

## **A Comparison of Different Aspects of Special Education of Pakistan with USA, England and France**

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### **Abstract**

The motive of this qualitative study was to compare educational provisions and practices being adopted for persons having special needs in Pakistan, USA, England and France. While comparing various aspects of special educational practices, the focus of this study was to find a comprehensive picture for sake to make suggestions to improve existing setup of special Education in Pakistan. In this regard a systematic documental and content analysis was done to compare different aspects. After doing dense content analysis and discussion made by researcher; it was observed that approaches of Pakistan regarding educational provisions for Special Education needs (SEN) are insufficient and are in developmental stages; still plenty of improvements are required to meet international standards. Pakistan needs to improve legislation, infrastructure and mainstream approach for better facilitations. Timely adoption of emerging trends (e.g. inclusion) all over the world appears to be the most efficient way to fulfill needs of the persons with special needs.

**Key words:** Special needs education, Comparison, Practices, Provisions

### **Introduction**

Pakistan is ranked as a developing country with its basic infrastructure whereas United States, England and France are developed countries with their strong economies and well established system of management (Tabassum, Afzal & Tabassum, 2013). As reported by the United Nations Educational, Scientific, and Cultural Organization (UNESCO) programming document 2013-17, Pakistan has extensive human and natural resources but restricted operating potential. In the past few decades there have been political turbulence and internal instability.

In addition, Pakistan has been testing the parliamentary experience. In that period, Pakistan's situation in meeting millennium development goals (M.D.Gs) remains less than impressive. Pakistan faces diverse development challenges ranging from, weak economic conditions, increasing poverty, illiteracy, gender inequality, environmental degradation, deteriorating health conditions,

etc. The education sector is facing difficulties in management and administration due to inequality in education and in access and services. Likewise, there are challenges in the science sector related to water, energy, climate change and environmental confront the science sector. Pakistan, though bestowed with a very rich culture, fails to preserve its extensive tangible and intangible heritage (UNESCO, 2013).

Pakistan is the 6th most populous country in the world, with over 180 million people. People belonging to various casts, culture and color can be found. Pakistan has one of the lowest literacy rates in the world and estimated to be about (55%) and ranks at 160<sup>th</sup> in total countries of the world (Hassan, 2016). Persons with disabilities are mostly unseen, unheard and uncounted persons in Pakistan and they are one of the most marginalized groups. Disability work in Pakistan is contested and fragmented and social exclusion of PWDs in the development discourse is a major challenge.

This reduces the voices, participation and recognition of PWDs in the sustainable development issues and concerns. Presently, in Pakistan very few organizations are aware of the issues of disability from development perspectives, and are able to sense its easy integration like gender in the development process. According to Naeem (2010) this exclusion undermines the abilities, competencies and capabilities of about 10% population of Pakistan, who could play a very effective role if provided with an opportunity as an integral part of development initiatives.

### Research Questions

1. What are the similarities and differences in the system of special education of Pakistan, USA, UK and France?
2. In what ways do Special Education systems of Pakistan, USA, UK and France alike and different in regard to the six dimensions of special education?

### Methodology

This study was qualitative in nature and content analysis was done. The content analysis is a research tool used to determine the presence of certain concepts in text or set of text. Researchers quantify and analyze the existence, meaning, concepts and try to produce conclusive content for further comprehension. Text can be considered books, essays, interviews, discussions, newspaper headlines, articles, historical articles documents, speeches, conversations, advertisements, informal conversations or any other.

### 1) Comparison of Evolution of Legislature/Policies on Education for Special needs in Pakistan, USA, England and France:

#### Pakistan at Glance

The antiquity of imparting education to the physically disabled children started way

back during the British period in Indo-Pak subcontinent. During the year 1906, a school for the PWD's was established in Lahore to fulfill the vocational and educational requirements of the children with visual impairments. Later on in 1923, Ida Rio an institution for the students having hearing impairments was established in Karachi. In the year 1959, a Government institution was developed to serve the educational needs of the children who required special care and attention. A report by *National Commission on Education (Aug 26, 1959)* indicated the need for establishing services for individuals having special needs in both public and private sectors. The report also highlighted the need for specially trained teachers to work with individuals with special needs. Pakistan government with the aid of United Nations took initiative to declare 1981 as the year of celebration for persons with disabilities. This was considered to be a breathtaking event which was responsible for making more and more people aware of the needs, prospects and issues of the people.

