INTRODUCTION

In the contemporary globalised landscape, national education policies are produced in response to international influences. Whilst the effect of globalisation on education is often described solely in terms of neo-liberal market forces (e.g., Ball, 2012), it has been argued that inclusion policies in education are simultaneously influenced by the conflicting international discourses of UNESCO and the Organisation for Economic Co-operation and Development (OECD) (Hardy, 2015). The Salamanca Statement (UNESCO, 1994) articulated a vision of inclusion that acknowledged the diversity of children and placed an emphasis on schools developing practices that would enhance the participation of all children in the life and learning of the school. It framed the role of inclusive education broadly, calling for welcoming communities which combatted discrimination, and adopted child-centred pedagogies to ensure high-quality learning for all. By contrast, the OECD (e.g., 2012) emphasises equity in education in terms of outputs, mainly the acquisition of skills and knowledge that support economic productivity. Inclusion is these terms is conceptualised as
reaching minimum levels of qualification, regardless of socio-economic circumstances, gender or ethnicity. As pointed out by Savage, Sellar and Gorur (2013), this discourse harmonises economic competitiveness with educational equity, which are seen as complementary goals. Tension is evident between the social democratic purposes of UNESCO and the neo-liberal influences of the OECD; a tension that is recognised by educators around the world.

Hardy (2015) argues that these divergent policy perspectives play out in very different experiences of schooling for children who experience difficulties in learning. A neo-liberal model of education is based on competitive individualism and focuses solely on the end products of schooling. Models of efficiency and best use of resources are invoked, and this often involves the categorisation and labelling of children, as ‘support’ is targeted toward those deemed to be in deficit. By contrast, the UNESCO vision of inclusion seeks to reduce labelling and enhance inclusive pedagogical approaches (Opperti & Brady, 2011) whereby all children learn together and teachers support children in ways that avoid marking some children as different (e.g., Florian & Spratt, 2013; Spratt & Florian, 2015). In this model, the lived experience of schooling and its democratising role are as important as the products of education.

Although countries around the world face similar international pressures, they do not necessarily respond the same way. Ozga and Lingard (2007) refer to local responses to international pressures as the ‘vernacular’. Winter (2012) describes ‘vernacular globalisation’ as the constitution of ‘hybrid education policies’ that contextualise global influences in the historical, political and cultural traditions of each nation. In this chapter, we discuss the inclusion policies of two countries within the United Kingdom (UK), Scotland and England, to examine their vernacular responses to international influences. By comparing the Scottish and English educational systems, we seek to examine how the two global influences of UNESCO and OECD are enacted in the vernacular policies of social justice in two different policy contexts. To contextualise this discussion, an outline of the political structures in the UK follows.
GOVERNANCE IN THE UNITED KINGDOM

The United Kingdom is comprised of four nations: England, Scotland, Wales and Northern Ireland. The UK Parliament, based in Westminster, London, has overarching control of the four nations. Members of the UK parliament (MPs) are elected in constituencies across the UK.

However, since 1999, Scotland has also had its own devolved Parliament based in Edinburgh. Scottish citizens are represented in this body by Members of the Scottish Parliament (MSPs), who are a discrete and different body from the UK Parliament. The Scottish Parliament has powers over health, social work and education and has limited tax raising powers (tied to the UK tax laws +/- 3%), whilst the UK government retains overall control of monetary policy, foreign policy, immigration, military strategy, employment law and social security.

Importantly, education in Scotland has always been a devolved matter and has evolved independently of the English education system. Consequently, education within each of the two countries has been shaped by a slightly different ‘mix of social, economic, political and historical concerns formed within shifting national and international landscapes’ (Beaton & Black Hawkins, 2014, p. 341). Interestingly, as there is no separate English Parliament, English education comes under the jurisdiction of the UK Government, which includes some Scottish MPs. Whilst English politicians have no power over Scottish education, the converse is not true. Since 2007, the Scottish Government has been led by the Scottish National Party (SNP), whose overarching political aim is full political independence for Scotland. Clearly, there is some advantage for the SNP to promote a discourse that emphasises the differences between Scottish and English policy, particularly if they can claim the Scottish approach to be ‘better’. In this essay, we will consider the apparent differences and similarities between Scottish and English education in the context of inclusion policies.

