

A COMPARATIVE ANALYSIS OF INCLUSIVE EDUCATION POLICIES IN DEVELOPING COUNTRIES: A SYSTEMATIC LITERATURE REVIEW OF IMPLEMENTATION AND CHALLENGES

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Abstract

This article presents a comparative analysis of inclusive education policies in developing countries through a systematic literature review of their implementation and associated challenges. Inclusive education is viewed as a strategic effort to guarantee the right to education for all students without discrimination; however, its implementation in developing countries still faces various obstacles, such as limited human resources, insufficient teacher training, inaccessible infrastructure, limited funding, and social stigma toward students with special needs. The study's findings indicate that the success of inclusive education implementation is significantly influenced by policy consistency, school readiness, government support, and the involvement of the community and parents. Furthermore, there is a significant gap between policy formulations at the national level and actual practices on the ground. Therefore, it is necessary to strengthen teacher capacity, provide adequate facilities and infrastructure, ensure sustainable funding, and establish more comprehensive evaluation mechanisms so that inclusive education can be implemented effectively and equitably.

Keywords: inclusive education, education policy, developing countries, implementation, challenges, systematic literature review.

Introduction

Inclusive education has become a principle of international education policy that has garnered increasing attention since the late 20th century, as it promises equal access and participation for all students regardless of ability, socioeconomic background, or other identities; this concept demands a transformation of the education system from segregation toward shared learning environments that are adaptive and responsive to student diversity (UNESCO, 2020).

In developing countries, the push toward inclusive education interacts with unique structural challenges—such as limited fiscal resources, inaccessible school infrastructure, a shortage of trained teachers, and inadequate data—so that the implementation of inclusive policies often results in a wide range of practices and outcomes across countries (Anwar et al., 2025). Systematic literature reviews enable researchers to collect, evaluate, and synthesize empirical evidence on how inclusive policies are formulated and implemented in various developing countries, including

common patterns of success and obstacles; this approach helps identify research gaps as well as evidence of good practices that can be replicated or adapted to specific contexts (Lundqvist, 2023).

Policy formulation at the national level is often influenced by international frameworks—such as the Salamanca Declaration, the Incheon Framework, and SDG 4—which emphasize the right to education for all; however, the formal adoption of these documents does not automatically guarantee effective implementation at the local level without adequate funding mechanisms, teacher training, and governance (UNESCO, 2020).

Comparative studies indicate two main implementation models commonly found in developing countries: the integration model, which maintains special facilities while promoting access to public schools, and the system transformation model, which focuses on curriculum modification, teacher training, and adjustments to the learning environment; each model faces different practical and political trade-offs (Lindner et al., 2021). One of the most consistently identified barriers in the literature is teacher competence; without concrete pre-service and in-service training on differentiated instruction strategies and inclusive classroom management, formal policies on inclusion tend to remain stagnant at the policy level without resulting in changes in classroom practice (Nisak, 2018). Non-technical barriers such as social stigma, cultural norms, and gender- or ethnicity-based exclusion also reinforce inequities in access even when formal policies advocate for inclusion; therefore, interventions must integrate efforts to change community attitudes, advocate for rights, and provide family support programs to achieve sustainable outcomes (Guna et al., 2024).

From a governance perspective, the effectiveness of inclusive policies depends on intersectoral coordination (education, health, social services), targeted budget allocation, and monitoring and accountability mechanisms that measure inclusion not only through access indicators but also through the quality of learning and social participation in schools (Lindner et al., 2021); (Romadhon and Aslan, 2025).

Some developing countries demonstrate notable best practices—such as policies to strengthen teacher education, flexible curriculum adaptations, and subsidy or incentive programs for inclusion—but the effectiveness of these initiatives often depends on the fiscal and political context as well as the bureaucratic capacity to scale up pilot programs into national policies (Firmansyah et al., 2026). Data gaps are a serious methodological and policy issue: many education systems in developing countries do not collect adequate disaggregated data on student diversity (e.g., disability, native language, migrant status), making it difficult to monitor progress toward inclusion, allocate resources appropriately, and evaluate program impact (Nisak, 2018).

The comparative and systematic research approach in this article aims to synthesize quantitative and qualitative evidence from cross-national studies, evaluate policy mechanisms and implementation practices, and identify contextual factors that

moderate success; the results are expected to provide operational policy recommendations for policymakers, education practitioners, and donors (Elijah and Aslan, 2025).

