

Submission to the Committee for the UN Convention on the Rights of Persons with Disabilities

Response to Draft Article 24 General Comment on Inclusive Education

Submission from:

International Disability and Development Consortium (IDDC) and Global Campaign for Education (GCE)¹

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¹ The submission was compiled by the Inclusive Education Task Group of the International Disability and Development Consortium (IDDC) and the Global Campaign for Education (GCE) in collaboration with Enabling Education Network (EENET) and Save the Children

Introduction

IDDC, GCE and its members welcome the General Comment (GC) and applaud the level of detail in the document. We feel there are many positive elements of the GC. Due to the limited space available for our response, we are focusing on issues that we feel need attention. This document presents a brief summary of very extensive feedback provided by members of IDDC's Inclusive Education Task Group and GCE. This summary highlights key issues and indicates to which paragraphs they relate. We encourage the Committee to refer to some more detailed explanations in Appendix 1.

Overall tone, language and terminology of the GC

Several paragraphs in the GC use rather passive language, implying that States 'may wish to' rather than 'absolutely should' take certain actions (e.g. P12(f), P70, P79, see Appendix 1). We would like to see overall a stronger, more decisive tone that reiterates the responsibility of all states to deliver the right to inclusive education for all learners and that leaves less room for avoidance or misinterpretation of States' obligations.

In various places there is need for more detail and/or simplified detail to help States' readers who may not be experienced in inclusive education (e.g. P3 needs to explain very briefly *how* IEPs/co-operative learning strengthen teacher competence; P12(b) may need to be further clarified for non-educationalist readers; P52 needs to explain briefly *how* inclusive education supports the realisation of freedom of expression).

Attention needs to be paid to key terminology. P34(b) – the term 'deaf and hard of hearing' should be used, and the issues discussed not limited to sign language. We suggest not using 'fundamental education' (P40) as this is not a common term for describing an education level/stage. Throughout the GC there is reference to parents; this ideally needs to be broadened to recognise that many children with disabilities are looked after by other caregivers/family members. Throughout we suggest using 'learners with disabilities' (not 'children with disabilities', unless a point is specifically only discussing children) to reflect the wide age range of people covered by the GC/Article 24.

Explaining and justifying inclusive education

Overall the GC does not offer sufficiently clear, easy-read explanations of inclusive education, particularly in terms that its non-expert target readership will engage with. P3 needs to offer stronger (and evidenced) justifications for inclusive education, especially in relation to the economic case, given that economic arguments may be the most compelling for many stakeholders. The last two sentences of P28 also refer to economic justifications and could be strengthened by emphasising that States need to think differently about allocation of existing resources.

P9 begins to define inclusive education but requires more detail, particularly in relation to the need for deeper/broader education system transformations in order to achieve inclusive education. In line with global concepts, the GC could present a definition of inclusive education in broader terms to include all learners, (particularly those who are marginalised), even though the GC specifically addresses those with disabilities. P11 also offers some explanation of key terms, but greater clarity on inclusive education is needed here, using stronger or more direct language (see above). P82 could also be adjusted to ensure the GC does not reaffirm the misconception that inclusive education is just about inclusion for learners with disabilities, by mentioning collaboration with organisations working on educational inclusion for other marginalised groups.

The twin-track approach to inclusive education (delivering national and institution-level systemic change alongside individual/disability-specific interventions) offers an important and tangible way for States to understand inclusive education for learners with disabilities and the different steps they need to take. This could be mentioned in the GC, for instance in P10(a).

Stronger commitment to quality

The GC is weak in terms of laying down the standards of quality for inclusive education settings. P26 fails to address quality tools (appropriate curricula and inclusive teaching and learning materials and resources, including textbooks and ICT) and quality environments (healthy, safe, secure, supportive and comfortable teaching and learning environments with appropriate facilities). P63 should flag development of national quality and teacher qualification frameworks and complying with them should be a core component of education sector plans (P64). We welcome the reservations expressed under P77 about relying on standardised assessments as indicators of individual and systemic success.

Ensure compliance with SDG / Framework for Action

The GC must reflect and not regress from agreements reached in the Sustainable Development Goal (SDG) 4 and the accompanying Education 2030 Framework for Action for its implementation. The GC currently seems to be setting obligations lower than those in the SDG and Framework. For instance, when explaining which levels of education should be free, the GC needs to clearly indicate at least 12 years of free primary and secondary, with at least one year of free compulsory pre-primary. P1&2 need to explicitly mention SDG 4, to emphasise the importance of inclusive, equitable, quality education and life-long learning opportunities for all.

Systemic transformation

Successful inclusive education involves comprehensive reform across the whole education system. We feel the GC does not stress this clearly enough. P5 (bullet 4) could highlight the limited understanding of what is entailed in providing an inclusive education system, beyond making changes within schools. Rather than waiting until p60, P12 could mention that a core feature of inclusive education is inter-sectoral/inter-ministerial efforts to support inclusion, and for education ministries to embed inclusive education within every department. P12(g) could mention that monitoring, evaluation and learning around inclusion need to be embedded as a regular task, with clear indicators in every education programme and data collection processes, for all personnel working in education. P13 could clearly mention the removal of systemic barriers as well as barriers in the community and education institution. P63 could mention more explicitly the need for clear legislative commitment to time bound reform to the overall education system, beyond just schools. There needs to be a clear call for inclusive education policies to be developed or for special education policies to be reformed. The Committee could suggest a mechanism for developing the 'comprehensive and coordinated legislated framework' being called for. P63(g) may need to offer a concrete example of 'legislation potentially impacting inclusive education'. P64 needs to be more concrete, for instance recommending that Education Sector Plans ensure all learners with disabilities access quality inclusive education within the next 15 years and allocate the necessary resources for this. P65 should reiterate redress mechanisms to enforce the right to inclusive education

Special education, special schools, specialist support

The GC needs to offer better clarity with regard to the role of special education and specialist support within the development of inclusive education, as the situation is not

necessarily as clear-cut as ‘stop special schools and start inclusive schools’, yet we are concerned this could be the underlying message States take from the GC. We are concerned that States may use this opportunity to end special school provision without fully grasping what they need to do to make regular education inclusive (beyond integration). States with strong special education commitments may need more help understanding the process of change towards inclusion. There is a need for the GC to more clearly endorse and explain how states can retain/develop specialist skills/resources to support inclusion whilst ending specialist/segregated institutions.

