



Understanding Student Disability and Implementation of Inclusive Education in Nepal and Brazil

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Abstract

This study examines the legislative framework that governs disability rights and the implementation of inclusive education practices in Nepal and Brazil. This study's objectives were to review journal articles on student disabilities and the challenges of inclusive education; assess the disability laws of both countries; compare their policies; analyse the laws; evaluate the opportunities and challenges of implementing inclusive education; integrate the findings from both countries; and to identify research gaps in the implementation of inclusive education at the school and higher education level institutions. In order to bring the literature to the fore, this study employed the literature review method. The findings reveal marked differences in the implementation of inclusive education between Nepal and Brazil. Moreover, our findings indicate that implementing disability laws and policies in both countries is inadequate.

Nepal and Brazil are confronted with the challenge of allocating sufficient financial and material resources to ensure the effective implementation of inclusive education. Furthermore, discrepancies between policy and practice pose an additional obstacle to the effective implementation of inclusive education. Our study also briefly highlights that implementing inclusive education is essential for promoting human rights and sustainable development, as it supports the inclusion and empowerment of students with a range of learning needs, including those with disabilities. The implication of this study benefit to scholars of both countries. We also recommend that two critical teaching approaches Universal Design for Learning and Differentiated Instruction are effective strategies for addressing the diverse needs of students and fostering an inclusive educational environment.

Keywords: *Challenges, differentiated instruction, inclusive education, Nepal and Brazil, student disabilities, universal design for learning.*



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Introduction

Background of the study

A disability is defined by Merriam-Webster as a physical, mental, cognitive, or developmental condition that impairs, interferes with, or limits a person's ability to engage in specific tasks or actions or participate in typical daily activities and interactions. The Oxford Dictionary refers to a similar physical or mental condition that limits a person's movements, senses, or activities while also offering a disadvantage or handicap, especially one imposed or recognized by the Law. (Merriam-Webster.com Dictionary, V.S disability, accessed December 1, 2021), which are based primarily on a medical model of disability, rooting the concept of disability in medical or biological conditions or states. Disability studies recognize additional models and constructions of disability based on culture or society (Department for International Development [GOV.UK]. 2019).

The Government of Nepal has categorized disabilities into ten distinct types: physical, vision-related, hearing-related, vocal and speech-related, deaf-blind, intellectual, mental, psychosocial, hemophilia, autism, and multiple disabilities. To assist individuals with disabilities, the government has issued disability I.D. cards. The types of disabilities among children were verified using medical documentation from doctors since this study was based in an institution, all participating children had medical records (Hunt & Poudyal, 2019; Graziela & Maria, 2019).

However, due to insufficient data for some disability types, these categories were redefined. Ultimately, the disabilities were grouped into the following categories: physical, sensory disabilities (vision-related, hearing-related, vocal, speech-related, and deaf-blind), developmental disabilities (encompassing intellectual, mental, and psychosocial), autism, and multiple disabilities (Ministry of Education, Nepal, 2019). Among 345 children with disabilities, 45% were stunted, 33% underweight, 19% thin, and 12% overweight. Those with physical disabilities were 1.88 times more likely to be stunted compared to those with

sensory disabilities. Children with autism had a 5.56 times higher chance of being overweight or obese, while those with intellectual disabilities had a 5.84 times higher risk compared to their peers with sensory disabilities (Chennat, 2019).

In Brazil, the Brazilian Inclusion Law, enacted in 2015, defines a person with a disability as an individual who has a long-term physical, intellectual or sensory impairment that, in conjunction with one or more barriers, may impede their full and effective participation in society on an equal basis with others (Brazil, 2015).

There has been a worldwide movement towards more inclusive education systems since the Salamanca and Dakar Agreements (UNESCO, 1994). The Salamanca Statement acknowledges the unique nature of each child and their essential right to education, further reinforced by the Framework for Action, which stresses the significance of child centred teaching approaches to support all learners (Armstrong, Armstrong & Spandagou, 2011). Across Europe, numerous countries have undertaken to improve their inclusive education systems (European Agency, 2016), with each country adopting different strategies based on its specific historical and social circumstances, including Nepal. In Brazil, the Salamanca Declaration played a pivotal role in facilitating a conceptual shift from the practice of segregated education to a more inclusive approach (Brun & Mellier, 2016). Before this, individuals with disabilities constituted the primary target audience of special education, which had previously existed as a distinct educational modality separate from mainstream schooling. From this point onwards, there was a convergence in the discourse surrounding integrating individuals with disabilities into the formal education system, with special education assuming a joint and transversal role (Brittany & Joshi, 2017; Byrne, 2019; Mantoan, 2000).

Nonetheless, inclusive education is seen as a vital component in the more considerable effort to create more socially inclusive societies, a shared goal for all nations ethically and politically (European Agency, 2017). The European Agency



has developed a vision to guide and support its initiatives and those of its member countries in alignment with current inclusive education trends. Nepal is an underdeveloped country where resources are minimal for students with disabilities. Day by day, the economic condition of Nepal has been diminishing due to governmental corruption; so many students with disabilities are deprived of the right to educational opportunities and even food and shelter. Instructing students with disabilities presents unique challenges. Students with disabilities require more time and special attention and often demand specialized instructional strategies in a structured environment (European Agency, 2017; Mendes, 2015).

The government of Nepal ratified and enacted several international conventions and declarations to improve access to education for all students, including students with disabilities, in line with the Sustainable Development Goals (SDGs) Target by 2030. SDGs Target 4 seeks “an inclusive and equitable education and promotes lifelong learning opportunities for all students.” However, several studies reported that many children in Nepal with disabilities still did not attend school. For instance, the UNESCO Institute for Statistics (UIS) reported that 258 million children with and without disabilities and youth had not attended school for the school year in 2018 globally (Ministry of Education, Nepal, 2019, UNICEF, 2018).

There are different laws and policies for disabilities in both Brazil and Nepal; however, many students with disabilities are still not getting educational opportunities. The main reasons behind this are the ineffective implementation of laws and the unstable government in Nepal (Sapkota et al. et al., 2023). Further, many students with disabilities are even deprived of food, clothes, and shelter because of fragile economic conditions. On the other hand, there is no long-term vision, mission, or plan for disabilities in Nepal, so we regretfully state that students with disabilities are poorly supported (Hunt & Poudyal, 2019; Cologon, 2020). Despite affirmative actions in Brazil that guarantee a certain amount of support, social assistance, and access to education, several factors emerge as challenges to realizing a truly inclusive education.

These include insufficient investment in public education, a lack of accessibility, and effective monitoring to ensure that the laws and directives to include people with disabilities are complied with (Delou, 2016; Ministry of Education, 2015).

