Special Needs Education in India and Japan: Current Status and Challenges

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Abstract

This paper presents a comparative analysis of the current status, challenges, and innovative practices in special needs education in India and Japan. India's system, shaped by a relatively recent legal framework, promotes inclusive education while maintaining special schools. However, it faces persistent challenges, including low enrollment rates, inadequate teacher training, funding shortages, and entrenched social inequalities. Japan, with a longer history of structured special education, has transitioned to a "special needs education" model that offers diverse learning environments-special schools, special classes, resource rooms, and support in regular classrooms. While this framework has expanded access, it continues to face criticism for perpetuating segregation rather than fully realizing inclusive ideals. Financial constraints, the need for teacher retraining, and evolving public attitudes remain ongoing challenges. The study identifies shared obstacles in both countries, such as attitudinal barriers, insufficient teacher preparedness, and systemic inflexibility, while underscoring their distinct historical and policy trajectories. It concludes with recommendations to strengthen policy-practice coherence, enhance teacher development, expand infrastructure investment, and deepen stakeholder participation. Overall, the findings emphasize that inclusive education requires not only educational reform but also a broader societal transformation toward equity and cohesion.

Keywords

Inclusive education, Special needs education, India, Japan.

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1. Introduction

Inclusive education is an educational philosophy that advocates for the full inclusion of all students, regardless of their abilities, backgrounds, or disabilities, in the same schools and classrooms. This approach aims to provide all children with tailored support to meet their individual educational needs and promote social participation (Mani, 2003). The global movement towards inclusive education has been significantly shaped by the UN Convention on the Rights of Persons with Disabilities (CRPD), which mandates the right of all individuals to full and equal societal participation (United Nations, 2006).

This international trend has prompted countries to re-evaluate their special needs education systems, moving away from segregated models. While many nations have committed to the principles of inclusive education, their implementation varies widely due to unique historical, cultural, and socio-economic factors. Under-standing these differences is crucial for developing effective strategies and fostering mutual learning among countries.

This paper will comparatively analyze the current status and challenges of special needs education in India and Japan, two major Asian economies with distinct contexts. This analysis will highlight diverse approaches to promoting inclusive education and identify common structural challenges that persist across different national settings.

2. Special Needs Education in India: Current Status and Challenges

2·1 Impact of National Education Policy (NEP) and CRPD Ratification

India's special needs education, under a new National Education Policy (NEP), 2020 aims to provide equitable and inclusive education. For children with disabilities, the policy outlines three approaches: special education in public and private special schools,

inclusive education in mainstream schools, and home-based education (JICA, 2021). This multi-pronged approach is an attempt to respond to the realities of India's vast territory and diverse communities.

Following the ratification of the UN CRPD, India is reviewing its laws, policies, and programs to align them with the CRPD's provisions (JICA, 2021). This includes The Rights of Persons with Disabilities Act 2016, The Mental Healthcare Act 2017, and the National Trust for the Welfare of Persons with Autism, Cerebral Palsy, Mental Retardation and Multiple Disabilities Act, 1999. This movement highlights the strong influence of international human rights standards on domestic education policy and clarifies India's stance on aligning its domestic laws with international norms.

NEP has been argued to further obscure the principles of social justice by arbitrarily categorizing constitutionally recognized marginalized groups into a single category and by establishing "Special Education Zones" for marginalized people (Batra, 2020).

2·1·1 Key Legislations

The key legislations supporting special needs education in India are the Rehabilitation Council of India Act (RCI Act 1992) and the Rights of Persons with Disabilities Act, 2016 (RPwD Act 2016). The RCI Act 1992 was enacted by the Parliament in 1992, created by the then Ministry of Welfare (later, Ministry of Social Justice and Empowerment) for human resource development programs for special needs in the field of child education. The RCI aims to regulate and ensure the quality of training for rehabilitation professionals. The RCI has so far developed over 50 courses and accredited over 100 organizations to provide education and rehabilitation resource development programs for children with disabilities in India. The RCI's human resource development plan is advanced to facilitate the education of all children with disabilities and supports the policy of inclusive education (Mani, 2003). This Act plays an indispensable role in fostering professional personnel and ensuring quality to support inclusive education.

The PWD Act 1995 is the predecessor of RPwD Act 2016. It covered seven disability conditions: blindness, low vision, leprosy-cured persons, hearing impairment, locomotor disability, mental illness, and intellectual disability, guaranteeing free and appropriate education for persons with disabilities up to 18 years of age (Mani,

2003). The Act emphasized the introduction of private education, functional literacy programs, provision of assistive devices, and education through open courses in schools and universities. It also stated that the government should establish appropriate teacher training facilities and conduct research and development on assistive devices. The PWD Act strongly promoted the idea of inclusive education wherever possible, legally guaranteeing the right to education for persons with disabilities and laying a crucial foundation for the transition to inclusive education. While the 1995 Act laid the foundation, the 2016 Act significantly expands on the rights and protections for persons with disabilities in India, including increasing the number of recognized disabilities from 7 to 21 (The Gazette of India Extraordinary, 2016).

