



Literature Study: The Development of Inclusive Education In South Korea, Thailand, and Indonesia

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Abstract

This study is conducted to collect sufficient information about the development of inclusive education in three Asian countries; South Korea, Thailand, and Indonesia. The research method applied in this study is a literature study. This study collects several previous studies to answer the development of inclusive education in Asia. The development of inclusive education that relates to the early history of inclusive education to its current practices. Every child has the right to obtain a proper education. This right is protected by law in every country. One of the programs carried out to achieve 'education for all' is special or inclusive education. This education program is a strategy used to protect the rights of disabled students to obtain a proper education without discrimination. Several studies have shown the obstacles and developments experienced by inclusive education. Every country has its own obstacles and progress. This study is expected to be an insight to know how the development of inclusive education in South Korea, Thailand, and Indonesia runs.

Keywords: Inclusive education, Indonesia, South Korea, Thailand.

Introduction

Every child in the world has the right to an education. Every country has a law that protects this right. Education is not a program that guarantees 'education for all'. Every child in the world has the right to an education, regardless of race or gender. Every child, regardless of their limitations or circumstances, has the right to an education.

Special education or inclusion is one of the programs implemented to achieve 'education for all'. This inclusive education is a strategy used to protect the rights of students with disabilities to receive a proper education free of discrimination (EFA, in Mulyadi, 2017; Kim, 2014). The Salamanca Declaration, issued in 1994, is evidence that inclusive education is being recognized and implemented in a number of countries.

Some Asian countries are already known for having the best education systems; for example, South Korea is known for having a superior education system in East Asian.

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Thailand is already one of the Southeast Asian countries with the highest education budget, with 7.6 percent of Thailand's GDP allocated to education, while Indonesia is still ranked below Bangladesh and Mongolia in terms of education (Postbaru.com, 2020). However, the Asian region's implementation of inclusive education is still limited. According to Forlin (2008), most Asian countries are still attempting to increase the number of public schools in order to provide a more inclusive education. According to Forlin (2008), inclusive education in the Asia Pacific Region is still in the process of curriculum reform, changes in academic structures, and the introduction of what inclusive education is.

Inclusive Education is an educational service system that requires children with special needs or disabilities to attend regular classes in nearby schools with peers at their own age (O'Neil, 1994). Schools that provide this type of education are known as inclusive schools. These schools offer an educational program that is appropriate, challenging, and tailored to each student's abilities and needs (Staiback, 1990).

Due to the complexity of inclusive education, its implementation frequently encounters obstacles. Inclusive education entails integrating students with disabilities, students with learning disabilities, and students from other marginalized groups into regular schools (Ainscow and Haile-Giorgis, 1999). Because not all levels of society are willing to accept or have negative attitudes toward disability or other marginalized groups, inclusive education is more complex than regular education (Rouse, 2007).

On the other hand, schools that provide inclusive education face more complex demands. The schools must continue to improve their regular students' achievement while also supporting for students with special needs, and it is difficult to balance the needs of students with special needs with the hope of achieving high academic grades (Ainscow, Booth and Dyson, 2006).

This study was carried out in order to gather sufficient information about the development of inclusive education in Asia Pacific countries, particularly South Korea, Thailand, and Indonesia. The method employed in this study is a literature study, which is carried out by collecting data from several previous studies in order to answer the question of how the development of inclusive education in these three countries runs.

Literature Review and Discussion

Inclusive Education

According to Sapon Shevin in O'Neil (1994), inclusive education is a system of educational services that requires children with special needs to attend regular classes in nearby schools with their peers. According to UNESCO, inclusive education is a process that aims to bridge students' diverse needs by increasing participation in learning, culture,

and community and decreasing exclusivity in the realm of education. Inclusive education entails changes and modifications to general education's content, approach, structure, and strategies, where these changes can bridge the needs of all children of learning age. Stubb (2008) defines inclusive education as a strategy, activity, and process for seeing the universal reality in order to receive an equal and appropriate education. According to Stubb (2008), inclusive education also involves communities, systems, and all cultural layers in order to combat discrimination, celebrate diversity, and promote participation in education for all humans. Inclusive education is one strategy that can be used to create a peaceful society, a sense of tolerance, and social justice in which all human beings' basic needs and rights are met (Stubb, 2008). According to Stubb (2008), the key to inclusive education is that every child has the right to learn in their community.

