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Inclusive Education in Ghana: Challenges and Lessons from Canada

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Major Research Paper

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Abstract

This Major Research Paper (MRP) adopted the Systematic Literature Review (SLR) approach to examine the evolution and current state of inclusive education in Ghana and Canada (Ontario), with an emphasis on challenges and lessons learned. The movement towards inclusive education began in Ghana in 1936, with separate schools for disabled children. However, challenges remain, such as geographic disparities, prohibitive costs, and a lack of teacher understanding. Inclusive education has evolved over the last 50 years in Canada, thanks to legislative advancements such as the 1982 Charter of Rights and Freedoms and provincial acts. Key findings show that Ontario is significantly ahead of the curve when it comes to implementing inclusive education, thanks to diverse provincial approaches and effective strategies. Despite challenges in both countries, Canada's lack of a unified national policy contrasts with Ghana's policy, which is riddled with problems, limiting its effectiveness. Discrimination against disabled children is less prevalent in Ontario than in Ghana, where negative attitudes prevent inclusion. Financial constraints are a common barrier, with Ontario's lessons pointing to a comprehensive framework that combines Universal Design for Learning and Differentiated Instruction to address financial concerns while also improving inclusive practices. Challenges for teachers and principals in both systems highlight the importance of teacher preparation and school leadership in implementing successful inclusive education policies. Lessons from Ontario focus on strategies for incorporating inclusive education principles into teacher training programs and increasing principal accountability, emphasizing the importance of professional development and leadership in fostering inclusive practices. Drawing lessons from Ontario, the findings highlight the need for a comprehensive

national policy in Ghana that addresses financial constraints while promoting teacher and principal preparation to improve inclusive education outcomes.

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Dedication

I dedicate this project to my uncle (Mark Akudugu); your unwavering support and guidance have been the cornerstone of my academic journey. In every challenge and triumph, your encouragement has been a source of strength.

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Chapter One

Introduction

In June 1994, at a conference organized by UNESCO in Salamanca, Spain, access to inclusive education for persons with disability was reaffirmed as a fundamental right, in line with the provisions of the 1948 Universal Declaration of Human Rights. The conference report called upon all governments to prioritize inclusive education in developing school curricula (UNESCO, 1994). This call aligns with the provisions of the UN Convention on the Rights of the Child (1989) and, subsequently, the UN Convention on the Rights of Persons with Disabilities (United Nations Treaty Series, 2006). In accordance with the objectives of the Salamanca conference, governments as well as national and international stakeholders, particularly in Western Societies have developed policies and strategies for enhancing inclusive access to education (Mantey, 2014). Given the critical role of education in global development, the Salamanca Statement, signed by ninety-two countries, called on signatories to adopt the Inclusion Education (IE) principle to ensure that every child has access to quality education, irrespective of physical and mental challenges (UNESCO, 1994).

Additionally, the UN Convention on the Rights of Persons with Disabilities advocates for all persons to have equal opportunity to quality education and calls in the elimination of barriers that bar people from participating in schools (United Nations Treaty Series, 2006). The Convention on the Rights of Children also recognizes education as a right of all children, and advocates for equal education for all (United Nations Treaty Series, 2006).

Inclusive Education recognizes and responds to the varying needs of students, including the learning and teaching approaches suitable for these learners, as well as ensuring the provision of

appropriate curricula, resources, and support essential for quality education (Petrescu, 2013). According to Gadagbui (2010), Inclusive education encourages children to develop firm belief and self-confidence in themselves and pull-down barriers of all forms of discrimination which helps them to participate effectively in society. Despite the treaties and international calls for inclusive education (IE), Ofori (2018) indicated that not all countries have been able to implement it effectively.

Abubakar (2019) contends that, “disability is a condition in which a person is unable to perform essential everyday tasks mobility, spatial orientation, or control of the body because of injury or deformity to one or more vital organs, such as the skeleton, muscles, hands, toes, fingers, or spinal cord. A disabling condition creates an impairing situation by putting an obstacle in the way of tasks that should be completed easily or independently”. According to WHO & World Bank (2013) the outcome of disability is the interactions between health issues and personal, environmental, and societal variables rather than being only a biological or social construct. Disability can manifest in three ways: a physical or functional impairment; an activity constraint, like not being able to read or move; or a restriction in participation, such as being driven out of school or workplace. In addition to this perspective, UNICEF (2014) argues that the concept of disability is a complicated issue than its traditional meaning of body defects on individuals. Disability has been placed in the context of diversity, poverty, and discrimination, as well as being denied access to human rights.

Despite formulating policies and constitutional instruments to promote inclusive education in Ghana, Obeng-Asamoah (2016) argues that the implementation and practice of inclusive education

in Ghana is yet to be effective due to several factors. According to Ofori (2018), implementing and practicing inclusive education requires systemic changes to the country's educational system. Hence, considerable changes to norms and culture must be considered before inclusive education can thrive. As part of the accounting factors for the ineffectiveness of inclusive education in Ghana, Slee (2011) revealed that most people in the country have negative attitudes towards implementing and practicing inclusive education. The study further opined that the negative public attitude to inclusivity in schools often deters the families of persons with disabilities from enrolling them in school. Given this, Obeng-Asamoah (2016) stated that adopting a positive mindset and attitude toward disabilities is necessary for promoting inclusive education in Ghanaian society. In understanding the factors that account for this behavior, Tchintcharauli and Javakhishvili (2017) revealed that most parents of disabled children are primarily ashamed of their children's disability. Hence, they cannot afford to face public ridicule for taking their wards to schools. Nonetheless, promoting inclusive education in society is particularly important to help mitigate people's negative perception/attitudes about people with disabilities.

Additionally, Hodkinson (2010) also pointed out that some teachers within the Ghanaian educational system have negative attitudes towards children with challenging behaviours or disabilities, which collectively thwart the country's efforts to enhance inclusive education. The study further noted that some of these teachers even, to some extent, consider the exclusion of such students from mainstream education. According to Kuyini and Boitumelo (2011), teachers are central to the implementation of inclusive education, and hence, it is essential to enhance their capacity to support physically challenged children. Apart from the negative attitude of teachers, Kuyini (2010) stated that most of the schools lack disability-friendly infrastructure and facilities

conducive for disabled students to access educational facilities. Providing proper facilities and infrastructures in these schools will encourage more disabled students to attend, promoting inclusive education.

Comparatively, the implementation and practice of inclusive education in Ghana differs from that of the Western world. In Ontario, the Ontario Ministry of Education (2021) explained that the province has invested a lot in inclusive education. As a result of that, students with special needs are easily integrated into the educational system. Kopfer and Oskarsdottir (2019) noted that, despite segregated placements within Canada, the country is considered a model for inclusive education on the global stage. In the light of challenges associated with inclusive education in Ghana and the in some Western countries, but particularly Canada, this paper draws lessons from Canada to articulate ways to improve the implementation of inclusive education in Ghana.

Research Objectives and Questions

This study highlights the different policies and programs designed to advance inclusive education in Ghana and Canada and explores the successful Canadian policy frameworks which could be helpful in improving the inclusive education in Ghana. The Policies discussed include the Free and Compulsory Education Policy designed by the first post-independence government, led by Dr. Kwame Nkrumah, the Free Senior High School Policy, the Inclusive Education Policy of Ghana, and the Ghana Education Reform Agenda. To have a vivid insight into the Canadian system of inclusive education, the Canadian Charter of Rights and Freedoms, the Canadian Human Rights Act, the Inclusive Education Policy Statements designed by Ontario's Ministry of education as well and Ontario's Special Education Policy was assessed to establish how these legislations and programs can complement Ghana's Inclusive Education programs/policies. These policy frameworks provide the background to have a deeper insight and foundation of a solid educational system accessible to all populations.

The paper also explored some community-level structures put in place to support inclusive education in Ghana. To address this question, various community-level structures in Ghana was assessed. In Ghana, some community-level structures have been instituted to promote inclusive education, each playing significant and diverse roles. These structures discussed in this study include the District Assemblies, Parent-Teacher Associations (PTAs), Non-Governmental Organizations and Traditional Authorities. Other community-level structures in the Canadian educational system, such as the Parent and Community Advisory Committees, Community-Based Organizations, Local Government, and faith-based and cultural organizations, were also examined to establish efforts made toward promoting inclusive education.

This study sort to answer the following questions:

- What is the status of inclusive education in Ghana? And what are the institutional, structural, and cultural challenges to implementing inclusive education policies in the country?
- What structures exist at the community level to support inclusive education in Ghana? What factors undermine the realization of these structures?
- What challenges have these structures faced in promoting inclusive education in both countries?
- Canada has been celebrated for its advancement in promoting inclusive education (Grynova & Kalinichenko, 2018). What Canadian policies and /or programs account for this advancement and how could these policy frameworks help improve Ghanaian condition?

Relevance of the Study

The paper would support inclusive education efforts in Ghana and Canada by examining policies implemented in these countries and their challenges. More specifically, the study would contribute to the realization of the Sustainable Development Goal 4 (Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all) with emphasis on target 4.5 which aims to eliminate gender disparities in education and ensure equal access to all levels of education

and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situation (UNESCO, 2024). By exploring these research questions, I hope other research scholars could make constructive suggestions on strengthening the promotion of inclusive education efforts, leading to (a) the improvement of inclusive education policies and (b) the promotion of information sharing between Ghana and Canada.

Methodology

Introduction

This study employed the systematic literature review approach to provide insight into Inclusive Education in Ghana and Canada and the policy frameworks supporting inclusive education efforts with lessons drawn from Canada. The primary goal of this section is to provide an overview of how data was collected, analyzed, and synthesized from various scholarly sources to effectively address the research questions.

Research Design / Methodology

The study employed the systematic literature review approach to critically assess and evaluate existing studies that meet the inclusionary and exclusionary criteria. According to Petticrew and Roberts (2006), a systematic approach to literature review comprehensively identifies, assesses, appraises, and synthesizes all the relevant studies related to a given topic. Chandler & Hopewell (2013) defines systematic literature review as the process of identifying, evaluating, and synthesizing all the empirical evidence that meets pre-specified eligibility criteria to answer a given research question. Data extraction sheets were used to generate data from qualified studies and analyzed to support the findings of the study.

Criteria for Inclusion and Exclusion of Studies in the Review

The following criteria were used to determine whether a study would be included in the review.

Types of Studies:

I selected studies related to inclusive education as well as policy frameworks and challenges impeding the progression of inclusive education in Ghana and Canada.

Research objectives: These identified studies were reviewed and assessed to determine the alignment of research with the objectives of this study.

