between provincial and city governments. Additionally, there is a dearth of reliable data of persons with disabilities from BPS, as well as educational result and student experiences (OECD & Asian Development Bank, 2015).

Japan has adopted multi-track approach to its educational system, blending the specific methods of inclusion. This approach encompasses specialized structures, specialized classrooms, and mainstream classroom. Students with assigned special needs education (SEN) services, follows the same curriculum as regular students in classroom, with of the flexibility of modifications depends on their level degree of special needs. According to Sato, and colleagues (in Maeda et al., 2021), implementation the concept of inclusive education services was considered feasible by most of Japanese society and communities. Elementary schools in Japan use a class teacher model, where students are placed in homeroom, and their teacher has a role to teach the whole curriculum program (Forlin et al., 2015). The `tsukyu` scheme caters to children with milder level of disabilities and special educational needs (SEN), such as low vision, hearing impairments, learning or language disorder, LD, or ADHD. An amendment of School of Law in 2016 permitted high schools to establish `tsukyu` scheme, extending accommodations and supports to high school students who had received special needs education in middle school previously. Special needs schools not only accommodate students with significant disabilities but also provide guidance and assistance to disabled children upon request from regular schools, leveraging their expertise and skills (ISOGAI, 2017). Furthermore, these special needs schools serve as resource centers for special needs education within the community. Schools in Japan are granted autonomy to tailor their curriculum according to local characteristics while adhering to national guidelines and educational objectives outlined in the Basic Act on Education (OECD, 2018).

## **CONCLUSION**

Global trends significantly influence the pragmatic of inclusive education practices both in Japan and Indonesia, with their policies frameworks shaping school operations and leadership trajectories, emphasizing the need for critical examination of ideological and political motivations. Educational curriculum was indeed the vital role in elevating inclusive education policies, by extending beyond adaptations for students with special education needs (SEN) for fostering inclusive services in mainstream classes and emphasizing the importance of aligning the educational systems with inclusive education goals at local, national and international position. Special needs schools in Japan and Indonesia serve as resource centers within the community, providing guidance and assistance to special educational needs (SEN) children due to their application in two-track and multi-track system.

This research showed that school leadership and management determined how inclusive education implementation works in both countries. School leadership was a crucial role in sustaining the implementation of inclusive education services that meet the diverse needs in school. In both cases, school leader would like to use their knowledge of disabilities studies, particularly in educational policies, special needs education services to sustain the implementation of inclusive education services in both elementary schools. Both leaders demonstrate a holistic approach to inclusive education, starting with understanding students' needs, aligning content to inclusive practices, implementing collaborative teaching models, and gauging teaching success through continuous assessment and reflection. The emphasis on collaboration, flexibility, and a deep understanding of individual student needs reflects a commitment to creating inclusive educational environments in Indonesia and Japan.

Comparatively, Japan generally outperforms Indonesia, but both countries have areas for improvement, emphasizing the need for continuous improvement in teaching and learning practices. Primarily, if we discuss inclusive classroom settings, one thing to consider is Universal Design for Learning (UDL). Based on educational research regarding Universal Design for Learning by Fovet (2021), using data from classroom observations, interviews of parents, teachers, and students with special educational needs (SEN), and assessments for informing decision-making and improve of inclusive education services. With Universal Design for Learning (UDL) training for teacher, will help teachers design and deliver inclusive lessons that meets the diverse needs of all students, especially focused on explicit instruction. Archer et al. (2011) identified a range of instructional elements as characteristic of an explicit approach to teaching. Support practice, frequent responses, monitoring students' performance, providing affirmative and corrective feedback, delivering the lesson briskly, helping students organize knowledge, and providing distributed cumulative practices will help in order to designing Inclusive teaching at classrooms setting.

This research focuses on implementation of inclusive education services in elementary schools in Japan and Indonesia. Only reveals the impact of policy implementation in a specific school management. This research could provide crucial insights into school practices (meso) and classroom practices (micro) linked with national policies (macro). However, the pursuit of inclusive education is continuous, requiring constant reflection, adaptation, and commitment from all stakeholders involved. As both countries continue to evolve their educational systems, it is hoped that the lessons will be reflective, those successes will be achieved, and they will contribute the inclusivity and equitable education for all students.

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