Inclusive Education in South Korea

The History and Development of Inclusive Education in South Korea

When Dr. Rosetta Sherwood Hall taught Braille to visually impaired individuals in Pyongyang, it was one of the first signs that inclusive education was being implemented in South Korea (Kim and Kim, 2002; Kim, 2014). Furthermore, during the Japanese occupation period in 1913, it was noted that one type of special education was provided to the deaf and blind, but the education was primarily devoted to orphans under state supervision (The Colonial Japanese Government Publication 242, 1961). Education for the deaf and blind expanded after South Korea gained its independence from Japan in 1945. At the time, education for the deaf and blind began to expand. Therefore, students with disabilities began to receive special education without discrimination.

In 1948, South Korea's Constitutional Law stated that "every person has the same right to receive an education commensurate with his ability," and at the time, all children were required to receive a basic education. The constitution of South Korea specifies that the government would offer adequate education to all people without discrimination, and that education will be adequately supervised by the government (The Education Law Publishing Committee, 2014; Kim, 2014).

In 1949, the South Korean Education Regulation, also known as the Korean Education Bill, reaffirmed the goal of holding inclusive education in South Korea. The regulation emphasizes that special schools should provide learning related to life skills and knowledge that is equivalent to primary and secondary school education for the blind, deaf, mentally retarded, and others, or for students who have physical or mental disabilities (Kim, 2014).

On December 31, 1977, South Korean Law expanded opportunities for students with special needs. South Korean policy states that special schools can provide education

equivalent to higher education for students, and it provides opportunities for students with special needs to obtain education equivalent to high school or secondary education.

Law 3053, Act on the Promotion of Education for the Handicapped, or education policy for individuals with special needs, is an affirmation of South Korea's commitment to special education. This policy marked the beginning of special education regulations in South Korea. It was made permanent in 1979, and with the legitimacy of special education regulations, basic education became compulsory education. This is done to protect the rights of students with special needs.

The special education regulations underwent major changes in 1994. Previously, South Korean education regulations focused more on students with special needs to study in special schools. However, in 1994, the South Korean government stated that education for students with special needs should take place not only in special schools, but also in regular classes, hospitals, and homeschooling education are also forms of special education.

In 2007, the South Korean government emphasized that special education is the responsibility of both the government and the local government, and that the diversity of special education forms, such as cooperative programs between hospitals and schools and extracurricular programs, is further ensured. The government also emphasized the availability of special education for children in early childhood, kindergarten, and higher levels, as well as the development of free education fees for special education services.

Table 1.

Timeline of the Development of Inclusive Education Regulations in South Korea

Year	Information
1913	Special education was only given to the blind and deaf orphans under the supervision of the Japanese government.
1948	South Korean constitutional law "Every resident has the same right to obtain an education according to his ability."
1949	South Korean Education Regulations or <i>The Korean Education Bill</i> "Special schools are required to provide learning related to life skills and knowledge equivalent to primary and secondary school education for the blind, deaf, mentally retarded and others, or for students who have physical or mental limitations."
1977	<i>The Education Act</i> special schools could provide education equivalent to higher education for students, it provided opportunities for students with special needs to obtain education equivalent to high school or higher education.

1979	<i>Act on The Promotion of Education for the Handicapped</i>
	Basic education was compulsory education for students with special needs.
1994	The education regulations in South Korea had undergone significant changes. Students with special needs were also permitted to attend public schools. At the time, inclusive education included public schools, hospitals, and homeschooling.
2007	<i>Act on Special Education for Persons with Disabilities</i>
	Inclusive Education was also applied to early childhood educations, kindergartens, and universities. As well as the exemption of education fees for special education services.