ENGLISH POLICIES FOR INCLUSION

English education is often perceived as having a markedly different educational system from that of its northern neighbour, Scotland. In many ways, it is subject to
the same contradictions and tensions within educational policy and practice as it grapples with the contrasting views of inclusive education espoused by UNESCO and the OECD. Successive governments in London have aspired to the promotion of a socially inclusive society meeting the ambitious international principles of UNESCO as demonstrated by Prime Minister Theresa May’s first speech on her appointment, articulating her vision of a country where all members of society will be valued (www.independent.co.uk). Nevertheless, many educational policies in England by those same governments are dominated by neo-liberal marketisation, which seeks to address the economic requirements of business and industry through provision of educational processes ensuring that as many young people as possible are prepared for the 21st-century workforce.

Taylor refers to a ‘marked shift in the education system of England’ for compulsory education since 1979, particularly for the organisation and provision of secondary education (Taylor, 2002). Hursch (2005) states that this shift has impacted both primary and secondary provision and notes that the economic and social policies of much of the world in recent years have shifted from the Keynesian welfare state to the neo-liberal post-welfare state in what Adler refers to as a ‘shift away from the collective welfare orientation….towards an individual-client orientation’ (Adler, 1993, p. 2 cited by Taylor, 2002).

In 1992, the then-Conservative government provided the option, within law, for parents to ‘express a preference as to where they would like their children to go to school’ (DfE, 1992, p. 28). This option has been continued by the Labour government in 1997 and subsequent Conservative governments, with ever greater freedom of choice being offered through the development of Academies and Free Schools, all of which are independently governed and financed either directly from central government or through businesses, universities, other schools, faith groups or volunteer groups. This expansion of the market has resulted in the development of a competitive market for pupils as schools compete for students to remain financially viable.

Neo-liberal thinking has also been applied to English education through an increasing standardisation of the curriculum. The 1988 Education Reform Act (DES, 1988) introduced a common curriculum for the first time. With the imposition of the National Curriculum in England came the opportunity for standardised
testing throughout schooling, including the Standard Attainment Tests (SATs) administered to seven-, 11- and 14-year-olds, making schools more accountable for pupils’ attainment. As the results of these SATs are published nationally, their introduction has contributed to competition between schools to attract pupils who will perform well on these standardised tests.

The introduction of the National Curriculum has also resulted in subsequent changes that narrow the curriculum within English schools. Oates (2011) suggests that this narrowing of the curriculum is a necessary mechanism to reduce what had become an overly bulky curriculum. However, other writers note that as successive governments have initiated changes to the National Curriculum, the emphasis has increasingly focused on the core elements of literacy and numeracy with less time being allocated for creative subjects (Booth, 2011; Berliner, 2011).

The competition between schools is further fuelled by the powerful educational inspectorate, the Office for Standards in Education, Children’s Services and Skills, known as Ofsted, who publish their findings following inspections including the summary terms of ‘Outstanding’, ‘Good’, ‘Requires Improvement’—which replaced ‘Satisfactory’ as it was deemed too soft a term—or ‘Special Measures’. The labelling of schools in this blunt manner with the threat of ‘Special Measures’ does not take into consideration the demographic of the pupils attending the school or the diversity of the community in which it is located, leading to heightened pressure on teachers and school leaders. Fredrickson and Cline (2002) and more recently Norwich (2014) suggest that there is increasing evidence in recent years that this performance-led culture results in schools feeling pressured to accept pupils who will perform well against standards set out within the National Curriculum and to reject pupils who are not able to achieve those externally determined standards. Considering the increasing marketisation of education provision in England during the last 40 years, it would seem that education policy has developed a significant leaning toward the OECD understanding of the purpose of education—a view of education that will ‘produce human capital for competitiveness in the global economy’ (Hatcher, 2003, p. 1).

Nevertheless, this does not accurately reflect the whole picture of education policy in England. On closer inspection, one can find policy recommendations that would also seem to support the idea of schools valuing diversity within society.
and seeking to provide opportunities for all to participate in meaningful learning, which aligns with the UNESCO vision of what inclusive education means, either through the whole policy or through elements of the policy.