These laws form the legal basis for special needs education in India, establishing a division of labor where the RPwD Act provides the legal foundation for educational opportunities and inclusion, and the RCI Act is responsible for training the specialized personnel for this purpose.

2·2 Education System and Services Provided

2·2·1 Coexistence of Special Schools and Inclusive Education

In India, education in residential special schools is permitted for children with severe disabilities (Ishikawa & Matumoto, 2019). This suggests a recognition of the need for specialized environments to address individual needs. On the other hand, the policy is to primarily educate children with disabilities in mainstream schools, while also allowing education in special schools (Ishikawa & Matumoto, 2019). This approach demonstrates a pragmatic attempt to transition towards inclusive education while maintaining the role of existing special education infrastructure. Currently, there were approximately 3,000 special schools for various types of disabilities (Wijunamai, 2020), and it is stated that even as inclusive education expands, special schools for children with disabilities remain an accepted model for education in India and will continue to be so. This reflects the current situation where special schools still play a significant role.

2·3 Major Challenges

2·3·1 Disparities in Enrollment Rates and Access

In India, home-based learning is permitted depending on the type and severity of disability, resulting in a low enrollment rate of 49.7%

for children with disabilities (Ishikawa & Matumoto, 2019). This suggests that despite legal guarantees of the right to education, many children with disabilities are effectively excluded from the education system. There is also a gender disparity, with the enrollment rate for girls with disabilities being lower than for boys (45.3% for girls compared to 52.1% for boys) (Ishikawa & Matumoto, 2019). This indicates that intersecting discrimination based on gender and disability affects access to education.

India started Unique Disability ID(UDID), pan-India identification document and certificate for people with disabilities in 2016 (Government of India, 2016). However, in rural areas where UDID cards are not yet widely disseminated, providing inclusive community services accessible to all persons with disabilities without discrimination is a challenge. The lack of UDID card dissemination leads to delays in accurate identification of persons with disabilities and the provision of appropriate support based on that identification, consequently widening the gap in educational opportunities. Furthermore, improving education for people under the caste system, girls, and children with disabilities is a challenge, and it is believed that even if education is improved, it will not necessarily solve poverty and educational disparities caused by the caste system. This suggests that educational issues are deeply intertwined with structural social inequalities.

This implies the existence of deeper socio-structural challenges that cannot be resolved by legal frameworks alone. Therefore, the challenges in India's special needs education are not merely issues of the education system but are closely intertwined with profound problems such as social structure and economic disparities. Legal enforceability of policies alone is difficult to change the reality, and a comprehensive approach including societal awareness reform, infrastructure development, and poverty alleviation is essential.

2·3·2 Quality and Securing of Teacher Training

The lack of adequate teacher training for special needs education is a critical issue in India. Research consistently highlights that both special educators and mainstream teachers are often unprepared to effectively teach and support children with disabilities.

There is a significant gap between the number of children with disabilities needing specialized support and the number of qualified special educators (Gauthami, 2024). A United Nations Educational,

Scientific and Cultural Organization (UNESCO) report noted that with a large number of children with disabilities, India only had a fraction of the special educators needed (United Nations Educational, Scientific and Cultural Organization [UNESCO], 2019).

While the Rehabilitation Council of India (RCI) sets standards for special education teacher training, many institutions do not fully adhere to these regulations. This results in a compromised quality of education for special educators themselves.

Most regular teachers have little to no training in special education. This is a major challenge for the implementation of inclusive education, a key goal of India's national policies. Teachers often feel they lack the skills and knowledge to address diverse learning needs and may be resistant to the additional responsibilities that inclusion brings. Furthermore, many special education training programs focus on a single disability (e.g., intellectual disability, hearing impairment). This leaves educators ill-equipped to handle the variety of disabilities they might encounter in a single classroom (UNESCO, 2019).

In addition, the lack of training often leads to negative attitudes and a lack of confidence among teachers. They may hold a "deficit-oriented" view of disabilities, which can hinder the successful inclusion of students with special needs into the classroom.

Even when teachers have some training, they often work in environments with inadequate resources, a lack of assistive technologies, and no support staff, making it nearly impossible to implement inclusive practices effectively (Uma, 2023).

The NEP 2020 and RPwD Act, 2016, emphasize inclusive education, but the lack of prepared teachers remains a major barrier to turning policy into practice.