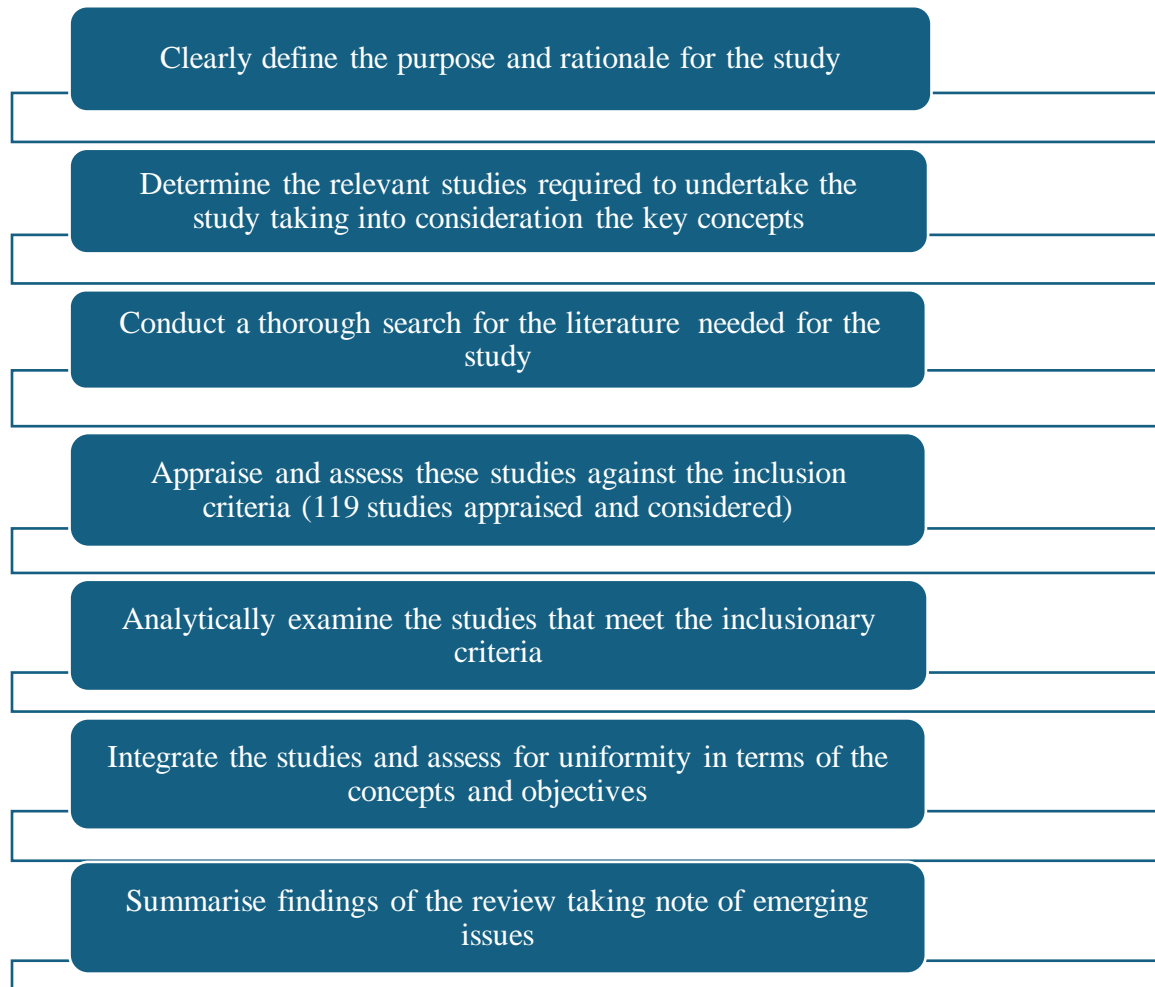
Geographical context: This review also considered literature on inclusive education policies and programs in Ghana and Canada with particular attention on Ontario to derive findings that answer the research objectives and questions.

Search Procedure

Before the search for relevant literature related to the topic, a preliminary search was conducted to get a better understanding of the topic. Furthermore, literature was thoroughly searched for in various electronic sources. The electronic databases searched included University Repositories, Google Scholar and other online databases directed from Google. To enhance the validity of the study, the credibility of these sources was taken into consideration during the search. These included ensuring that searches are conducted in reputable electronic databases, making effective use of peer reviewed journals while avoiding non-peer-reviewed materials such as blogs, forums, and unverified websites, which could compromise the integrity of the research. After this, search terms were developed from the research topic into key concepts. Moreover, Boolean operators were used in combination with the key terms developed from the research topic to search for literature on the electronic databases. These included, “Inclusion,” “Inclusive Education OR disability,” policy frameworks AND Inclusive education,"(constitutional instruments) AND (inclusive education in Ghana and Canada) AND (challenges", “(challenges OR barriers OR obstacles) AND (disabilities OR impairments). This was done to help conduct a thorough search and to successfully collect all potentially applicable studies that have been conducted on each key concept on the topic. Once relevant studies are achieved, they were then refined sufficiently according to the inclusion and exclusion criteria to minimize the number of irrelevant studies.

The stages followed in conducting the study:

The researcher adopted Petticrew and Roberts' (2006) stages for conducting systematic literature review as it presents a much simpler and systematic approach to the study. These include:



Theoretical Framework

I adopted the Social Model of Disability as a theoretical framework for my research study. It helped me explore and analyze inclusive education in Ghana and Canada and the barriers that hinder the progression of inclusive education efforts by institutions in these countries. Developed by Micheal Oliver and Colin Barnes from the United Kingdom, these proponents who were themselves physically challenged, provided a clearer overview of how society views disabled individuals (Oliver and Barnes, 2012). Oliver had a spinal cord injury and used a wheelchair which influenced

his views about disability. His predicament gave him an insight into the social and environmental challenges experienced by disabled people (Oliver, 1996). Barnes on the other hand, also experienced visual impairment offering him an insight to addressing inequalities and barriers that people with disabilities are faced with (Barnes & Oliver, 1995). Oliver and Barnes (2012) have collectively changed the perspective of disability from the individual view to a social perspective which highlights the role of social barriers and advocates for systemic change to promote inclusion. The social disability model asserts that the limitations placed on disabled people by social, cultural, economic, and environmental barriers, rather than their impairments, is what causes their disadvantage and provides a radical alternative to the individualized medical conception of disability. In this theory, disability is more about social exclusion and discrimination than it is about health or disease.

According to social models, disability is a social and political problem. This consequently results in essentially distinct policy priorities and decisions centered primarily on eliminating obstacles to development and a robust focus on human and civil rights (Albert, 2004). The social model recognizes disability as a historical and cultural phenomenon. It makes a distinction between individuals with disabilities who are oppressed and those without disabilities who either cause or contribute to that oppression. It assigns responsibility to society. Understanding a few fundamental contradictions is necessary to comprehend the social model of disability. First, an individual's handicap is different from the social construction of disability that may surround it (Shakespeare, 2006; p. 195).

Interestingly, The Model has made a distinction between disability and impairment. The model defines impairment as a functional constraint resulting from a physical, mental, intellectual, or sensory state that deviates from widely accepted norms of an individual (p. 5). Disability on the other hand is viewed as the disadvantage of any limitation or activity imposed by a modern social organization that excludes individuals with disabilities from mainstream social activities by giving them little or no consideration (Loynes, 2018).

According to the model, while people with disabilities do experience oppression, exclusion, and discrimination, these things are not a natural byproduct of their impairments; instead, they are the result of the structure and management of society (Inclusion London, 2015). The social model has supported efforts to remove disability from the medicalized "special needs" and to push for the mainstreaming of disability concerns in all development policies and practices by viewing impairment as a normal part of life, and disability as the product of discrimination and exclusion (Albert, 2004). Not only does the Social Model attribute disability to society, but it also explains how society's unfavorable community conditions treat an individual. The model, also known as a barriers approach, offers a route map that shows the obstacles that prevent individuals with disabilities from achieving their goals and how these obstacles can be eliminated, reduced, or neutralized by other types of assistance (Inclusion London, 2015). Although differences in physical, sensory, intellectual, or psychological abilities may result in functional limitations or impairments for an individual, these differences do not always have to cause barriers or disablement unless society fails to recognize and accept individuals for who they are, regardless of their unique differences (Loynes, 2018). The model argues that disability is not just a medical condition but a socially constructed perspective. According to this view, disability is not so much

about health or illness as it is about social exclusion and prejudice. This leads to different policy priorities and decisions, with a strong emphasis on human and civil rights and a primary focus on removing development-related barriers (Albert, 2004).

The model highlights some barriers that lead to the disabling of people in society. Some of these barriers are as follows:

Attitude obstacles: The following are examples of social and cultural attitudes and assumptions about people with disabilities that support, legitimize, and explain prejudice, discrimination, and exclusion from society: those who believe that people with specific disabilities are scroungers, incapable of working, incapable of being independent, incapable of having sex, should not have children, need to be protected, are "child-like," are "dangerous," should not be seen because they are upsetting, or should not be allowed to have children (Inclusion London, 2015). The model considers societal attitudes and structural factors to be the root cause of impairment rather than an individual's physical illness (Buder & Perry, 2021). The model affirms that all people should be treated equally and shows that society is the source of unfavorable attitudes towards disabled people as well as placing impediments that hinders their participation and limit their opportunities for advancement (Loynes, 2018).

Physical obstacles: These barriers, which are associated with the built environment, include a wide range of obstacles that impede equal access, including stairs, narrow doorways and corridors, inaccessible restrooms, housing, inadequate lighting, uncomfortable seating, malfunctioning elevators, and poorly maintained streets and public areas (London Inclusion, 2015). According to Loynes (2018), the model suggests that removing these obstacles is the solution to disability. Buder & Perry (2021) argues that the inability of society to sufficiently guarantee that the needs of

individuals with disabilities are taken into consideration in the structure of society and to offer suitable services contributes to disability of individuals. For example, creating wheelchair-accessible sidewalks and doors may transform a disability to ability.

Communication and Information Barriers: These include obstacles to knowledge and communication, like a lack of interpreters who can translate words into Sign Language for the Deaf, hearing induction loops, and information in accessible formats like large type, Easy Read, and plain English (London Inclusion, 2015).

The social model has also given disabled people a solid framework for unity in terms of equality and rights. In doing so, the model has advanced the notion that persons with disabilities ought to take an active role in their lives instead of being passive beneficiaries of assistance (Albert, 2004). I utilized desired-centered analysis to understand how inclusive education efforts are compromised or promoted by analyzing policies and community-level structures and how the Social Model of Disability plays out in policy implementation.

Chapter Two

This chapter presents a literature review on the concept of inclusive education, constitutional instruments promoting inclusive education in Ghana and Canada, the status of inclusive education in Ghana and provides insight into the institutional, structural, and cultural challenges involved.