Practices of Inclusive Education in South Korea

The practices of special education in South Korea do not appear to have any significant obstacles. South Korean government regulations have bridged the opportunity for students with special needs to obtain education up to college. But in reality, the implementation of inclusive education system in South Korea is a significant challenge. Students in basic education age are very accepting of students with special needs, but this attitude is increasing negative as the level of education of students increases (Kim, 2013).

The South Korean education system adheres to a system of 6 years of elementary school, 3 years of junior high school, 3 years of high school, and 4 years of university. The South Korean government is responsible for funding elementary to junior high schools. There is nothing different from the elementary school education system in South Korea. However, when it comes to junior high school age, every student is expected to master mathematics, English, and Korean, as well as social and natural science, art, physical education, and character development (Kim, 2013). The pressure of these demands and responsibilities will increase along with the education level of students in South Korea (Kim, 2013). The level of junior high school education determines where the students will continue their education (2017, Transfer Wise).

The strict screening of students in South Korea causes demands to obtain good grades for every student, the competitive culture in South Korea is one of the reasons why inclusive education has not been fully implemented in the public school curriculum (Kim, 2013).

In addition to the academic demands imposed on students, the demands of parents are also the reason why inclusive education has not been fully implemented. Parents expect their children to perform well in school because of the competitive environment (Kim, 2013). Many parents in South Korea have enrolled their children in *hagwon* or tutoring since they were in elementary school. At *hagwon*, students are taught not only academic material, but also extracurricular education and life skills (Astuti, 2017).

The South Korean government has provided a number of adequate facilities for students with special needs. These facilities include the South Korean government's provision of a hospital school, which serves to meet the needs of students who are unable to attend education in a classroom setting. The South Korean government has established a special education support center, which is a service center formed to provide information for parents of special-needs children (Sarwendah, 2019).

The South Korean government has provided a service card that is given to parents with special needs children in order to receive doctor consultation services, and the South Korean government has also provided special courses for employment for students with special needs who have completed their studies (Sarwendah, 2019). However, the South Korean government must make every effort to transform the competitive system into a 'school life for all' or more cooperative one so that the implementation of inclusive education can run optimally (Kim, 2013).

Aside from the competency climate that still dominates the South Korean education system, there are other factors impeding the growth of inclusive education in regular classes in South Korea. Regular teachers have a tendency to avoid or underestimate the responsibility to provide education for students with special needs (Kim, 2013; Song, 2016). They prefer to delegate all responsibility to special education teachers. This emphasizes the increasing competence and active role of special teachers and regular teachers in communicating and exchanging expertise to ensure the success of inclusive education in South Korea (Kim, 2013).

Students with disabilities in South Korea are indeed given the opportunity to be able to attend university. Since the enactment of the *Act on Special Education for Persons with Disabilities* in 2007 the South Korean government has guaranteed that students with special needs can attend lectures. However, the opportunity is not without challenges. Students with special needs who want to continue their education to the university level face challenges due to the limited knowledge provided in high school equivalent education. One of the challenges that accompanying teachers face in higher education is a lack of information about the conditions that must be met for students with special needs to continue to the university level. One of the complaints for students with special needs is the limitation of majors that can be pursued (Kim, 2013).

Students with special needs in South Korea stated that they had difficulty taking classes even when they were in college. This is due to the fact that special schools in South Korea place a greater emphasis on a vocational curriculum, which does not cover the knowledge requirements required at the university level, namely Korean, English, and Mathematics. Most students with special needs who want to continue their education to the university level rely on extracurricular activities to learn the materials required at the university level.

Aside from a lack of knowledge, some students with special needs who attend lectures report having difficulty establishing relationships with their peers (J.Kim et al., 2007; Kim and Kim, 2019).