2·3·3 Funding Shortages and Deterioration of Educational Infrastructure

Due to financial constraints, the shortage of educational materials and the deterioration of educational facilities are serious.4 This particularly hinders the provision of specialized teaching materials and equipment, and the development of barrier-free environments necessary for special needs education. India's education budget aims for 6% of GDP, but this goal has not yet been achieved (Khan, 2025). As a result, sufficient investment in educational infrastructure

development and teacher training programs has not been possible. Financial constraints of local governments also hinder investment in education. Especially in poor and rural areas, local governments often have weak financial capacity and cannot allocate sufficient funds to education.

2·4 Innovative Practices and Success Stories

Innovations in grassroots movements are revolutionizing inclusive education, especially in resource-limited countries like India. Where top-down policies often fall short, these bottom-up approaches are showing how local initiatives can create sustainable, effective change by leveraging community strengths and innovative, low-cost models.

2·4·1 Local Innovations in Inclusive Education

A powerful example of this is a small group of parents of deaf children who organized to ensure their children's inclusion in mainstream education. Instead of waiting for government intervention, they took direct action: raising funds for interpreters, teaching sign language to classmates, and promoting their initiative in local schools. This proactive, parent-led approach successfully demonstrated that community cooperation can be the driving force behind inclusive education.

Similarly, Leonard Cheshire Disability's "Children's Clubs" in India offer another brilliant model (Inclusion International, 2009). These informal clubs bring together disabled and non-disabled children for activities like sports, art, and drama, fostering social interaction and breaking down barriers. A key innovation is their peer-to-peer education system, where one non-disabled child tutors two children with disabilities at home. This low-cost, sustainable model not only provides academic support but also builds confidence and community awareness, proving that effective education can be achieved with minimal resources. Since 2006, these clubs have supported hundreds of children, a testament to the power of this model.

2·4·2 The Power of Bottom-Up Approaches

While India's education system faces systemic challenges like teacher and funding shortages, and while acts like the RCI Act aim to promote inclusion from the top down, grassroots efforts are succeeding where formal policies struggle. These innovative approaches highlight the value of being locally tailored and

community-driven. They demonstrate that peer-to-peer education and parental initiatives are not just supplemental but vital, sustainable models for a diverse and resource-constrained country like India.

2·4·3 Initiatives of the National Resource Centre for Inclusion (NRCI)

The National Resource Centre for Inclusion (NRCI) was an initiative established by the Spastics Society of India (now known as ADAPT) in 1999 to promote inclusive education by integrating disabled children from special schools into regular schools (Pestonji, 2017). It aims to enable children with disabilities to attend mainstream schools, transform schools and education, train teachers, expand the knowledge base of inclusive education, change public policies at the local, state, and national levels, and positively influence public attitudes. This comprehensive approach indicates that promoting inclusive education requires multi-layered interventions. This initiative has enabled children to attend mainstream schools in Dharavi, Mumbai, and other public and private schools. NRCI has spearheaded the formulation and adoption of the National Action Plan for Inclusive Education by the national government. Through its networking strategy, NRCI collaborated with NGOs, universities and colleges, corporate entities, print media, broadcast media, government departments, and international organizations. The participation of these diverse organizations enabled the project to advance reforms from the micro to macro levels. This demonstrates a successful model of comprehensive inclusive education promotion through international cooperation and multi-sectoral partnerships, suggesting that large-scale system change is possible when governments, NGOs, academic institutions, and businesses collaborate (Pestonji, 2017).

3. Special Needs Education in Japan: Current Status and Challenges

3·1 Policy and Legal Framework: Transition from "Special Education" to "Special Needs Education"

In 1948, school attendance became compulsory for blind, deaf, and special support children, but for severe disabilities, there was a history of exemption or postponement of school attendance, meaning they were not permitted to attend school (Tanaka & Sakuma, 2019). This indicates that while ensuring educational

opportunities was prioritized, segregated education was the mainstream approach in Japan. Post-war special needs education began in 1952 with the establishment of the Special Education Section within the Elementary and Secondary Education Bureau of the Ministry of Education. Initially called "special education", it focused on establishing educational settings and providing meticulous education tailored to the type and degree of disability (Tanaka & Sakuma, 2019).

In 1993, the Ministry of Education issued the "Special Curriculum under the School Education Law". This was the official notification that institutionalized "*tsûkyû ni yoru shidô*" (guidance through attending resource rooms, often referred to as "Speech and Language Classrooms"), and from this time the transition toward special needs education began.

In 2001, the Ministry of Education, Culture, Sports, Science and Technology (MEXT) began using the term "special needs education" instead of the traditional "special education", and from April 2007, "special needs education" was formally positioned in the School Education Act and officially implemented. This institutional reform led to further enhancement of support for infants, children, and students with disabilities in all schools (Tanaka & Sakuma, 2019). This involved expanding the scope of covered disabilities and recognizing the importance of support in regular classrooms.