Objectives

This study aims to explore the current disability laws and practices related to educational opportunities for students with disabilities in Nepal and Brazil. The first objective is to find Journal articles published on students with disability and the challenges of inclusive education in Brazil and Nepal. The second objective is to assess the existing practices of disability laws in both countries. The third objective is to compare the disability laws and policies of Nepal and Brazil. The fourth objective involves a thorough analysis of the laws themselves. We will also examine the opportunities and challenges of implementing inclusive education in both nations as our fifth objective. The sixth objective is to compare and integrate the findings of different countries. Lastly, the seventh objective aims to identify research gaps in implementing inclusive education in schools and higher education (Ministry of Education, 2001).

Overview of the education policy and provision for students with disabilities in Nepal

Article 31 of the 2015 Constitution guarantees free and compulsory education up to the secondary level. Citizens with visual impairments have the right to receive education in Braille, while those with hearing impairments can access education through sign language. As part of its commitment to the education for all initiative, the School Sector Reform Programme (2009–2015) was established, which required the creation of supportive environments in schools and expanding scholarship programs specifically for children with disabilities. Concurrently, the National Plan of Action for Education for All (2001–2015) was also implemented. The National Child Policy (2014) ensures an inclusive education system that meets the needs of children with special learning requirements. To further the implementation



of the Convention on the Rights of Persons with Disabilities (CRPD), the Act Relating to Rights of Persons with Disabilities 2074 (2017) enhances the rights of children with disabilities, emphasizing non-discrimination (Article 21.5), access to learning support such as Braille, sign language, and assistive technology (Article 21.6), and the provision of appropriate teaching materials (Article 21.11).

The Government of Nepal has made considerable progress in disability rights and education by adopting various policies and laws; in 1996, it implemented a Special Education Policy and ratified the Convention on the Rights of Persons with Disabilities in 2010. Subsequent initiatives include launching the Consolidated Equity Strategy in 2014, enacting disability rights legislation in 2017, and establishing compulsory free education in 2018 (School Sector Development Plan (2016/17–2020/21)). The National Education Policy now requires inclusive education, replacing the previous Inclusive Education Policy. In 2019, the Nepal Multiple Indicator Cluster Survey used the Washington Group's questions for the first time and drafted a paper on inclusive education. Additionally, an education sector analysis focusing on disability inclusion was initiated in 2020 (Constitution of Nepal, 2015; UNICEF, 2018).

Convention on the Rights of the Child (1989) (1990), Convention on the Rights of Persons with Disabilities (2006) (2010), and Convention on the Rights of Persons with Disabilities and Optional Protocol (2006) (2010) are the primary laws related to disability laws (School Sector Development Plan, 2016/17–2020/21). Similarly, the Education Act (1971), Children's Act (1992), Special Education Policy (1996), National Policy and Plan of Action on Disability (2006), Consolidated Equity Strategy (2017), and National Child Policy (2024) also constitute disability laws. .

Similarly, the Act Relating to Rights of Persons with Disabilities, 2074 (2017), the Act Relating to Children, 2075 (2018), the Act Relating to Compulsory and Free Education, 2075 (2018), and National Education Policy (2019) are domestic laws and policies related to disability-

inclusive education (Ministry of Education, 2019). Our study applies the review method to find the holistic literature on students with disabilities and their current opportunities and challenges in both countries (Baral, 2019).

Overview of the education policy and provision for students with disabilities in Brazil

The 1988 Brazilian Constitution mandates free, quality education for all and mentions specialized support for people with disabilities, ideally within the regular school system. This milestone in educational democratization reflects a historical shift from exclusion to inclusion (Brazil, 1988).

Brazil's first efforts to educate people with disabilities began with the Imperial Institute for Blind Boys in 1854 and the Deaf-Mute Institute in 1857, both founded in the Empire era. Until the 1950s, religious and philanthropic groups mainly provided education, while specialized institutions like APAE emerged in response to limited formal education access. (Garcia & Kuhnen, 2020; Delou, 2016)

In 1962, the National Education Plan granted scholarships for people with disabilities. Later, in 1971, Law No. 5,692 addressed special treatment for students with disabilities. The 1970s, influenced by neoliberalism, reinforced a medical model of disability focused on workforce readiness. During this period, the hegemonic conception of disability was underpinned by the dichotomy between normal and pathological, established by the medical/biological paradigm and supported by a technicist education aimed at training individuals to enter the labour market. (Björnsdóttir, 2016; Garcia & Kuhnen, 2020)

In 1988, the Constitution promoted well-being without discrimination, emphasizing equal educational access in Article 205 and calling for specialized educational care preferably in the regular school system in Article 208. The Statute of the Child and Adolescent (1990) further reinforced this by requiring school enrollment for children with disabilities. At this juncture, special needs education is increasingly regarded



as a cross-cutting modality that permeates and intersects with regular education. (Brazil, 1988; 1990; OECG, 2020).

The 1990s brought global influences like the Salamanca Declaration, which advocated inclusive education. However, the 1994 National Policy for Special Education limited inclusion, as only students who could follow mainstream curricula were integrated into regular classes. Such a policy is believed to tend to exclude a proportion of disabled students from mainstream education, forcing them into special education (Ibrahim, 2023).

1996, the current Brazilian Law on Educational Directives and Bases (Law No. 9.394/96) was enacted. Article 59 states that the education system must ensure that students with disabilities have “specific curricula, methods, techniques, educational resources and organization to meet their needs” and “specific terminality for those who, because of their disability, cannot reach the level required for the completion of primary education, and acceleration to complete the school programme in less time for the gifted”, “Teachers with appropriate specialization at a secondary or higher level to provide specialized support, as well as mainstream teachers trained to integrate these students into mainstream classes.” and “special education for work, aimed at their effective integration into life in society, including appropriate conditions for those who do not show the ability to enter competitive work, in coordination with the relevant official organs, as well as for those who show superior artistic, intellectual or psychomotor abilities”.

The 1999 National Policy for Disability Integration framed special education as supplementary to regular education. Brazil’s ratification of the Guatemala Convention (2001) and the 2006 UN Convention on the Rights of People with Disabilities reinforced a shift to a social model of disability, mandating societal adjustments rather than individual adaptation (OECD, 2020).

Laws passed between 2002 and 2021, including provisions for sign language and braille, as well as measures promoting higher education

accessibility, highlighted continued advancements. In 2004, the “Incluir Programme” was launched to comply with Decree 5.296/2004, which promotes accessibility for people with disabilities, among other legal provisions. Article 24 of this Decree states that educational institutions, at all levels, must provide conditions for access and use of all their environments or compartments for people with disability or reduced mobility, including classrooms, libraries, auditoriums, gyms, and sports facilities, laboratories, leisure areas, and toilets. (Brazil, 2004). Intending to develop accessibility policies with a focus on higher education, the Include programme has provided financial support from the Ministry of Education and Culture to proposals from universities across the country, supporting projects to create or restructure accessibility centers at federal and state higher education institutions (Lara & Sebastián-Herederó, 2020).