Inclusive Education in Thailand

The History and Development of Inclusive Education in Thailand

Special education in Thailand was begun in 1935 with the help of Miss Genevieve Caufield, a blind person from the United States (Vorapannya and Dunlap, 2014). However, at the time, special education was still limited to blind students, and other students with special needs were denied the opportunity to attend school. The special school program began in 1951 at the *Somanus Temple School*, providing services for deaf students, and began to expand across the country in 1964 with schools for students with intellectual disabilities. Then, in 1965, a school called *Srisangwan* was established in Thailand for students with physical disabilities. (Amatayakul, Tammasaeng and Punong-ong, 1995). In 1973, the Thai government began to develop regulations to improve the quality of life of people with disabilities, as well as to establish and expand rehabilitation centers across the country (Sawangsi, 2005).

In 1975, the Thai government issued the *Individual with Disabilities Education Act*, ensuring that students with disabilities receive free and appropriate education according to their needs. Students with special needs will be served in special schools and separate from regular schools (Kachondham, 2010). The integration of students with special needs with regular students began in 1992 and in 1999, the *National Education Act* was enacted, ensuring that every individual with special needs had the same opportunities and rights to receive basic education for at least 12 years in Thailand (Kingdom of Thailand, Ministry of Education, Office of the Educational Council, 2004).

In 2008, the *Education Provision for People with Disabilities Act* or regulations for supervision of education for individuals with disabilities became law, and this regulation explains that, 1) inclusive education is a type of educational service for individuals with disabilities, 2) individuals with disabilities have the right to attend an education at any level, 3) schools are not permitted to reject students with special needs, 4) students with disabilities must be provided or served with an individual learning program or *Individual Educational Plan* (IEP) that is changed or improved every year (Rajkijjanubaksa, 2008).

Table 2.

Timeline of the Development of Inclusive Education Regulations in Thailand

Year	Information
1935	Special education in Thailand was begun in 1935 with the help of Ms. Genevieve Caufield and was previously dedicated for the visually impaired individuals.
1951	<i>Somanus Temple School</i> was established but limited only for hearing impaired students.
1964	Special schools for students with intellectual disabilities were being established.
1965	The establishment of the <i>Srisangwan</i> school which was specifically for students with physical disabilities.
1973	The Thai government began to establish rehabilitation centers throughout Thailand.
1975	<i>Individuals with Disabilities Act</i> Regulations ensuring students with disabilities obtained free and appropriate education in special schools.
1992	The merging of students with special and regular needs was begun.
1999	<i>National Education Act</i> Regulation saying that every individual with special need will get a minimum of 12 years of basic education.
2008	<i>Education Provision for People with Disabilities Act</i> 1). Inclusive education as a form of educational service for individuals with special needs 2). Individuals with special needs have the right to obtain education at every level 3). Schools are not allowed to reject students with special needs 4). Every student with special needs must be given an individual learning program or <i>Individual Education Plan</i> and the program must be changed every year.

Practices of Inclusive Education in Thailand

Inclusive education regulations in Thailand have been in existence for almost 12 years, but changing policies into concrete actions is not an easy thing. The development of inclusive schools in Thailand is not a new phenomenon, given that the number of students in Thailand is higher than in other developing countries, which is around 45 – 50 students (Vorapanya and Dunlap, 2014).

The development of the implementation of inclusive schools in Thailand itself cannot be separated from the society culture that develops in Thailand. The majority of Thai people who practice Buddhism, wherein disability is considered as a form of *karma* for what has been done in a previous life. Individuals with disabilities are considered to have low social status in Thai society, where social status is valued. Thai people also still believe in information that is contrary to the facts, which is why the implementation of inclusive schools cannot run optimally. The inclusive school system, which is mostly adapted from the western system, its ideas and practices are regarded incompatible with the existing culture in Thailand; in fact, some practices and ideas about inclusive schools are still considered strange and impossible by some Thai community groups (Vorapanya and Dunlap, 2014).