In P32 the use of IEPs needs to be explained more comprehensively – they are not just for outlining support in terms of assistive technology, but are for setting learning targets. All States have different interpretations of IEPs, so clarity in the GC is vital.

In P66 / P73(b) there is need to better explain the purpose of inclusive resource centres (transforming them from special centres/schools) to ensure that: States understand the functional changes needed to provide outreach support for inclusive education and do not don't just make name changes; and understand the State's role in this regard. More detailed guidance for States is likely to be needed. In P73(b) there needs to be more acknowledgement that staff in special schools/centres are likely to need intensive retraining/re-orientation to be able to support inclusive education. In P73(c) there needs to be recognition that ‘resource teachers with additional training and expertise’ have often only received minimal training and do not possess much more practical experience than a regular teacher. The GC could provide more clarity on the expertise needed or minimum standards for expertise and for resource centres. The role of teaching assistants needs to be raised in the GC, with clarity regarding their responsibilities vs the primary responsibility of the mainstream teacher to ensure inclusion.

Education levels

The GC offers at times gives confusing or conflicting messages about which levels of education it refers to (pre-primary, primary, secondary, etc.) and the obligations of States (P17, 19, 23, 40(bullet 3)). The SDG4 and Education 2030 Framework for Action should be the guide here. P8 needs to clarify what is meant by pre-school (e.g. clarify whether this includes early childhood care and education – which is a term better aligned to the SDGs and Framework). P40(bullet 4) needs to ensure that national education strategies address all levels of education from early childhood care and education upwards.

Teacher education

Effective teacher education is essential for successful inclusive education. There are various concerns about the way the GC addresses this issue. Our primary concern is the endorsement in the GC of cascade style training in P73(a). Train-the-trainer / cascade approaches are common and favoured for being economical, and yet the impact is often limited to teachers' improved awareness and topic knowledge rather than significant change in practice. Such training is often short and theory-heavy, yet for inclusive education to succeed, teachers need to be guided, mentored and supported by someone with extensive practical experience and given hands-on learning opportunities. We urge the Committee to recommend whole-school approaches to inclusive education capacity building, but to suggest more effective measures than cascade training. Various other paragraphs (e.g. P74) could offer stronger endorsement of practice-based inclusive education training for teachers, including peer learning and action research, and a clear call for system-level reform of teacher education institutions (e.g. in P75).

At various points (e.g. P35), there needs to be stronger commitment to ensuring availability of professional teachers with emphasis and explanation/justification for ongoing training/continuous professional development (and quality training institutions) for teachers and for other professionals supporting inclusive education, such as rehabilitation professionals.

P72 needs to stress the importance of ongoing long term support/professional development for teachers, not just until pre-service training has improved, as such training will never prepare teachers for every future inclusion challenge. P73(d) raises an important issue of collaboration and peer learning for teachers, but this needs more clarity regarding why/ how to 'develop partnerships between neighbouring education institutions'. A vital purpose for developing partnerships between neighbouring institutions is to ensure effective, inclusive transition of learners with disabilities between education levels (e.g. moving from primary to secondary), and to facilitate the transfer of information about learning/support needs – all of which can help reduce/prevent drop-outs during/after transition. This important, under-addressed issue needs attention in the GC. Partnerships between special and mainstream institutions, with a focus on working together to develop/support inclusion, could also be mentioned. P35 needs to call for States to ensure that initial teacher training helps teachers learn about broader principles and practices of inclusive education, non-discrimination, UDL, etc., beyond disability.

Education in emergencies

The reference to inclusive education in emergency contexts is positive. The language used should reflect that used in UNCRPD Article 11 which refers to “situations of risk, including situations of armed conflict, humanitarian emergencies and the occurrence of natural disasters”. Reference could be made in the GC to inclusive disaster risk reduction in education and school safety frameworks that include children with disabilities. P14 could emphasise the likelihood of multiple discrimination/barriers for persons with disabilities, to help highlight why education in ‘situations of risk’ needs to be more inclusive. P14 could mention that refugee learners need access to language training and support to integrate into regular schools as soon as possible. P50 could mention the increased vulnerability of women and girls (with and without disabilities) in emergency and conflict situations and stress the need to ensure their inclusion in education.

Technology, materials, etc.

P21 could mention that such technologies are not a reality for most learners with disabilities in low/middle-income countries and that efforts are needed to ensure the development of technologies. Accessible transportation could be mentioned here. P27 seems to suggest that ICT could be an alternative if there is no accessible learning environment available. However, such ICT is likely to be unavailable to most in low/middle-income countries (accessible transportation may be more pertinent there), and there is a risk that ICT access could be used by States as an excuse to home-school rather than develop inclusive schools. P34(a) could stress more explicitly the importance of state-level investments in ensuring accessible books/ learning materials, which in part could be addressed by ratification of the Marrakesh Treaty.

Adjustment and reasonable accommodation

P25 could offer some examples of what is meant by providing adjustments to individual needs. This paragraph could more explicitly emphasise the importance of reasonable accommodation for learners with disabilities within education testing and assessment; and highlight that standardised international testing (such as PISA) is inherently discriminatory for many learners with disabilities and learning difficulties.

Exam/assessment bodies need training on how to ensure flexibility and accessibility and retain standards.

P63(d) should provide guidance on 'acceptable standards of accessibility' as this is subjective and often interpreted simply as wheelchair access, neglecting the access needs of persons with other disabilities. P63(f) needs to recognise the need for human resource training and budgetary resources to support reasonable accommodations.

Types of disability

While we recognise that disability is very diverse and the GC cannot discuss each impairment type in detail, there are some places in the GC where recognition of less well-addressed impairments could be made. For instance, P29 could use examples that mention the needs of children with severely limited speech (by mentioning picture-based communication books/boards and voice output devices). P34 could also have a point on children with complex communication impairments, limited speech and language abilities.

Parents, community, etc.

P80 could encourage states to work with family members of children with and without disabilities, as parents/caregivers of children without disabilities can cause or help break down barriers to inclusion. In P80, parental roles could be explained not just in terms of engaging in their children's learning processes, but in terms of their role in school governance. Similarly, P81 could encourage consultation with people with disabilities through education/school governance and monitoring systems, and recognise that not all people with disabilities are represented by an existing organisation. The GC should also ensure that it encourages States to consult with teachers regarding education reforms. Since household poverty is one of the main barriers to education for children with disabilities, the benefits of social protection packages need to be stressed in the GC.

