

A Comparative Analysis of Educational Policies for Disabled People in China and Britain

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Abstract. In many nations, education for the disabled members of their communities has proven to be a challenge. The level of education of the disabled reflects the level of education, welfare level and civilization of the country. Due to the differences in economic, political, cultural and social, and objective geographical location, historical background and other factors in the world, the development of education for the disabled in different countries has its characteristics. Therefore, this study selects two countries, China and the United Kingdom, for comparative analysis, and compares the differences between the two countries in terms of education for people with disabilities by integrating and analyzing relevant literature and comparing the laws and regulations on the protection of the right to education of people with disabilities in both countries. This study is significant as it enables researchers to understand where Chinese education for the disabled falls short compared to that of the UK, thus, making critical recommendations for policy change to favor the education of the disabled in China. The results of the study indicate that while Britain practices inclusive education for people with disabilities, China has adopted the Integrated Education development model as the main line of development and reform. Whichever mode of inclusion a country takes up, it is important to ensure fair and just treatment of people with disability. The document concludes by stating that China's future potential can enhance the policy of education for the disabled and can focus on future research direction.

Keywords: China; Britain; educational policy; education for the disabled.

1. Introduction

Disability education is an indispensable part of the national education system, and the degree to which education for the disabled has developed indicates the level of education in a nation or region. To a certain extent, and reflects the welfare level and civilization of a country or a region. Helping people with disabilities to receive education can enable them to better learn knowledge and participate in social life, help them improve their overall quality, and promote the civilized progress and development of Chinese society. The development of education for the disabled is in line with the trend of civilization and education development in modern society. Due to the differences in economic, political, cultural and social, and objective geographical location, historical background and other factors in the world, the development of education for the disabled in different countries has its own characteristics. Therefore, this study selects two countries, China and the United Kingdom, for comparative analysis, and compares the differences between the two countries in terms of education for people with disabilities by integrating and analyzing relevant literature and comparing the laws and regulations on the protection of those with disabilities' right to an education in both nations. The Chinese government understands that education is a national priority. The loss of educational equity for disadvantaged groups will have a negative impact on their future productive lives and competition for resources. Therefore, the Chinese government has created a number of educational policies to ensure that people with disabilities are not marginalized. However, in contrast to the UK's policies and laws, China's educational protection for people with disabilities is inadequate in certain circumstances. Therefore, China's policy framework needs to be improved in order to properly safeguard the legal rights of students with disabilities.

During the past decades, Chinese researchers has pointed out the importance of disabled education and put forward constructive suggestions. In 2012, Lu Deyang wrote in his *Disabled People and the Development of Disabled Education in Modern China* that disabled people are an important group in the history of disabled education in modern China.

In Data Analysis and Discussion of Educational Equity for People with Disabilities in China, Pangwen pointed out the current situation such as the inequitable allocation of educational resources for people with disabilities. He argued that the state should improve the relevant laws and regulations on education for the disabled, increase the rate of compulsory education for the disabled, extend the number of years of compulsory education, increase the investment in education for the disabled and reasonably adjust the expenditure structure, so as to promote the equity of education for these kind of people.

Meanwhile, scholars have put the line of sight in other countries in education policy for the disabled to learn from it. Early in 2006, Wang Wei In his *Development, Problems and Directions of Special Education in Britain*, he reviewed the history of special education in Britain and explained the survival of children with disabilities, then analyzed the problems of special education in Britain and put forward many constructive suggestions. Then, Chen Xuefei's Case Study on the Implementation of Higher Education for Persons with Disabilities in the UK mainly used literature analysis and case study method to explain the development status and policies of higher education for persons with disabilities in the UK, and selects Cambridge University and De Montfort University to explore the specific implementation of higher education for persons with disabilities in the UK, so as to provide reference for better implementation of higher education for persons with disabilities in China.

In general, China is not perfect in education for the disabled, but some achievements have been made so far, and further research is needed in the future in conjunction with relevant theoretical results. Therefore, in terms of the structure of the study, this paper is divided into five main parts. The first part introduces China's policies on education for people with disabilities and outlines the relevant policies and the process of adding and improving them. The second part introduces the policies on education for people with disabilities in the UK, and outlines the relevant policies and the process of their improvement. The third part compares and contrasts how the educational policies of China and the UK treat disabled people. This leads to the fourth part, which analyzes the advantages of education for people with disabilities in the UK from the perspective of development, and what advanced experiences China can learn from them to more effectively support the growth of education for those with disabilities in China. The fifth part concludes the study with a summary of where China can enhance its policies on disability education in the future, and the directions of research that can be focused on in the future.