The Concept of Inclusive Education

Inclusive education is an international ambition every state seeks to implement in its educational system. According to Biermann and Powell (2016), it is a global phenomenon that seeks to realize the fundamental human rights of the marginalized in society and ensure equity in education systems. The United Nations (UN), through the Sustainable Development Goals, specifically SDG 4, seeks to ensure equitability, quality and inclusion of education and provide equal education opportunities for all (United Nations, 2026). From this statement, SDG 4 points to the importance of integrating the education systems of children with special needs and enhancing infrastructure and facilities to become user-friendly to these people.

The discourse of inclusive education traces its roots to the Salamanca Statement in 1994 (UNESCO, 1994) and the UN Convention on the Rights of Persons with Disabilities in 2006 (UN, 2006). As defined by the Salamanca statement, the discourse focused on eliminating all barriers that hindered effective participation in schools Booth and Ainscow (2016). Despite its conceptualization, its implementation and practice vary from each society. Inclusive education tends to create an all-inclusive education system and society with zero tolerance for discrimination in schools (European Agency, 2016). According to Kuyini (2010), the main purpose of inclusive education is to provide all students with equal access to quality education in their localities and

provide a system that is responsive to the varying needs of students irrespective of their race, physically challenged and all other students requiring special attention.

There are various definitions of inclusive education. The UNESCO Salamanca Statement (1994) defined inclusive education as “education for all, with a commitment to respond to the needs of individual learners, including children with special education needs, within regular education systems, as compared to special education systems” whereas (Magrab, 2003) defines inclusive education “as the method that acknowledge the difference in a child and accept the child in a regular school despite the barrier or physical challenges affecting the child to receive quality education”. For the purpose of this study, the study will adopt the UNESCO (2008) definition of inclusive education as “an ongoing process aimed at offering quality education for all while respecting diversity and the different needs and abilities, characteristics and learning expectations of the students and communities, eliminating all forms of discrimination” Despite the critiques Opertti et al. (2009) associated with this definition, the definition encompasses the essential concepts of the Salamanca Statement and the UN Convention on the Rights of Persons with Disabilities’ conceptualization of inclusive education.

Constitutional Instruments Promoting Inclusive Education in Ghana and Canada

While the goals of the Salamanca declaration have been significantly advanced in many Western states, particularly Canada, many countries in the Global South are yet to pay priority attention to inclusive education, either because of resource poverty or ineffective policy design and implementation. For example, while Ghana has made some efforts to promote inclusive education, challenges remain. Gyimah and Vanderpuye (2011) reported that under the direction of the Special Education Division of the Ministry of Education Science and Sports (MOESS), the country has since 2003 started programmes towards inclusive education (IE). The formulation of the

Educational Strategic Plan (ESP) from 2003 to 2015 significantly elaborated steps towards promoting inclusive education in Ghana (Ametepee and Anastasiou, 2015). According to Obeng-Asamoah (2016), through the objectives of the ESP, more than thirty-four districts in the country started implementing inclusive education models. From the progress made by the ESP, the Ministry of Education of Ghana adopted the Inclusive education policy to attend to the diverse needs of students, including students with disabilities, ensuring easy access to educational resources and infrastructure essential for quality of education (Ministry of Education, 2015). The policy further states that the educational system should support all children to create a conducive environment that motivates children to go to school. According to the Ministry of Education (2015), in line with the policy, schools shall be provided with facilities that are friendly to students' usage and enhance teachers' capacity to manage students of all calibers (disabled and non-disabled).

In many jurisdictions, diversity, and inclusive education for all kids in regular classrooms have become the norm. A compelling need to review provincial education legislation and related regulations, policies, and practices and align them with these rulings and human rights instruments has been identified by policy directives, training in inclusive practices, including Universal Design for Learning and differentiated instruction, research and understanding on the benefits of inclusion and the harms of isolation, and statutory human rights jurisprudence Carr (2016).

The Constitution of Canada, Act, 1867, section 93 makes provision for the promotion of inclusive education. Act 1867, Sect. 93 states.

Section 93: In and for each Province, the Legislature may exclusively make Laws in relation to Education, subject and according to the following Provisions:

1. Nothing in any such Law shall prejudicially affect any Right or Privilege with respect to Denominational Schools which any Class of Persons have by Law in the Province of the Union.
2. All the Powers, Privileges, and Duties at the Union by Law conferred and imposed in Upper Canada on the Separate Schools and School Trustees of the Queen's Roman Catholic Subjects shall be and the same are hereby extended to the Dissentient Schools of the Queen's Protestant and Roman Catholic Subjects in Quebec.
3. Where in any Province a System of Separate or Dissentient Schools exists by Law at the Union or is thereafter established by the Legislature of the Province, an Appeal shall lie to the Governor General in Council from any Act or Decision of any Provincial Authority affecting any Right or Privilege of the Protestant or Roman Catholic Minority of the Queen's Subjects in relation to Education;
4. In case any such Provincial Law as from Time to Time seems to the Governor General in Council requisite for the due Execution of the Provisions of this Section is not made, or in case any Decision of the Governor General in Council on any Appeal under this Section is not duly executed by the proper Provincial Authority in that Behalf, then and in every such Case, and as far only as the Circumstances of each Case require, the Parliament of Canada may make remedial Laws for the due Execution of the Provisions of this Section and any Decision of the Governor General in Council under this Section.

Education is a provincial responsibility in Canada (Constitution Act, 1867, sect. 93). As a result, each province and territory are allowed to pass its laws. A child's right to inclusive education is recognized in several ways by all ten provinces and three territories (McCrimmon, 2015, p. 235, as cited in Lord, 2020). However, the exclusion of the federal government from one of the most expensive duties of contemporary states has made the quality of education necessary to rely on the

financial good fortune of provinces. As a result, regional inequality in Canadian education is becoming a persistent concern. Furthermore, disallowance clauses that restrict the potential for improving educational services frequently give provincial authorities difficulties Kim (1991).

Notwithstanding the impact of the Canadian Constitution in promoting inclusive education, since the Supreme Court of Canada (SCC) decided in *Eaton v. Brant County Board of Education* (1996) that a student with disabilities could be removed from the regular classroom against her parents' wishes, there has been a significant evolution in Canadian jurisprudence, policy, and society at large about the delivery of education services (Carr, 2016). The right of individuals with disabilities to inclusive education is acknowledged in Article 24 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD, 2007, as cited in Lord, 2020). State Parties, including Canada, are required to offer "an inclusive education system at all levels," according to the specifics (UNCRPD, 2007, art. 24(1) as cited in Lord, 2020). The British North America Act of 1867, Section 93, establishes Canada's fundamental principles of public education. Although it forbids regulations that violate the rights of groups, it gives provincial legislatures the authority to enact laws about education in their regions. It has a significant effect. Schools can appropriately address various regional demands since education is under the purview of the province Kim (1991). According to Article 24 of the United Nations Convention on the Rights of Persons with Disabilities, students with disabilities are guaranteed equal opportunities and a discrimination-free inclusive education system at all educational levels alongside other members of their community. In order to fulfill this obligation, State Parties, which include Canadian provinces and territories, must make sure that disabled students receive the support and reasonable accommodations they need to develop socially and academically in a way that advances their goal of full inclusion in regular classrooms and schools (Carr, 2016).

Ghana has also made several efforts to initiate and implement several constitutional frameworks and policy guidelines to promote inclusive education. As a signatory to the Salamanca Statement, Ghana has implemented several policies and reforms towards inclusive education (Ofori, 2018). According to Akyeampong (2010), Ghana, since independence, has formulated and implemented policies, including the Accelerated Education Development Plan of 1951 and the Education Act of 1961 (Act 87), to ensure universal access to primary education as well as making basic education free and compulsory for all children. The 1992 constitution of the Republic of Ghana also conferred the right to equal educational opportunities on all of its citizens by stating, “All persons shall have the right to equal educational opportunities and facilities and to achieve the full realization of that right— (a) basic education shall be free, compulsory and available to all” (Government of Ghana, 1992, article 25, section 1(a)). In this regard, all children in the country, including the physically challenged, are conferred the right to access equal educational opportunities. Hence, any action that seeks to bar them from enjoying this right infringes on their rights.

Given the commitments of international agencies and treaties to ensuring Inclusion Education (IE), governments and public authorities have implemented policies and developments and made educational reforms focused on ensuring all children can attend school without any hindrances (Mary et al., 2020).

The status of inclusive education in Ghana

Inclusive education in Ghana traces its roots to the 1936 law aimed at the inclusion of children with disabilities into the country's education system (Ofori, 2018). This law established special schools on the ¹Gold Coast as special education schools (Ametepee and Anastasiou, 2015). These

The name Gold Coast was imposed on Ghana by Britain prior to the Country gaining Independence in 1957

schools included Akropong-Akwapim School for the Blind in 1946 and other schools for the deaf. However, this initiative failed because such students were not given the chance to attend regular schools as their colleagues. This law did not allow these children to be in regular schools (Ametepee & Anastasiou, 2015). Despite the limitations of the 1936 law, it allowed students with special needs to engage in life skills and vocational activities, including basketry.

In 1957, following independence, the government of Ghana advanced efforts to promote special education, through the enactment of the Educational Act of 1961, which mandates the Free Compulsory Universal Basic Education (FCUBE) policy in Ghana (Agbenyega, 2007). The Act states that “every child who has attained the school-going age as determined by the Minister shall attend a course of instruction as laid down by the Minister in a school recognized for the purpose by the Minister” (Agbenyega, 2007, p. 4). The government is to take full responsibility for students with special education needs. Following this development, the Special Education Unit (now the Special Education Division) was created in 1970 by the Ministry of Education Ametepee and Anastasiou (2015). However, despite the efforts of the government to promote special education in the country, Ofori (2018) revealed that geographical disparities in the location of these special schools affected access to these facilities and hence, not all disabled children could access these schools.

In line with international treaties, Ghana regarded education as a fundamental human right its citizens enjoy. It is therefore enshrined into the constitution (1961 Education Act) by the Ministry of Education. However, children with special education needs were only placed in schools designated for such purposes and were not integrated into the regular schooling systems.

Moreover, these schools were quite expensive, which barred most disabled students from accessing them even though they were well-resourced (Ofori, 2018). As a result, there were constant calls for the adoption of an integrated system which would allow disabled children to learn together with non-disabled students in the same class (Ametepee and Anastasiou, 2015).

The government eventually adopted the integrated system in the 1980s, where special units were created in the regular schools to set the pace for implementing and practicing inclusive education. (Danquah, 2019). According to Danquah (2019), as part of the government's efforts to ensure the successful implementation of the integrated approach, regular schools were provided with special resource teachers and programs to improve the acceptability and integration of these students into mainstream schools.