Early years

The GC does mention early years issues at various points, but this could be done with more prominence earlier in the document, and with more explanation. P53 could stress the importance of early childhood intervention, and of training health professionals across various cadres and in issues relevant to early intervention for inclusive education. P54 should call for system level availability, accessibility and information about early childhood intervention services to parents/careers of children with disabilities. P63(h) discusses identification, but should stress *early* identification.

Financing, including through international co-operation

P70 should make a clear commitment on the part of states for adequate budgetary allocations for making quality inclusive education for all a reality. P39 mentions international cooperation – there should be a strong statement in the GC calling for all bilateral, multilateral, ODA funded education programmes to mainstream disability across all programmes and fund specific programmes to redress exclusion. P58 could also make a stronger call for ODA commitment to inclusive education, and for data on ODA spending to be disaggregated by spending on persons with disability.

Role of the private/business sector

Under p 83, we welcome the reiteration of the role of the state in ensuring inclusive education in private settings, but suggest replacing 'business enterprises' with 'private actors'. Furthermore, reference may be made to UN Human Rights Council Resolution 29/L.14/Rev.1, *Resolution on the Right to Education* for state responsibilities for ensuring private actors' compliance with human rights obligations.

Appendix 1: Detailed Feedback on Each General Comment Paragraph

The following is an amalgamated summary of detailed feedback provided by members of IDDC's Inclusive Education Task Group and the Global Campaign for Education. As such the feedback represents the views of diverse organisations working on disability, education and development issues.

Para 1

Please add reference to the Sustainable Development Goal (SDG) Goal 4 (education) and the Education 2030 Framework for Action that lays down modalities for its implementation. Going forward, SDG 4 and Framework for Action messages need to be reflected in the CRPD Article 24.

Para 2

This paragraph should refer more explicitly to the SDGs Goal 4 (education) to emphasise the importance of ensuring inclusive, equitable, quality education and promote life-long learning opportunities for all learners. The translation of this goal in the Education 2030 Framework for Action also needs highlighting.

Para 3

The educational case: The case needs to be made for *how* IEPs and cooperative learning strengthens teacher competences in inclusive education. References to the sources of research would be helpful, giving examples from each disability group. It needs to be noted that education is not all about academic results, rather holistic development, including social and emotional development. Some learners may achieve high levels of social inclusion, yet not achieve the academic levels of their peers. Education is ultimately a social activity.

The social case: Highlight more that inclusive education is a step towards an inclusive society which accepts diversity and celebrates differences.

The economic case: This particular point needs further referencing. No evidence is cited for either the social or economic argument, yet the economic case in particular could be the most compelling argument for 'winning over' certain stakeholders. Some examples of further sources include:

- Sobsey (2005): Inclusive Education Research
- Morgon Banks & Polack (2015 - ICED) 'The Economic Costs of Exclusion and Gains of Inclusion of People with Disabilities'
- Lamichhane and Sawada (2013: p. 86): 'wage returns to education associated with increased schooling for children with disabilities are substantial, with one study from Nepal estimating returns to education for people with disabilities ranging from 19.3% to 25.6%'
- Lamichhane (2015): Disability, Education and Employment in Developing Countries: From Charity to Investment

Para 4

This paragraph needs to highlight the issues related to accessibility to education.

Further reference needs to be made to education as part of life-long learning opportunities. The SDGs and the Framework for Action recognise the importance on

early childhood education, as well as tertiary. Thus far in the GC there are no references to technical and vocational education and training or to adult literacy.

Whilst there is a general consensus that inclusive education is the way forward, the negative references to special education here need to be reconsidered, or at the very least elaborated further to explain the meaning here. Figures are required to verify the findings alluded at. Even in high resource countries where inclusive education is in place, there continue to be specialised settings and well-resourced, specialist support to ensure quality inclusive education. It would be ill-advised to withdraw all support to specialised provision. This approach can also lead to division in education, rather than promoting unity and complementary approaches (e.g. specialised resources within special schools can be used to support inclusion). In order to actualise inclusive education, a systemic revision is required of the way education is provided, from pre-service to in-service teacher preparation, to assessments (broader than academic); WASH; Universal Design considerations, etc.

Para 5

Bullet point 4: Add that there is limited understanding of what is entailed in providing an inclusive education system where learners with diverse disabilities can thrive.

This list should likewise recognize that there is an overarching issue around the political will to invest in the systemic requirements for practicing inclusive education- that of political commitment and will towards provision on the part of the state itself. Schools are often required to implement inclusive education, but without the training, resources or expertise required to fully implement the approach. Long-term financial resources need to be ring-fenced for implementation. In addition, in order to identify learners with disabilities and those at risk of disability, there needs to be greater collaboration between Health and Education ministries (and others) to ensure greater opportunities for early intervention (medical and educational) as well as early childhood development and education within community services.

Para 8

Should include all stages of education implicit in the lifelong learning approach. Furthermore, it is unclear whether pre-school is used synonymously with early childhood care education (ECCE). The latter term is preferable in order to be aligned with SDG and Framework for Action.

Consider changing the term 'on equal terms with others' to ensure equitable access as this would exclude reasonable accommodation

Para 9

This point begins to define the term inclusive education, but requires more detail.

Furthermore, emphasizing further the need to transform educational systems could lead to a stronger statement, as would emphasising the need for cross ministerial collaboration in order to enable access to quality education.

The definition of inclusive education could be framed in broader terms to include all learners and reflect their diversity / intersectional needs. In the last sentence referring to goal, expand to: regardless of disability, gender, ethnicity, language.

- a) Refer here to the twin-track approach as a rights based approach, with inclusive education being a fundamental right for all learners.
- d) Identify barriers before being able to eliminate them.

Para 11

Further clarity on the definition needs to be embedded here.

Para 12

Emphasis needs to be placed here that this is the role of the Member State along with disability inclusion in all ministries related to education (health, welfare etc.). Within the Ministry of Education, inclusive education needs to be embedded in all related fields e.g. ICT; Curriculum Development; Assessment; Policies and Guidelines.

Point (a) should mention School Governing Bodies.

Point (b) Another aspect of the **whole person approach** is it focuses on learning holistically, e.g. learning styles; autonomy for learning; self-awareness, self-esteem; motor skills, life skills and creative skills as well as academic learning which is life-long, applying reasonable accommodation as required. Some learners will need differentiated learning in order to achieve their goals. This may need further clarification for a non-educationist readers. Once completed, the whole document will require adaptations for easy-read access for non-specialist readers.