Taking into account the available cross-country and systematic evidence, this article will present a comparative analysis highlighting common patterns and contextual differences in developing countries regarding policy formulations, implementation strategies, key barriers, and practices that demonstrate potential for scalability; The main argument put forward is that effective inclusion requires a sustainable combination of legal and institutional frameworks, teacher capacity, community support, and funding mechanisms.

Research Methodology

The research method used in this article is a systematic literature review, which involves collecting, selecting, and analyzing relevant scientific sources from journals and books that discuss inclusive education policies in developing countries. The review process was conducted by identifying keywords, screening based on inclusion and exclusion criteria, and then performing a thematic synthesis to identify implementation patterns, key challenges, and differences across countries. This approach was chosen because it provides a comprehensive overview of the state of the literature while assessing research gaps and the most frequently recommended policy directions in the literature (Patten, 2016) ; (Elijah and Aslan, 2025) .

Results and Discussion

Implementation of Inclusive Education Policies in Developing Countries

Inclusive education in developing countries is a policy agenda that demands fundamental changes in the education system, not merely providing access for students with special needs to regular schools. In this context, inclusion means that schools must be able to adapt the curriculum, teaching methods, physical environment, and school culture so that all children can participate meaningfully. Thus, inclusive education must be understood as a systemic transformation process oriented toward the right to learn for all students (Nisak, 2018) .

Many developing countries already have a fairly strong policy foundation, whether through national education laws or implementing regulations that explicitly recognize the right to education for children with special needs. However, the strength of these formal policies is often not matched by adequate implementation capacity at the local and school levels. Indonesia, for example, has a solid policy framework, but its implementation still faces major challenges related to coordination, resources, and school readiness (Lubis and Usiono, 2026) .

In practice, the implementation of inclusive education policies often reveals significant disparities across regions. Schools in urban areas generally adopt inclusion programs more quickly because they have better access to trained teachers, support

institutions, and more adequate facilities. Conversely, schools in remote or underdeveloped areas often face shortages of teaching staff, infrastructure, and administrative support, causing the implementation of inclusive policies to proceed more slowly and unevenly (Lundqvist, 2023). The success of implementation is largely determined by the leadership of the principal and the school's organizational culture. Schools with open leadership tend to be better prepared to coordinate with teachers, parents, and education authorities to support students with diverse needs. In the literature, successful schools typically incorporate inclusion as part of the school's vision, rather than as a temporary, add-on program (Auliawati et al., 2023).

Teachers are central actors in the implementation of inclusive education policies because they are the ones directly involved in the teaching and learning process. The most common challenges include a lack of knowledge among general education teachers regarding the characteristics of students with special needs, difficulties in implementing differentiated instruction, and limited adaptive assessment skills (Aslan and Nur, 2025); (Aslan, 2024). A study in East Java shows that the shortage of special education teachers and the lack of training for regular teachers are significant barriers to the implementation of policies (Sudarto, 2016).

In addition to classroom teachers, inclusive schools require support staff such as special education teachers, counselors, psychologists, and therapists to help identify students' learning needs and support their developmental progress. Unfortunately, many developing countries have not been able to provide sufficient support staff due to budgetary constraints and uneven distribution of personnel. As a result, classroom teachers often bear the primary burden even though they lack sufficient specialized competencies (Auliawati et al., 2023).

The curriculum is also a crucial aspect in the implementation of inclusive policies. A curriculum that is too uniform and emphasizes standard academic achievement will make it difficult for students with diverse learning needs to develop optimally. Therefore, developing countries serious about implementing inclusion typically begin to promote curriculum flexibility, adaptation of instructional materials, and the use of more personalized learning strategies (Supriyanto et al., 2026). In terms of facilities and infrastructure, the implementation of inclusive education requires schools to provide an accessible and safe learning environment. This includes basic facilities such as ramps, disability-accessible restrooms, adequate lighting, easily accessible layouts, and appropriate learning aids. However, various studies indicate that many schools in developing countries have not yet met minimum accessibility standards, so students with physical or sensory impairments still face difficulties in fully participating (Lubis and Usiono, 2026).

Funding is a critical factor in the sustainability of inclusive education policy implementation. Many schools in developing countries actually intend to implement inclusion but lack sufficient financial support to train teachers, purchase assistive devices, or modify school facilities. Consequently, inclusive policies without a clear

funding framework often end up as normative commitments that are not fully realized (Lundqvist, 2023) .