2. China's Policy on Education for People with Disabilities

Education for people with disabilities in China has a long history. Since the founding of the People's Republic of China and especially after the reform and opening-up, it has made very remarkable achievements. In real society, people with disabilities are in a disadvantaged position for resource access and resource competition. Since the implementation of the Law on the Protection of Persons with Disabilities (2008) in China, although education for people with disabilities in China has made great progress, there are still serious situations and problems.

2.1 1949-1978: Pioneering development

Before the founding of New China, the foundation of education for the disabled has made relatively little progress. After the founding of New China, the national development plan involved the development of education for the disabled and supported it in a number of ways, including policy and funding which encouraged the growth of education for the disabled. During this period, the first laws and regulations were enacted to protect the education rights of children from disadvantaged

groups, such as the Law of the People's Republic of China on Compulsory Education (1986), and the Regulations on Education for Persons with Disabilities (1994). The implementation of these laws and regulations has been a positive development for the right to education of people with disabilities. However, in the process of implementation, there are still phenomena such as unsatisfactory results, lack of implementation, lack of funding, and inadequate facilities. The main reason for the difficulty of implementation is that these laws and regulations are relatively broad, so there is a lack of intuitive and feasible specific operational norms.

2.2 1979-2011: Constructive development

In the 1990s, China established the general high school for the deaf and the blind in Nanjing and Qingdao to fill the gap in the high school section respectively. In 2007, China signed the United Nations Convention on the Rights of Persons with Disabilities, putting forward the principles and concepts of guaranteeing the right to education for persons with disabilities. A growing number of pupils with various disabilities were able to attend school during this time. At the same time, general schools and society became more and more inclusive. A number of laws and regulations ensured that the hiring of teachers, allocating funds, and developing curricula for students with disabilities were done in a systematic way. This led to the improvement of the educational experience for these students. The disabled education system has been completely redesigned, improving the quality of disability education. The compulsory education has been popularized, and it has become easier for students with impairments to transition from home to school and from school to society. The report of the 17th Party Congress first proposed "caring for special education". By 2011, the gap between urban and rural areas had significantly narrowed, and the enrollment rate of students with disabilities in rural areas had significantly increased [1]. The national average level of compulsory education for students with disabilities was 72.1%, 74.5% in urban areas, and 71.5% in rural areas. The enrollment rate of rural students with disabilities has increased dramatically, and the gap between urban and rural areas has been significantly narrowed.

2.3 2012-2019: Transformative upgrade

Since the 18th Party Congress, disability education in China has also embarked on a new historical adventure, clearly bringing forward the transformation to integrated education and the pursuit of "fair and quality" education. The protection of social rights has given way to a greater emphasis on the education of people with disabilities. Education for people with disabilities has once again ushered in a significant chance for progress, this time with the development model of integrated education as the major line of development and reform.

The 14th Five-Year Plan for the Protection and Development of Persons with Disabilities, published by the State Council in 2021, conforms to the notion of people-centered development and establishes an overarching development strategy from the perspective of protecting the livelihood of persons with disabilities and promoting their comprehensive development. It is a programmatic document to guide the development and implementation of the special education program's third phase. The introduction of the Plan has led to the popularization of nine-year compulsory education for children with disabilities, and has increased the enrollment and transition rates. In this decade, the education system in China has been further improved, with 435 more special education schools, the gradual development of high school education for the disabled, the continuous improvement of schooling security, and a comprehensive and three-dimensional system for protecting the rights and interests to escort the cause of education for this special group.

3. UK's Policy on Education for People with Disabilities

Education for the disabled in the British education system has undergone a lot of development over the years, which has set the path for the current trends in the education of disabled children in the country. In this section, the authors shall review the stages of development that the policies on the

education of the disabled have undergone over the years in the British education system. Although these developments have been specific to one country, some of the policies can be implemented in other countries, such as China in order to foster the education of students with disabilities or those with special education needs (SEN).