Pakistan government developed several ministries, organizations and policies to improve lives of Special persons. According to Yousaf (2011) in 1986, the *Directorate General of Special Education* established a national policy to impart special needs education to individuals with special needs. In 1988, the policy was improvised cater to the requirements of the people with special needs in a more efficient and effective manner.

In 1999, special education policy was created to enhance education of persons with special needs. More recently in 2002, Pakistan Government launched a new national policy for individuals with disabilities. As noted earlier, in Pakistan the first legislation introduced was "Disabled Persons (Employment and Rehabilitation) Ordinance, 1981. A 1985 literacy ordinance was passed by Parliament in 1987 which emphasized that all Pakistani citizens should acquire basic literacy skills, including those who with disabilities (UNESCO, 1996) after a long period another legislation was

introduced named as the “National Plan of Action for Persons with Disabilities, 2006.” Later on an act was launched to give special status to special persons named as “Special Citizens Act, 2008”. A year later an act was introduced to facilitate special persons including special students which was named as “Special Citizens (Right to Concessions in Movement) Act, 2009” (Mughees Ahmed, 2011).

### **United States at Glance**

The story of Special Education begins in the early part of the 20th Century. Parents formed advocacy groups to help bring the educational needs of children with disabilities to the public eye. These groups gained momentum in mid-century.

In 1961, President John F. Kennedy created the President’s Panel on Mental Retardation. The panel’s recommendations included federal aid to states. In 1965, Lyndon B. Johnson signed the Elementary and Secondary Education Act, which provided funding for primary education, and is seen by advocacy groups as expanding access to public education for students with special needs.

Prior to the 18<sup>th</sup> century in the United States, persons having special needs were neglected and discriminated against. Some laws were introduced after 18<sup>th</sup> century for education of “deaf dumb” (now referred to as communication disorders or hearing impaired) and blind (now referred to as visually impaired) pupils. Initial federal attempts occurred in 1958 and 1965 (Edwin W. Martin, 1996). The legislation was designed to improve services for children with special needs in Government primary and grade 10<sup>th</sup> level educational institutions. LaNear & Frattura, (2007) stated that despite these two important events, by the 1970’s, only a relatively small number of children with special needs were being educated in public schools. In order to further services for students having special needs, Education for All Handicapped Act (EHA; PL 94-142) was enacted in 1975.

The EHA established a right to public education for all children regardless of disability, while the IDEA requires schools provide individualized or special education for children with qualifying disabilities. Under the IDEA, states who accept public funds for education must provide special education to qualifying children with disabilities.

According to Martin (1996), between the mid of 1960s and 1975, state legislatures, the federal courts and the U. S. Congress spelled strong educational rights of children with disabilities. Forty-five state legislatures passed laws required, encouraged, and / or the funding of special education programs. Federal courts, interpreting the equal protection and guarantees a fair trial of the Fourteenth Amendment to the US Constitution, ruled that did not discriminate against the school on grounds of disability, and that parents had a fair trial rights in connection with the education of their children. In 1990, the U.S. Congress amended the EHA and changed the name to Individuals with Disabilities Education Act (IDEA).

The amendment laid out detailed procedural protection with regards to the rights of the parents, Individualized education programs (IEP’s), necessary qualification for specialized education services, serving the disabled children in non-restrictive surrounding and also keeping them connected with various non-learning services. The national and the local authorities remain responsible for deciding about different aspects of IEP’s and educational curriculum. People who consistently fought for the children with disabilities have also been successful in raising funds for the special education for special children).

There are numerous illustrations of key early Federal legislation that supported improved programs and services. Notable examples include the Training of Professional Personnel Act of 1959 (PL 86-158), which helped train leaders to educate children with mental retardation; the Captioned Films Acts of 1958 (PL 85-905),

the training provisions for teachers of students with mental retardation (PL 85-926), and 1961 (PL 87-715), which supported the production and distribution of accessible films; and the Teachers of the Deaf Act of 1961 (PL 87-276), which trained instructional personnel for children who were deaf or hard of hearing. PL 88-164 expanded previous specific training programs to include training across all disability areas.