Another particularly prominent challenge is the social stigma surrounding students with special needs. In a number of developing countries, society still views disability as something shameful or as a burden on the family, so parents are reluctant to enroll their children in regular schools. This stigma can also arise within schools, both from peers and from some educators who do not yet fully understand the inclusive approach (Alya et al., 2025) . The involvement of parents and the community is also crucial in determining whether inclusion policies are accepted or not. If families feel they have not received adequate explanations, they tend to hesitate to enroll their children in regular schools (Syakhrani and Aslan, 2024). Conversely, when schools conduct outreach, provide opportunities for dialogue, and involve parents in the learning process, acceptance of inclusive education typically increases significantly (Sudarto, 2016) .

Cross-sectoral coordination is another crucial element. The burden of inclusive education cannot be placed solely on schools, as many students' needs overlap with health services, rehabilitation, social protection, and psychological support. Supriyanto et al., (2026), emphasize that an inclusive education system requires inter-agency coordination so that students are not only accepted into schools but also receive comprehensive support.

The implementation of inclusive education policies in developing countries is also heavily influenced by the quality of education data. Without data disaggregated by disability, gender, location, and socioeconomic background, the government will struggle to map actual needs and evaluate whether policies are truly effective. Therefore, an accurate and sustainable data collection system is one of the most critical prerequisites for formulating targeted inclusive interventions (Sarmila et al., 2023) .

In several studies, including research in Indonesia, the implementation of inclusive education is also influenced by varying regional policy models. Some regions have formally designated schools to provide inclusive education but have yet to establish adequate technical infrastructure. This situation indicates that policy decentralization without strong local capacity can result in significant variations in the quality of implementation across regions (Sudarto, 2016) .

The use of digital technology is beginning to open new opportunities for the implementation of inclusive education, particularly to support more flexible learning and access to information for both students and parents. However, the benefits of technology remain heavily dependent on the availability of devices, internet connectivity, and teachers' ability to use them effectively. In developing countries, technology can be a solution, but it can also widen the gap if not accompanied by equitable access (NANDA, 2025) .

Overall, the implementation of inclusive education policies in developing countries shows that success is not determined by the existence of formal policies

alone, but rather by consistency among regulations, funding, training, school leadership, community support, and periodic evaluation. Findings from various sources confirm that the greatest challenge lies not in the normative recognition of inclusion, but in the education system's ability to translate these principles into sustainable, real-world practices.

Challenges in Implementing Inclusive Education

Inclusive education in developing countries faces complex challenges because sound policies at the national level are often not matched by adequate resources at the school level. In many cases, governments have recognized the right to education for all children, but implementation is hindered by budget constraints, teacher unpreparedness, and weak systemic support. Therefore, the challenges of inclusive education cannot be viewed as merely technical issues, but rather as broader issues of educational governance (Supriyanto et al., 2026) .

One of the most common obstacles is the gap between policy and practice. Many developing countries already have inclusive regulations, but schools have not received clear operational guidelines on how to admit, teach, and evaluate students with diverse needs. As a result, inclusion often stops at administrative admission without any tangible pedagogical changes in the classroom. (Sudarto, 2016) . The next challenge is the limited number of teachers with competencies in inclusive education. In many schools, general education teachers have not been equipped with sufficient knowledge regarding differentiated instruction, adaptive assessment, and strategies for addressing varying learning needs. Studies in Indonesia indicate that the shortage of special education teachers and the weak understanding of general education teachers are the dominant barriers to the implementation of inclusive education (Fitroh and Aslan, 2026) . The lack of ongoing professional development exacerbates this situation. One-time training sessions are often insufficient to change long-standing teaching practices that rely on a “one-size-fits-all” model for all students. Several systematic reviews indicate that the most effective strategies involve continuous professional development for teachers through in-service training, on-site mentoring, and teacher learning communities (Yasin et al., 2023) .

Human resource issues extend beyond classroom teachers. Many schools in developing countries lack special education teachers, counselors, psychologists, or therapists who can provide individualized support to students. The absence of these support staff places the entire burden of supporting students with special needs on regular teachers, even though they are often unprepared—both academically and psychologically—to do so (Aslan, 2017) .

Inaccessible infrastructure also poses a very real barrier. Many schools still lack ramps, disability-accessible restrooms, easily accessible classrooms, or visual and auditory cues that support the participation of all students. These facility limitations

not only make it difficult for students to move around but can also create a sense of insecurity and reduce their engagement in daily learning (UNESCO, 2020) .