Before the 1940s, children with special education needs and disabilities (SEND) in England were seen as uneducable [2]. Between 1940 and 1970s, due to communitarian approaches of embracing equity in education, schools started seeing more SEND students in their classrooms. In addition to the social factors, the agenda was also cemented by legislative acts such as the Sex Discrimination Act (1975) and the Race Relations Act (1976) improved the overall attitude towards education of SEND children as well as other marginalized groups [2]. In 1970, the Education Act was implemented and addressed the issue of segregation of SEND students. The law insisted that all children were educable and insisted on the inclusion of SEND students in mainstream education [3]. As a result, more SEND students were offered placements in mainstream education facilities as long as their educational needs were in line with those offered in mainstream education and could be achieved at an understandable cost.

More light was shed on the issue of integration when the Warnock committee was formed in 1978 to look into the issue of integration. Their report highlighted three types of integration that were being used in mainstream schools at that time. "Location Integration" defined the situation where SEND students were placed in separate classes in the mainstream schools, "Social Integration" referred to when SEND students could engage in social activities such as eating and playing with their peers, while "Functional Integration" was used to refer to when SEND students could engage in educational activities such as classes and other activities with their peers [3]. The report stressed locational and social integration. Thus, at the time, the employment of integration was done in a limited way. Other amendments on the Education Act, such as the Education Act (1980), the Education Act (1981), and the Education Act (1988), were developed to look into children with Special education needs specifically.

The concept of inclusion was developed in the late 1980s and the 90 with international bodies such as UNESCO advocating for a move from integration to inclusion in mainstream schools [4]. Thus in 1997, Excellence for All Children: Meeting Special Educational Needs marked a new age in the British Education System that focused on inclusion rather than integration in order to accommodate the needs of the SEND students [5].

4. Comparative Analysis of China and Britain's Policies on the Education for People with Disabilities

4.1 Education for people with impairments has evolved as a result of social growth.

In 19th century of China, Western missionaries were hindered by a large number of Chinese people in the process of propagating the gospel and turned their attention to the field of education, hoping to carry out cultural penetration through school education, so they set up church schools, and subsequently, church schools arose in China on a large scale, and special schools also appeared one after another [6]. The church schools were concerned about the education of the disabled population in China, and they not only carried out special education activities to help the disabled acquire life skills but also published articles in church journals to promote theories about special education in Western countries and advocate China's progress in special education. The practical activities of the Western missionaries directly contributed to the emergence of China's special education system.

The background behind special education in England can be traced back to the first special school for deaf and blind students created many years ago, which marked the beginning of special education in England [7]. The impetus of education for disabled children in the early years originated with charities and philanthropists. In the early years, compulsory education came into being to accommodate the growth of large capitalist industries, allowing many children who had not previously received any form of education to enter school and receive it. At the same time, the

industrial revolution led to the transfer of many people from rural to urban areas. In this situation, society as a whole paid less attention to disabled children, who were then considered unfit to study in regular schools, and people also did not believe in the ability of disabled people to learn, convinced that it was right to separate these special groups of people from the rest of the normal population. As a result, philanthropists began to focus on this group, providing various forms of care for the disabled, so that the "normal" could be protected, and the disabled could be protected through the care of "philanthropists. In response to this trend, segregated special schools and institutions have been established in the name of shelter and protection. Special schools were established under this principle of protection and care.

4.2 Philosophy of education

Beginning in the latter half of the 20th century, the philosophy of education for those who are disabled, and the field of education in general, has changed dramatically: the idea of inclusive education has surfaced and is growing in popularity. It has had a significant influence on decision-makers, educators, individuals who are disabled and their parents worldwide. "Inclusive education" promotes integrating those with impairments into the regular school system and the creation of conditions for them to be educated in general classrooms alongside their peers without disabilities and to use educational resources equally for their own development [8]. Inclusive education appears on the stage of history as a new teaching philosophy and educational philosophy, marking a great progress of human civilization, and has been widely practiced in many countries, including developed and developing countries, among which, Britain is one of the most representative countries.

Following are some general summaries of Britain's inclusive education policies for those with handicaps:

First, creating an inclusive culture and establishing inclusive values. Every student is treated fairly. Secondly, to develop inclusive policies. Let schools open their doors to all. Recruit, appoint and promote staff fairly. Thirdly, implement inclusive behavior. Carefully arrange teaching and learning activities. Teachers prepare lessons well and take into account the needs or special circumstances of each student to encourage all pupils to participate in class and honor the differences among them, and largely motivate students in their learning.

The Integrated Education Development Model has been accepted by China as the main path of development and reform. Inclusive education inherits a basic theory of returning to the mainstream, which refers to a way to integrate the majority of children with disabilities into regular classes and enhance learning in regular classes by merging the regular and special education systems, creating a unified and unique system to manage educational resources, and integrating students from different types of classes [9].