3·1·1 Related Laws and CRPD Ratification

Japanese special needs education aims to support the independent efforts of infants, children, and students with disabilities towards self-reliance and social participation. It seeks to understand the individual educational needs of each child, enhance their abilities, and improve or overcome difficulties in daily life and learning by providing appropriate guidance and necessary support.

Many institutional reforms have been undertaken to respond to international trends and domestic needs. These include the "Full-scale Implementation of Special Needs Education" in April 2007 (amendment of the School Education Act, etc.), the "Enforcement of the Revised Basic Act for Persons with Disabilities" in August 2011, the Central Council for Education's report "Promotion of Special Needs Education for the Construction of an Inclusive Education System towards the Formation of a Cohesive Society" in July 2012, the "Ratification of the Convention on the

Rights of Persons with Disabilities" in January 2014, and the "Enforcement of the Act on the Elimination of Discrimination against Persons with Disabilities" in April 2016. These legal amendments promote the provision of reasonable accommodation and respect for the intentions of individuals and their guardians, while striving to improve and enhance educational content and methods, with consideration for children with disabilities to learn together as much as possible (Ministry of Education, Culture, Sports, Science and Technology [MEXT], n.d.-c).

In particular, the Act on the Elimination of Discrimination against Persons with Disabilities obligates the prohibition of discrimination and the provision of reasonable accommodation in educational settings, strengthening the legal foundation for promoting inclusive education.

3·2. Diverse Learning Environments and Support Systems

3·2·1 Special Needs Schools, Special Needs Classes, Resource Room Instruction, and Support in Regular Classes

Japan aims to realize the philosophy of an "inclusive education system" where children with and without disabilities can learn together as much as possible. Based on this philosophy, diverse learning environments are being developed to provide guidance that most accurately meets the educational needs of each child, with a view to their independence and social participation. Specifically, the following four types of learning environments are continuously provided:

- **Special Needs Schools:** These schools target individuals with visual impairments, hearing impairments, intellectual disabilities, physical disabilities, and those with chronic illnesses (including physically frail individuals). They provide education equivalent to kindergartens, elementary schools, junior high schools, and high schools, while also aiming to impart the knowledge and skills necessary to overcome learning or daily life difficulties caused by disabilities and promote self-reliance (MEXT, n.d.-d). The standard class size is 6 students (8 students for high school), allowing for meticulous, small-group instruction.

- **Special Needs Classes:** Established in elementary and junior high schools, these classes target individuals with intellectual disabilities, physical disabilities, chronic illnesses and physical

frailty, low vision, hearing impairments, speech impairments, autism, and emotional disturbances. They are set up to overcome learning or daily life difficulties caused by disabilities (MEXT, n.d.-d). The standard class size is 8 students, providing instruction tailored to individual circumstances.

↳ **Resource Room Instruction (*tsûkyû ni yoru shidô*):** This form of instruction is for students enrolled in regular classes in elementary, junior high, and high schools who can generally participate in regular class learning but require some special guidance. It provides special instruction tailored to their disability (MEXT, n.d.-d). Target disabilities include speech impairments, autism, emotional disturbances, learning disabilities (LD), attention-deficit/hyperactivity disorder (ADHD), low vision, hearing impairments, physical disabilities, and chronic illnesses and physical frailt. Special instruction is provided in a dedicated setting (resource room instruction classroom) for 1 to 8 hours per week.

↳ **Regular Classes:** For students with disabilities enrolled in elementary, junior high, and high schools, instruction based on the regular curriculum is provided, with consideration for their individual disabilities. Approximately 6.5% of students in elementary and junior high schools are estimated to have developmental disabilities such as learning disabilities, attention-deficit/hyperactivity disorder, and high-functioning autism (MEXT, n.d.-d).

3·2·2 Individualized Education Support Plans, Medical Care, School Attendance Promotion Expenses, and Facility/ Equipment Development

Individualized Education Support Plans and Instruction Plans are required to be created for all students receiving resource room instruction and those enrolled in special needs classes. These are important tools for understanding the individual educational needs of each child, enhancing their abilities, and providing appropriate guidance and necessary support to improve or overcome difficulties in daily life and learning.

Regarding medical care, with advances in medicine and the enactment and enforcement of the. "Act on Support for Children in Need of Medical Care and their Families", in 2021, there is an

increasing trend of children with medical needs not only in special needs schools but also in local elementary and junior high schools. Therefore, efforts are being made to enhance the system for providing medical care in schools.

School Attendance Promotion Expenses is a system where the national and local governments subsidize education-related expenses (such as commuting costs, school lunch fees, textbook fees, school supply fees, school trip expenses, dormitory daily necessities, bedding costs, and return travel expenses from dormitories) borne by guardians when infants, children, and students with disabilities study in special needs schools or special needs classes in elementary and junior high schools. This system provides subsidies according to the family's economic situation, and even students learning in regular classes are eligible for subsidies if they fall under the degree of disability specified in Article 22-3 of the School Education Act Enforcement Ordinance.