Point (c) On-going regular quality training is required for all staff. One-off training does not lead to inclusive education. Learning takes place in formal, informal and non-formal situations. Training should provide the core values and competencies needed to work effectively in an inclusive learning environment. Capacity building and professional development opportunities need to be supported by education authorities along with incentives.

Point (d) The curriculum and supporting published materials should reflect and cater for diversity.

Point (e) This could be strengthened by adding a focus on active, student-centered learning. Reference may also be made of universal design.

Point (f) The last sentence could be strengthened to: It is important to recognize that the relationship between the learning environment and the wider community can help to create/promote inclusion in the wider society.

Point (g) This should not be an additional burden for teachers. The monitoring, evaluation and learning should be on-going and regular in order to maintain quality and improve provision. The learning should reflect good practice as well as identify gaps. Segregated provision needs to be monitored on the level of inclusion supported. Disability inclusive indicators and the collection of disaggregated data for SDGs and the Education 2030 Framework for Action need to be emphasized here, along with the need to invest in building national statistical capacities and Education Management and Information Systems.

Para 13

'Systems' need to be mentioned alongside educational institutions / learning environments here. Please add: participate and achieve within an inclusive education setting (in the last sentence).

Para 14

Having reference to education in emergency situations is very positive. Reference is needed to inclusive Disaster Risk Reduction (DRR) and the adoption of comprehensive Schools Safety Frameworks that are sensitive to children with disabilities. There is a need to emphasise the chances of multiple discrimination / barriers for person with disabilities here to further highlight the need for education in emergencies to be more inclusive. Refugee students should have access to language training and information about the country they arrive in. They should be integrated as soon as possible in regular schools. Accessible training material (e.g. in braille) and school facilities must be provided for people with disabilities. Deaf children should have access to training in local sign language.

Para 15

This should reiterate the commitment to delivering quality education for learners with disability.

Para 18

Not all regular learning environments are run by the education department. Not everything that the education department does is regular learning environments (e.g. in India home-based learning is provided).

Para 19

This point about free primary and secondary seems contradictory to P17 and P23 which seem to imply only free primary education. If primary and secondary education should be accessible for people with disabilities on the same level as to students without impairments, granting the assistance that ensures the access is a precondition.

Para 20

Qualifying what is meant here by 'functioning' would be helpful. Further, accessibility requires consideration; disaggregated data by age, gender and disability. This information will assist with planning e.g. WASH. Needs assessment requires thought for all aspects of accessibility and reasonable accommodation.

Para 21

Such technology is not a reality for most learners with disabilities in low-middle-income countries. Efforts need to be made to ensure the development of technologies to support inclusion along with the related support service.

There is no mention here of accessible transportation. Without accessible transportation, many learners will not even get to school.

Para 22

Mention should be made that the supply of textbooks and other materials be timely, both in real terms relative to the academic calendar and relative to other students.

This requires working with, among others, publishing companies, ICT companies, Ministries of Communication, library services as well as curriculum development as

referred to in the Marrakesh Treaty. There is an overlap here with articles 9 I b and 21 of the Convention, which could be mentioned. Education cannot be dealt with in isolation.

Para 23

Clarity is required here and alignment with SDG and Framework for Action – primary and secondary provision must be free and accessible. The Framework for Action outlines that states must “ensure access to and completion of quality education for all children and youth to at least 12 years of free, publicly funded, inclusive and equitable quality primary and secondary education, of which at least nine years are compulsory, as well as access to quality education for out-of-school children and youth through a range of modalities. Ensure the provision of learning opportunities so that all youth and adults acquire functional literacy and numeracy and so as to foster their full participation as active citizens. The provision of at least one year of free and compulsory pre-primary education...”.² In addition, tertiary provision needs to be affordable.

Para 25

In this section it would be helpful to offer some examples of what is meant by providing adjustments to individual needs, and providing appropriate educational response. There needs to be emphasis that exclusion of learners with disabilities in national assessments is discrimination and exclusion. Reasonable accommodations and adaptations need to be in place. In addition, examination / assessment bodies need to be provided with training on how to ensure accessibility for all and yet retain standards required e.g. IEPs need to be seen as a valid form of assessment and validated by MoE.

Para 26 on quality is very weak and needs to relate more to comprehensive principles of quality in education and the twin-track approach to inclusive education for children with disabilities. Thus, quality education entails quality teaching, quality tools and quality environments³.

Listing ‘responding to the voices of person’s with disabilities’ first as a principle to adhere to when fulfilling the obligation of quality inclusive education, does not make sense. Responding to the access and learning needs of persons with disabilities should be first and foremost.

Para 27: There is a concern that high tech ICT is offered as an alternative option to educating children at school as it is not accessible to the majority of persons with disabilities living in low- and middle-income countries. Providing transport or grants for transport is a far more realistic solution. In higher income countries, there is a danger that ICT access to learning may be used as an excuse to home-school children with disabilities, placing additional strain on families of children with disabilities and depriving

² http://www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/ED/ED_new/pdf/FFA-ENG-27Oct15.pdf, p6

³ **Quality teaching** – ensured through the recruitment of high calibre candidates to teaching, high quality initial teacher education and continuous professional development and attractive salaries and conditions of service determined through collective bargaining and other forms of social dialogue. **Quality tools**– appropriate curricula and inclusive teaching and learning materials and resources, including textbooks and ICT. A quality curriculum that is flexible and designed through an inclusive process that guarantees teachers participation is highly desirable. ICT can be a powerful tool that can support teaching and learning. **Quality environments** – healthy, safe, secure, supportive and comfortable teaching and learning environments with appropriate facilities to support student learning and to enable teachers to teach effectively.

the children of the opportunity to socialise and learn from other diverse children. Participation with a diverse range of students should be stressed as there is a tendency to assume that peers or 'other students' are those with disabilities or with the same disability.

Para 28: The last two sentences should be changed to address the concerns that States and NGOs have about the high cost of inclusive education for children with disabilities and the assumption that it is impossible to implement without huge additional funding. A suggested change is: Developing an inclusive education system requires states to think differently about how existing resources are allocated, developed and used; there is a need to think about the benefits of developing new resources, such as training additional health cadres, to the majority of the population and future cost-benefit pay-offs.

It would be useful to emphasise that reasonable accommodations would not be an undue burden, if UDL was adopted as an overall approach to delivering inclusive education in a general classroom, as most individual learning needs for students can be accommodated in this way.