The following are some general summaries of how China approaches inclusive education for those with special needs:

For a start, China has promoted integrated education across the board, encouraging ordinary kindergartens to accept children with disabilities who are capable of receiving a general education in their vicinity to attend classes with them, and supporting ordinary secondary vocational schools and ordinary high schools to accept students with disabilities to attend classes with them. Second, to promote special education schools and ordinary schools twinning help co-construction, group integration school, create an integrated education environment, to promote the integration of children with disabilities and ordinary children.

However, whether it is inclusive education or integrated education, it actively upholds the liberties of those who are disabled to participate in equitable access to education and share social education resources, which is not only conducive to maintaining educational equity, but also conducive to enhancing social affinity and strengthening social cohesion, which is of great significance to building a harmonious society.

4.3 Comparative Enrolment Numbers

Since the 21st century, as the UK higher education sector actively promotes higher education for disabled students, the data has improved considerably, covering all aspects. By 2019, there will be 2,833,970 students enrolled in higher education in the UK, with no growth in the overall number of students, but a rise of 331,170, or 14%, in the proportion of disabled students. From this, it can be seen that because of the UK's higher education reform and expansion, the accommodation and acceptance of students with disabilities have been significantly improved, and students with disabilities in UK have become an important part of the student body [10].

On the contrary, in China, the overall education level of people with disabilities aged 18 and above is not high, and the number of people receiving higher education is relatively small. The 2013 monitoring data show that the proportion of people with disabilities aged 18 and above who have never attended school is 36.3%, and the percentage of people who have completed elementary and junior high school is 56.4%, while those with a college education is 1.1%, and those with undergraduate education and above is only 0.5%. 0.5%, while the gross enrollment rate of higher education in China was 34.5% in the same period, with a huge gap between the two, and the opportunities for people with disabilities to enter university and receive higher education are still very limited [11]. Through the general college entrance examination, 28,900 students with impairments were admitted to general colleges and universities from 2015 to 2017, of which 8,508 in 2015, 9,592 in 2016 and 10,818 in 2017, with a total enrollment of 4,107,400 in general undergraduates in 2017, and the proportion of new students with disabilities was only 0.003%; by 2018, 11,154 disabled students were admitted to general colleges and universities nationwide. 11,154 people with disabilities were admitted to general higher education institutions, and in 2018, general undergraduate enrollment in China was 4,221,600, and the proportion of new students with disabilities was still 0.003%, with almost no increase in the proportion. The population of China is 1.3 billion, while the UK has only 60 million people, but the number of new students with disabilities is much higher than ours, which is enough to see the UK's strong commitment to protecting and promoting disabled students' right to higher education [10].

5. UK's education for the disabled of advanced experience from the perspective of development

Policies regarding the education of the disabled in Britain have experienced change over the years. It is hoped that these policies have been effective in improving the way the disabled access education. In order to determine whether or not the policies have been effective, the authors shall take a few case studies and research conducted by other researchers on the issue.

Burchardt (2005) conducted research to compare the education and employability of people with disabilities and those that do not in the UK. People with disabilities in the past, have not always been encouraged to view themselves as having important roles to play in society. He reports that in a study conducted on people born in the 70s, the non-disabled members of the society had six times more expectations of securing middle to low-income jobs. In addition, only a fifth of the students with disabilities had dreams of working their dream jobs after school compared to a third of non-disabled students [12]. This shows that although policies have been formulated to ensure inclusion, equity is yet to be achieved in the United Kingdom.

In order to collect the data, the researcher held in-depth interviews with seven disabled students aged between 17 and 24 so as to get an idea of the issues the young people themselves felt were affecting both their experience of education and aspirations. The interviewees came from a wide range of socioeconomic backgrounds and had disabilities such as deafness, blindness, cerebral palsy, quadriplegia, and asthma. The insights from the interviewees were then used to interview a larger cohort of respondents so as to gain a clearer picture of the experience of people living with disabilities.

From the research, the author was able to gain the experience of disabled young adults in education over the years. They found that people with disabilities were doing worse in schools as well as in

employment, especially if they had severe disabilities such as mental health problems. The study also found that people with severe disabilities were more likely to stay in school after sixteen. Additionally, those who continued with education and had more severe conditions preferred to stay do a vocational course. It was also established that educational qualifications such as a university degree made it possible for young disabled adults to be more independent in life.