Further legislation reinforced these rights, such as the 2012 law protecting individuals with autism, which extended full legal recognition and required the state to promote inclusion and combat discrimination (Smucker, 2022).

In 2015, the Brazilian Law for the Inclusion of People with Disabilities strengthened educational and social provisions, including requirements for higher education institutions to accommodate students with disabilities (Brazil, 2015). These laws provide a framework for equal access and underline the state’s responsibility to ensure inclusive education.

This trajectory underscores Brazil’s evolving inclusive education model, driven by advocacy and legislative reform. Yet, true inclusivity requires not only legal frameworks but also educational environments that ensure quality education for all.

Theoretical framework of this study

Social constructionism (S.C.) is a theory that has different models. The most common model is the medical model. S.C. focuses on the role of social processes, cultural norms, and language in shaping our understanding of this world. The S.C. suggests that the reality of disability is not

a seen phenomenon or predetermined truth, but social interactions and shared interpretations construct it. This study applied the S.C. as a theory to understand human disability in depth and their complexities during teaching and learning activities (Rioux et al., 2024).

Research Methods

Literature review method

This study applied the literature review method to foreground the literature on examining disability and the challenges of implementing inclusive education in Nepal and Brazil. The keywords “inclusive education,” disabilities, student disability, inclusion, Nepal, and Brazil were used to search for literature on students with disability and the challenges of implementing inclusive education in Nepal and Brazil. The publication years were 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, and 2024. The document types were dissertations, reviewed articles, and other related documents. The indexes used were the Web of Science, Core Collection, MEDLINE, ProQuest, SciELO Citation Index, the KCI-Korean Journal Database, BASE, and Google Scholars. All the above sources were used to retrieve the literature for this study.

The research area was based on educational research entitled the student with disability and challenges of implementing inclusive education. Most Nepalese published articles mentioned in Table 1 were derived from Web of Science, Taylors & Francis, and Google scholars. The published articles below from 2015 were excluded from our literature search because we decided to include the published articles from 2015 to 2024 in our study. The selected articles were examined to find the authors’ names and publication years, sources, research topics, research objectives, methods applied, and findings. Selected articles were framed in a Table to identify the key focus of the articles. The data analysis was based on the priority of research outcomes, research-focused areas, and the most applied research methods in the documents (see Figures 1, 2 & 3). Data analysis further examined the most repeated journal source in the selected articles (see Table 1).

Critical analysis of the resources used in this study

The resources used in this paper are valid and trustworthy. The indexes used were the Web of Science Core Collection, Google Scholar, MEDLINE, ProQuest, SciELO Citation Index, the KCI-Korean Journal Database, BASE, and Google Scholars. The document types were dissertations, reviewed articles, and other related documents. All these indexes were world class and authentic because researchers worldwide used the same indexes during their investigation. The selected articles of Adhikari(2018), Banks et al. (2019), Chalise (2021), Chaudhary and Sharma (2024), Dawadi (2022), Human Rights Watch (2018), Kim and Kim (2018), Lamichhane (2016), Michael (2022). Morgon Banks et al. (2019), Niure & Shrestha (2023), Pletsch and Mendes (2015), Puri et al. (2024), Shahi (2022), Shiwakoti (2022), Shrestha and Bhattarai (2024), Singh (2023), Thapaliya (2023), Thapaliya. (2016), Thapaliya. (2024), and Young and Rai (2021) focused on the student disabilities and challenges of inclusive education in Nepal. The articles of Agra et al. (2021), Baptista (2019), Beltrão et al. (2023), Bueno, Bueno and Portilho (2023), Calheiros et al. (2016), Camargo et al. (2019), Cenci et al. (2016). Escudero and Espinosa (2021), Graziela and Maria (2019), Kiru and Cooc (2017), Murahara et al. (2022), Parente and Pessoa (2021), Pereira et al. (2021), Pletsch and Mendes (2015), Pletsch et al. (2017), Santos et al. (2020), Schabbach and da Rosa (2021), Shurr et al., 2021; Silva (2018), Silva and Carvalho (2017), Tanure Alves et al., (2018) and Wuo (2019) concerns about the Brazilian context.

All these sources examine the phenomena that we intend to examine in relation to the current situation of student disabilities and inclusive education. More importantly, we followed all the ethical criteria of downloading articles, privacy, informed consent, animosity, and legal access to all these selected articles from different online resources. Using the resources are based on relevance, authority and credibility, quality of evidence, variety of resources, correctness, bias

and objectivity, methodological rigor, contextual factors, synthesis of literature, and impact on practice on student disabilities and inclusive education between Nepal and Brazil (Srivastava, de Boer & Pijl, 2015).

Results

Table 1. Reflection of the previous studies on student disability and the challenges of implementing inclusive education

| Authors and years | Sources | Research topics | Research objectives | Research methods | Results |
|---------------------------|----------------------------------|--|---|---|--|
| Human Rights Watch (2018) | Nepalese government resource | Nepal: Barriers to Inclusive Education | To explore the challenges encountered by individuals with disabilities in accessing education in Nepal. | Semi-structured interview of qualitative approach | The results highlight the government's inability to provide sufficient budget and assistance, the failure of the curriculum to address the different needs of disabled students, a lack of educated instructors' capability to provide inclusive education, and social views towards people with disabilities as the challenges of implementing inclusive education in Nepal. |
| Lamichhane (2016) | Int. Journal Inclusive Education | Teaching students with visual impairments in an inclusive educational setting: A case from Nepal | To discuss teaching style considerations in Nepal's mainstream schools for students with visual impairments | The Mixed methods approach | The results indicated that teachers' years of schooling, teaching experience, and use of blackboard were positively correlated to teaching style adjustment. In contrast, a negative correlation of their age indicated that younger teachers were more likely to adjust their teaching styles for disabled students. |
| Thapaliya (2023). | Social Sciences | Challenges and opportunities to implementing inclusive education: A case from Nepal | To explore the perspectives of school principals, teachers, and students with and without disabilities on implementing inclusive education in Nepal | Qualitative semi-structured interviews. | The results highlight four areas of challenge that hindered inclusionary practices: environmental challenges, school-related challenges, socio-cultural-related challenges, and economic-related challenges. They further suggest that modifying ecological challenges increased the provision of and revisions to curricula, pedagogy, and assessment to implement inclusive education. |