Para 29: It would be helpful if the examples provided spoke to the needs of children with disabilities who are generally neglected such as those with severely limited speech e.g. picture-based communication books or boards and voice output devices.

The importance of including an expert in the decision-making on reasonable accommodations should be included.

Throughout the GC there is reference to parents, which overlooks the fact that in many cases children with disabilities are looked after by a care-giver or family member, therefore where 'parent' is used, we should also add 'care-giver and family'.

Para 32: The first sentence should be changed as the phrase 'to live, study and act autonomously' does not speak to the real aim of individual support in education. The following alternative sentence is proposed: Individual support should be provided to maximise the person's functioning to promote effective learning, participation and independence.

The sentence, 'In all cases, the nature of provision...' needs to be rephrased as it depends on the age and maturity of the person with a disability.

It is important to stress that an individualised education plan is not only about providing support in the form of assistive devices and aids; rather it should include learning targets and explain the methodology of how to achieve these targets.

Since there is variation from State to State and even within states on what an IEP is, a clear message is required.

Para 34

Point (a): The text is unclear and does not speak to state level interventions, which are also relevant in ensuring accessible publishing of textbooks and learning material. Suggested revision: Blind and partially sighted students must be provided with opportunities to develop orientation and mobility skills and have access to information in alternative formats, such as Braille, audio, electronic, and/or large print. States should ensure that publishers make textbooks and learning material available in accessible

formats. States are urged to ratify the Marrakesh Treaty, to facilitate access to published works for students with visual impairment and additional disabilities or deaf blindness. Alternative and augmentative communication (AAC) systems, such as communication boards and touch switches, may be required.

Point (b): The term 'Deaf and hard of hearing' should be used. The issues relating to Deaf and hard of hearing cannot be limited to sign-language translation. This group of persons with disabilities range from sign-language users to users of other support such as hearing aids and other assistive technology to ensure their full linguistic development. Therefore, interaction with both hearing and Deaf students is necessary and a whole-school approach where all learners in a school with Deaf learners are encouraged to learn sign-language. An inclusive class should ideally have at least two Deaf learners. Deaf culture and identity should be incorporated in curricula addressing diversity, peace and sustainable development. States should encourage programmes that teach parents, family and community members an adequate level of fluency in sign-language.

States should invest in developing sign-language interpretation services with the view of recognizing sign language as an official language. Sign language research and development needs to be supported in order to ensure that sign language can be incorporated in educational materials and quality interpretation services are available to meet the demand.

Para 34 should have an additional sub-point on children with complex communication impairments / limited speech and language abilities. The point could read as follows: Students with communication impairments must be provided with the opportunity to express themselves and learn using Alternative or Augmentative communication. This may range from sign language to low or high tech communication aids such tablets with speech output, voice output communication aids (VOCAS) or communication books. States should investment in developing expertise, technology and services in order to promote access to appropriate technology and alternative communication systems to facilitate learning. Peer support and mentoring schemes should be introduced and encouraged.

Para 35

Initial teacher training should not just include disability but teaching about broader principles and practice of inclusive education such as UDL, non-discrimination etc. which would promote both a better understanding of the wider interpretation of inclusive education and practical implementation in a class with learners with diverse needs. The need for ongoing support and professional development needs to be emphasised. During pre-service training the student teacher may learn about inclusive education, different disabilities etc., but it is only when they are teaching the class that they realise what other knowledge is needed. From year to year different learning styles, learning needs and disabilities are encountered. Each situation requires new learning for the teacher, therefore on-going regular in-service training and on-going regular visits from specialist peripatetic advisory teachers is required. In-service and pre-service training and on-going support must be rooted in practice and not just theoretical. Hands-on learning, not just awareness-raising, has to be at the heart of teacher education for inclusion to work in practice.

The second sentence should use the "adequate numbers of professionally qualified, trained and committed teachers." Doing so reflects the need for maintaining reasonable

pupil teacher ratios and highlights the need to recognize teachers as a profession and the need for recurring teacher training (in line with SDG 4).

The recommendation should also express the need to train adequate numbers other professionals who are key in supporting inclusive education. These include specialist teachers (with special needs skills) and rehabilitation professionals such as speech-therapist, audiologists, occupational therapists, physiotherapist, community based rehabilitation workers as they play an important role in improving inclusion, learning and functioning of persons with disabilities. Further attention should be given to developing training institutions' capacities to deliver quality professionals.

Recommendations on how to retain motivated teachers and support teachers by creating a good working environment, a good career path, incentives and professional development opportunities should be given (e.g. reducing the learner-teacher ratio). Relevant training for the entire education workforce including head teachers, pedagogical directors, education managers and planners should be provided to ensure favourable conditions and the transformation towards an inclusive education system.

The phrase, 'shortest possible time' could be misinterpreted and could encourage fast, low quality interventions, so it is better to relay the urgency by calling for States to 'step-up action'.

Para 36

The investment and support to teachers with disabilities should include career path development and encourage States to consult with teachers with various disabilities to resolve challenges.

Para 37

It would be more beneficial to suggest affirmative action measures coupled with support to increase the number of professionals with disabilities in order to dispel negative attitudes about the worthiness of investing in children with disabilities.

The financial barrier is an important barrier not mentioned in this paragraph.

Para 38

The essential features of education needs a reference. The obligation to 'fulfil' should also draw on the need to provide social protection in the form of school feeding schemes and grants to poor families.

Para 39

In relation to 'international cooperation', there should be a strong call for all bilateral and multilateral aid / ODA funded education programmes to respond to learners with disabilities by mainstreaming disability across all programmes and by funding specific programmes with the aim of redress. In addition, data and spending of ODA on education should be disaggregated by disability. The last sentence on 'retrogressive measures' needs more explanation and perhaps a tangible example of a scenario to minimize the possibility of abuse of this clause.

Para 40

The point on compulsory free primary education should not regress from the international agreement under the SDG framework that commits to 12 years of free education for all learners. More specifically, the SDGs and Education 2030 Framework for Action states:

“Ensure access to and completion of quality education for all children and youth to at least 12 years of free, publicly funded, inclusive and equitable quality primary and secondary education, of which at least nine years are compulsory, as well as access to quality education for out-of school children and youth through a range of modalities. Ensure the provision of learning opportunities so that all youth and adults acquire functional literacy and numeracy and so as to foster their full participation as active citizens. The provision of at least one year of free and compulsory pre-primary education of good quality should also be encouraged”.⁴

The point on ‘national educational strategy’ should address all levels of education ECCE, primary, secondary, technical vocational training, higher education and recognize the principle of lifelong learning. The terminology used in education should be applied e.g. ‘fundamental education’ is not a term commonly used.