In addition, in 1965, the Elementary and Secondary Education Act (PL 89-10) and the State Schools Act (PL 89-313) provided states with direct grant assistance to help educate children with disabilities. Finally, the Handicapped Children's Early Education Assistance Act of 1968 (PL 90-538) and the Economic Opportunities Amendments of 1972 (PL 92-424) authorized support for, respectively, exemplary early childhood programs and increased Head Start enrollment for young children with disabilities. These and other critical Federal laws began to open doors of opportunity for children with disabilities and their families. (U. S. D. O. Education, 2007).

### **England at Glance**

In England in 1944, the first act was introduced to categorize children having special needs. Lots of children were contemplated to be "uneducable" and pupils were labeled into categories such as "maladjusted" or "educationally sub-normal" and given "special educational treatment" in separate schools. The Warnock" formulated a report in 1978, followed by Education act 1981 that had transformed the devising of the needs for special education. It presented idea of Special Education Needs (SEN), "statements" of SEN, and an "integrative" which later became known as "inclusive" approach, based on common educational goals for all children regardless of their abilities or disabilities: namely independence, enjoyment, and understanding (Commons, 2006).

The 1988 Education Reform Act introduces the national curriculum, which all children, whether in mainstream or special education should follow. In 1993, the Education Act introduces a code of practice on identifying and assessing special needs for all schools. The "Excellence for all children" policy document 1997, stresses importance of spotting learning difficulties early, and introduces literacy and numeracy initiatives and opened up new technologies for special needs.

The 2001 Special Educational Needs and Disability Act outlaws' discrimination against disabled and SEN students in schools, colleges and higher education. Parents can go to tribunals to ensure this right. The school told to anticipate the needs of disabled pupils, and adjusts to meet them. The 2004 "Removing barriers to achievement" policy paper emphasizes the importance of raising expectations for SEN pupils in mainstream schools. In the 2005 Warnock's U-turn Baroness, Warnock backtracks on her 1978 report about inclusion (Newspaper, 2008).

The Children and Families Act 2014: The Children and Families Bill had its First Reading in the House of Commons on 4 February 2013. Part 3 of the Bill, made provision for identifying children and young people with special educational needs (SEN), assessing their needs and making provision for them. The changes included:

- Definitions and duties to identify children and young people with SEN
- Local integration of education, health and care provision and joint commissioning
- Inclusion in mainstream education
- Personal budgets for young people with an EHC plan

### **France at Glance**

Charles Michel L. Epee was one of the initiator in the 18<sup>th</sup> century in what concerns the education of special persons. In 1760 he founded the first public school for people with disabilities in France. Till 1989 special

education could not develop as part of state controlled system (Moon, 1996).

Extent and Nature of Legislation is that the article 1 of Law No. 75-534 of 30<sup>th</sup> June 1975 states that handicap should be prevented, that the education, care, professional training and orientation, right to work, the guarantee to minimum resources and the access to sports and leisure activities for disabled persons constitutes a national obligation.

This has been further strengthened in 29 January 1982 and of 29 January 1983. Article 5 of the same law states that disabled children will be admitted into regular classes or educational establishments under the jurisdiction of the Ministry of Education or Agriculture. The Ministry of Education Circular No. 76-156 of April 1976 states that only when a child is not able to attend regular classes will the child be enrolled in a special school (UNESCO, 1996).