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| Young & Rai (2021). | Thesis | Primary School Teachers' Attitudes Toward Integration of Students with Disabilities in the General Classroom in Nepal | To examine teachers' attitudes toward inclusive education for students with disabilities in general elementary school classes, focusing mainly on the differences in attitudes between teachers who have or have taught students with disabilities and those who have not taught students with disabilities. | The survey study | The results show that teachers who had experience in teaching students with disabilities had more positive attitudes than teachers who did not. The results further show that teachers who had taught students with disabilities were more confident in dealing with students with disabilities and their parents. However, teachers with experience in teaching students with disabilities cited the following challenges in implementing inclusive education for students with disabilities. |
| Banks et al. (2019) | Journal of Educational Research | Perspectives of children with disabilities and their guardians on factors affecting inclusion in education in rural Nepal: "I feel sad that I can't go to school | To understand why these inequalities persist, this study explores the barriers and enablers to accessing education, including school attendance and the quality of the learning and social experience at school. | A Qualitative approach | The results highlighted that challenges to inclusion are complex, involving a mixture of individual, family, school, community, and policy-level factors. Notable barriers were attitudes towards education for children with disabilities, schools' low capacity to provide inclusive education, and the interplay of additional 'push factors' such as poor health and poverty. |
| Chalise (2021). | Universal Journal of Educational Research | Studies on Disability Perspectives Inclusive Education in Nepal - Focus on Methodological Review. | To offer thoughts on inclusive practices within higher education. | Review of literature method | The results highlighted that most studies were carried out using subjective analysis (qualitative) rather than objective (quantitative) ones, excluding the analysis to determine to what extent the atmosphere of schools will hamper the education of disabled children. |
| Shahi (2022). | Mansyangdi Journal | Practices of Inclusive Education in Nepal. | To identify the indicators of inclusive education that can be helpful for teachers to make their teaching effective | Qualitative research design | The results show the various gaps in inclusive practices, such as promoting diversity, social justice, cooperative learning, and collaboration in general and in TVE schools in Nepal. Herzberg's motivational hygiene theory is used as a theoretical lens to investigate the practice of inclusiveness in TVE schools. The results further found some demotivating factors, such as fragile TVE policy and job insecurity of teachers, that demotivate teachers and students toward technical and vocational education in western Nepal. |
| Thapaliya (2016) | Nepalese government report | A Report on Disability in Nepal | To ascertain local attitudes towards inclusive education policy and practices in Nepalese Primary Schools through discussions with local governmental officers, | Review report | The results show that people in Nepal continue to see disability as a result of an individual's sinful past actions. While the Nepalese government has endorsed a range of legislation and policies to protect the disabled population, local attitudes and perceptions are yet to shift, which can be attributed to cultural beliefs, a lack of awareness, and gaps in local education. |



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| Puri et al. (2024) | Educational Journal | Unlocking Potential: A Comprehensive Analysis of Inclusive Education Policies for Children with Disabilities in Nepal | To examine Nepal's inclusive education policies from 1996 to 2017, focusing on changes and challenges. Recent successes include the 2010 ratification of the Convention on the Rights of Persons with Disabilities and the 2018 Compulsory and Free Education Act. | Literature review method | Results show that Nepal faces policy discrepancies, a lack of trained special educators, and insufficient resources. Implementing inclusive education policies in Nepal is challenging due to contextual, organizational, and policy barriers. It requires infrastructure investments, awareness campaigns, and targeted regulations. |
| Shiwakoti (2022) | Nepjol | Policy Implementation Challenges of Special/ Inclusive Education in Nepal | To analyze Nepal's policy implementation challenges of unique/inclusive education. Using qualitative data collected through document analysis, interviews, and focus group discussions | The qualitative approach | The results indicate that inadequate human resources, a lack of necessary budgetary provisions, and a low level of awareness are the significant challenges of special education in Nepal. |
| Shrestha and Bhattarai (2024) | Int. Journal of Inclusive Education | How "Inclusive" Has the Inclusive Education Been? | To include diversity in terms of access to education. Hence, inclusive education is of tremendous significance to a country like Nepal. | The Literature reviewed method | The results indicate that despite policy provisions, Nepal has not been able to actualize inclusion in education because its strategies and actions are not directed toward inclusion, mainly because of the need for a uniform understanding of inclusive education. Its present practice will lead toward segregation but not towards integration. |
| Nture & Shrestha (2023). | Journal of Positive Behavior Interventions | Strengthening Inclusive Education: Unraveling Prerequisites for Children with Intellectual Disabilities in Nepal | To provide inclusive education to children with intellectual disabilities. | Mixed Methods approach | The results show that teachers should have high expectations and provide quality support for all students to ensure their access to the general curriculum. Educational services for children with intellectual disabilities in Nepal reveal a significant policy-practice gap. |
| Singh (2023) | Educational report | "Barriers to Education for Individuals with Disabilities in Nepal: Exploring Challenges and Assessing Inclusive Education Strategies | To promote equity and inclusion in education, ensuring that individuals with disabilities have equitable access to high-quality education. | Interview method of qualitative approach | The results indicate factors that underscore the existence of obstacles to education for individuals with disabilities in Nepal, including poverty, inadequate infrastructure, insufficient supportive services, and social stigma. |
| Michael (2022). | Internet Archive | A study of self-affirmation on secondary school students with hearing impairment in Nepal | To demonstrate how self-affirmation improves the performance of students who experience stereotype threats | Experimental design of a two-group randomized block design with the survey | The primary results show that a behavioral outcome measure for self-affirmation demonstrates how self-affirmation improves the performance of students who experience stereotype threats by targeting their construal of the self and the surrounding learning environment. |
| Adhikari (2018) | Int. Journal for Research in Vocational Education and Training | The Experiences of Learners with Disabilities in Mainstream Vocational Training in Nepal. | To understand how learners with disabilities have been learning with their peers without disabilities and whether the vocational training was inclusive from the perspectives of learners with disabilities. | In-depth interview method of qualitative design | The results show that learners with disabilities had difficulty commuting to and from the training center. The physical learning environment was insufficiently accessible, which affected the learning of students with disabilities. |