Regarding facility and equipment development, MEXT provides national subsidies and local financial measures to enhance the development of facilities and equipment and other support in special needs education. This includes barrier-free school facilities (elevators, ramps, accessible toilets, etc.) and the development of equipment necessary for education adapted to disabilities (e.g., tactile copy equipment, FM hearing aids, Voice Output Communication Aid). Furthermore, local financial measures are also provided for the placement of special needs education support staff who assist with learning activities for infants, children, and students with disabilities in public kindergartens, elementary schools, junior high schools, and high schools (MEXT, n.d.-b).

3·3 Major Challenges

3·3·1 Consistency between the Philosophy of Inclusive Education and "Diverse Learning Environments"

On the one hand, MEXT claims that it understands that special needs education and the inclusive education system are moving in the same direction (Tsuruno, 2025). It positions that "towards the formation of a cohesive society, the philosophy of an inclusive education system based on the CRPD is important, and to build it, it is necessary to steadily promote special needs education", and asserts that "it is important to develop diverse and flexible mechanisms that can provide instruction tailored to individual educational needs",

and thus, it is necessary to prepare "diverse learning environments with continuity". Japan has ratified the CRPD and advocates for the philosophy of inclusive education in 2014.

On the other hand, the 2022 "Concluding Observations on the Initial Report of Japan" by the UN Committee on the Rights of Persons with Disabilities expressed concern about the perpetuation of "segregated special education" for children with disabilities through medical assessments and the existence of special needs classes in mainstream schools (Tsuruno, 2025). It also called for the withdrawal of the government notice that stipulates that students in special needs classes should spend more than half of their weekly class hours in special needs classes as a general rule. This clearly indicates that Japan's "diverse learning environments" are subject to international criticism for contradicting the inclusive education philosophy of "learning together in the same place".

While "individualized optimal learning" is compatible with both special needs education and inclusive education, a challenge is the difficulty in seeing the connection between "collaborative learning" and inclusive education.

This situation suggests that while Japan accepts the philosophy of inclusive education, it is attempting to position inclusive education as an extension of the existing "special education" framework rather than completely dismantling it. This approach can be seen as a "realist" perspective, considering historical circumstances and the expertise of practitioners, but it creates a significant gap with the international "idealist" perspective. In particular, the government notice regarding class hours in special needs classes is seen as reinforcing this segregation tendency and is a barrier to true inclusion. Japan is trying to find a unique balance between the international trend of inclusive education and the current state of its domestic education system. Whether this "Japanese-style inclusive education" can truly achieve education where "no one is left behind" or if the divergence from international standards will continue depends on future policy decisions and practices. In particular, the challenge is how to strengthen "inclusion" rather than "segregation" while maintaining diverse learning environments. This challenge affects not only equal educational opportunities but also the broader goal of realizing a cohesive society.

3·3·2 Financial Burden and Difficulty in Forming National Consensus

Regarding the promotion of inclusive education, a pragmatic view states that "a national consensus, including on financial burden, should be sought to improve the broader framework and pursue a system of 'growing and learning together'" MEXT, n.d.-a). This suggests that within the current education system, financial constraints are a major challenge to realizing a system where all children learn in regular classes. Results of the call for opinions on the summary of issues raised by the Special Committee on the State of Special Needs Education in 2012 expressed concern that the phrase "while seeking national consensus, including on financial burden" might push the issue aside by implying that improving educational conditions is difficult (MEXT,n.d.-a). This reflects the current situation where securing financial resources is a bottleneck for promoting inclusive education.

3·3·3 Need for Teacher Professional Development and Awareness Reform

In line with the revision of the curriculum guidelines in 2017, compliance with the "Teacher Core Curriculum" for teacher training courses was required, and in particular, the establishment of new subjects related to special needs education became necessary. In this context, it became necessary to learn about identifying and supporting infants, children, and students who do not have disabilities but have special educational needs. This indicates the importance of all teachers having basic knowledge and skills related to special needs education.

The results of public comments on the State of Special Needs Education, 2012, indicate that many opinions emphasize the need for teacher awareness reform, curriculum reform, and fostering a strong sense of human rights for "learning together" (MEXT, n.d.-a). This suggests that teacher professionalism should not be limited to instructional techniques but should also include an understanding of respecting diversity and the philosophy of a cohesive society. There is an opinion that the expertise in special needs education is biased towards instructional content and methods, and that teaching methods and content for "learning together" should also be incorporated as part of that expertise (MEXT,n.d.-a).

While Japan emphasizes teacher professionalism, its focus has historically been on specialized knowledge within segregated

educational environments. The shift to inclusive education demands a broader definition of professionalism for teachers, including human rights, diversity, and collaborative learning. This change poses the challenge of re-educating existing teachers and training new teachers based on a new paradigm. This involves overcoming resistance rooted in traditional practices and perceptions of disability, requiring not only technical skill improvement but also a fundamental transformation of values and attitudes (Toda, 2017).