The development of inclusive schools in Thailand cannot be separated from the development of facilities that are developing in Thailand. Infrastructure in Thailand is still not sufficient to support the mobility of students with special needs. Distance barriers are not only infrastructure and school location, but also transportation barriers from home to school. Traveling in a city like Bangkok is a challenge for individuals in general, and it can be even more challenging for individuals with special needs (Vibulpatanavong, 2017).

Meanwhile, when viewed from the education system, Thailand adheres to a 9-year basic education system, of which 6 years is primary school and 3 years is junior high school. Thai people obtain a waiver of basic education fees in public schools in Thailand. Even though the Thai government recommends that every student attend 3 years of preschool education and 3 years of education equivalent to high school, these two types of education levels are not required for Thai people.

In Thailand, there are 3 kinds of schools: schools owned by the Ministry of Education, schools owned by the local government, and private schools. Most public schools in Thailand accept students with disabilities, preferring to be called integration schools compared to inclusive schools. Most students at the integration school are divided into 3 programs, namely students who are fully in special classes, students who take general and special classes, and students with special needs who take full general classes (Vibulpatanavong, 2017). Some students who fully participate in special classes only join regular students in extracurricular activities. Some students with special needs who are in regular classes only join regular students in sports activities, where adaptations and modifications for students with special needs are not common in these Thai regular classes (Vibulpatanavong, 2017).

All students in Thailand who want to attend school will be divided into 3 categories, 1) students who have been identified by third parties as having special needs, 2) students who have special needs but have not been identified by third parties, and 3) regular students. But one thing remains constant; every school in Thailand recognizes the importance of the initial

screening process for students, even though the students have conducted an assessment with a third party, the school also provides an assessment for each student (Vorapanya and Dunlap, 2014).

The screening system carried out on the education system in Thailand is divided into 3 forms, including external assessment, internal assessment, and ongoing classroom-based assessment. External assessment is an assessment process carried out through psychologists and medical parties. The results of the assessment are in the form of reports or certificates showing that the student is a student with special needs. If the certificate is owned by the parents before the child enters school, the school has the right to apply for government financial assistance for the student's education; however, if the student is diagnosed as a student with special needs after the student enters school, the student and school have no right to apply for financial assistance from the government until a report or certificate showing that the student is a student with special needs is issued (Vorapanya and Dunlap, 2014).

Internal Assessment is an assessment carried out by the school. Most schools in Thailand use the Stanford-Binet as a test tool. Most schools in Thailand will not accept students with IQ lower than 50-60. The school will also carry out an interview process with both students and parents. In addition to interviews, several schools in Thailand will carry out a reading assessment, which is regarded as one of the best assessments for determining students' learning abilities (Vorapanya and Dunlap, 2014).

Ongoing Classroom-Based Assessment, several teachers in Thailand stated that they had difficulty in determining appropriate learning. Assessment is carried out to determine the appropriate curriculum for students (Vorapanya and Dunlap, 2014).

In addition to conducting initial assessments, teachers in Thailand also create individual learning programs for students. The program is created after students complete a series of assessments carried out. The program is used as a follow-up or guide for the daily learning of students with special needs. However, some teachers believed that the learning program was not being used optimally. Some teachers stated that they developed the program only to apply assistance from the government. It was not used as a tool to increase parents' awareness of the needs and achievements of these students. The teachers stated that it was difficult for them to consult with qualified parties about their program. Furthermore, most parents are unaware of the value of individual learning programs and do not attend learning program discussion meetings (Vorapanya and Dunlap, 2014).

Inclusive Education in Indonesia

History and Development of Inclusive Education in Indonesia

Since 1947, Indonesia has enacted laws to protect people with disabilities. The Indonesian government enacted Law Number 33 of 1947 in order to protect workers with disabilities by providing compensation if they had a work accident. (Wibowo and Mulin, 2016). In 1954, Indonesia enacted Law Number 12 of 1954, which states in Paragraph 7 that people who have physical and spiritual disabilities and others are cared for and educated so that they can live a decent life. (Wibowo and Mulin, 2016; Government of Indonesia, 1954).