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| Kim and Kim (2018). | Journal of Special Education & Rehabilitation Science | Review of Nepal's Disability Policy and Legislation. | To analyze Nepal's National Policy and legislation for persons with disabilities (2017) based on core concepts of the human rights approach and the pre-defined core concepts such as non-discrimination, individualized services, access, and family,..... | Qualitative approach (An Equiframework Tool). | The results highlight that the Nepal government's inclusive education policy and disability acts and regulations for persons with disabilities are moderate in quality and efficiency in meeting the unique and individualized needs of vulnerable groups, including persons with disabilities. |
| Banks et al. (2019). | Oxford Development Studies | Perspectives of children with disabilities and their guardians on factors affecting inclusion in education in rural Nepal: "I feel sad that I cannot go to school." | To understand why the inequalities persist, this study explores the barriers and enablers to accessing education. | Qualitative semi-structured interviews. | The results found that challenges to inclusion are complex, involving a mixture of individual, family, school, community, and policy-level factors. Notable barriers were attitudes towards education for children with disabilities, schools' low capacity to provide inclusive education, and the interplay of additional 'push factors' such as poor health and poverty. |
| Thapaliya. (2024). | Research in education | Impacts of neoliberal school reforms policy on students with disabilities in Nepal | To analyse the effects of market-based schooling practices on students with disabilities in Nepal | Qualitative approach | The results reveal that the current policy and practice signal changes in government structure rather than working to fulfill these commitments in the everyday practice of students with disabilities. |
| Dawadi (2022). | Journal of Research in Special Educational Needs, | Inclusion of children living with disability in early childhood development and education: constructing a stakeholder-informed framework. | To explore the factors affecting the inclusion of CIwD in ECDE programs aiming at informing policy, plans, and strategies about existing barriers to early intervention and education services for CIwD | Qualitative interviews, focus group discussions | The results identified that the interconnection of several organizational and contextual factors created multiple barriers to successful inclusion. Furthermore, organizational factors were policy, attitudes, teacher efficacy, resources, coordination, communication processes, and parental engagement. Contextual factors were spirituality, caste, ethnicity, language, economic status, and geographic location. |
| Chaudhary and Sharma. (2024). | International Journal of Inclusive Education | Towards inclusion: a comparative examination of the status of disability acts in South Asia. | To identify and examine the commonalities and differences in the provisions, participation of persons with disabilities (PWD), educational considerations, and rights of women with disabilities within their disability Acts | Qualitative content analysis method | The results were based on the emphasis placed on the involvement of PWD in regulatory committees in all Acts taken in the study. However, the level and extent of participation in these committees vary among countries. The nature of the educational provision is more inclined towards inclusive education across these Acts. However, not all of these four practices fully include PWD. Less emphasis has been put on including the rights of women with disabilities in the Acts. |
| Essudero and Espinosa (2021) | Human Rights Watch | Inclusive Education is at Risk in Brazil | To explore the current state of inclusive education in Brazil, examining the barriers that students with disabilities and marginalized groups encounter. | Policy review method | The results highlight the need for comprehensive policy reforms, enhanced teacher training programs, and community engagement to foster an inclusive environment supporting diversity in education. By addressing these challenges, Brazil can move closer to achieving its goal of an equitable education system for all students. |



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| Silva (2018) | European Journal of Multidisciplinary Studies | Educational Inclusion in Brazil: A Challenge for Higher Education | To discuss the processes of inclusion of students with specific educational needs in higher education, | Policy review method | The results emphasized the extreme relevance of public policies, academic discussions, and analysis of the curricular structure to the inclusive perspective's needs. |
| Pletsch and Mendes (2015). | Education Policy Analysis Archives | Between policies and practices: the challenges of inclusive education in Brazil | To present the second edition of the special education dossier: differences, curriculum, and teaching and learning processes | Policies review method | The results indicate the importance of joint work between teachers in general, specialized education, and point to obstacles to be overcome to mobilize practices that enable student learning. They also show the widespread idea of inclusion in the school context without proper financial investment to secure it effectively. |
| Beltrão et al. (2023). | Ensaio: aval. Pol. públ. Educ. Rio de Janeiro | Inclusion of students with disabilities in Brazilian tertiary education. | To outline a profile of students with disabilities who joined the system from 2009 to 2019. | The survey | The results show that the most significant number of students with disability present physical disabilities, followed by vision impairment, both increasing in time. The total contingent of students with disability more than doubled in the period given. |
| Graziela and Maria, (2019) | Revista Brasileira de Educação Especial | Education and Pedagogical Policy of Special Education in the Perspective of Inclusive Education in the Public Education Network of Manaus - Brazil | To describe the transformation that occurred in the physical space of the elementary schools in Brazil | Literature review method | The results highlighted that the physical network expansion followed the parameter rationalization of public spending, which was corroborated by mass access and led to the adoption of standardized architectural solutions and the impoverishment of the physical structure of Brazilian public schools. |
| Parente and Pessoa, (2021) | Book chapter | Special Education in Brazil: An Inclusive Perspective | To present a framework of Brazil's actual special and inclusive education situation. | | The results show that although the data indicates advances in including students with disabilities in the mainstream education system, the goals of the National Education Plan have not yet been fully met. |
| Kiru and Cooc (2017) | Journal of International Special Needs Education | A comparative analysis of access to education for students with disabilities in Brazil, Canada, and South Africa | To examine access to education for children with disabilities in Brazil, Canada, and South Africa | Review of literature | The results show a range of cultural and structural issues that currently exacerbate educational equity for children with disabilities. |

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| Callheiros, et al... (2016) | Avaliação: Revista da Avaliação da Educação Superior (Campinas) | The inclusion of students with disabilities in Physical Education under-degree courses in the city of Maceió-AL, Brazil | To understand the inclusion process of students with disability in Physical Education under-degree courses in Maceio/A.L. | Research of cases multiples and qualitative approach – semi-structured interview | The results showed that although the inclusion process was going on and the participation of students with disability in the Physical Education under-degree courses was more expressive than years ago, their permanence was conditioned to their own efforts and the help of classmates. This condition was due to several barriers still existing in the educational space, leaving them more vulnerable to exclusion. |
| Pletsch et al (2017). | Educar em Revista | Analysis of scientific production on the inclusion in Brazilian higher education | T focus on higher education. This paper starts with the analysis of the theme as treated in the scientific production available in the Scientific Electronic Library Online database (SciELO-BRAZIL) | Bibliographic research | The results showed that despite the advances in knowledge production on the subject, it still falls short of the demand, which grows at an accelerated rate, largely due to the development of public policies that foster the participation of students with disabilities. This aspect puts universities facing several issues beyond infrastructure, such as pedagogical, social, and attitudinal order. |
| Wuo (2019) | Saude e Sociedade | Education of people with autism spectrum disorders: State of knowledge in dissertations and theses in the southern and southeastern regions of Brazil (2008-2016. | To analyze the state of knowledge about autism spectrum disorders, based on theses and dissertations produced in the southern and southeastern regions of Brazil from 2008 to 2016 | Bibliographic review | The results conclude that, although knowledge about autism is still in the domain of medical areas, the emergence of investigations in the scope of school inclusion allows the construction of ways of thinking about the schooling process that surpasses exclusively medical models of examining the difference. |
| Silva and Carvalho. (2017). | Revista Brasileira de Educacao Especial | Understanding the process of school inclusion in Brazil from the teachers' perspective: An integrative review. | To understand what the facilitators and the limitations of the process of school inclusion in Brazil are from the teachers' view | Integrative review | The results show views on the resources and strategies used in teaching, special education policy and training offered by the government, conceptions of the teaching-learning process; the arising gaps in the initial training of teachers, and the need to know the specificities of the student were five categories for challenges of student disabilities and inclusive education |
| Santos et al.. (2020) | InterCambios: Dilemas y transiciones de la Educacion Superior | Initial teacher training and discussions about inclusion. Analysis of the curriculum of the pedagogy course of a public university in the north of Brazil | To identify, in the curriculum of the initial training, which are the subjects offered and if they meet the needs of the students so that they can develop, through their pedagogical practices, classes that address the specific educational needs of students' target audience of special education. | Documentary research | The results point to the insufficient disciplines to prepare for inclusive educational practices, contributing to embryonic teacher education and making it challenging to include students with specific academic needs. In addition, it was noted that it is not enough to include a few generalist disciplines on the subject of inclusion in the curricula of teacher training courses. These subjects need to be planned based on the reality of the school that the future teacher will be part of in the exercise of their profession. |