Sction 4, ‘relation with other provisions of the convention’,

The section seems redundant and contains references to articles that are not very relevant (e.g. political representation) or neglects ones that are very pertinent (e.g. Article 28 on adequate standard of living and social protection, Article 9 on accessibility which speaks to accessible information and communication).

Para 50

The increased vulnerability of women and girls in emergency and conflict situations should be emphasised. In the interest of child-protection, States should require that schools have a learner safeguard policy, signed by teachers, where procedures are outlined. In addition to ‘sanctions’, recommendations on how to promote positive relations and respect among peers should be provided.

Para 52

It would be useful to explain how inclusive education would support the realisation of freedom of expression. The following sentence could be added to explain: ‘Doing so will also equip staff, governors and overall community with the attitude and skills to support expression and participation of persons with disabilities’.

Para 53

In this paragraph, the importance of well-being and early intervention should be stressed. The appropriate treatment and care needs to start as soon as any risk factors are identified (below age 3) and should include supporting parents and caregivers to provide time-appropriate stimulation in the child’s natural settings. These interventions are likely to reduce the need for expensive specialized interventions later in life for around 70% of young children identified with risk factors.

In addition, the recommendation to states should include training and acknowledgement of health professionals of a broad range of cadres and specialities such as optometrists, ophthalmologists, speech and hearing therapists, etc.

Para 54

The importance of early intervention should be given more prominence earlier in the GC and explained more fully. Availability, accessibility and information about these services to parents/carers of children with disabilities should be included. In the set of abilities to

⁴ http://www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/ED/ED_new/pdf/FFA-ENG-27Oct15.pdf, p6

be developed, the need to develop a person's emotional ability should be included and 'mental' should be substituted for 'intellectual'. The inclusion of 'multidisciplinary assessments' necessitates that States train and acknowledge a full range of rehabilitation professionals that are trained to work in inclusive education settings and with an inclusive education approach to rehabilitation. Community Based Rehabilitation workers have successfully filled the gap for professional services in many low-income countries and rural communities by providing home-based care, linking learners and their families to education other services. Their good work should be acknowledged and encouraged in the GC.

Para 55

The point on the right to work on an equal basis as others should rather focus on employment and work conditions of teachers with disabilities in the education sector. The opportunities that can be opened by including persons with disabilities in technical and vocational education and training should be emphasised as this is a key priority in education and disability is specifically mentioned in SDG 4.5.

Para 56

State parties must remove bureaucratic barriers to enable participation of persons with disabilities in public life, including school governing structures or other education governance structures set-up to promote civic participation. All policies and structures that prevent students from accessing and completing education must be removed. It is recommended that Article 28 (Adequate standard of living and social protection) is referenced, 'ensure access by persons with disabilities, in particular women and girls with disabilities and older persons with disabilities, to social protection programmes and poverty reduction programmes'. Poverty is one of the biggest root causes of exclusion in education of learners with disabilities, and social protection programmes such as feeding schemes, grants, etc. are known to increase enrolment and retention rates of learners.

Para 58

There needs to be a strong recommendation that all development corporation and humanitarian aid with a focus on education, must mainstream disability and include a specific component of redress for persons with disabilities. There should be a stronger call for Overseas Development Aid (ODA) commitment to inclusive education and that the share of ODA spending on persons with disabilities should be disaggregated and available in the public domain.

Para 60

The government intersectoral approach and community participation in realising inclusive education is crucial and needs to be explained in the first six paragraphs of the document. The importance can be elaborated upon by explaining the importance of early detection and intervention or the on-going medical and rehabilitation needs of persons with specific disabilities.

Para 63

There needs to be a clear call for countries to either develop an inclusive education policy for children with disabilities or reform their special needs education policy and legislation. The Committee should suggest a mechanism / structure for developing the 'comprehensive and coordinated legislative framework' proposed. Too often inclusive education for learners with disabilities is the responsibility of a small unit or department with little to no influence, human resources or budget. Driving the process through such a

department would diminish the status of the issue and not actualise the education reform needed to realise inclusive education for learners with disabilities.

The reference to 'education institutions' does not reflect the education system reform / overhaul needed or the importance of building and using special needs expertise to facilitate inclusive education for learners with disabilities. The roles and responsibilities of those coordinating inclusive education for learners with disabilities at all levels needs to be clarified.

It would be best to provide guidance on 'acceptable standards of accessibility' as this is subjective and generally there is a tendency to prioritise wheelchair accessibility over the accessibility needs of those who are Deaf/hard of hearing and Blind/partially sighted, etc.

It would be good to add a recommendation on developing comprehensive quality standards for educational settings (both the inclusive educational setting and resource centres), including qualification frameworks for teachers and other personnel. These must include availability of specialist staff, support staff, infrastructure and learning environment that is healthy safe, secure and supportive, appropriate curricula, teaching learning materials and resources, rehabilitation / assistive technology devices and services.

On 'monitoring mechanism: The following, more relevant language is suggested: Introduction of disability-inclusive monitoring mechanisms to track progress in implementation and ensure that policies, and programmes are implemented and backed by the requisite investment.

On 'reasonable accommodations' there needs to be recognition that in order to support reasonable accommodations, human resource training and budgetary resources are required e.g. sign-language interpreters, screen-readers.

On 'legislation potentially impacting on inclusive education', it is important to provide a concrete example. Perhaps the example of transportation could be used or information and communication technology accessibility, together with a time frame for adaptation of existing schools.

On 'identification, assessment and support' the emphasis needs to be placed on 'early identification.'

On 'the right to be heard' / participation of learners with disabilities, there should also be a reference on child protection. The word "school system" must be replaced with "educational system"

Para 64

The Committee should recommend that Education Sector Plans ensure all learners with disabilities access inclusive education of appropriate quality in the next 15 years and provide the necessary resources to this end. The data on the current situation of learners with disabilities should encompass the following: current budgetary allocations, numbers of children with disabilities in and out of school (disaggregated by type of disability, income, gender, age, race, ethnicity, migratory status, and geographic location). Education Management Information Systems data should collect data on other parameters that indicate quality, including, but not limited to, dropout, repetition, completion rates at all levels of the education system, percentage of students attending

segregated education, teachers trained in inclusive education, extent of adherence to the national standards of quality (textbook-learner ratio, qualified teachers, etc.), challenges and barriers in mainstreaming inclusive education, extent of implementation of existing laws and policies, and take into consideration the key concerns of both persons with disabilities, families and the State party.