Indonesian government regulations that aim to protect individuals with disabilities do not stop there, in 1980, the Indonesian government enacted Law Number 36 of 1980, namely a regulation that provides social welfare protection for individuals with disabilities, which was followed by Law Number 14 in 1992 concerning road transport traffic for individuals with disabilities (Wibowo and Mulin, 2016).

In 1991, the Indonesian government began to regulate the education system for individuals with disabilities, with government regulation number 72 of 1991 explaining the development of special education through special schools (SLB) for students with disabilities. This helps students with disabilities to obtain a proper education, which is on par with regular students. It's just that education for students with disabilities was separated from regular education at the time, which made parents hesitant to send their children to special schools. Because of the negative stigma attached to individuals with disabilities in the society (Wibowo and Mulin, 2016).

In 2003, along with the Indonesian government's understanding of disability. The government enacted Law Number 20 of 2003, It is stated in Article 5 paragraph 2 that citizens with physical, emotional, mental, intellectual, and/or social disabilities have the right to special education. Special education is education for students who have difficulty following the learning process due to physical, emotional, mental, social, or intellectual disabilities, as well as those who have the potential for special intelligence and talents.

In 2009, the Indonesian government again refined the regulations governing education for students with disabilities. Through the regulation of the ministry of national education or *Permendiknas* number 70 of 2009. The government issues regulations on inclusive education. Inclusive education is an education system that allows all students with disabilities and students who have the potential for special talents and intelligence to study together with regular students, and its implementation is supervised by the government and local governments. Students with the abnormalities mentioned in the legislation are students who are deaf, blind, speech impaired, mentally retarded, learning difficulties, slow learners, autism, motor disorders, victims of sexual harassment and illegal drugs, double blindness, and other abnormalities (Government of Indonesia, 2003; Mulyadi, 2017).

After enacting *Permendiknas* number 70 of 2009, the government enacted Law Number 23 of 2014 concerning the transfer of the management of special schools to the local government. Then, the Indonesian government enacted Law Number 8 of 2016 which regulates human rights, equality, and protection of human rights for individual with disabilities (Kemendikbud, 2019).

In line with the objectives and understanding of the Government of Indonesia regarding persons with disabilities, the Indonesian Government has refined *Permendiknas* number 70 of 2009 on education for persons with disabilities, by issuing government regulation number 13 of 2020 concerning the regulation of inclusive education in Indonesia. The regulation contains adequate accommodation for students with disabilities. The regulation states that the government will provide special tutors, training for regular teachers, curriculum flexibility, inclusive education graduation standards, and sanctions for misuse of inclusive education (Government of Indonesia, 2020).

Table 3.

Timeline of Development of Regulations for Individuals with Disabilities in Indonesia

Year	Information
1947	<i>The Law Number 33 of 1947</i> Compensation for workers who get work accidents.
1954	<i>The Law Number 12 of 1954</i> Regulations on the basic principles of education and teaching in schools in Indonesia. “People who are in a state of physical or spiritual deficiency are people who are blind, deaf, mute, imbecile or who have other physical and spiritual disabilities are cared for and educated so that they have a decent life.”
1980	<i>The Law Number 36 of 1980</i> Regulations on social welfare protection for individuals with disabilities.
1991	<i>The Government Regulation Number 72 of 1991</i> Special education system for students with disabilities.
1992	<i>The Law Number 14 of 1992</i> Regulations on road transport traffic for individuals with disabilities.
2003	<i>The Law Number 20 of 2003</i> Providing special education for students who have difficulties in participating in a learning process due to physical, emotional, mental, or social disabilities, and/or those who have potential intelligence and special talents.
2009	<i>Permendiknas Number 70 of 2009</i> Regulations on inclusive education, the right for students with disabilities and those who have special talents and intelligence to study with regular students.
2014	<i>The Law Number 23 of 2014</i> Management of Special Schools is managed by the local government.