Table 1  
Comparison

Country	Description of Initiative/Legislation/ Policy	Description
<b>PAK</b>	1. The need for education of special needs was endorsed at government level.	1959
	2. First Act introduced in 1981 (Disabled Rehabilitation Ordinance)	No. Acts/ legislations:5
	3. Literacy ordinance for handicapped person 1985	
	4. 1986 marked the development of the first policy which was revised and implemented in the year 1988 and 1999 respectively.	
	5. 2002 marked the development of second <i>national policy</i> for the disabled people	No. of Policies: 2
	6. In 2006 <i>national plan of action</i> was implemented to aid the needs of the disabled people	
	7. Special Citizens Act 2008	
	8. Right to concession Act for special persons given in 2009	
<b>USA</b>	1. The first major federal effort was done for education of special needs(Public Law 94-142)	1958
	2. Professional Personnel training (PL 86-158) in 1959	No. Acts/ legislations:13
	3. President's panel for mental retardation was developed by the president John F. Kennedy in 1961	
	4. Teachers of Deaf act (PL 87-276) in 1961 <i>Elementary and Secondary Education Act</i> was signed by Lyndon B. Johnson (PL 89-10), Act (PL 89-313) in 1965	
	5. <i>Handicapped Children's Early Education Assistance Act</i> (PL 90-538) was launched in the year 1968	
	6. Handicapped Children's Early Education Assistance Act (PL 90-538) 1968	No. of Policies: 0
	7. Economic Opportunities Amendments (PL 92-424) 1972	
	8. The Education for All Handicapped Children Act (EHA) was implemented in 1975	
	9. Individuals with Disabilities Education Act (IDEA) was established in 1975	
	10. The Amendments (IDEA) to EHA (PL 98-199) was developed in 1983	
	11. Amendments to EHA (PL 101-476) were done in 1990	
	12. Act (IDEA), as amended (PL 105-17) 1997	
	13. Act (IDEA) amended in 2004	
<b>England</b>	1. First act was introduced to categorize children having special needs.	1944
	1. The Warnock Report 1978	No. Acts/ legislations:8
	2. Education Act 1981.	
	3. Education Act 1996	
	4. Special Educational Needs & Disability Act (SENDA) 2001	No. of Policies: 0
	5. SEN Green Paper 2010	
	6. Disability rights & Equality Act 2010.	
7. SEN framework Part 3 of the Children and Families Act 2014.		

Country	Description of Initiative/Legislation/ Policy	Description
France	1. The first public school for people with disabilities was developed in 1760.	1760
	2. Article 1 Of Law No. 75-534 handicap should be prevented 1975	No. Acts/
	3. Article 5 Admission into regular class 1983	legislations:12
	4. The Ministry of Education Circular No. 76-156 (1976) special school admission	
	5. Integration within the education system 1989	
	6. Circular 76-156 Enrolment committee 1989	
	7. Circular 91-302 of 18 establishes a pedagogical committee 1991	
	8. Circular 91/304 of 18 November 1991 child to enter a CLIS integration course	
	9. Circular 93-248 Assessment of the disability 22 of July 1993	
	10. Circular No. 82/2 Disabled integration policy 1976	No. of
	11. Circular 83/082 conditions for integration 29th January 1983	Policies: 1
	12. Circular No.91-304 CLIS 18th November 1991	
	13. Circular No. 89/036 professional education 6th February 1989	
	14. Circular No. 90/082 special education aids network 9th April 1990	

## 2) Comparison on definitional aspect of disability considerations

In the citizenry census 1998, Pakistan has developed below stated definition of a person with special needs: “A person who on account of injury, disease or deformity is handicapped for undertaking any gainful profession or employment, in order to earn his livelihood and includes a person who is blind, deaf, physically handicapped or mentally retarded” (Awan, 2012).

In United States IDEA 2004 disability is defined as: “A disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written. The disorder may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations. The term Specific Learning Disability includes such conditions as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia. This term does not include a learning problem that is primarily the result of visual, hearing, or motor disabilities, of mental retardation, of emotional disturbance, or of environmental, cultural, or economic disadvantage” (U. D. O. Education, 2006).

In England according to the *Comprehensive Instruction Law* (1999) each child must receive a standard education which is appropriate to age, special needs for education and their potential. Each

individual has a right to an education in a standard quality environment and surroundings. This law states that the towns must have the provisions to provide comprehensive education to the students irrespective of their age, gender, creed and religion. In the 1990s, the refinement in the school organization, with decentralization of decision-making to the towns, decreased the number of special schools.

At the same time, special classes were founded in mainstream schools. Special education is provided to all pupils who are unable to cope with mainstream instruction due to intellectual or physical disability, a learning disorder or some other reason. Modern laws state that categorization of people on the basis of their “type” and “degree” of disability should not be done. It also reveals that each and every town must be able to fit and engage the people who need special attention and educational requirements must be a part of mainstream system of education. The social, educational and health authorities should work together for catering standard quality of education to the differentially able people (Morris, 2001).