3·4 Innovative Practices and Success Stories

3·4·1 Kanagawa Prefecture's "Inclusive Education Practice Promotion Schools" Initiative

Kanagawa Prefecture is designating "Inclusive Education Practice Promotion Schools" among its prefectural high schools to realize a cohesive society (Mannen, n.d.). This initiative began in 2016 as part of prefectural high school reform, aiming to expand opportunities for students with intellectual disabilities to receive high school education, and as of 2024, the number has reached 18 schools (Mannen, n.d.).

Various efforts are made to create an environment where all enrolled students can learn easily. Students with and without disabilities learn together in the same classroom of approximately 40 students and can participate in student council activities and club activities. Through individual counseling, students set goals tailored to their individual needs for learning, and in some classes, two teachers are assigned to support students while peer-to-peer teaching and problem-solving initiatives are encouraged. "Career education" classes are conducted to equip students with the skills necessary for society after graduation, particularly through intensive courses for students with intellectual disabilities, and during summer vacation, activities such as school and workplace visits and work experience learning are organized. In addition to daily school life, opportunities for mutual understanding are provided through activities such as para-sports experiences and lectures.

These initiatives serve as concrete examples of integrating students with intellectual disabilities into mainstream educational environments.

3·4·2 Practice of Individualized Optimal Learning

In Japanese educational settings, various practices are implemented to address individual learning difficulties. For example,

when working with students who struggle with word finding, teachers fill in the words for them and provide model demonstrations using correct pronunciation and confirmation, striving to help students understand new vocabulary through interactive dialogue (Prefectural Comprehensive Education Center, 2008). Additionally, opportunities to present topics of interest, such as games, are provided during morning meetings to increase speaking opportunities.

For children with visual weaknesses, as a way to compensate with hearing, "repeating" is implemented, where teachers or guardians pre-read aloud and the child repeats. During reading aloud, the child is encouraged to trace the text with their finger to promote visual focus, and to reduce feelings of inadequacy, the teacher stands nearby and quietly offers advice. After reading aloud, the child's efforts and improvements are praised to foster confidence (Prefectural Comprehensive Education Center, 2008).

For children who struggle with writing, before learning, practice equipment that promotes core body awareness and a mirror are used for posture practice. Correct sitting posture and pencil grip are displayed with photos to encourage awareness. Rest breaks are provided during class to reduce fatigue, and commercial worksheets are used to practice the starting and ending strokes of characters. Matching games using favorite kanji characters are also used to reduce feelings of inadequacy and increase motivation.16 Consideration is also given to adding furigana (reading aids) to test questions and providing reading support.

These practices are concrete efforts to achieve "individualized optimal learning" tailored to each child's educational needs. They demonstrate that flexible instruction, adapted to the characteristics of disabilities and learning situations, contributes to children's motivation and ability improvement.

4. Comparative Analysis of India and Japan

4·1 Common Challenges and Differences

India and Japan share the common goal of responding to the international trend of inclusive education in special needs education, but there are significant differences in their approaches, the nature of the challenges they face, and their historical backgrounds.

4·1·1 Common Challenges

Common challenges in both countries include the quality and securing of teacher training, ensuring comprehensive accessibility (physical, informational, and attitudinal), and the discrepancy between the ideals of inclusive education and actual practice on the ground. Both countries face the financial burden of building truly inclusive education systems and the difficulty of forming a national consensus on this issue. In particular, the lack of teacher professionalism and issues with their treatment are bottlenecks for providing high-quality education in both countries.

Despite significant differences in their societal structures and education systems, India and Japan face similar fundamental challenges in implementing inclusive education. The core issues revolve around attitudinal barriers, teacher readiness, and systemic inflexibility.

⟶ **Attitudinal and Social Barriers:** Both nations struggle with societal attitudes toward disability. In India, deep-seated social stigma and a lack of public awareness often led to the marginalization of students with disabilities. This is compounded by a persistent fear among parents of non-disabled children that inclusive classrooms will negatively impact their child's academic progress. Similarly, in Japan, a cultural emphasis on conformity and a highly standardized education system can make it difficult to embrace and accommodate individual differences. In both contexts, there is a lingering resistance from some parents of non-disabled children who fear that inclusive classrooms will negatively impact their child's academic progress. This shared challenge highlights the need for a broader societal shift in perception, moving away from a medical model of disability to a social model that focuses on adapting the environment to meet diverse needs.