Out of the interviewees, four of them had experience with higher education. One of the respondents recalled how she gave up her first attempt at gaining a university degree citing "inaccessible" campus, which made it difficult to study as she couldn't access classrooms and other university resources such as the library. This was a common finding from the other students, although it was not the main issue they raised. Two of the respondents claimed that they had spent time in school campaigning for more accessible services to be offered for people with disabilities, which could make universities a better experience for future generations while taking the distraction away from their studies.

The other three respondents mentioned that some aspects of their courses were inaccessible, due to the fact that the teaching and examination modes were inflexible and not suited for people with disabilities. This proved a challenge as they could not participate in educational activities with their peers, making it difficult for them to perform well.

However, all four respondents claimed that they enjoyed their time at the university and were glad at the opportunity presented to learn new things, interact with their peers, and make connections that could benefit them in the future, participate and socialize in events in the university as well as join clubs and societies that could accommodate them with their disabilities.

The research unveiled that it was more likely for non-disabled students to be in full-time or part-time education, thus being more likely to gain a job and succeed in life. Similarly, students with disabilities rated their transition from one level of education to another as either difficult or very difficult compared to their non-disabled peers, who found it easy. This is due to the fact that they had to adjust to the new environments every time and were mostly not designed to accommodate them.

Generally, it was clear that at the time in Britain, the inclusion of students with disabilities had not yet been achieved, and more schools needed to make adjustments in their resources and curriculum to accommodate them. Additionally, there were insufficient policies to ensure that students with disabilities are accommodated in mainstream education. Although the government is concerned with ensuring the inclusion of students with disabilities in mainstream education, the students find it difficult to participate in the activities of the school and are, therefore, more likely to drop out. This puts them at a disadvantage compared to their peers. More institutions have to make changes in their facilities, and the government needs to implement more policies to ensure inclusion is not only possible but easy.

6. Suggestion

The education of students with disabilities is an international concern. China can make sure that their special needs students get a fair chance as their peers by focusing more on research in that area so that they can be able to implement the right policies to support them. Ensuring inclusion for all students requires an environment that supports inclusivity. Some of the elements that China needs to focus their research on include; the presence of local governance structures in schools that promote inclusion so that the children can understand their rights as well as promote participation. Good local governance will ensure that the children's rights are considered during planning, policy-making and resource allocation. Issues to do with disabilities can be introduced during local policy-making and planning, and by promotions aimed at changing public attitudes towards people with disabilities [13].

Secondly, they could focus their research strategies on introducing and developing laws and policies that favor students with disabilities. Many countries have policies in their constitution that foster provision of services in a non-discriminatory manner. While gender, religion and race are always cited as groups for protection, disabilities are often not as common. It would therefore be advantageous to the SEND students in China if the government would consider issues of people with

disabilities as a mainstream concern. However, China is one of the countries that have enacted protection of the rights of people with disabilities in the constitution. They could focus more energy into policies that favor the inclusion of students with disabilities as education is a basic human right [13].

Additionally, China focused their research efforts on coming up with mechanics that enable people with disabilities and their families to influence policies related to disabilities. This is because people with disabilities and their families are more aware of what issues they face than any other person. Making them part of the policy-making process would ensure that they come up with the right policies.

The Chinese government could also focus its research on ways that they could create general awareness of issues affecting the education of students with disabilities. The purpose of this is to change the general attitudes of the community towards people with disabilities. This would ensure that the students feel comfortable in schools and make inclusion not only possible but also easy.

Finally, the Chinese government could ensure that budgeting and funding are done with the rights of students with disabilities at the back of their minds. For example, they could allocate more funds to schools so that they can upgrade their resources and curriculum to accommodate students with special needs and convert their facilities to be more accessible. This would ensure that their stay in school is comfortable and accommodating.

7. Conclusion

This study has highlighted some of the ways China should improve the policy of education for the disabled. China has boundless possibilities for the future. Recently, the Chinese government has made investments in a number of programs meant to make it easier for persons with disabilities to find work and educational opportunities. The number of disabled persons who are able to attend school and work has already increased thanks to these measures, but there is obviously still a lot of work to be done. The need for a shift in Chinese society's attitudes toward handicaps is the primary force at work here. Less stigma will surround those who are afflicted by disability, and they will receive more support when they most need it if this research can help the general public understand what it means to be disabled. All people with disabilities and their families would live better overall as a result of this strategy. Future potential in China can improve the approach to education for people with disabilities and can concentrate on the direction of future research.

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