No single term is used to acknowledge the children who need special education services in France. There is a variety of terms which are used to describe the disabled children like non-adaptive, differentially able children, etc. These terms are distinctive in nature and are mainly associated with connotations and other

historical situations. The law 2005-102 that has been enacted on 11<sup>th</sup> of February, 2005 for equal opportunities and rights, citizenship and participation of the disabled people states. According to the law 2005-102 of 11 February “a disability is constituted by any limit on activity or restriction on the participation in social life endured by a person in his or her environment due to a substantial, durable, or permanent alteration of one or several physical, sensory, mental, cognitive, or psychological functions, to a multiple disability or to a disabling health problem

### 3) Comparison of assessment/ diagnostic procedures

There is a procedure for the assessment of disabling condition in every country. Each country has its own system and approaches for assessment. In Pakistan, the Social Welfare Department, in collaboration with the *health departments* of the respective districts, provides a disability certificate after a thorough examination by a medical board.

Under section 12(2) of Special people (Employment & Rehabilitation) Ordinance, 1981 Provincial Council for the Rehabilitation of Disabled Persons (PCRDP) has developed District Assessment Boards (DABs) in all districts of Punjab for assessment of nature of special needs and to issue disability certificate. These boards are working in all District Head Quarter (DHQ) Hospitals of Punjab. District Assessment Boards hold meetings weekly/fortnightly/monthly based on the number of applicants (Fulcher, 2015).

The *National Institute of Handicapped (NIH)* has been established in order to create a *comprehensive referral system* around the country (UNESCO, 1996).

At school level when a child arrives at special school a group of professionals likewise special education teacher, audiologist, speech therapist, psychologist and teacher or as the school management specified a committee for admission and placement is responsible to assess the

handicapping condition, its range and severity This body decides to place special student in class which may best suit to that disabled child.

In the United States Assessment is seen as having four main functions:

1. To determine the eligibility of students to receive special education services
2. To create suitable program to meet the educational purposes
3. To evaluate the progress of *Special Needs Education program*
4. To examine needs of pupils after every consecutive three year and justify if they still need *special education services*

There are distinctive guidelines in the legal requirements regarding to assess the eligibility to assure if a student really has a disability.

#### Legal requirements for an assessment

##### *Conducting the assessment*

1. Must use a variety of assessment tools and strategies to gather relevant functional, developmental and academic information
2. Must not use any single measure or assessment as the sole criterion for determining whether a student has a disability
3. Must use technically sound instruments that may assess the relative contributions of cognitive, behavioral, development and physical factors.

##### *Assessment procedures*

Must determine if a student has a disability that makes him/her eligible for special education services and determine the educational needs of the student all areas of need identified must be addressed in the IEP.

Three specific issues are addressed in the 2006 regulations. Firstly, the assessment team must consider whether the student received appropriate educational instruction

by a qualified teacher in 'reading, including the essential components of reading instruction, in math, or limited English proficiency'.

Secondly, Individual with disabilities act (IDEIA) gives clear guidance to state governments on the issue of using the IQ-Achievement discrepancy to identify learning difficulties. States can no longer require school districts to use the discrepancy between intelligence test scores and scores on attainment tests to determine a learning disability. The federal legislation sets out a two stage process for assessment of SEN.

The first stage concerns whether the child has a disability as defined by the legislation. The second stage assesses whether the disability adversely affect the child's educational performance. If the answer is yes, then further assessments, including curriculum-based ones, must provide sufficient information to draw up a comprehensive IEP designed to cover all aspects of the child's special educational needs. This should set out objectives that can be assessed on a regular basis. Within this broad framework, each state has to provide regulations to guide school districts in meeting the requirements of the federal legislation. Once a child or young person has been referred to the school district with a possible disability, the multidisciplinary team meets to discuss whether or not the student should have an assessment for special education. In addition to the professional members of this team, the child's parent is, as of right, a core member of this decision making team (Lindsay, 2010).

The 2001 statutory code of practice of England set out a graduated approach to SEN that recognized a continuum of SEN which might require increasing action by a school.

There were three levels of intervention for pupils with SEN.