⟶ **Teacher Training and Professional Development:** A major, shared obstacle is the lack of adequate training for mainstream teachers. In both countries, teachers often feel unprepared to work with students who have diverse learning needs. They lack the specialized skills to adapt curriculum, use inclusive teaching methods, or manage a wide range of behaviors. This deficiency in professional development leads to feelings of

inadequacy and stress among educators, ultimately hindering the effective implementation of inclusive practices. While both countries have policies advocating for inclusion, the practical support and training for teachers on the ground are often insufficient.

⇸ **Systemic and Infrastructural Barriers:** Both India and Japan face the challenge of transitioning from a historically segregated education system to an inclusive one. This is reflected in the continued existence of separate special education schools or classes, which, while offering specialized support, can perpetuate segregation and limit opportunities for social interaction. Additionally, both countries often struggle with a lack of appropriate infrastructure, such as accessible buildings, assistive technologies, and learning resources. These physical and systemic barriers make it difficult for students with disabilities to fully participate in mainstream education, reinforcing the cycle of exclusion.

4·1·2 Differences

⇸ **Maturity of Legal Frameworks and Historical Background:** Japan has a long history of systematically developing special education institutions since the post-war period, evolving from a foundation of segregated education. Subsequently, it has gradually reformed its system by incorporating the international philosophy of inclusive education. In contrast, India's legal framework for special needs education is relatively new and heavily influenced by CRPD ratification. However, due to its vast territory and diverse socio-economic contexts, it faces significant challenges in nationwide implementation and penetration.

⇸ **Structure of Education Systems:** Japan has established a multi-layered and systematic education system comprising special needs schools, special needs classes, resource room instruction, and support in regular classes. India aims for the coexistence of special needs schools and inclusive education in mainstream schools, but exhibits a more fragmented structure, with a significant role for non-formal education.

⇸ **Enrollment Rates and Access Disparities:** India faces low enrollment rates for children with disabilities and severe access disparities stemming from gender, region, and the caste

system. Ensuring basic educational opportunities remains a major challenge. In contrast, Japan has largely secured school attendance opportunities for children with disabilities, but the challenge lies in how to achieve high-quality inclusion within the existing segregated education system.

⇥ **Teacher Training Challenges:** In India, fundamental problems such as low teacher wage levels, delayed salary payments, and poor quality of training programs lead to teacher shortages and a decline in quality. In Japan, improving teacher professionalism is an ongoing challenge, but the focus has shifted to retraining existing teachers based on the philosophy of inclusive education and acquiring broader professional competencies.

⇥ **Interpretation of Inclusive Education:** Japan interprets "diverse learning environments" as part of the inclusive education system, but this is internationally viewed as "segregation" and has been criticized. India aims for more direct inclusion but faces substantial barriers such as widespread poverty, inadequate infrastructure, and teacher shortages.

4·2 What India Can Learn from Japan in Inclusive Education

Despite the challenges Japan faces in fully implementing inclusive education, its systematic approach to special needs education offers valuable lessons for India's efforts to strengthen inclusive educational practices. Japan's decades of experience in developing structured support systems, legal frameworks, and institutional mechanisms provide a roadmap that India could adapt to address its current challenges in inclusive education.

4·2·1 Systematic Legal and Policy Frameworks

Japan's comprehensive legal structure for special needs education, developed incrementally since the post-war period, demonstrates the importance of creating coherent policy frameworks. Japan has established a multi-layered and systematic education system comprising special needs schools, special needs classes, resource room instruction, and support in regular classes (Dyliaeva, Rothman, & Ghotbi, 2024). India could benefit from Japan's approach of creating clear, interconnected policies that define roles, responsibilities, and pathways across different educational settings, helping to resolve the

current lack of coherence between the 2009 RTE Act and the RPWD on the educational options for children with disabilities.

4·2·2 Multi-Layered Support Systems and Individual Education Plans

Japan's structured approach to providing differentiated support based on individual needs offers a practical model for India. Children with disabilities can receive instruction in special schools, special classes in mainstream schools, or in specially equipped regular classrooms (Dyliaeva, Rothman, & Ghotbi, 2024), with resource rooms providing supplemental instruction a few times a week for students with milder disabilities. This systematic continuum of support could help India address the current fragmentation in its educational provision and ensure that children with varying support needs receive appropriate interventions within inclusive settings.

Japan's emphasis on individualized education plans (IEPs) and systematic assessment procedures could help India move beyond the current challenges where it is a very big challenge to identify children with disabilities and where there is under-reporting of disability in educational data.

4·2·3 Professional Development and Teacher Training Systems

While Japan faces its own challenges in teacher preparedness, its systematic approach to professional development offers insights for India. Japan's structured teacher training programs and ongoing professional development initiatives could inform India's efforts to address the current situation where teachers in India do not rate themselves as competent to be inclusive and lack adequate training, infrastructure, and institutional or peer support for inclusive education.