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| Agra et al. (2021) | (RI)EC)/Iusophone Journal of Cultural Studies (LIJCS) | Inclusive Education Policies and Pedagogical Practices in Public Schools: Experiences in Brazil | To characterize the experiences of pedagogical praxis with students with visual impairments who are considered to be in a situation of inclusion. | Critical theory of society | The results revealed that the Adelino Magalhães Municipal School is developing inclusive education, mainly due to implementing public education policies in Niterói, prioritizing including students with disabilities. It was found that inclusive education demands collective political-pedagogical commitment from teachers, administrators, and family members in favor of public schools and their democratization. |
| Baptista (2019) | Educacao e Pesquisa | Public policy, special education and schooling in Brazil | To analyze the schooling of people with disabilities in Brazil, considering the period 2008-2018 as a priority and based on a public policy that assumes school inclusion as a guideline for action in the different spaces of educational management | Qualitative study performed based on documentary analysis | The results indicate an increase in the enrollment of students with disabilities in ordinary education, besides the approval of many normative instruments on the subject. Programs aimed at various forms of specialized support were also established, showing a locus shift focused on these students' schooling, prioritizing ordinary education. Nevertheless, coexisting trends reaffirm and contradict the perspective proposed by the guidelines analyzed, especially when considering the qualitative dimensions of the formative processes. |
| Schabbaeh and da Rosa (2021) | Revista de Administracao Publica | Segregate or include? Advocacy coalitions, ideas, and changes in special education in Brazil; | To examine the educational changes for people with disabilities (PwD) in Brazil, arising from disseminating ideas and government actions that introduced the inclusion perspective. | The Case study | The results identified two coalitions in the subsystem: specialized and exclusive care (coalition 1) and inclusive education (coalition 2). |
| Pereira et al., (2021) | Psicologia: Ciencia e Profissao | School Psychologist in Inclusive Education: Contributions and Perspectives of the Profession in Brazil | To reflect on the contributions brought by the school psychologist to inclusive education and discuss, albeit briefly, the future prospects of the profession in Brazil. | Theoretical-documentary, reflexive-critical study | The results show that psychologists and schools play an important role in overcoming and changing this logic of exclusion. In this regard, school psychologists must use assessment methods to identify the strengths and needs of students with disabilities and develop effective interventions, services, and programs to promote school inclusion in their future professional practice. |
| Camargo et al., (2019) | Revista Brasileira de Educacao Especial | The Right to Education of Students with Disability: The Management of Inclusive Education Policy in Municipal Schools. | To investigate the implementation of a public policy for inclusive education in the Municipal Education Network of Corumbá/Mato Grosso do Sul, Brazil. | The survey method | The results showed that despite their efforts to carry out the work, the implementing agents encountered difficulties that directly interfered with their performance. |
| Bueno, Bueno and Portillo (2023) | Revista Ibero-Americana de Estudos em Educacao | Historical aspects of inclusive education in Brazil. | To understand the historical movement of inclusive special education in Brazil. | Bibliographic and documental nature | The results show that understanding the historical panorama faced by people with disabilities allows us to visualize their path and struggles. They also show that the search for the right to education for all has been discussed for a long time and has already been denied to a large part of the population. |

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| Murahara et al., (2022) | Children's Geographies | Becoming a student representative in Brazil: a phenomenological study of students with intellectual disabilities | To investigate the lived experience of all stakeholders involved in the process of students with ID becoming representatives in a Brazilian school | Qualitative interview | The results showed that the students' representation was an inclusive practice that allowed students to develop advocacy skills. |
| Tanure Alves et al., (2018) | International Journal of Inclusive Education | 'I didn't do anything, I just watched': perspectives of Brazilian students with physical disabilities toward physical education. | To analyse the inclusion of students with physical disabilities in P.E. classes through cultural analysis of curriculum, | Qualitative semi-structured face-to-face interviews and reflective field notes | Findings include enacted values of sports practices where performance and ability are prioritized. A lack of participation was associated with P.E. teachers' curricular choices and values. The effectiveness of the inclusion process in P.E. class is discussed. |
| Cenci et al., (2016). | Research, Society, and Development | The challenge of inclusive education in a Brazilian School: teachers' concerns regarding inclusion. | To analyze the impact of implementation of the Brazilian inclusive education policy | Change Laboratory methodology | The results show that under the theoretical framework, it was possible to perceive that the contradictions reveal the tensions involved in the inclusion process and the potential for change they carry in themselves. |

Results and discussion

Results

Results section of this study has been divided into two columns: Nepalese publication results and Brazilian publication results. The summary results are presented first and then the results of both countries' publications are compared. Finally, similar and divergent results can be merged and interpreted (see Table 1). This analysis has focused on the challenges of student disabilities and implementing inclusive education; research focuses on the selected articles, methods applied in the selected articles, and source title.

Table 2. Results comparison between Nepal and Brazil

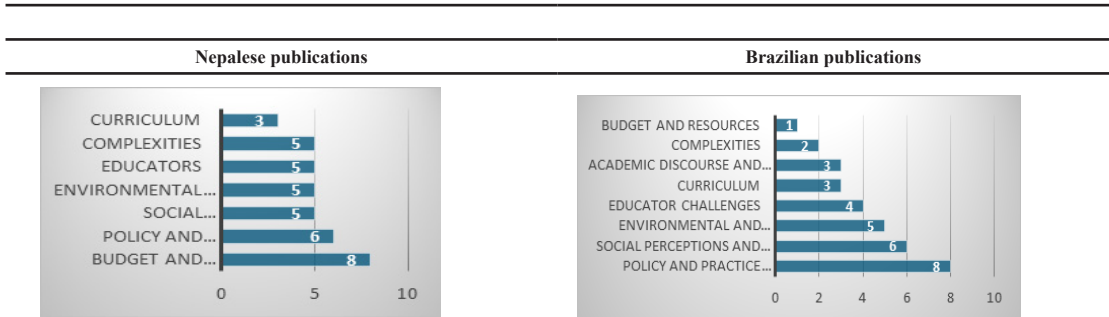


Figure 1. Reflection on student disabilities and inclusive education

The results from the Nepalese publications show that budget and resources, curriculum issues, educators’ complexities, social perceptions and attitudes, environmental and infrastructure challenges, policy and practice discrepancies, and collaboration in inclusive challenges were the primary challenges to implementing inclusive education in Nepal.