Para 65

The complaints mechanism should adequately address issues of redress and avenues through which to challenge violations. These mechanisms should be child-friendly and user friendly. The following language is suggested: Effective, accessible, safe and enforceable complaints and redress mechanisms must be introduced through which it is possible to challenge violations of the right to education and enforce the right to inclusive education. States parties must also ensure that information about the right to inclusive education itself, and how to challenge denial or violations is widely disseminated and publicized. Child friendly ways of doing so must be found to enable children with disabilities to exercise this right. Rights cannot be exercised unless they are known about and understood. This has already been proposed by Eugeen Verhellen (2000), and the 'General Measures of Implementation' of the CRC (Juneja, N, 2009). Active steps must be taken to build capability to exercise the right among affected parties, including persons with disabilities themselves, as well as parents and caregivers.

Para 66

The purpose of inclusive resource centres needs to be elaborated on in order to ensure that this is not just a change in name but in overall functioning. These centres should provide outreach support in order to facilitate inclusive education for persons with disabilities in regular schools.

Para 67

The paragraph should be strengthened as follows: The Committee draws States parties attention to the research evidence indicating that early childhood interventions have long lasting positive impact in terms of physical, cognitive and psychosocial development for all learners, but can be particularly effective for children with disabilities, serving to strengthen their capacity to benefit from education and promoting their enrolment and attendance.ⁱ It, therefore, emphasizes the importance of early detection from birth, identification and access to services for pre-school children, together with the provision of support and training to parents and caregivers of young children with disabilities. They can play a crucial role in stimulating the early development of their child's potential and preventing the onset of severe secondary disabling conditions, affecting both physical and intellectual ability. In order to deliver effective early intervention, States parties need to ensure coordination between ministries of health, social welfare and education as well as NGO partners. In addition, the Committee encourages States parties to invest in inclusive pre-school education in light of the clear evidence of the benefits to children as well as the enhanced likelihood that attendance at pre-school results in improved learning outcomes in later levels of education and greater acceptance into local community schools

The importance of Early Childhood Care and Education should also be captured in this paragraph.

Para 68

The collection of appropriate disaggregated data enables states to formulate appropriate policies, plans and programmes – ‘plans and programmes’ need to be included in the first sentence.

Para 69

The word ‘quality’ should be omitted here as we need to determine the barriers that prevent persons with disabilities from having access to, remaining in, and making progress in education (regardless of the quality).

Para 70

This paragraph needs to be strengthened in order to sound more definite. The following is suggested: The Committee stresses the need for allocation of sufficient committed financial and human resources through the development of Education Sector and Cross-sector Plans to support the implementation of inclusive education, consistent with progressive realization. States must reform their governance systems and institutionalize financing mechanisms to ensure the right to education for persons with disabilities. Doing so will, furthermore, improve quality of educational settings and support teachers, freeing them to act as agents of change. Recognizing that the right to inclusive, quality life-long education is a fundamental right for all learners, the Committee recommends that States parties prioritize budgetary allocations to inclusive education. These allocations must prioritise ensuring adequate resources for making all existing educational settings accessible in a time bound manner, ensuring adequate numbers of professionally qualified, trained and motivated teachers are trained in inclusive education, especially through enhancing invests in teacher education, making available reasonable accommodations, provide accessible transport to school, make available appropriate and accessible text books, teaching and learning materials, reducing class sizes, ensure assistive technology provisioning and Sign Language, and provide awareness raising initiatives to address stigma and discrimination particularly bullying in schools.

Para 72

The GC needs to stress the importance of ongoing inclusive education-related support and professional development for teachers in the long term, not just until pre-service training has been improved. Teachers will always need hands-on, practical support around inclusion and disability because of the very wide range of learning needs and other challenges they have to deal with. This paragraph could also explain more about the other sorts of human and materials resource support this system could deliver – beyond teacher training/advice. There could be a paragraph in the GC dedicated to discussing the continuous professional development and accreditation of teachers. The GC could also call for minimum norms and standards on professional competence for teachers teaching specific disability groups, which is particularly important for teachers working as resource teachers or pedagogical experts.

Para 73

Point (a) This train-the-trainer approach to teacher training for inclusive education is not effective and should not be recommended in the GC. A whole-school approach – in which all teachers and staff (as opposed to just one or two ‘special’ staff) are aware of and suitably skilled to respond to the needs of diverse learners, including those with disabilities – is essential. But cascade-style training is not the best way to achieve this. Evidence from international research, as well as multiple programme evaluations for NGO projects, has revealed that it is an unrealistic expectation to think that teachers who have received usually rather superficial and theoretical training can go on to train colleagues in an in-depth, practical and ultimately useful way. Successful inclusive

education depends on teachers engaging in very practical, experiential learning, where they can build the skills and confidence to problem-solve their way through diverse inclusion challenges. Short, theory-heavy training courses, of the type common in cascade training models, serve usually to raise basic awareness but not to equip teachers with the necessary practical skills and problem-solving capacity. We urge the Committee to recommend whole-school approaches to inclusive education capacity building, but to suggest more effective measures than cascade training.

Point (b) Overall we feel that the contentious issue of special schools and how to deal with them needs to be given more attention, and perhaps earlier in the GC. This issue is of great significance to many countries where special schools are well-established or currently being developed, and where there is/maybe resistance to changing this. Furthermore, significant support is needed to any education frontline providing institution that is restructured into a support institution; this is frequently not adequately provided to special schools- many of which may not be able to successfully make the transition. There is not yet a strong body of successful examples of countries that have managed to roll out this approach in a way that genuinely achieves transformation from special school/centre to effective resource outreach service. If the GC is to advocate for this approach, this needs to be accompanied by guidance to develop norms and standards for special needs resource centres, clearly outlining that such centres exist to provide outreach/itinerant support to regular schools/teachers and to help prepare children with disabilities for school enrolment (not as places to deliver education directly learners with disabilities over the long term), and covering staff skill levels and outreach expectations for staff (to assess and support children in school, train/mentor regular teachers, etc). The GC also needs to acknowledge that staff in special schools/centres are likely to need intensive retraining to work in an outreach rather than direct provision approach; and that staff who are experienced at providing direct special education support to learners may need intensive assistance to convert their role into that of trainer of regular teachers. The GC could provide some outline of what (practically) is needed to achieve these significant shifts in focus for special schools and their staff.