Japan's model of integrating special education expertise into general education practice, through specialized training modules and collaborative support systems, offers valuable insights for India, where government special educators often face severe challenges, including contract-based employment, low pay, and working conditions they describe as hostile and exploitative.

4·2·4 Infrastructure Development and Resource Allocation

Japan's systematic approach to creating accessible school environments and providing assistive technologies offers a model for addressing India's significant infrastructure gaps. Given that less

than 40% of school buildings have ramps and around 17% of schools have accessible toilets in India, Japan's methodical approach to ensuring barrier-free environments and adaptive technologies could provide practical guidance for infrastructure development.

4·2·5 Medical and Therapeutic Support Integration

Japan's integration of medical and therapeutic services within educational settings offers a valuable model for India. Japan's provision of medical care within schools could help India develop comprehensive support systems that address both educational and health-related needs of children with disabilities, complementing the educational interventions with necessary medical and therapeutic support.

4·2·6 Quality Assurance and Monitoring Systems

Japan's systematic approach to monitoring and evaluating special needs education services could inform India's efforts to ensure quality implementation of inclusive education policies. This is particularly relevant given India's current challenges with unclear guidelines around quality, curriculum, certification, or infrastructure in special schools and the need for better accountability mechanisms.

4·2·7 Gradual Implementation and Pilot Programs

Japan's incremental approach to educational reform, building on existing strengths while gradually introducing new practices, could inform India's implementation strategy. Rather than attempting wholesale transformation, India could adopt Japan's model of piloting inclusive practices in select regions, evaluating outcomes, and then scaling successful approaches-particularly valuable given India's vast territory and diverse socio-economic contexts.

By adapting these systematic approaches to its own context, India could strengthen its inclusive education system while building on its existing strengths in community-driven initiatives and flexible, grassroots approaches to addressing educational challenges.

5. Recommendations

Based on the above analysis, both India and Japan need to work on various aspect of education making inclusive education more effective. For the future of special needs education in India and Japan, several key reforms are essential. First, both countries must strengthen consistency between policy and practice. In Japan, this

means re-examining the operation of "diverse learning environments," ensuring reasonable accommodation in regular classes, and redefining special needs classes as hubs for inclusion rather than segregation. In India, existing legal frameworks such as the PWD Act, RCI Act, and NEP need to be effectively disseminated to grassroots communities through measures like accelerating UDID card use, expanding non-formal education, and linking with poverty alleviation programs.

Teacher training reform is another urgent priority. Both countries must enhance teacher professionalism and expertise, but India should also address wage levels, salary delays, and modernize training programs to strengthen evidence-based practice and e-Education skills. Japan, meanwhile, needs to expand training opportunities to foster human rights awareness and capacity to respond to diverse needs. Adequate funding and efficient allocation are also critical. While both countries should strive to meet education budget targets and prioritize rural areas, severe disabilities, and infrastructure, Japan must further shift its approach by viewing inclusive education as a strategic investment in social cohesion.

Equally important are accessibility and awareness. Both countries should ensure barrier-free environments and promote the widespread use of accessible teaching materials, while also advancing societal attitudes that recognize disability as diversity rather than deficiency. International cooperation can further strengthen these efforts, with India's grassroots initiatives and Japan's institutional frameworks serving as complementary models, particularly through organizations such as JICA. Finally, greater participation of children with disabilities and their families in policy design, curriculum development, and evaluation is essential to ensure that inclusive education is truly responsive to their needs. Together, these reforms provide a roadmap for building inclusive systems in which all children can realize their potential and contribute to cohesive societies.

6. Conclusion

The analysis of the current state of special needs education in India and Japan reveals that both countries, while pursuing the ideal of inclusive education, face distinct yet deeply rooted challenges. India, despite having advanced legal frameworks through CRPD ratification and setting inclusive education as a national goal,

continues to grapple with severe basic access and quality issues, such as low enrollment rates for children with disabilities, insufficient quality of teacher training, and funding shortages, due to its vast territory, regional disparities, and persistent socio-economic and cultural barriers. There is a significant gap between policy and practice on the ground, and the perception of disability as something to be "cured" remains deeply ingrained. However, parent-led grassroots activities and comprehensive multi-sectoral initiatives demonstrate the potential for promoting inclusive education even with limited resources.

Japan, on the other hand, has undergone a historical transition from "special education" to "special needs education," building diverse learning environments and a systematic support system. However, it faces the major challenge of reconciling its existing system of 'diverse learning environments' with the inclusive education philosophy of 'learning together in the same place', as highlighted by the UN Committee on the Rights of Persons with Disabilities in its criticism of 'segregated education'. Financial burden, improving teacher professionalism and awareness, and ensuring physical and informational accessibility are also recognized as significant challenges.

Common to both countries is the understanding that achieving inclusive education is not merely an issue of the education system but a complex social transformation requiring societal awareness reform, financial commitment, and collaboration among diverse stakeholders.

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