2016	<i>The Law Number 8 of 2016</i> Regulations on human rights, equality, and protection of the human rights of individuals with disabilities in Indonesia.
2020	<i>The Government Regulation Number 13 of 2020</i> Inclusive education system, availability of special teachers, inclusive education curriculum, and sanctions for misuse of inclusive education.

Practices of Inclusive Education in Indonesia

The implementation of inclusive education in Indonesia is a government effort to produce the next generation who can understand and accept all forms of difference without creating discrimination. As a form of collaboration between schools and the city government, several cities in Indonesia have established inclusive schools. However, the plan is not without challenges, one of them is the existence of a negative stigma on the Indonesian people who are still unable to accept students with special educational needs in public schools (Darma and Rusyidi, 2016). This negative viewpoint begins with parents' inability to accept their children's condition. According to Anggraini (2013), some parents are still embarrassed and disappointed by the presence of their child who is classified as having special needs, so they will tend to reject the student's condition.

The implementation of inclusive schools for children with special needs should create a learning environment that allows all students to learn comfortably and happily. The establishment of inclusive schools is not as simple as the establishment of public schools. The characteristics of the accepted students remain unknown, the level of intelligence remains below the national average, there is no limit on the number of students accepted, and the availability of facilities and infrastructure remains insufficient (Darma and Rusyidi, 2016).

In Indonesia, there are several models of inclusive schools (Ashman, 1994, in Emawati, 2008) as follows,

1. Regular Class (Full Inclusion)

Students with special needs study together with regular students along day in regular classes by using the same curriculum.

2. Regular class with cluster

Students with special needs study with normal children in regular classes in special groups.

3. Regular class with pull out

Students with special needs study together with normal children in regular classes, but at certain times, they are moved from regular classes to other rooms to study together

with special tutors.

4. Regular class with cluster and pull out

Students with special needs study with regular students in special groups, and sometimes they are placed to study together with special tutors.

5. Special class with multiple integrations

Students with special needs study everyday in special classes, but for certain subjects they study together with regular students in general classes.

6. Full special class

Students with special needs study in special classes in public schools.

Although the government has tried to run inclusive education to the fullest, there are still some things that still need to be improved to ensure inclusive education can run even better. Improving the competence of teachers is still needed. Generally, regular teachers at inclusive schools have not adequately identified and/or assessed the characteristics of students with special needs. They will leave it entirely to special teachers. Assessment and identification should be carried out together so that the results of the assessment can be followed up with the preparation of an education plan that is suitable for the students (Darma and Rusyidi, 2016; Rudiyadi, 2011).

The facilities and infrastructure of some inclusive schools are still inadequate. The curriculum applied in inclusive schools still does not fully refer to the conditions and needs of children with special needs. Not all inclusive schools have Individual Education Plan or programs for students with disabilities. Media, sources, and equipment that support the occurrence of students with special needs are still inadequate. Physical facilities in schools are still inadequate. The facilities owned still do not support accessibility for students with special needs (Rudiyadi, 2011).

Likewise, when evaluating the learning outcomes of students with special needs, most of the evaluation processes for students with special needs are still equated with regular students or depend on the curriculum system that applies at the school. For example, if the school uses a duplication system for students with special needs, the evaluation system will be the same as for regular children, but if the school uses a modified system, it will be adapted to the conditions and needs of these students. These adjustments include exam questions, evaluation time, methods, graduation criteria, grade promotion system, and report card form (Maftuhadin, 2014).

The process of inclusive education in Indonesia still requires some improvements. These improvements are not only carried out by one party but are carried out jointly by the government, schools, and the society.