The results have highlighted seven key issues of effective inclusive education in Nepal. Budget and resources play the most influential role (8), followed by curriculum issues as the least influential factors (3) (see Figure 1).

Our results supported Sapkota’s previous study (2023), highlighting that budget and resources were the main challenges of student disabilities and inclusive education in Nepal.

We reviewed twenty articles from Nepal, and our study found that the qualitative approach and its different methods, including tools, were highly prioritized (see Table 1).

The results indicate that most selected reviewed articles used qualitative approach including interviews and tools to collect data for their studies (see Table 1).

Figure 2. Reflection on student disabilities and inclusive education

In analyzing the Brazilian articles, it became evident that there was a notable prevalence of discussion of “policies and practice discrepancies” (8), which was followed by discussions on “social attitudes and perceptions” (6) and “environmental and infrastructural barriers” (5). As previously indicated, the country currently has legislation to include students with disabilities at all levels of formal education. However, implementing these policies in institutions has not been accorded the requisite importance, particularly regarding accessibility. The lack of training for teachers on how to teach students with disabilities, as well as issues related to attitudinal accessibility, such as stigmatization, prejudice, and ableism, were identified as critical areas of concern in the results of several articles.

A further emerging factor concerning the implementation of public policies is the multidisciplinary work of school subject teachers with support teachers. Integrating special education professionals’ concepts and support into formal education appears largely segregated, lacking meaningful joint work and effective inclusion. The issue of “Educator challenges” (4) was also identified as a topic for analysis, frequently associated with the “curriculum issue” (3). The rigidity of the curriculum, when considered alongside the dearth of teacher training, directly impacts how teachers address the inclusion of students with disabilities in educational institutions. Additionally, several articles highlight the necessity for enhanced “Academic Discourse and Investigation” (3) to include students with disabilities.

The results demonstrated that only one study employed a quantitative methodology, whereas the remaining studies were qualitative (Figure 2). In quantitative research, a survey was conducted to delineate the profile of students with disabilities who entered tertiary education between 2009 and 2019. The most frequently applied methods in qualitative research were documentary and bibliographic analyses, case studies, and action research (see Figure 4).

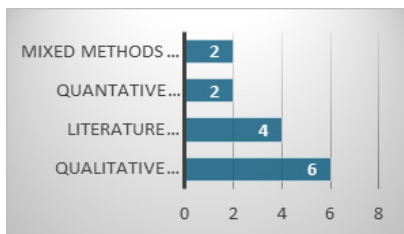


Figure 3. Research methods applied in the selected articles.

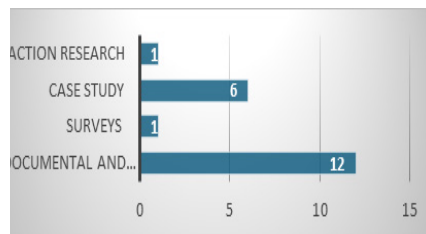


Figure 4. Most applied research articles in the selected articles

Our results show that the most repeated method was the qualitative approach and its tools, which is based on the previous studies of Human Rights Watch (2018), Banks et al. (2019), Shahi (2022), Shiwakoti (2022), Singh (2023), Kim and Kim (2018) and Dawadi (2022), Chaudhary and Sharma, (2024) (see Table 1)

Ultimately, our analysis revealed that the articles under examination predominantly addressed the most applied methodology, Documentary and Bibliographic Analysis, in the selected documents in Brazil (Figure 4).

Comparison between Nepal and Brazil

The results show variation between the difficulties of students with disabilities and the implementation of inclusive education. Budget and resources were the first challenges for students with disabilities and the implementation of inclusive education in Nepal. Still, policy and practice discrepancies were the main challenges for student disabilities and the implementation of inclusive education in Brazil (see Figures 1 & 2). Similarly, the results further highlight that the qualitative research method and its tools were repeatedly applied in the Nepalese-selected articles. In contrast, the Brazilian articles repeatedly applied documental and bibliographic analysis (See Figures 3 & 4).

The research focuses on the selected articles from Nepal and Brazil.

The results indicate that the most focused area of inclusive education and disabilities was studies and research on disability and inclusive education (6), followed by the least concentrated area on perspective and children with disability and education (2) (see Figure 5). On the other hand, our analysis revealed that the articles under examination predominantly addressed the policy and implementation of inclusive education (8). At the same time, the "history of the inclusion movement" was the least explored topic (1) (Figure 6).

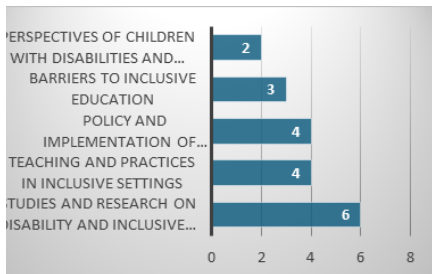


Figure 5. Research focuses on selected articles.

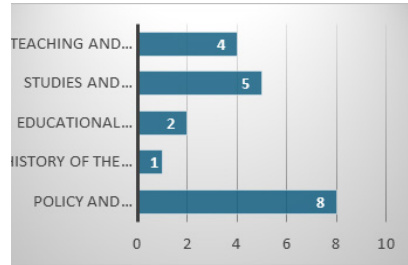


Figure 6. Research focuses on selected articles.

Comparison between Nepal and Brazil.

The results notably show variation in the research's focus on the selected articles between Nepal and Brazil. The results highlight Nepal's challenges and barriers to education (6), followed by policy and practice discrepancies in Brazil.

Source titles of the selected articles from Nepal

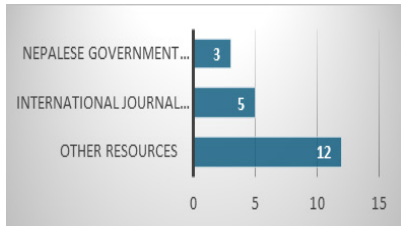


Figure 7: Source titles of the selected articles

The results show that the source titles of the selected articles were other resources: the International Journal of Inclusive Education and Nepalese Government resources were the other chosen sources of the selected articles. But the most repeated source titles was other resources (see Figure 7).

Source titles of the selected articles from Brazil



Figure 8: Source titles of selected articles

The results demonstrate that the most frequently utilized sources were Brazilian Journals, particularly the Revista Brasileira de Educação Especial, which was noted on three occasions. The second most utilized source was international publications, while other resources, including book chapters and Human Rights Watch.

Comparison between Nepal and Brazil.

The results show that most articles were derived from other source titles, followed by the fewest Nepalese Government resources/reports (see Figure 7). On the other hand, the results show that most of the selected articles were derived from Brazilian publications, contrasting with the Nepalese context (see Figures 7 & 8).