Point (c) We advise caution in the wording of this point. Often a 'resource teacher with additional training and expertise' has only received minimal extra training through a short course that has not equipped them with significantly more practical experience than a regular teacher, lacks ability to adequately address the diverse needs of learners with different disabilities and may lack the support infrastructure needed to address the needs of diverse learners within the school. Often anyone who has attended a basic inclusive education course, regardless of the length and quality, is regarded as an 'expert'. The GC could offer greater clarity regarding the specific expertise such resource teachers should have and the minimum standards needed to determine 'expertise'.

Point (d) It can be very useful for teachers to meet, share experiences, discuss challenges and problem-solve together – both within and between schools. However, the paragraph currently does not offer much clarity regarding why / how to 'develop partnerships between neighbouring education institutions', and does not highlight the approach's potential for contributing to teacher education/ongoing support. Further, in reality schools/teachers are often over-burdened and attempts to achieve inter-school collaboration rarely succeed/continue beyond initial facilitation by whichever organisation initiates it. If the approach is to be recommended, therefore, the GC may need to offer more guidance on the practicalities.

Para 74

In this paragraph (and throughout, at any relevant opportunity) the GC needs to stress that 'learning about inclusive education' needs to be based around practice-based learning/training (many states urgently need to move away from models of theory-dominated inclusive education training, and instead begin to inject practical and reflective activities such as action research into teacher education). This paragraph also leaves the reader asking 'what are the necessary level of core competencies and values', suggesting a need to provide guidance on defining minimum competency levels and how to measure/accredit this.

Para 75

The GC needs to emphasise (either here or in a related paragraph) the need to strengthen or reform teacher education institutions to be able to deliver quality training that covers the issues outlined in this paragraph (and other paragraphs), through practice-based teaching/learning approaches. We note that UDL was mentioned several times earlier in the GC, but is not mentioned here, when it could be important to highlight the need to train teachers to be able to deliver/support UDL. This paragraph notes that "teachers need practical guidance and support", which potentially causes confusion with the point raised in para 72 which suggests ongoing support would be needed only until all pre-service teachers have received inclusive education training.

Para 76

This paragraph could also mention rehabilitation and health professionals when listing 'all possible sources of support'. The paragraph could acknowledge that it is not just student teachers who 'need experience in inclusive schools' – in-service teachers who are still learning about inclusive education (and will continue to learn and develop for many years) also need opportunities to visit, observe and practice alongside more experienced peers. The Committee may want to ensure that community participation is highlighted elsewhere in the GC, as it is not just vital for helping teachers but also for systemic accountability (e.g. see comment on para 80).

Para 77 (learning IE – there seem to be 2 paras numbered 77)

It is assumed this paragraph refers to classroom assessment and not to international standardized assessments such as PISA, although this is not made particularly clear. It is not clear whether the GC is calling for states to ensure that assessment focuses on 'individual progress towards broad goals' for all learners, given that it's not just those with disabilities that struggle with standardizes tests (necessitating comprehensive assessment/exam reform across the education system) or if the GC is just saying those identified with disabilities should have their individual progress against goals measured (which could potentially mean learners with disabilities being seen to have progressed through a 'special' assessment process that does not put them on an equal footing with other student). The last part of the paragraph is not easy to understand and needs to be explained more clearly for the non-expert target audience.

Para 78

We need to be cautious that indicators to measure barriers do not just result in more attitudinal studies (to add to the existing plethora) which don't really take us forward in understanding the depth and breadth of barriers to inclusion. Indicators should also focus on specific learning needs, and there should be a focus on qualitative as well as quantitative indicators. In the last sentence, it would be more appropriate to refer to 'completing primary education'. rather than 'final certification'

Para 79

This needs to be more definite – rather than ‘considering’ measuring education quality and affirmative measures, this must be recognized as an integral part of the right to education (without quality education we cannot successfully achieve inclusive education). There is also a need to ensure that quality education is clearly defined within the GC (the document cited in this paragraph contains a good definition). Throughout the GC, the definition of equity is not unpacked. When considering the wording of the SDG4 it would be important to explain this concept.

Para 80

This paragraph could encourage states to work with parents of children with and without disabilities, as parents of children without disabilities also have a vital role to play, and can cause or break down barriers to inclusion for children with disabilities.

The paragraph could mention that they have a role to play not just in learning programmes and individual education plans, but also in school governance. It is important to stress that family members, volunteers etc can assist teachers if they are enabled to do this properly, through receiving appropriate training and awareness of child safeguarding policy, inclusive practices and what support is required. However, it is important not to endorse that additional support can rely on volunteers. Instead, there should gradually be built a tier of assistant teachers who are trained, recognised and paid for their services as any other form of employment by the education department. Volunteers can still be a useful addition or interim measure.

It is important to mention that community links also improve accountability, not just helping with barrier removal and understanding.

Para 81

This paragraph could stress that in addition to consulting with persons with disabilities, they should be included within existing education/school governance and budgeting/monitoring structures. It’s important to recognise that not all persons with disabilities have representative organisations, and/or many people with disabilities may not be aware that there is a representative organisation, so alternative ways to consult these people also need to be found.

Para 82

There is a possibility that the GC could reaffirm the (mis)conception that inclusive education is just about inclusion for learners with disabilities. This paragraph could help to challenge that, and encourage wider inter-sectoral efforts, by mentioning collaboration with organisations (NGOs, CBOs etc) working on educational inclusion for other marginalised groups.

Para 83

It may be important for this paragraph to reiterate that just because private providers exist and are encouraged to be inclusive, this does not lift any of the state’s responsibility to deliver inclusive education.

Rather than mention ‘business enterprises’ it may be better to keep this more general as ‘private sector actors’.

When discussing state obligations, [reference may be made to UN Human Rights Council Resolution 29/L.14/Rev.1, Resolution on the Right to Education](#), that calls on nation

states to establish regulatory frameworks that are consistent with their international human rights obligations and contain minimum norms and standards for educational institutions, confirms that education is a “public good,” emphasizes that States must invest the “maximum of available resources” towards education, and urges States to invest in increasing their understanding of the ways in which the commercialization of education impacts the right to education.

ⁱ Inclusion of Children with Disabilities: The Early Childhood Imperative, N° 46 / April – June 2009 / REV/.
UNESCO Policy Brief on Early Childhood