Soan (2014 in Cooper & Elton-Chalcroft, 2014) highlights several pieces of legislation that provide examples which would seem to align with the UNESCO vision of inclusive education. Soan (ibid) suggests that in the 1970s and 1980s, legislation set the direction of education within England to align with ideologies of equity and social justice. This included the influential Warnock Report (DES, 1978) enshrined in the 1981 Education Act (DES, 1981), which made three important changes to how young people with special educational needs were viewed within education. Warnock introduced the term ‘special educational needs’, proposed the move from a medicalised model of disability to a social model and introduced the idea of integration rather than segregation.

More recent education policy in England continues to espouse some of the principles of UNESCO. The National Curriculum for England and Wales (DfE, 2014) was presented by the government as a means to enable teachers to adapt their teaching to meet the needs of all pupils in their classrooms.

This implied that English schools were to welcome the diversity of all learners into mainstream classrooms in contradiction to the pressure many teachers felt to privilege those pupils who might meet the standards expected by powerful bodies such as Ofsted. Indeed, Ainscow and Cesar note that the National Curriculum (DfE, 2014) was viewed as a means of ‘eliminating social exclusion that is a consequence of attitudes and responses to diversity in race, social class, ethnicity, religion, gender and ability’ (Ainscow & Cesar, 2006, p. 231). This widening of the understanding of inclusion beyond only those with a disability or special educational needs toward an understanding of inclusion in education in terms of overcoming discrimination and disadvantage in relation to any groups vulnerable to exclusion was a significant step.

For children and young people with special educational needs, the principal educational policy document in England is the current ‘Special Educational Needs and Disability Code of Practice 0-25 Years’ (DfE & DoH, 2014). The Code of Practice (2014), as it is commonly known, takes a view of inclusive education as a driver for
social democracy, valuing diversity within schools and classrooms as it seeks to make provisions for young people to be effectively supported in their education. The Code of Practice states that provisions for children and young people with special educational needs should not be viewed as a separate system but that ‘identification of SEN should be built into the overall approach to monitoring the progress and development of all pupils’ (DfE & DoH, 2014, Section 6.5). Educational provisions for all pupils are to be provided, maintaining a common curriculum at school level wherever possible.

Even within policy documentation that seems underpinned by ideology which is neo-liberal in nature, there are unintended outcomes that would seem to align with UNESCO’s vision. As stated earlier, the 1988 Education Reform Act (DES, 1988) introduced a common National Curriculum. The introduction of this common curriculum across all provisions, including both mainstream and special education schools, allowed children and young people to move more easily between both systems of provision. Whilst not in itself signalling complete alignment with the UNESCO view of inclusion requiring a focus on all children and young people, nevertheless, this legislation would seem to signal that education policy was moving closer to those ideals.

In summary, educational policy production in England would seem to be caught between two competing educational philosophies: the neo-liberal view of education which results in governments wishing to reduce funding to education whilst seeking educational solutions to economic problems (Hursch, 2005), as exemplified by the standards agenda focusing on literacy and numeracy; and an aspiration to promote social democratic values through the inclusion of all young people in educational provisions that value diversity, as exemplified by the new curriculum in 2014 which sought to value diversity within classrooms.

The current emphasis on assessments, results and accountability has led to schools being predominantly concerned about their reputations and continuing financial viability. The expansion of educational provisions across England and the resultant element of competition to recruit the highest achieving pupils means that those policies and practices, underpinned by an understanding of inclusion as espoused by UNESCO, are less powerful than those underpinned by neo-liberal understandings of society. An example of this is identified by Norwich (2014),
where he notes that pressures to meet school attainment targets have resulted in increased difficulty for young people who qualify for an Education, Health and Care plan—and therefore may require the highest levels of support in school—to secure a place in the mainstream school of their choice and instead are often placed within a special education setting.

This results in a challenging environment for practitioners to operate in as they are required to provide authentic learning opportunities for all young people in their classrooms in a time of economic austerity and a climate of budget cuts whilst being judged by Ofsted in a very public arena to meet challenging achievement targets.

This is particularly acute in the northern parts of the country. There has long been an acknowledged social and economic divide between the north and south of England. It is not accurate to think of the north as one homogenous unit. Martin (2018) points out that one cannot compare the cities of Sunderland with the seaside towns of Scarborough, nor the university town of Durham with the former coal mining area of Doncaster. Nevertheless, there are distinctive cultural and societal issues located in the north of England which warrant it being treated as a distinctive geographical area. Geographically, the north has large areas of rurality with small communities who subsist on small-scale farming. Martin (ibid) also notes that councils in the north have lost a disproportionate level of spending in comparison with councils in the south: a 7.8% reduction in the north-east in comparison with cuts of 3.4% in the wealthier south-east.