Results and Discussion

In general, implementing inclusive education in a country is not easy. The implementation in South Korea, Thailand, and Indonesia has its own set of challenges and benefits. However, it is important to note that the obstacles that the three countries face are similar. Specifically, the public's perception of people with disabilities or special needs students. According to Kim (2013), students with special needs will be accepted at first, but their treatment will become increasingly negative as their age or level of education progresses. Students with special needs or disabilities are regarded in Thailand as *karma* for their past actions. This negative view is caused by the religious culture in Thailand, namely Buddhism. Buddhism recognizes the existence of *karma*, someone will be reborn according to the actions in his previous life (Vorapanya and Dunlap, 2014). In Indonesia, students with special needs still experience rejection from the environment (Darma and Rusyidi, 2016). The rejection received by students with special needs in Indonesia does not only occur in the society, but also occurs in their closest environment; their family. In Indonesia, there are many parents who feel ashamed and disappointed if they have children with special needs. They will tend to reject the existence of the children (Anggraini, 2013).

Meanwhile, in terms of infrastructure and inclusive education systems, South Korea already has adequate infrastructure and education systems for students with special needs. The South Korean government has established a *special education support center*, a service center formed to provide information for parents who have children with special needs (Sarwendah, 2019). The South Korean government also provides opportunities for students with special needs to study in universities (Kim, 2013).

The inclusive education systems in Thailand and Indonesia have several similarities. Thailand and Indonesia emphasize 9 years of basic education, divided into 6 years of primary education and 3 years of secondary education. However, the inclusive education systems in Thailand is more organized than in Indonesia. From the beginning, the Thai government has provided integrated schools, namely public schools that accept students with special needs. The Thai government has established regulations for the existence of an assessment that is used to screen students. All students in Thailand who want to attend school will be divided into 3 categories, 1) students who have been identified by third parties as having special needs, 2) students who have special needs but have not been identified by third parties, and 3) regular students. According to Vorapanya and Dunlap (2014), the schools are also given the freedom to provide assessments for each student. This screening is done to obtain the right program for each student.

In Indonesia, the inclusive education system has not been optimally organized. According to Darma and Rusyidi (2016), there are still no acceptable characteristics or that

can be classified as students with special needs. Unlike in Thailand, where an assessment is required to screen students. In Indonesia, assessment implementation is entirely up to the schools. As a result, the type of assessment required and carried out by the school varies. Some schools require parents to take a third-party assessment before registering new students; others do not. The lack of strict regulations regarding the criteria for students with special needs often confuses schools and parents.

The three countries face the same challenges in terms of special education teachers' competence. Many regular teachers continue to undervalue and do not maximize the learning programs that have been developed (Vorapanya and Dunlap, 2014; Kim, 2013; Song, 2016). Regular teachers will tend to give a full responsibility for learning programs to special education teachers (Kim, 2013; Song, 2016). The teachers find it difficult to exchange ideas with experts as well as with their colleagues. According to Kim (2013) and Vorapanya and Dunlap (2014), special education teachers have difficulty communicating with peers and competent people in order to exchange expertise and consult on the programs they have created. According to Vorapanya and Dunlap (2014), most teachers also struggle to communicate their programs with the parents; this is due to parents' understanding of children and the benefits of individual learning programs that have been developed.

Conclusion

The implementation of inclusive education is not without challenges. Many challenges must be overcome. Developed countries, such as South Korea, face similar challenges in developing special education. The cultural challenges that exist in society, such as the fact that there are many people who look down on students with special needs, as well as the acceptance of parents to the circumstances of students with special needs, are some of the obstacles that are frequently encountered.

In terms of the education system, one of the gaps that distinguishes regular students from students with special needs is the existence of a competitive culture in the education system. Uncertain regulations regarding the criteria for students with special needs can also be an obstacle in implementing special education effectively. This ambiguity can be perplexing for both schools and parents.

In terms of teacher competence, special education teachers continue to complain about the difficulty of communicating between fellow teachers and those who are more competent; special education teachers continue to have difficulty in discussing individual learning programs that they have created; and special education teachers continue to state that they need experts to discuss whether the programs they have created are appropriate or not. Along with colleagues and experts, special education teachers stated that they had

difficulty in communicating with parents, due to parents' understanding of children and the value of individual learning programs.

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