The 1992 constitution of Ghana further stressed education as a fundamental human right and declared that all children in the country should be given rights and opportunities to be educated (Agbenyega, 2007). Inclusive education in Ghana took a significant turn in 2003 with the implementation of the Educational Strategic Plan (ESP) from 2003 to 2015 to provide education for everyone, reduce poverty and facilitate an educational advanced society (Ministry of Education, 2003). The Educational Strategic Plan (ESP) focused on four key areas, including ensuring equitable access to education (Ministry of Education, 2003). In the implementation of the ESP, the Ministry of Education in Ghana (MoE) reported that only twenty-nine districts in seven out of the ten regions of Ghana were involved in implementing inclusive education in the country in 2011. Additionally, by 2015, about forty-six districts in all ten country regions had started implementing inclusive education models in their schools (MoE, 2015; Nketsia, 2018).

Additionally, according to Deku and Vanderpuye (2008), about 3,022 schools in the country implemented inclusive and unique education models.

The Education Act enacted in 1961 was amended in 2016 to become the current National Inclusive Education Policy of Ghana with the main aim of ensuring that all children have equal educational opportunities and also giving recognition to the diverse educational needs of all children and measures to provide them (Ministry of Education, 2015). The policy stated that schools should have facilities that are friendly to disabled students and provide logistics, including big print books, sign languages, slate, and stylus used in writing braille. This is in recognition that children learn differently, requiring different tools and integrative initiatives to facilitate and make the school environment conducive.

According to the national inclusive education policy, to ensure the effective implementation of inclusive education in the country, regular schools shall collaborate effectively with special schools to ensure the successful integration of children with special educational needs in these schools while considering their special needs. The policy gives exceptions to students who, after assessment, can be part of the regular schools. Hence, provisions will be made for such students to attend the special schools established (Ministry of Education, 2015). Inclusion, as defined by the policy is broadly understood to mean providing access and education for every child: particularly those who are less fortunate due to gender, language, and ethnic minority in terms of geography or religion, from a financially disadvantaged background as well as kids who have unique requirements, such as individuals who have impairments (Ministry of Education, 2015). The Ministry further opined that learner with special educational needs goes beyond just

physical impairments; it includes children who fail in school due to barriers they are faced with which inhibits their optimal progress and development. The policy acknowledges different categories of learners with different educational needs. These forms of diversity include but are limited to; Persons with Hearing Impairment Persons with Visual Impairment Persons with Deaf-Blindness Persons with Speech and Communication Disorders Persons with other health impairment and chronic diseases such as Rheumatism, Epilepsy, Asthma, Spina Bifida and Sickle Cell Anaemia Children displaced by Natural Catastrophes and Social Conflicts Persons with Multiple Disabilities, Persons with Emotional and Behaviour Disorder etc.

Despite Ghana's efforts to adopt and implement inclusive education as proposed by the Salamanca statement, Komabu-Pomeyie and Sefakor (2020) indicated the policy has failed to live up to expectations, hence leaving so many disabled and marginalized children without access to education in the country. A few issues hinder the integration of disabled students into regular classrooms. This includes the negative perceptions that some families and individuals have about children with disabilities (Agbonyega, 2007).

Incidentally, there have been recorded cases where some teachers show lack of commitment to work with students who have disabilities in the classroom. Consequentially, this attitude may fester in such a way that students with disabilities would tend to develop poor relationships with teachers which underscores the significance of the teacher's attitude towards promoting inclusive education. Another obstacle to the practice and execution of inclusive education is a lack of infrastructure to support disabled students in schools (Ofori, 2018).

Agbonyega (2007) highlights that in Ghana most teachers need help to understand the concept of inclusive education. He argues that most of these teachers needed to gain the essential skills to manage special children in their schools, and hence, such children are forced to be taken to specialized schools rather than regular schools. Moreover, Kuyini and Desai (2008) contend that, because of the inability of teachers to manage such students, they develop negative attitudes towards such students in their schools. Several studies by Oguntade (2017) and Danquah and Francis, (2020) indicated that students in inclusive education need more support in terms of resources and physical facilities to promote academic achievement. Lamptey (2015) and Ofori (2018) also stated that the lack of adequate training and inclusive curriculum affects the ability of teachers to manage special students in their schools. Additionally, Kuyini (2004) in a study on inclusive education in Ghana, noted that regular classroom teachers and some students exhibited negative attitudes toward inclusive education. According to Oppong-Boateng (2020), these barriers to inclusive education in Ghana tend to affect the self-esteem and confidence of disabled students, preventing them from accessing education freely.

Inclusive Education in Canada (Ontario)

The implementation and practice of inclusive education in developed countries are far different from developing countries including Ghana (Komabu-Pomeyie & Sefakor, 2020).

In a comparative study on Equality dichotomies in inclusive education Comparing Canada and France, Berg and Schneider (2012) revealed that in most Western countries like France and Canada, the practice of inclusive education was similar to that of Ghana as students identified with special education needs are first assigned to special schools and then absorbed to the regular school system. This attracted many advocacies as this practice was labelled as a form of segregation, and hence, these students were fully absorbed into the education system.

Inclusive education in Canada traces its roots to advocacy calls for including students with special education needs in the general education system in the 1970s (Bunch, 2015). Sharma (2014) revealed that special education had been in practice in Canada for decades but was limited in terms of its inclusion in the education system. Thus, Lupart (1998) indicated that these calls were a result of the exclusion of students with disabilities from the education system of the country. The concept of inclusive education began taking shape upon the enactment of Canada's Charter of Rights and Freedoms in the Canadian Constitution in 1982, which sought to eliminate all sorts of discrimination by conferring the right to nondiscrimination in Canadian society McGhie-Richmond et al. (2013). According to Rosenbaum & Chadha (2006), Canada was the first country in the world to include the rights of people with disability in a national Charter. Following recognition for a legal protection against all forms of discrimination, this period witnessed rising calls for the inclusion of students with special education needs into the general education system. According to Cayer (2019), these heightened calls led to the transition of special education from segregated institutions to the current inclusion models, which allow for both disabled and nondisabled students to use the same school facilities. Cayer (2019) further indicated that some schools provided specialized programs in addition to the general curriculum to aid in integrating these students into the schools.

The model of inclusive education practiced in Canada today stems from the Charter of Rights and Freedoms and the ideology of the Salamanca statement. For the effectiveness of the inclusive education model, provincial governments passed legislation to guide its implementation and practice in their provinces. That accounts for the differences in implementing inclusive education in each province.

According to Cayer (2019), the composition and components of inclusive education at the federal level need to be elaborated. Provinces are mandated to formulate and implement policies of inclusion and its principles in their jurisdictions. In this regard, each province has differences in the way inclusive education is conducted. However, despite differences in its implementation, they are all driven by the same concepts.

In Canada, though, continuous occurrences of segregated placements exist, which tends to hinder the effective practice of inclusive education in the country. According to Bota (2023), it is estimated that less than fifty percent of students with various disabilities are in inclusive schools throughout Canada. Bennett et al. (2019), on data collected on the state of inclusive education in Ontario, reported that about 14.5% of students with disabilities spend most of their day in segregated settings, and 20% are withdrawn from regular classrooms for learning support across the province. However, Kopfer and Oskarsdottir (2019) revealed that Canada is still a force worth emulation in the country's implementation and practice of inclusive education. According to Sharma (2014), inclusive education has been practiced in Canada for over 50 years and has evolved from mainstreaming and integration models to inclusive models. The Canadian education system differs from others, as inclusive education varies in its ten provinces (Mann et al., 2023).

In this regard, each province adopted different approaches to implementing inclusive education within its jurisdiction. Even with this approach, Porter and Richler (2011) revealed that some provinces have progressed more steadily in their practice than others. For instance, AuCoin et al. (2020) and Köpfer and Óskarsdóttir (2019) noted that the New Brunswick province in Canada

leads the world in closing segregated schools and reforms made to improve inclusive education. Bunch (2015) stated that inclusive education is mandatory in New Brunswick. Hence, no student should be denied access to education regardless of differences, including disability, in the province.

Another provincial effort is Ontario's Equity and Inclusive Education Strategy (Ontario Ministry of Education, 2009). It calls upon essential school stakeholders, including school boards and teachers, to improve student performance by identifying and eliminating all barriers that hinder them. In Ontario, Bunch (2015) revealed that the Ontario Ministry of Education outlines several guiding principles to ensure the effectiveness of inclusive education in the province. The study further indicated that, as a result, provisions have been made to enhance the capacity of teachers to manage special students in their schools.

Bernard & Wade-Woolley (2005) opined that these guiding principles from the Ministry seeks to support teachers with emphasis on students with special needs to enhance teaching and learning in the classroom. These guiding principles includes the following:

- Instructional strategies and content should be based on knowledge of the developmental sequence of numeracy/literacy skill acquisition.
- Foundational skills and conceptual skills need to be taught concurrently.
- Instruction for both foundational and conceptual skills need to be delivered systematically, explicitly, and with sufficient intensity and duration.
- Early assessment of children at risk is important for providing instruction that prevents later learning difficulties.

- Ongoing literacy assessment of children with special needs is critical for improving instruction. Instruction must be sufficiently varied and balanced to ensure that all students are active participants.

In affirmation, Bunch (2015) revealed that Ontario teachers must offer professional development courses to enhance their capacity to manage their classrooms, which will facilitate their management of students with disabilities or other challenges. In 2019-2020, the Ontario Ministry of Education reported that 364,038 students were receiving special education services, reflecting the commitment of the Ontario province to inclusive education. A commitment to inclusive classrooms impacts a substantial percentage of students in Ontario. Using the province of Ontario as an example, inclusive education can potentially improve student outcomes across the country. Aside from enhancing the capacity of teachers to manage students with disabilities in regular schools and the practice of inclusive education in Canada, several provinces-initiated strategies to ensure that the school social environment is conducive to students with special education needs. MacKay (2008) also revealed that legislative amendments in Ontario to confer on disabled students the right to attend regular schools rather than just special schools demonstrate provinces' efforts towards inclusive education.

In Southwestern Ontario, the Avon Maitland board introduced a Learning for All Coaches initiative to help teachers understand and respond appropriately to the diverse needs of individual students (Inclusion London, 2015).

Bota (2023) contends that the provincial approach to inclusive education in Canada may be a barrier to effective inclusive education due to its inconsistencies. Similarly, in another study, Slee

(2011) revealed that some teachers still need to have the capacity to manage students with special education needs in their classrooms. Despite these existing challenges in Canada, a literature review points out that implementing inclusive education in Canada is far more advanced and effective than in most developing countries, including Ghana.

Chapter Three

Community-level Structures Supporting Inclusive Education in Both Countries

This chapter presents comprehensive review of community-level structures supporting the promotion or implementation of inclusive education in Ghana and Canada (Ontario). Some structures in Ghana such as the District Assembly, Parent and Teachers Associations, Traditional Authorities and Non-Governmental Organizations are reviewed and analyzed. Other structures in Canada (Ontario) such as the Parent and Community Advisory Committee, Community-Based Organizations, Local Government, Faith-Based Organizations have also been reviewed putting emphasis on the roles they play in the implementation, promotion, and practice of inclusive education.