Bambra et al. (2014) highlight that the current spatial health divide between the north and south of England is extreme by comparative standards, and a recent report by the Children’s Commissioner concluded that children in the north of England are finishing school with poorer grades and are less likely to remain in education (Children’s Commissioner for England, 2018). Although the Northern Powerhouse, an independent body representing business and civic leaders across the north, is focused on developing an economically driven workforce for the north, nevertheless, it has identified three major factors requiring attention if this disparity is to be addressed: improving early-years provisions, addressing disadvantaged communities and the need for northern businesses to provide meaningful work opportunities for youth (www.northernpowerhousepartnership.co.uk).
The fact that the organisation recognises the need for a geographically contextu-alised response to educational disparity is encouraging, with the distinction made that the north requires something different.

**SCOTTISH POLICIES FOR INCLUSION**

Scotland takes pride in its strong social democratic identity that seeks to articulate a narrative of community and equality for all, which can be achieved through its educational provisions (Riddell & Weedon, 2014). For example, it introduced compulsory education earlier than other countries in the UK, it has had a fully comprehensive secondary school system since 1965 and it is the only UK country that continues to offer free university education. Scotland's commitment to providing equal opportunities through education is encapsulated in the (mythical) 'lad of pairts', a Scots dialect term used to describe a young man from humble origins who rises to achieve great things in life, owing to his access to education. Leaving aside the obvious gender bias in this historic concept, this term is widely understood in Scotland to represent the idea that good education is available to anyone, regardless of their background, and that educational success depends upon merit. Sadly, as will be discussed later, this ideal is not entirely borne out by the facts, but it nonetheless represents Scottish aspirations for education.

Furthermore, the Scottish education system is governed locally by 32 local authorities, giving rise to a system whereby local schools are seen as partners rather than competitors. Although parents can choose which school their children attend (although this freedom is of limited usefulness in rural areas where only one school exists), the Scottish system is not organised around the principles of the free market to the same extent as the English system. The system of 32 local authorities also allows for vernacular interpretation of national policy in local contexts across the country.

As a country, Scotland is very aware of its ‘northerliness’ within the UK. Like other northern countries, it has a widely dispersed population. The most recent figures show that 6% of the population live in areas described as ‘remote rural’ (which constitutes 70% of the area of land), and 12% of the population live in ‘accessible
rural areas (constituting 27% of the land). The remaining 82% of the population are squeezed into 2% of the land (Scottish Government, 2015).

Hence, Scotland shares some educational issues with the Arctic nations, such as providing a national curriculum that has the flexibility to be relevant to individuals in diverse contexts, providing teacher education and professional development that prepare teachers for all these possible circumstances and difficulties in recruiting teachers in remote areas. It also shares with other countries a cultural diversity. On one hand, Scotland seeks to provide an education that supports the contemporary, multi-cultural communities in towns and cities; on the other hand, it seeks to protect traditional culture and language. The indigenous language of Gaelic currently survives mainly in small pockets of the rural north (the Highlands and Islands). For these reasons, Scotland often looks north, particularly to Scandinavian countries, for policy influences whilst simultaneously remaining closely wedded to and influenced by its southern neighbour with its Anglo-American focus. Hence, some ideological tensions and ambiguities are evident within the Scottish policy environment.

Since the turn of the 21st century, Scotland has developed a series of legislative and policy frameworks that guide the work of local authorities and schools in their inclusion of children who experience difficulties. The Standards in Scotland’s Schools etc. Act 2000 introduced the requirement that all children be educated in mainstream local comprehensive schools unless exceptional circumstances could be demonstrated. This ‘presumption of mainstreaming’ was the legislative background which drove subsequent policies to enhance the inclusion of all children. Whilst the presumption of mainstreaming has been a distinctive plank of recent policy, marking Scotland as a leader in inclusive schooling, it is notable that this policy is currently under review, with a Scottish Government consultation on the matter recently closed.