**School Action:** When a mentor or teacher of *Special Educational Needs Coordinator (SENCO)* decides to offer or provide a student with disability something

different from the actual course curriculum of the school which would help the children in a positive manner.

**School action:** the school jointly with the specialists helps the physically disabled children to improve their lives.

**Statement:** if a candidate asks for help which the school is unable to provide, the local authority can help the children to fulfill their requirement.

The governing bodies of maintained schools were required to use their best endeavors to secure appropriate SEN provision for any pupil with SEN, and had to appoint a member of the school staff to be a Special Educational Needs Coordinator (SENCO). Each local authority was responsible for identifying the children in their area who had SEN of a kind that may call for SEN provision. Having identified a child with SEN, the local authority was required to notify the parent that considering whether to make a formal (statutory) assessment of the child's needs. After a statutory assessment the local authority would decide whether it was necessary to make a statement of SEN.

A parent could also request a local authority to arrange a statutory assessment of a child for whom the authority was responsible and for whom no statement had already been made. A statement of SEN described, in six parts, the child's needs and the special provision needed. Provision was also in place for statements to be reviewed (Long, 2016). In England parents are given confidence to approach to local authorities to pursue their rights. Local authorities assesses child and let the parents decide to place in ordinary class or in special class (Teather, 2011).

In France there is a law which defines the assessment and identification process and detail of benefits on the basis of this identification. The Law no. 75-534 of 30 June 1975 on Policy for Persons with special needs has initiated the legal concept of disabled people. The Law of 11 February 2005, on the Equality of Rights and Opportunities, Participation and Citizenship of People with Disabilities, provided a

definition of disability. According to this law, the people who are physically disabled are unable to perform daily activities like the normal pupils and their capabilities to take part in social activities are also restricted due to certain specific intellectual, cognitive, physical, psychic, sensorial functions, degraded health condition or different disabilities. The law states every child with

disabilities is entitled to a needs evaluation. A multi-disciplinary evaluation team, elected by the Commission for the Rights and Autonomy of People with Disabilities of the *Departmental Centre for People with Disabilities (MDPH)*, performs the evaluation and decides upon the applicable legal measures for assistance.

Table 2  
*Comparisons*

Assessment aspects	Pak	USA	UK	France
1. Is there any proper body having legislative entity for assessment of disability for educational purpose?	Yes	Yes	Yes	Yes
2. Is there exists any authority in said countries which may itself approach to special person?	No	Yes	Yes	Yes
3. Does assessment body adopt specified assessment procedure?	No	Yes	Yes	Yes
4. Does assessment body issue any certification for special educational needs?	No	Yes	Yes	Yes
5. Is there any law which may empowered assessment body?	No	Yes	Yes	Yes
6. Does this body take consent form parents/ special persons?	No	Yes	Yes	Yes
7. Does assessment body adopt standard tools for assessment?	No	Yes	Yes	Yes
8. Does assessment body comprised on special school personals?	Yes	Yes	Yes	Yes
9. Is assessment body school based?	Yes	Yes	Yes	Yes
10. Does assessment body suggest some instructional program?	Yes	yes	yes	Yes

#### 4) Comparison on adoption of International conventions/ UN declarations

Table 3

International Laws on different occasions	Adaptations			
	Pak	USA	England	France
Declaration of the Rights of Mentally-Retarded Persons		✓	✓	✓
Declaration on the Rights of Disabled Persons		✓	✓	✓
World Program of Action concerning Disabled Persons,		✓	✓	✓
Tallinn Guidelines for Action on Human Resources Development in the Field of Disability		✓	✓	✓
Principles for the Protection of Persons with Mental Illness and the Improvement of Mental Health Care.		✓	✓	✓
Standard Rules on the Equalization of Opportunities for Persons with Disabilities		✓	✓	✓
Standard Rules on the Equalization of Opportunities for Persons with Disabilities,	✓	✓	✓	✓
ILO Recommendation concerning Vocational Rehabilitation of the Disabled	✓	✓	✓	✓
ILO Recommendation concerning Vocational Rehabilitation and Employment (Disabled Persons),	✓	✓	✓	✓
Sandburg Declaration on Actions and Strategies for Education, Prevention and Integration, adopted by the UNESCO World Conference on Actions and Strategies for Education, Prevention and Integration, Malaga (Spain), 2 - 7 November 1981,		✓	✓	✓
Salamanca Statement and Framework for Action on Special Needs Education, adopted by the UNESCO World Conference on Special Needs Education: Access and Quality, Salamanca (Spain), 7 - 10 June 1994 .	✓	✓	✓	✓