Structures in Ghana

District Assembly

In order to guarantee the efficient provision of development services at the local level, decentralization policy is crucial. Decentralized government systems are used by governments all over the world to support development that is oriented on the needs of people (Odoom et al., 2021).

The District Assembly System in Ghana was established in 1989 as an "integrated" decentralized authority that combined the revenue-generating capabilities and duties of decentralized democratic local government with the supervision of deconcentrated line Ministries (Crook, 1994). In Ghana, the decentralization concept and related policies aim to establish decentralized administration by transferring power, responsibilities, and means of competence from central government Ministries, Departments, and Agencies (MDAs) to sub-national institutions like the Regional Co-ordinating Councils District Assemblies (MMDAs). This is designed to improve the public sector's ability to

organize, coordinate, and oversee social, spatial, and economic development (Hackman et al., 2021).

Through the District Assemblies, resources are allocated to support projects and programs in a wide range of sectors including education: the fund is used to support brilliant but needy students to pursue their educational aspirations as well as the construction and renovation of schools to meet the needs of people with disabilities. A Common Fund has been established to support educational projects in each district in Ghana. According to Gyimah (2020), the District Assemblies Common Fund (DACF), was created to guarantee a more equitable allocation of federal funds for development across the nation. He further noted that the Fund is utilized to provide funding for numerous initiatives and programs that aim to enhance local residents' quality of life. Housing, educational infrastructure, high-quality education, mostly at the basic and secondary levels, and primary education are some of the areas it supports. According to a study by Ephraim, Naami, and Boateng (2022), people with disabilities reported receiving financial assistance for secondary and post-secondary education as well as other related expenses like transportation through the District Assembly Common Fund.

The DACF was established in accordance with Article 252 of the Constitution to act as a conduit for the distribution of funds from the central government to the local governments (the MMDAs). According to the article, the Fund should receive at least 5% of Ghana's total national tax revenue (which has currently increased to 7.5%). The Fund will then distribute this money to local level authorities, mostly for the purpose of carrying out development projects. The District Assemblies Common Fund Act (Act 455) was passed by Parliament in July 1993 to operationalize this

constitutional provision and to give further laws and information on the Fund's management (Gyimah, 2020).

In a study conducted by Boateng (2022), which sought to study district assembly and the provision of social services in Ghana, it was revealed that along with improving community infrastructure, the Assembly and locals launched a number of programs to draw and keep teachers in schools. For instance, in order to encourage instructors to remain in the communities and guarantee good teaching and learning, free housing and a free plot of land for farming were provided to teachers assigned to the community. Nevertheless, the teacher gives up the land when they decide to leave the community or go on a transfer.

Given the relevance of the district assembly concept as an offshoot of Ghana's decentralizations efforts, the educational system has hugely benefitted from this structure in promoting quality education for all populations. The district assembly system has led to the renovation and construction of adequate schools which are user-friendly to all categories of students including constructing persons with disabilities friendly systems and increasing access to education. It is also worth noting that the district assembly system has provided accommodation facilities for teachers as a way of encouraging them to remain at post in most deprived schools in Ghana. Given the importance of the District Assembly Common Fund, students with special needs and brilliant but needy students are also given financial support to help them utilize educational opportunities in Ghana.

Parent and Teacher Associations

The Parent Teacher Associations (PTAs) now known as Parent Associations (PA) has a long-standing contribution to the inclusive education efforts in Ghana for decades. For the purposes of this research, the PTA and PA would be used interchangeably. The Ghana Education Service (2024) guidelines state that each PA must have a connection to a certain school. In order to increase parent involvement in school activities, good parent-teacher collaboration and parental education are most important (Djirackor, 2021). Parents have been encouraged to collaborate closely with teachers in order to maintain inclusive practices as part of the endeavor to implement inclusive education. Parents and other varied stakeholders must be involved in the implementation of inclusive education, as stated in Ghana's Inclusive Education Policy paper (Ampong et al., 2018). The implication is that each PA must consist of parents/guardians whose children attend a certain school and that the PA's activities must be related to that particular school (GES, 2024). When making crucial decisions about the operation of the school and the welfare of students with intellectual disabilities, school administrators ought to take the views of the parents into account (Djirackor, 2021).

Parents have a significant influence on their children's education and can provide practitioners working with their children with extensive information needed to support them in school activities (Vanderpuye, 2013). The Ghana Education Service acknowledges Parent Associations as a helpful forum where parents and guardians can work with the administration of the various schools to support the main objectives of improving student comfort, school growth, and/or education (GES, 2024). According to the findings of a study by Djirackor (2021), parents of children with intellectual disabilities play four key roles in their children's education. These include keeping an eye on their children's growth, informing the school administration about their children's

circumstances, paying tuition fees, and giving children with intellectual disabilities access to educational resources. According to Ministry of Education's Inclusive Education Policy (2013), PTAs, play advocacy roles supporting the rights of all children with special educational needs as well as work together with the community (district assemblies, opinion leaders, traditional authorities, and community welfare groups) to raise awareness of disability concerns in order to encourage a change in community and school attitudes.

In order to support the government's objective of providing all Ghanaian children with access to high-quality, inclusive, and equitable education, parent associations must be strengthened (GES, 2024). Children with intellectual disabilities benefit from their parents' participation in school by enhancing their practical skills and academic achievement (Djirackor in 2021).

It is worthy to acknowledge that historically, the PTAs/PAs have played significant roles such as the provision of school infrastructure (PWD walkways), provision of teaching and learning resources, supply of furniture, provision of water and sanitation systems, supply of vehicles, maintenance of school facilities, motivation for staff, school beautification and environmental cleanliness (GES, 2024).

Notwithstanding the limited availability of literature of PTAs/Pas in promoting inclusive education efforts in Ghana, there has been substantial literature highlighting the roles that parents and Parent Associations play in supporting their wards including persons with disabilities in schools and their quest to access quality education (Epstein et. al., 2002). These contributions include the provision of user-friendly furniture, provision of teaching and learning resources, provision of PWD school

infrastructure, provision of water and sanitation systems, supply of vehicles, maintenance of school facilities, motivation of staff, and supporting persons with disabilities to improve in their academic work and performance (GES, 2024). These roles have proven to contribute significantly to the promotion, implementation, and practice of inclusive education efforts in schools.

Traditional Authorities/Philanthropies

According to Ghana's 1992 Constitution and the Local Government Act of 1993 (Act 462), chieftaincy institutions and local government institutions currently exist in tandem (Busia & Adjei 2022). For the purposes of promoting education and social cohesion, traditional leadership is essential (Ministry of Education, 2013).

Traditional authorities collaborate with the government and other foreign organizations on local development projects like the provision of healthcare and educational facilities by building on their legitimacy and the support of the community at large (Busia & Adjei 2022). According to Ministry of Education's Inclusive Education Policy (2013), traditional leaders have a role to promote inclusive education at the local level which includes; mobilizing and sensitizing community members on inclusive education, participate in inclusive education planning, execution, monitoring, and evaluation at the local level as well as mobilizing resources and pushing district assemblies to provide more funding. Chieftains carried out non-statutory duties such as providing clan members, parents, and students with advice on education; educating the public; mobilizing resources; enhancing employee welfare; and endorsing inclusive education policies (Akron, 2022).

Notwithstanding the roles traditional authorities or leaders play in development, chiefs are also known as the "gatekeepers" of local development and have a tendency to stifle efforts for a variety

of reasons, including failing to acquire land on time for projects, mismanaging and appropriating community resources for their own gain at the expense of their people, a lack of transparent governance, and accountability issues (Busia & Adjei 2022). In order to advance inclusive education and strengthen accountability, collaborations and partnerships with traditional leaders are essential (MOE, 2013). In a study conducted by Akrong (2022), in the towns and villages of Ghana's Avatime Traditional Area, low expectations and poor student outcomes were the results of the exclusion of grassroots leaders from the educational policy reforms.

Non-Governmental Organizations

NGO provision is still viewed as "second-best" to public education, with public education continuing to get most of the attention (p.1) (Rose, 2009). Although the majority of NGOs in Ghana that assist in the education of disabled children have extraordinarily little funding to support children, they have been making a positive impact on the welfare of the children with disabilities (Adatuu & Gyader, 2021). According to Ministry of Education's Inclusive Education Policy (2013), NGOs/Philanthropies play the role of assisting communities to enable them to provide for their children, raising awareness about changing negative perceptions, providing aid and scholarships to students who face the risk of being excluded from pursuing education, mobilize resources and advocate for additional funding for Inclusive Education efforts. Several organizations, including UNICEF, have highlighted significant strategies to increase the inclusion of girls in schools. The strategies cover topics that affect education at all levels, both at home and in the classroom (Casely-Hayford et al., 2011).

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Additionally, they also make provision of assistive technology, increase availability of adapted instructional resources, building schools that are physically and ecologically accessible, as well as converting already-existing schools into accessible spaces and participating in the creation of initiatives for monitoring, assessment, and research. NGOs assist in the education of children with disabilities by finding and placing them in schools, offering educational resources, feeding the children, developing their capacity, and providing the children with love and care (Adatuu & Gyader, 2021). Currently, UNICEF is assisting the Ghanaian government in better refining and developing their own standards for attaining more inclusive education by utilizing the child-friendly standards (Casely-Hayford et al., 2011).

NGOs have realized that the key to the development of disabled children is for them to collaborate closely with children and their parents in the community to meet and support the needs of the children with disabilities (Adatuu & Gyader, 2021). The Voluntary Services Organization (VSO) in Ghana for instance provides inclusive education in three districts in the country's north, where it is presently carrying out the Tackling Education Needs Inclusively (TENI) project. To improve

inclusivity in schools, the VSO needs clarifications and insight into some of the best practices that are currently in place (Casely-Hayford et al., 2011).

It is apparent that NGOs have had a productive impact on promoting inclusive education in Ghana through influencing policy, constructing and renovating schools, supplying adequate teaching and learning resources, helping teachers to adapt to a more practical approach in teaching students with different abilities and also providing appropriate technology to support teaching and learning activities.

Structures in Canada

Parent and Community Advisory Committee (PAC)/Role of Parent Associations

Although a lot of research has been done on inclusion from the perspective of the student in terms of program delivery in Canada, not much has been written regarding the involvement of parents from minority groups in special education procedures (Cobb, 2010). When it comes to children's rights and the rights of people with disabilities, inclusion and participation have a greater significance (Pare, 2015). In the past, home and school associations, advocacy groups, and informal advisory councils have been used by parents to express their concerns (McKenna & Willms, 2012). In the case of Ontario for example, the government has created rules and guidelines that support inclusive education. Nonetheless, the seventy-two school boards are free to decide how they want to implement these policies (Parekh, 2020).

The Parent and Community Advisory Committee/Council for Inclusive Education is a formal mechanism that guarantees the ongoing participation of parents and community members in the establishment of an inclusive education system in most schools across Canada including Ontario.