Funding is another recurring structural challenge highlighted in the literature. Inclusive education requires additional funding for training, assistive devices, assessments, building modifications, and other support services, but many local governments have not yet allocated specific budgets for these purposes. As a result, schools often have to choose between running their core programs or meeting inclusion needs, and this choice often disadvantages the students who need support the most (Alimin, 2013). In addition to material constraints, social stigma remains a major barrier. In many communities, disability is still mistakenly viewed as a source of shame, a burden on the family, or a sign of permanent incapacity, leading to recommendations that children study at home or in separate institutions. Such stigma not only hinders access to regular schools but also affects students' social participation in the classroom and their relationships with peers (Alya et al., 2025). A lack of parental understanding is also a common barrier. Some families are unaware of their children's right to inclusive education or feel that regular schools are unable to meet their children's needs. In other cases, families are hesitant because they fear their child will be the target of ridicule or fail to keep up with the lessons. Limited information and communication between schools and parents slow down the process of adopting inclusive policies (Alimin, 2013).

An overly rigid curriculum also poses a major obstacle in practice. When the curriculum requires all students to achieve the same goals in the same way, students with different learning needs fall behind. In the context of developing countries, many schools remain fixated on test scores and uniform achievement standards, leaving very limited room for adapting instruction (NANDA, 2025). Language barriers and cultural diversity are also critical considerations, particularly in developing countries with numerous ethnolinguistic groups. Students whose native language differs from the school's language of instruction often struggle to understand instructions, while schools frequently lack adequate bilingual or multilingual strategies. In a multicultural context, inclusion that fails to accommodate linguistic differences can become a new form of exclusion (Fitriyanti and Aslan, 2025) .

Another challenge is weak interagency coordination. Inclusive education requires collaboration among the education, health, social services, and child protection sectors, but in many developing countries, this coordination remains sporadic and relies on individual initiatives. As a result, services that should complement one another operate in isolation and fail to form an integrated support system for students (Alimin, 2013) . The lack of disaggregated data is an issue that is often overlooked but is fundamental. Without detailed data on the number of students with disabilities, the types of special needs, their locations, and their learning outcomes, it is difficult for the government to design evidence-based policies. The

absence of data also makes program evaluations inaccurate, so that many implementation failures go undetected systematically. (Anwar et al., 2025) .

In many studies, the lack of clarity regarding the role of local governments has also emerged as a serious issue. While the decentralization of education does provide room for local governments to tailor policies to local needs, without strong bureaucratic capacity, decentralization actually creates new disparities between regions. Some regions are making progressive strides, while others lag far behind because they lack the priorities, resources, or leadership to support inclusion (NANDA, 2025) . Difficulties in monitoring and evaluation also hinder policy improvements. Many schools lack clear indicators to measure whether inclusion is truly taking place—for example, in terms of participation, engagement, a sense of belonging, and learning outcomes. Without appropriate measurement tools, schools and governments tend to assess success solely based on the number of students admitted, rather than on actual learning experiences (UNESCO, 2020) .

Overall, the challenges of implementing inclusive education in developing countries are multidimensional and interrelated. Limitations in human resources, infrastructure, funding, social stigma, rigid curricula, weak coordination, and inadequate data create structural barriers that are difficult to address in isolation. Therefore, solutions for inclusive education must be designed systematically, with policy changes accompanied by operational support, school capacity building, and consistent cross-sectoral commitment.

Conclusion

Inclusive education policies in developing countries have made progress in terms of formal recognition of every child's right to education, but their implementation remains uneven and tends to be stronger at the regulatory level than in school practices. A systematic literature review shows that the success of inclusion is greatly influenced by policy consistency, teacher capacity, principal support, and adequate facilities and funding.

Furthermore, the main challenges to inclusive education in developing countries are multidimensional, encompassing limited human resources, social stigma, inflexible curricula, inadequate accessibility, and weak cross-sectoral coordination. These conditions prevent many schools from translating the principles of inclusion into learning experiences that are truly equitable, participatory, and meaningful for all students.

Thus, the success of inclusive education policies cannot be measured solely by the existence of regulations or the number of schools implementing inclusion, but rather by the extent to which these policies bring about tangible changes in access, participation, and learning outcomes. Consequently, developing countries need to strengthen teacher training, expand budgetary support, foster a school culture that

embraces diversity, , and develop more comprehensive evaluation mechanisms so that inclusive education can be implemented in a sustainable and equitable manner.

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