### 5) Comparison on Categorization of Disability

The disabilities in Pakistan are categorized into physical handicap, hearing impairment, visual impairment and mental retardation. The province of Punjab has established separate schools for slow learners (learning difficulties) However at national levels four types yet been being considered. Further, these are classified as mild, moderate, and severe/profound.

In USA (IDEA 2004) described that disabilities can be categorized as hearing and visual impairment, physical handicap and mental retardation. The level of disabilities can be severe, moderate or mild. USA IDEA has reported that there are thirteen different types of disabilities. Each state basically provides detailed criteria about the eligibility for disability like behavior scales, test scores, etc. As a person is found to be eligible for ESE services on the basis of any one of the listed exceptionalities that have been outlined in GSGA SEN definition then their *Individual Education Plan (IEP)* for the disability is developed (Moffitt, 2006).

Special education has been based on categorical model of services in the United States. The students and children those who are eligible for the special education are segregated into distinctive disability groups. The institutions for the disability people perform assessments on those who are eligible for special education. The assessments are always carried out by the people who are specialists in the field of disability. For instance, an audiologist carries out assessments for the people with hearing impairments, a psychologist for those who are mentally retarded or having intellectual disability for determining the eligibility of the candidates. The primary categories in *Public Law* were learning

disabilities, hearing impairments, speech and vision impairments, behavior disorders, and orthopedic impairments, multiple disabilities, fully blind and fully deaf. Later on in 1990 some additional disabilities were categorized like traumatic brain hemorrhage and autism. Attention deficit hyperactivity disorder has never been a separate disability category of IDEA because it has been considered to be a psychiatric diagnosis (Agunloye, Pollingue, Davou & Osagie, 2011).

In England in 1944 first act was introduced to categorize children having special needs. Many children were considered to be “uneducable” and pupils were labeled into categories such as “maladjusted” or “educationally sub-normal” and given “special educational treatment” in separate schools. The Warnock Report in 1978, followed by the 1981 Education Act, radically changed the conceptualization of special educational needs. It introduced the idea of special educational needs (SEN), “statements” of SEN, and an “integrative” which later became known as “inclusive” approach, based on common educational goals for all children regardless of their abilities or disabilities: namely independence, enjoyment, and understanding (Commons, 2006).

There is no established term in France which refers to the population of children who benefit from specific measures defined on the basis of special educational needs. According to the law, a disability is constituted by any limit on activity or restriction on the participation in social life endured by a person in his or her environment due to a substantial, durable, or permanent alteration of one or several physical, sensory, mental, cognitive, or psychic functions, to a multiple disability or to a disabling health problem.

Table 4

Country	No. of Categories considered	Description
Pak	4	<ol style="list-style-type: none"> <li>1. Physically handicap</li> <li>2. Impairment of hearing</li> <li>3. Impairment of vision</li> <li>4. Mentally challenged. (Slow learners in Punjab Province)</li> </ol>
USA	13	<ol style="list-style-type: none"> <li>1. Learning disability (Tavangarian, Leypold, Nölting, Röser, &amp; Voigt)</li> <li>2. Speech or language impairment (Mughees Ahmed)</li> <li>3. Other health impairment (OHI)</li> <li>4. Mental retardation (Leedy &amp; Ormrod)(McCarthy, Muñoz, &amp; White)</li> <li>5. Emotional disturbance (ED)</li> <li>6. Autism</li> <li>7. Multiple disabilities</li> <li>8. Developmental delay</li> <li>9. Hearing impairment (HI)</li> <li>10. Orthopedic impairment (Tavangarian et al.)</li> <li>11. Visual impairment (VI)</li> <li>12. Traumatic brain injury (TBI)</li> <li>13. Deaf &amp; blindness</li> </ol>
England	3	<ol style="list-style-type: none"> <li>1. Uneducable</li> <li>2. Maladjusted</li> <li>3. Educationally sub-normal</li> </ol> <p>These were broad categories introduced by the Educational Act 1944. Later on the Warnock Report in 1978, followed by the 1981 Education Act, radically changed the conceptualization of special educational needs. But now any Law does not categories pupils into “types” of disabilities. It is the duty of the town and the individual school to integrate pupils with special educational needs into the mainstream educational system. Educational, social and health authorities must co-operate in arranging instruction for pupils with special educational needs.(Morris, 2001)</p>
France	5	<ol style="list-style-type: none"> <li>1. Physical,</li> <li>2. Sensory ( hearing, vision)</li> <li>3. Mental</li> <li>4. Cognitive, or psychic functions, to a multiple disability</li> <li>5. Health impairment</li> </ol>