It allows for two-way communication and discussion about district policies, rules, and practices pertaining to inclusive education between the administration and committee members (Inclusion Alberta, 2012). PAC, a dynamic community made up of committed parents and caregivers, works hard to provide a safe, caring, and enjoyable environment for each student in school (School District of Richmond, 2023). Committee activities offer the chance to learn about community and parent objectives for inclusive education, as well as the Administration's opportunity to submit issues for information and recommendations (Inclusion Alberta, 2012).

Given the importance of inclusive education and special education and how they are interconnected (Florian, 2008), the government's intentions to ensure more accountability in the field of special education and to enhance the caliber of special education services and programs in Ontario were unveiled by the Minister of education on January 27, 2000. In 2000, the Ministry published Standards for Special Education Plans and Individual Education Plans that are Province-wide (Near North District School Board, 2023).

The Special Education Plans establishes that parents have a critical role to play in promoting inclusive education some of which include.

- Parents learn about and become acquainted with the board's policies and procedures in areas where the kid is impacted.
- Participates in the development of the Inclusive Education Policy (District School Board, Near North, 2023)

Highlighting the role of parent association, parents are regarded as partners in schooling in Abbotsford. All PACs in the Abbotsford School District are encouraged to participate in the Abbotsford District Parent Advisory Council (DPAC). DPAC's mission, is to "support, encourage

and improve the quality of education and well-being of children in our schools" and to notify educational partners about parent concerns in addition to informing parents of relevant information (Abbottsford School District, 2024, p2).

Community-Based/Faith-based Organizations

NGOs have taken a proactive stance in promoting laws and regulations that facilitate inclusive education. They collaborate closely with governments, educational institutions, and other relevant parties to advance the rights of marginalized populations, including girls, refugees, and children with disabilities. NGOs work to influence policy decisions that favor inclusive practices in education through research, awareness initiatives, and lobbying (Satya Shakti Foundation, 2023).

Canada's more than 20 years of experience with inclusive education has had a significant impact on the Global South. This inclusive vision is based on the conviction that children are able to do more. This idea is reflected in a number of widely used best practices, such as Person-Centered Planning, Making Action Plans (MAPS), Circles of Friends, and PATH (Planning Alternative Tomorrow's with Hope), which got their start in Ontario schools. These educational initiatives are effective means of fostering relationships between communities, parents, and schools as well as resolving intricate problems involving people, families, and institutions that could otherwise serve as obstacles to IE (Peters, 2004). Additionally, some NGOs such as Inclusion Education Canada offers details on policies and inclusion principles, covering topics such as classroom procedures, school tactics, student and teacher support strategies, leadership, managing change for inclusion, parent and family concerns, instruction and pedagogy, teacher preparation, and more (Inclusion Education Canada, 2023). With an unobstructed vision statement, the organization states that all individuals with intellectual disabilities participate completely in mainstream education alongside

their classmates, receiving the necessary supports throughout their early years, adolescence, post-secondary education, and adult lifelong learning (Inclusion Education Canada, 2023). To promote inclusion in education and communities, the Centre for Integrated Education and Community in Toronto, Canada, develops and funds innovative initiatives (Peters, 2004), such as providing information on principles and policy of inclusion; classroom practices/strategies, capacity building programs for teachers among others (Inclusion Education Canada, 2023). These initiatives contribute to the successful implementation of inclusive education efforts by providing the stakeholders with the right information and skills.

Non-governmental organizations (NGOs) are essential in furthering the cause of inclusive education, even if governments are ultimately accountable for its provision. NGOs collaborate with communities and governments to develop inclusive learning settings that are beneficial to all children, bringing special viewpoints, knowledge, and resources to the table. Through their efforts to promote inclusive education, NGOs play a crucial role in fostering equality (Satya Shakti Foundation, 2023).

Local Government

According to the Canadian Constitution, local government is only a provincial institution. Provincial governments have jurisdiction over municipal institutions pursuant to Section 92(8) of the Canada Constitution Act. Moreover, provincial governments have the authority to choose the sources of municipal revenue under section 92(9) (Lazar and Seal, 2005). Canada uses a decentralized leadership approach that is in charge of creating and delivering training and education (Waddington, 2018). In Canada today, provincial and territory governments are in charge of education. Waddington further noted that, the majority of the money needed to support

this decentralized style of education delivery comes from property taxes (58.4%), which are followed in importance by local board funding (25%), and other provincial grants (14.6%). The federal government's contributions make up the remaining 2%. While the three northern territories and one Atlantic province have made clear pronouncements about inclusive education, nine provinces have not fully committed to this practice. While certain children with disabilities are segregated in special classes and schools, others are enrolled full-time in ordinary classroom settings (Bunch, 2015).

Canada's local government is characterized mostly by the provinces' legally imposed subordination of municipalities, which has an impact on all facets of municipal operations. Instead of seeing local governments as just provincial organizations with goals set out by the provinces, the federal and provincial governments have recently shown an interest in giving them considerable, autonomous authority and power (Harvey, 2005). Numerous legal systems have adopted inclusive education for all students, both in theory and in practice. Nonetheless, most governments in Ontario among others acknowledge inclusion as a set of values that does not need every student to be engaged in a single classroom (Bunch, 2015).

Education policies are created by the provinces and territories separately from one another. Although there exists collaboration between the Provinces and Territories, the agreement is loose and does not require changes to educational practices or policies across jurisdictions. For universities in charge of graduate and undergraduate teacher preparation, the circumstances are comparable. Universities continue to be autonomous in creating and providing courses and conducting research on inclusive education, even within the same province (Bunch, 2015).

In order to promote student success and wellbeing, Canada's Ministry of Education keeps collaborating with School Boards to create and maintain positive learning environments (Ontario's Equity and Inclusive Education Strategy, 2019). There are 72 District School Boards in Ontario, comprising 31 public boards in English, 29 Catholic boards in English, 4 public boards in French, and 8 French-language Catholic boards (Ontario, 2024). Since Canada's Education Act was modified by the Education Amendment Act, 1980 (Bill 82), which mandated school boards to provide special education programs and services for eligible students, the tenets of equity and inclusion have shaped special education policy for physically challenged pupils (Ontario Public Service, 2014). It lays out requirements for all school boards to create welcoming, inclusive, and safe classrooms where each student can be successful (Ontario's Equity and Inclusive Education Strategy, 2019). The board manages publicly funded schools in the province. The province provides the boards with financing for their schools, which they manage (Ontario, 2024).

Chapter Four

Challenges faced in the implementation of Inclusive Education Policies in Both Countries

Challenges in the implementation and practice of Inclusive Education Policies in Canada

According to the Ontario Ministry of Education (2022), considerable progress has been made in bringing the vision of inclusive and equitable education to life in Ontario schools. Nevertheless, achieving these goals needs to be viewed as a process rather than an event. To protect people with disabilities in Ontario schools, the work must be continuous to create environments that are tolerant, safe, inclusive, and compassionate in order to promote each student's wellbeing and academic success. To address the ever-changing, complicated issues and concerns of our communities and schools, equity and inclusive education is a continuous effort that calls for joint dedication and leadership (Ontario Ministry of Education, 2022).

Although there are pockets of excellence in inclusive education throughout Canada, inclusion is not systemic. Barriers to inclusive education in Canada still persists. Some of these barriers are exacerbated by how the Canadian government organizes education. Education is the responsibility of the provinces and territories, so there is no federal ministry or department of education, and thus no federal policy on inclusive education (Kopfer & Oskarsdottir, 2019). Mann et al., (2023) asserted that while legislation and policy alone does not guarantee inclusive education, strong, unambiguous laws regarding students with disabilities provide a solid foundation for inclusive education. To that end, major public campaigns can help to challenge outdated beliefs about segregated schools and raise community expectations for inclusive education for students with disabilities.

Ontario Ministry of Education (2022) contends that barriers may be associated with sex, sexual orientation, gender identity, gender expression, race, ethnic origin, religion, socioeconomic background, physical or mental aptitude, or other variables. The possibility that many variables

may combine to provide extra obstacles for some students is now acknowledged. Whether overt or covert, deliberate or inadvertent, these obstacles and prejudices must be recognized and dealt with. Mann et al. (2023) identified four types of barriers affecting inclusive education in schools in Canada: societal barriers, systemic barriers, community barriers, and school level barriers. According to the findings of this study, these societal barriers are contradictions between inclusive education reforms and national-level decisions. According to this classification, the challenges of inclusive education in Canada stem from provincial differences in inclusive education implementation, which has had an impact on its effectiveness, with some provinces far ahead of the rest of the country. Furthermore, Mann et al. (2023) found that challenges within the overall system are one of the barriers to inclusive education in the country. As studies demonstrates, (Lupart & Webber, 2012; Sokal & Katz, 2015), the challenges in this classification stem from confusion about effective ways to transform the system, as well as difficulties disassembling the interdependent structures that have supported segregated services. Administrative hurdles and the complexity of developing an alternative system for providing support to students in need (Kopfer & Oskarsdottir, 2019) have slowed progress towards a unified system, with funding being one of the most significant. Fear of losing funding (van Wallegghem et al., 2013), insufficient funding (Brown, 2018), how to apportion funding fairly (Porter & AuCoin, 2012), and the cost implications of a unified system (Irvine et al., 2010) all contribute to inclusive education in Canada. Despite government policies and norms emphasizing inclusive education in Canada, practices and funding have not kept up with these developments. Improving teacher capacity and documenting student outcomes and experiences can be effective ways to address this barrier (Cologon, 2013).

Section 15 of the Canadian Charter of Rights and Freedoms (1982) guarantees equal rights to all individuals, free of discrimination (for example, on the basis of mental or physical ability). Section

15 requires equal access to education for all students, so all provincial and territorial education mandates include inclusion (Specht & Thompson, 2022). The Ontario education system has segregated placements for students with special needs (Specht & Thompson, 2022).

Interestingly, much of the initial resistance to inclusion, as well as some of the residual resistance and attitudes that work against inclusive practices, stem from within the field of special education (Fraser & Shields, 2010). The familiarity and comfortability of educators with inclusion is another barrier to inclusive education. Loreman (2010) discovered that Canadian teachers including Ontario do not always feel prepared to instruct students in inclusive settings. Similarly, Slee (2013) claims that teachers feel unqualified to instruct students with special needs. Even when pre-service teacher training incorporates inclusive practices, teachers report a disconnect between theory and practice (Levine, 2006). Closing this gap may help to improve teachers' perceived ability to teach in inclusive classrooms, educators' comfort with inclusion, and, ultimately, student learning outcomes. Teacher confidence in teaching students with special education needs is a significant barrier to inclusive education in Ontario that must be addressed.