Discussion and recommendations

Student disabilities and the implementation of effective inclusive education are not the only problems in Nepal and Brazil. They are a universal problem, but the development of inclusive education and support facilities for students with disabilities varies among countries (Global Disability Summit, 2019; Fabri et al., 2020; Walker et al., 2021; Wong & Chik, 2015).

The results show variations in student disabilities and the implementation of inclusive education between Nepal and Brazil. The results section covers four primary areas of our review study, where significant difficulties of student disabilities and the implementation of inclusive education, methods applied, research focuses, and source titles of the selected thirty articles from Brazil and Nepal (see Figures 1,2,3,4,5,6,7 & 8).

Our study could not find similar results between the two countries in terms of student disabilities and the implementation of inclusive education. Nepal and Brazil are facing the complexity of budget and resources for the effective implementation of inclusive education, as well as policy and practice discrepancies for the effective implementation of inclusive education (see Figures 1 & 2). Further, our study reviewed the policies and laws regarding student disabilities between Nepal and Brazil and found that implementing disability laws and policies seems weak in both countries. For example, since 1975, France has made significant strides in educating students with disabilities. Initially, the education ministry moved away from the practice of segregating students with disabilities from their typically developing peers (Savournin et al., 2020; Smucker, 2022; Yan & Deng, 2019) and began promoting their inclusion in regular schools. A further shift occurred in 2013, following the 2005 Equal Rights and Opportunities Act when the country fully embraced an inclusive education model. This shift was reinforced curriculum in 2019 with a law requiring teacher-training programs to prepare future educators to include students with disabilities in their classrooms. We importantly highlight that the responsibility for adaptation now lies with the educational environment, not

the students themselves, meaning schools and teachers must modify their teaching practices and environments to accommodate students' abilities rather than focusing on their disabilities (Calhau, Coelho & Veiga, 2024; Ibrahim et al., 2023; Lemoine et al., 2024; Waisath et al., 2022).

Our review reflects that training is crucial to help teachers build confidence in their abilities and adequately support students with disabilities. However, research by Campion and Debré (2012) revealed that initial teacher training in this area was insufficient. In-service training failed to address teachers' actual needs, supported by Berzin, Monchaux, and Ibernon (2020), who found that nearly half of the teachers they interviewed had received no training in working with students with disabilities. Every country has a nationwide framework for teacher training. Still, it does not fully address the needs expressed by educators, and the education ministry sometimes fails to provide the necessary resources for teachers to implement its policies effectively (Alsolami, 2024; McKinney & Swartz, 2015; Moriña, 2017; Shurr et al., 2021; Subba et al., 2018).

Universal Design for Learning (UDL) and Differentiated Instruction (DI)

Implementing inclusive education is essential for promoting human rights and sustainable development, as it supports the inclusion and empowerment of students with a range of learning needs, including those with disabilities (UNESCO, 2023). Two critical teaching approaches—Universal Design for Learning (UDL) and Differentiated Instruction (DI)—are effective strategies for addressing the diverse needs of students and fostering an inclusive educational environment (Hall, Strangman & Meyer, 2003).

Many studies suggest that Universal Design for Learning (UDL) and Differentiated Instruction (DI) work well together (e.g., Beasley & Beck, 2017; Cha & Ahn, 2014; Griful-Freixenet et al., 2017; Lee & Picanco, 2013). Beasley and Beck (2017) argued that UDL and DI complement each other effectively because both approaches focus on adapting the curriculum to meet the diverse needs of students using various teaching methods.

Similarly, Griful-Freixenet et al. (2017) pointed out that both frameworks share the understanding that each learner is unique, requiring teachers to tailor assessments and curriculum choices accordingly (Srivastava, de Boer & Pijl, 015; Smucker, 2022). Cha and Ahn (2014) highlighted that DI, which involves offering assessment options based on student’s strengths and weaknesses, can enhance the implementation of UDL. They stressed the importance of continuous assessment and authentic tasks to track student progress and provide regular feedback. Lee and Picanco (2013) noted that one aspect of DI is its alignment with UDL’s three principles: multiple means of representation, action and expression, and engagement. The first principle involves presenting content in varied ways that align with students’ developmental stages and individual characteristics. The second principle allows students to express their understanding through different assessment formats, such as oral, written, or performance-based assessments.

The third principle focuses on maintaining student engagement by offering varied tasks tailored to various learning stages based on teachers’ observations.

Other studies also support the idea that DI is an integral part of the UDL framework (e.g., Katz & Sugden, 2013; Selmer & Floyd, 2012; Tobin, 2008). Tobin (2008) emphasized that an effective, differentiated literacy course should incorporate universal design, enabling teachers to customize instruction to support each student’s success.

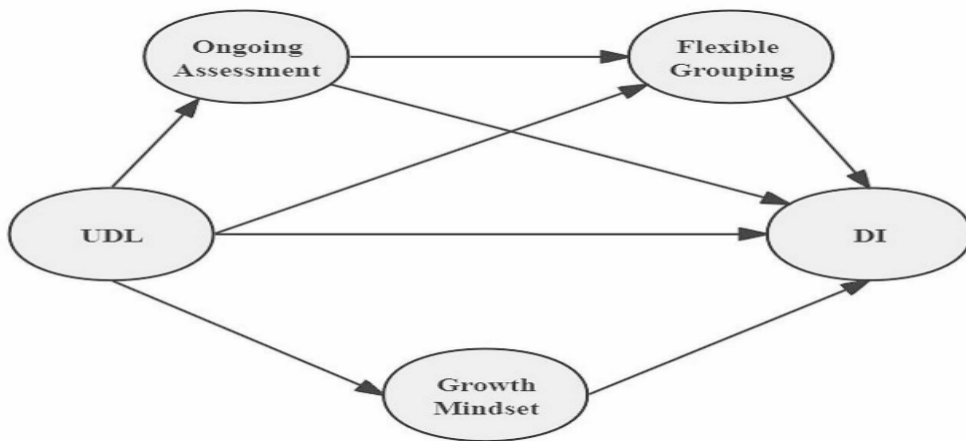


Figure 9. Recommendation model of student disabilities and inclusive education

Katz and Sugden (2013) included DI within the Three-Block Model (TBM) of UDL, particularly the second block, which focuses on instructional practices, allows students to decide how to develop their understanding, participate in activities, and choose materials, prompting teachers to differentiate learning experiences to meet diverse needs. Selmer and Floyd (2012) found that a curriculum built on the UDL framework naturally encourages differentiation, ensuring all students have the support they need (see Figure 9) (Calhau, Coelho & Veiga, 2024).

It is evident that the obstacles to the inclusion of students with disabilities are closely intertwined with the dearth of architectural, communicational, instrumental, methodological, programmatic, natural and attitudinal accessibility (Sasaki, 2019). The inflexibility of curricula and pedagogical approaches, when considered alongside the pervasive stigmatisation and discrimination against individuals with

disabilities, represent pivotal points of analysis for the advancement of inclusive education on a global scale.

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