## Conclusions

1. Evolution of legislation and policies regarding education of special needs in mentioned countries occurred in different times. In comparison sense USA and UK did well regarding proper legislations for the SEN. As mentioned in table. 1 brief description of evolution of legislations for each country. Pakistan as compare to other four countries looking pretty poor in this regard. Due to lack of research and development and lack of different type of resources Pakistan could not be able to make legislations regarding SEN according to the situation and needs. Few legislations

done under the shadow of international agenda or any accidental purpose like Mr. Zia Ul- Haq former President of Pakistan has his own daughter mentally challenged, he did put some attention to SEN and few steps taken in this regard.

2. Defining and determination of disability varied from country to country. In definitional aspect Pakistan up till now described a concept that a person who is unable to gain or adopt any profession to make his/her livelihood due to any handicapping condition. This was adopted to make census and to determine disability. Whereas U.S.A defined disability or handicapped condition very comprehensively. IDEA

2004 a legal document defines the disability very widely but in Pakistan there is no any law act or legal document that may define disability or handicapping condition. In England there is no such act that can define disability but it is considered that the person who cannot cope in mainstream education is disabled and he may be provided special education or may be placed in special classes. In France disability is considered as “a disability is constituted by any limit on activity or restriction on the participation in social life. As compare to Pakistan France focused on social life adaptation of a person who may not be able to adopt social life normally is disable. In this regard we can say USA is much better at defining or determining disability.

3. Assessment procedure and diagnostic practice differently adopted by each country. This practice has been compared in table 2 in ten different dimensions. Pakistan has no remarkable position as compare to other four countries. Various requirements related to assessment practices of SEN still could not be able to meet. USA In this regard done well by introducing IDEA code of practice and guidelines and designed a proper body to assess disability and its severity for purpose to place the SEN in proper classroom settings. UK and France designed in law proper bodies at town level to make certification for disability and assessment.
4. By being a signatory country of UN Pakistan adopted various its declarations relating to basic rights provisions and specially education as basic right. Pakistan as compare to other four countries by standing in the list of developing countries, could not adopt declaration according to true spirit. As mentioned in table 3 Pakistan as compare to USA, UK and France stands with not good position.
5. Disability categorization was observed in variation. There are different

opinions, thoughts and procedure in regard of disability categorization in mentioned countries. For example UK has different approach in different times i.e. Warnock report early appeared and later on he went against his opinions. USA in this regard has clear approach by defining disability in act IDEA. Pakistan still working and categorizing disability which is visible on the other hand other four countries also working with invisible disability specially in UK and USA has recognized learning difficulty and autism. Still Pakistan has recognized four types of disabilities mentioned in table 4.

### **Recommendations**

To compete and to meet the international standards regarding education of SEN Pakistan need to initiate following steps:

1. The country Pakistan needs to improve legislations, infrastructure, and mainstream approach for better facilitations. Timely adoption of emerging trends in all over the world like inclusion is only way forward for the solution to cater whole disable population for education.
2. There should be proper mechanism for early assessment of disability and placement.
3. Pakistan needs to work to mobilize community resources to properly handle SEN.
4. There are managerial flaws that need to be addressed and eradicated.
5. The role of Non-governmental Organizations NGO's should be invited and welcomed in this field to perform well in remote areas.
6. There should be decentralized managerial approach to control school system. District authorities should be more empowered to facilitate well.
7. Legislations, Policy formulation and decision making should be research based rather than authoritative.

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