Furthermore, parents are concerned about the acceptability and integration of disabled students in mainstream schools, which has led some parents to decide to homeschool their children. This concern is understandable given the widespread evidence of poor practice in schools that are not yet inclusive. During the transition period, schools must provide comprehensive support. Finally, Loreman (2014) described some parents' decision to home school their disabled children, arguing that this relieved pressure on education systems to be accountable for the quality of education provided to students with disabilities. When discussing inclusive education, it is critical to understand and raise awareness of its numerous benefits, which affect not only learning but also

schools, students, and society. This is a complex and time-consuming process, so there are numerous barriers to consider.

Major findings from the review: As a researcher looking into the challenges of implementing inclusive education policies in Ontario (Canada), the identified barriers provide valuable insights with important implications for future research and practical considerations.

The lack of a unified national policy emphasizes the need to investigate the potential impact of decentralized education governance on inclusive education outcomes. Investigating how policy and implementation variations across provinces affect student experiences and outcomes can help us gain a more nuanced understanding of the relationship between policy decisions and inclusive practices. The lack of a unified national policy may result in ongoing disparities in inclusive education practices across provinces, perpetuating fragmented approaches and limiting the potential for a cohesive and equitable national system. This could result in uneven educational experiences and outcomes for students with varying needs. Grynova and Kalinichenko (2018) conducted a comparative study of inclusive studies in Canada and the United States revealed Canada lacks a single legislative act that governs the practice of inclusive education. Societal and systemic barriers emphasize the importance of studying the interactions between broader societal attitudes, policy formulation, and on-the-ground implementation.

Financial concerns as a barrier may stymie progress in inclusive education and prevent the development of sustainable funding models. Without adequate funding, schools may struggle to implement necessary changes, potentially perpetuating resource disparities and limiting access to inclusive education for all students. According to Volker et al. (2022), increased staff capacity and funding are required to consider inclusive education. To address these concerns, the study proposed combining aspects of Universal Design for Learning and Differentiated Instruction to

maintain the least restrictive environment while tailoring to individual student needs. The incorporation of Universal Design for Learning principles into classrooms and learning environments promotes inclusion by providing support for all students, including those with special needs.

Educator and principal challenges provide an opportunity to focus on the intersection of teacher preparedness, school leadership, and the successful implementation of inclusive education practices. Exploring effective strategies for incorporating inclusive education principles into teacher training programs and increasing principal accountability can help to build comprehensive support systems. In line with the findings of this study, Cumming's (2021) study sought to answer the question, 'How do elementary school teachers in the province of Nova Scotia describe their experiences with inclusive education, and what does this mean for practice?' revealed that some teachers were lost in the province's practice of inclusive education due to an inability to handle students with special educational needs. The data was analyzed using a thematic analysis resulted in policy recommendations for a broader definition of inclusive education, the development of initial teacher education and professional development opportunities, and a focus on an inclusive pedagogical approach at the school level.

Challenges faced in the implementation and practice of Inclusive Education Policies in Ghana

Implementing inclusive education necessitates significant changes to organizations, practices, norms, and so on. Because inclusive education is a process, it will be motivating and encouraging when all factors contributing to its success are considered and addressed. That is, providing the necessary equipment and materials to promote inclusive education. There are some factors that make implementing and practicing inclusive education difficult for both the government and the people of the country, including students with special needs.

Negative attitudes of the Ghanaian society towards students with special education needs

According to Ofori (2018), one of the challenges to inclusive education in Ghana is the presence of parents (families) and negative societal attitudes. Adera and Asimeng-Boahene (2011) reported that people with disabilities are sometimes mocked in folklore and songs because of deeply held beliefs that they are God's curses or the result of witchcraft. As a result, some families find it difficult to show their children in public, let alone take them to school, because people mock them (Tchintcharauli and Javakhishvili, 2017). Due to the ridicule, some families consider it a shame to have such a child. According to the 2010 Census, approximately 100,000 Ghanaian children aged 6-14 had various forms of disabling conditions, with more than 16,000 of these children not attending school (Ghana Statistical Service, 2012). While significant, is conservative because information about children with special educational needs and disabilities is frequently withheld due to traditional, cultural, and social factors. According to Opoku-Nkoom and Ackah-Jnr (2023), such children are sometimes teased, stigmatised, and victimised, and they have limited access to education and social opportunities. As a result, authorities must identify these families, educate them on the importance of inclusive education, and encourage them to send their children to school despite societal challenges (Ofori, 2018). Slee (2011) stated that people should have a positive mindset and attitude towards inclusive education.

People's attitudes towards inclusive education improve, making it easier to implement and practice inclusive education. To accomplish this, people must understand the significance of inclusive education. They must be educated about it and the reasons why they must develop positive behaviour towards disabled children and send them to regular school in order for them to receive a quality education (Slee, 2011). Educating the public will therefore help to embrace and motivate children with disabilities to be in regular schools and society. If the public does not adopt a positive

attitude towards disabled children, thereby raising awareness, the plan's implementation and practice will be difficult. Adopting a positive attitude towards disabilities begins with the family. According to the Salamanca Statement, "a positive and good attitude from parents helps with school and social integration" (UNESCO, 1994, p.37). This means that parents must be supported in their efforts to help children with disabilities by providing them with the necessary information, such as educating them on the importance of encouraging and sending their disabled children to school. According to the Salamanca Statement, governments should provide parental partnership with parents in order to contribute to the development and decision-making processes for the education of their disabled children. If parents are not given the opportunity to participate in their children's education, they will not encourage their children to attend school or contribute to society, preventing inclusive education from being implemented and practiced.

Inadequate facilities and infrastructure to support inclusive education.

Furthermore, several studies (Oguntade, 2017; Adedoyin & Okere, 2017; Lamptey, 2015; Ofori, 2018) found that inclusive education in Ghana lacks the necessary resources and physical facilities for successful implementation in the country. According to Kuyini (2010), adequate facilities and infrastructure must be provided in schools to encourage and motivate teachers to instruct disabled children. Despite the fact that the Ministry of Education (2015) stated in its report on Ghana's inclusive education guidelines and standards that the government would provide the necessary facilities to support inclusive practice. According to Opoku-Nkoom and Ackah-Jnr (2023), the country still lacks the basic facilities and infrastructure required for effective inclusion. Similarly, Kuyini and Boitumelo (2011) stated that it is necessary to provide more facilities for effective inclusion because the lack of these facilities and infrastructure causes teachers to develop a negative attitude towards children with special needs, leading teachers to believe that these

children should be excluded. Kuyini (2010) believes that providing the necessary facilities is essential for the effective implementation and practice of inclusive education.

In affirmation, Kuyini and Boitumelo (2011) found a positive relationship between a lack of facilities in schools to promote inclusion and teacher attitudes towards students with disabilities. This is evident in Alhassan's (2014) study, which found that teachers develop a negative attitude towards inclusion as a result of large class sizes in many schools. The study also revealed that with so many children in one classroom, it is difficult for the teacher to keep track of them all, making inclusive education difficult to implement. As a result, the government must provide more facilities and support in order to accommodate fewer students in the classroom and allow teachers to handle everything. If teachers are to adopt a positive attitude towards inclusive education, they must first be educated, trained, and supported. The government must provide the various schools with resources and materials to aid in the practice and implementation of this programme. With this in mind, families, society, and teachers must adopt a positive attitude towards inclusive education. It is important to draw attention to the benefits and potential of inclusive education.

Attitudes of teachers towards inclusive education

In another dimension, Obeng-Asamoah (2016) contends that teachers can develop a positive attitude towards children with special needs; however, when teachers are not trained to handle these children in regular or segregated schools, it becomes difficult for them to handle and develop a positive attitude towards them (Kuyini, 2010). In a study of investigating inclusive education in primary schools in Ghana using quantitative methodologies, Opoku-Nkoom and Ackah-Jnr (2023) discovered that teachers in more than 52% of the primary schools considered for the study received inclusive practice training, while the rest did not. The study also found that only 45.9% of these schools provided teachers with detailed information and records on students with special educational needs and disabilities. It was also discovered that teachers in nearly 80% of schools

used traditional teaching methods, which may not be adequate for supporting special students. The study suggested that teachers be equipped with the knowledge and skills necessary to adapt the regular school curriculum for students who struggle to engage with it. This includes expanding pedagogical knowledge, modifying content, utilizing various teaching methods, and personalizing and differentiating instruction.

In affirmation, Opong-Boateng (2020) found that while most teachers had adequate knowledge of what inclusive education entails, they lacked the necessary skills to manage classes with students with special education needs. While some teachers stated that their inability to handle these students with special education needs stems from incapacity and a lack of pedagogical skills in such classes, others attributed it to the country's ineffective inclusive education system. In the study of Opong-Boateng (2020), an interviewer stated that:

“Hmm! no! no!! no!!! It is not practical and workable at all. At least not in the immediate future, because we do not have enough materials to support the policy and inclusive educators or teachers are not available and when they are available, the materials to use to help these children are also not available. Unless commitment is made towards the policy, it will be just passed as one of the usual policies and international conventions Ghana signs on to.”

Inclusive education creates opportunities for disabled children and recognizes their right to an education in regular schools. As a result, it is critical that teachers and school leaders understand what inclusive education entails, which means they must be introduced to the concept. Introducing the concept requires teachers to receive teacher training in Teacher Training Colleges (TTC) to equip them with the views and importance of inclusive education, thereby developing a positive attitude towards disabled children and gaining knowledge and skills on how to deal with them (Okorley, 2020). Teachers must also be trained in teaching methods and styles that are appropriate

for instructing all children. The Teacher Training Colleges (TTC) must introduce and train both new and experienced teachers in inclusive education and practices. Teachers may not have a positive attitude towards disabled children if they are not educated on teaching approaches and relevant pedagogy to include them and learn how to deal with them in the classroom (Kuyini, 2010). According to Opoku, Aybenyega, Mprah, Mckenzie, and Badu (2017), teachers must be supported and trained to use a variety of teaching techniques, strategies, styles, and approaches when teaching and supporting diverse students in the classroom. As a result, more children attend school, which motivates and encourages parents to enroll their children (Banks & Banks, 2010). According to Okorley (2020), teachers play a key role in achieving inclusive education and practices. As a result, it is critical to train them to develop positive attitudes towards disabled children, as these attitudes promote more successful inclusive programs for students.

However, Hodkinson (2010) mentions that some of the teachers may have a unique perspective on inclusion. He stated that some teachers will not support inclusive education when it comes to children who exhibit difficult behaviours. Some felt it was necessary to exclude such children from mainstream schools. To be inclusive, schools must support disabled children while also meeting the needs of teachers (Hodkinson 2010). Opoku- Nkoom and Ackah-jnr (2023) added that as teachers are trained and gain experience working with children with special needs, they develop a positive attitude towards teaching them. However, according to Opoku- Nkoom and Ackah-jnr's (2023) research, he came across some teachers complaining about inclusive education. They stated that they require assistance from principals, authorities, and school specialists in order to effectively manage children with disabilities. Even if they receive the necessary training, it is critical that they be provided with the expertise to help them in school. Nonetheless, they must

understand that children should be taught to develop themselves, which will eventually help the nation develop.

Major findings from Literature: The empirical review identifies significant challenges to the implementation and practice of inclusive education in Ghana. Negative attitudes in Ghanaian society towards students with special educational needs, stemming from deeply held beliefs and societal stereotypes, present a significant barrier. Families may be hesitant to enroll children with disabilities in school due to societal ridicule and stigma. Furthermore, inadequate facilities and infrastructure impede the effective implementation of inclusive education, with a lack of resources affecting both teacher attitudes and the learning environment. Furthermore, the study emphasizes the importance of teacher training in promoting positive attitudes and effective practices in inclusive education. The findings emphasize the importance of collaborative efforts from the government, educational institutions, and society to address these challenges. The implications include the need for awareness campaigns to change societal perceptions, increased facility investment, and comprehensive teacher training programs. Dedication to these initiatives is critical to creating an inclusive educational environment that truly meets the diverse needs of all Ghanaian students.

Analysis of Lessons learnt to Complement Ghana's Inclusive Education Efforts

Despite both Ghana and Ontario's commitment to inclusive education, Ontario is significantly ahead in terms of implementation and practice. Legislative advancements, such as the 1982 Charter of Rights and Freedoms and provincial acts guiding inclusive practices, have shaped the evolution of inclusive education in Canada. The proactive approach of provinces such as Ontario, which emphasize teacher training, capacity building, and creating a conducive social environment, demonstrates a broad commitment to inclusion. The comparative analysis reveals that Ontario's inclusive education model, with its legislative foundation, diverse provincial approaches, and

effective strategies, establishes the country as a leader in the field. The disparity in progress and initiatives between the two countries highlights Ontario's significant advances in promoting inclusive education, as opposed to Ghana's challenges and limitations.

Given the fact that Ontario has a more advanced and robust system promoting inclusive education, Ghana can draw inspirations from the practice of inclusive education's efforts in Ontario with emphasis on policies and practices. Below highlights key points to complement Ghana's inclusive education efforts:

- According to the Ontario Ministry of Education (2022), the ministry has improved student attainment and addressed impediments in recent years, making great progress. The curriculum review process in Ontario is still being improved in order to make sure that all students see themselves reflected in the curriculum and that it stays relevant and up to date. English Language Learners / ESL and ELD Programs and Services: Policies and Procedures for Ontario Elementary and Secondary Schools, Kindergarten to Grade 12, 2007) is the comprehensive policy for English language learners that covers Kindergarten through to Grade 12. Given that this curriculum review give advantage to persons identified as disabled, Ghana can emulate the review of its curriculum to ensure that vulnerable groups/children will not be deprived from educational content delivery.
- Ghana has a national policy that has been marred by numerous challenges, reducing its effectiveness. Furthermore, discrimination and restrictions against children with disabilities are at their lowest in Ontario, as opposed to Ghanaian society, where negative societal attitudes towards students with special educational needs impede their inclusion in schools. Grynova and Kalinichenko's (2018) comparative study revealed Canada's centralized approach, with effective legislative acts such as the Canadian Charter of Rights and Freedoms, whereas Ghana faces challenges based on societal beliefs and stereotypes. A successful adoption of inclusive

educational policies still faces challenges in many parts of the world, including Africa. For instance, Mantey (2014) noted that cultural and societal norms in Ghana barred people with disabilities from having equal access to social infrastructure, including education. Naicker (2005) contends that in South Africa cultural beliefs in the societies obstruct policies geared towards promoting inclusive education. These are challenges faced by inclusion education in the continent. Nevertheless, a few notable improvements have been recorded (Ofori, 2018). Ghana should therefore strengthen its legislative instruments by strengthening its constitution by providing similar charter rights. The Canada system demonstrates how decentralized education governance can improve inclusive education outcomes.

- Financial concerns are identified as a common barrier in both countries. Volker et al. (2022) emphasized the importance of increased staffing and funding to support inclusive education in Canadian schools. Similarly, in Ghana, financial constraints may impede progress and prevent the development of long-term funding models for inclusive education.
- Although, Canada runs a federal system of government while Ghana runs a unitary system, lessons can be drawn from Canada's approach (where provinces design and implement their own policy framework/direction), which proposes combining Universal Design for Learning and Differentiated Instruction to address financial concerns while also providing supports tailored to individual student needs. This implies that a comprehensive and adaptable framework can reduce financial barriers while improving inclusive education practices. Same can be adopted in Ghana such that various regions in the country can take up their own initiatives or make byelaws to strengthen inclusive education efforts.
- Lessons from Ontario suggest that strategies for incorporating inclusive education principles into teacher training programs and increasing principal accountability can aid in the development of

comprehensive support systems. This emphasizes the role of professional development and leadership in promoting inclusive practices. These strategies can be adopted in Ghana to enhance teacher pedagogical and classroom management practices to enhance teachers' ability to engage all categories of students in school.

- The National Inclusive Education Policy of Ghana is formulated to address geographical disparities in access to schools, prohibitive cost and lack of understanding and skills among teachers. Despite this policy initiative, the policy has been criticized for failing to live up to its expectation. Given precedence from the guiding principles of the Ontario's Equity and Inclusive Education Strategy (Ontario Ministry of Education, 2009), Ghana can draw policy directions to streamline its inclusive education efforts especially given the fact that the policy puts students with disabilities/impairments at the center of its guiding principles. One of the guiding principles which can be strongly adopted is the fact that early assessments can be conducted for special students to avoid learning difficulties in future dates. Additionally, the guiding principles also support the idea that instruction in school/class must be sufficiently varied and balanced to ensure that all students are active participants.
- In Southwestern Ontario, the Avon Maitland board introduced a Learning for All Coaches initiative to help teachers understand and respond appropriately to the diverse needs of individual students (Inclusion London, 2015). Ghana can institute a similar initiative to support teachers with best practices and tools necessary to support persons with disabilities/impairments in schools. Lessons from Ontario indicate that strategies for incorporating inclusive education principles into teacher training programs and increasing principal accountability can help with the development of comprehensive support systems. This emphasizes the importance of professional development and leadership in fostering inclusive practices.

Chapter Five

Major findings and conclusions

Introduction

This chapter presents a summary of the findings resulting from the review. These findings will serve as the bases for which policies can be formulated to address some challenges identified in the review as well as potentials to guide the practice of inclusive education globally.

Comparative Insights: Inclusive Education in Ghana and Canada

In Ghana, the journey towards inclusive education began in 1936, when special education schools for disabled children were established. However, the initial emphasis was on separate schools, which limited the inclusion of special needs children in mainstream schools. Efforts to integrate special units into regular schools began in the 1980s, and the Educational Strategic Plan (ESP) from 2003 to 2015 aimed to provide education for all. Despite progress, challenges remain, such as geographical disparities in access to special schools, prohibitive costs, and a lack of understanding and skills among teachers. The National Inclusive Education Policy of 2016 aims to address these issues, but it has been criticized for failing to meet expectations, leaving many disabled children without access to education (Ametepee & Anastasiou, 2015; Danquah, 2019; Ministry of Education, 2015; Komabu-Pomeyie and Sefakor, 2020).

In Canada, inclusive education has evolved significantly over time. Advocacy in the 1970s resulted in the transition from segregated institutions to inclusive models. The Charter of Rights and Freedoms, adopted in 1982, was instrumental in promoting the rights of people with disabilities, and provinces enacted legislation to guide inclusive educational practices. Each province has its own approach, with variations in implementation but driven by shared concepts. Despite challenges such as the ongoing occurrence of segregated placements, Canada is regarded as a

leader in inclusive education, with over 50 years of experience. Provinces such as Ontario stand out for their commitment to inclusive education, demonstrating effective strategies, teacher professional development, and initiatives that promote a positive social environment for students with special needs (Bunch, 2015; Cayer, 2019; Kopfer & Oskarsdottir, 2019; Bunch, 2015; Ontario Ministry of Education, 2019; Bota, 2023).

Challenges for teachers and principals are identified in both systems, emphasizing the importance of teacher preparation and school leadership in successful inclusive education practices.

Both systems present challenges for teachers and principals, emphasizing the importance of teacher preparation and school leadership in achieving successful inclusive education practices. Cumming's (2021) reveals the difficulties that teachers face when working with students with special educational needs. This is in line with the situation in Ghana, where teacher preparation is essential for effective inclusive education.

Despite the challenges confronting the implementation of inclusive education policies and programs in Ghana and Ontario, Ontario's model, and approach in address these challenges and advancing its inclusive education efforts can be emulated by Ghana to complement its inclusive education programs and policies.

Conclusion

This study conducted a thorough examination of literature on inclusive education efforts in Ghana and Canada (Ontario), with a particular emphasis on analyzing policy frameworks, community-level structures, and the inherent challenges faced by both countries. The overarching goal was to provide valuable insights into the field of inclusive education by critically reviewing existing literature and practical implementations in Canada, particularly Ontario. The study aimed to shed

light on the significance of strategic initiatives for Ghana to strengthen its efforts to promote inclusive education by drawing lessons from Canada (Ontario).

The research findings highlighted significant disparities between the two countries' inclusive education landscapes. Canada is a trailblazer, guiding inclusive practices through legislative advancements such as the Charter of Rights and Freedoms and province-specific acts. Proactive approaches in provinces such as Ontario, which prioritize inclusive base curriculum, teacher training, capacity building, and the creation of a supportive social environment, demonstrate a comprehensive commitment to inclusion.

Ghana, on the other hand, faced historical challenges in its transition to inclusive education, including the establishment of separate special education schools. Despite the implementation of an integrated system in the 1980s and subsequent policies such as the Educational Strategic Plan (ESP), Ghana continues to face challenges such as geographical disparities, prohibitive costs, and a need for improved teacher understanding and skills. The National Inclusive Education Policy of 2016, while a step forward, has been criticized for falling short of expectations.

The comparative analysis emphasizes the need for Ghana to strategize and improve its inclusive education efforts. Ghana stands to draw lessons from Canada's model. By delving into the policies, community structures, and challenges in both countries, this study provides a nuanced understanding of the complexities of implementing inclusive education. It emphasizes Ghana's need to take inspiration from Canada's successes, particularly in terms of legislative support, diverse provincial strategies, and comprehensive teacher training initiatives.

This research project makes an important contribution to the field of inclusive education. By synthesizing existing literature and conducting a comparative analysis, it provides policymakers, educators, and stakeholders in Ghana with actionable information. The importance of strategic

planning, policy refinement, and community engagement in promoting inclusive education is highlighted. As Ghana embarks on its inclusive education journey, the experiences and successes of Canada provide a blueprint for transformative progress, ensuring that all students, regardless of their abilities, can access quality education.

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