Following the introduction of mainstreaming, The Education (Additional Support for Learning) (Scotland) Act 2004 (amended 2009) introduced an important change to terminology by replacing the term ‘special educational needs’ with ‘additional support needs’. This change further signalled a move away from conceptualising difficulties as being located solely within the child to an approach recognising that difficulties in learning could arise from social and environmental circumstances.
Approaches to supporting children began to consider how schools and teachers could alter their practices to support the child rather than expect the child to fit into existing systems and ways of working. This can be characterised as a move from a discourse of ‘needs’ to a discourse of ‘rights’ (Runswick-Cole & Hodge, 2009). With this change in emphasis came a policy drive toward inclusive pedagogy that did not categorise or mark children out as different but instead sought to extend what is ordinarily available to everybody (Florian & Spratt, 2013), although the implementation of this approach in practice remains patchy across the country (Spratt et al., 2018).

The Education (Additional Support for Learning) (Scotland) Act 2004 (amended 2009) widened the definition of who might be deemed as having additional support needs, moving beyond diagnostic criteria and suggesting that many children may require additional support for long or short periods if they are deemed to be having difficulty with learning for any reason. One of the consequences of this distinction is that the number of children identified as having additional support needs has mushroomed. In 2017, 26.6% of pupils were recorded as having an additional support need (Scottish Government, 2017). This compares to a figure of approximately 5% throughout the period 2005–2009 (Riddell et al., 2016). Rather ironically, an act which sought to reduce deficit discourses resulted in a massive increase in categorisation of children. However, the reasons for increased recording of childhood difficulties may not be as simple as a change in definition. It is notable that the increased classification did not occur immediately on introduction of the changes; it started after 2009, a time at which the western world was facing economic turmoil.

As Scotland began to recognise the role of the classroom teacher in developing pedagogical approaches that enhanced the participation of all, a new national curriculum, the Curriculum for Excellence (CfE), was introduced in 2009. CfE was heralded as a transformation in education in Scotland by providing a coherent, more flexible and enriched curriculum for three- to 18-year-olds. It fostered child-centred, inclusive approaches to teaching and learning, positive school ethos and an understanding of achievement that is much wider than attainment measures. Formative assessment, badged ‘Assessment is for Learning’ (AiFL), was heralded as a key aspect of child-centred learning and teaching. Much of the decision making about what and how to teach was devolved to schools, thereby allowing
for context-specific flexibility in recognition of the diversity of contexts among Scottish communities. Although critics pointed to some conceptual incoherence in the design of the curriculum (e.g., Priestley, 2010; Gillies, 2006), its focus on the ‘four capacities’ of ‘successful learner’, ‘confident individual’, ‘effective contributor’ and ‘responsible citizen’ were largely welcomed as relief from a previous target-driven curriculum. Nonetheless, the ambiguity of Scottish policy was evident, and others identified a neo-liberal, character-building aspect to the curriculum as it strove to develop citizens with the dispositions required of the modern workforce (Lingard, 2008), albeit clothed in a lexicon of wellbeing (Spratt, 2017)

The tone of Scottish education policy took a new direction in 2016. Following persistent reports that Scotland’s most economically disadvantaged young people were performing poorly in schools despite the focus on inclusion (OECD, 2007; Sosu & Ellis, 2014), the Scottish Government announced its intention to close the ‘attainment gap’. This was one of the early pronouncements of the First Minister, Nicola Sturgeon, upon taking office, and it heralded a directional change in policy. The Education Scotland Act 2016 introduced a range of measures under the National Improvement Framework aimed at addressing the socio-economic inequalities in educational attainment, including targeted funding for schools based on the number of pupils who claim free school meals and additional funding for the nine local authorities deemed to be most in need. Alongside this, a return to national testing was introduced, justified by the argument that it would not be possible to gauge the success of the National Improvement Framework unless pupil attainment in maths and literacy were benchmarked. At the time of writing, the first tranche of national testing is underway.

Whilst the desire to improve the educational success of poorer children can be seen as an issue of equity, it is also very clear that we are seeing the introduction of a version of inclusion that has converged with the interests of the free market, as described by Savage, Sellar and Gorur (2013). Whilst maintaining the title of ‘Curriculum for Excellence’, the Scottish Government has returned to narrow attainment measures as the benchmark of success. Formative assessment has been overshadowed by summative assessment, process has been overshadowed by product and local freedom to respond to diversity has been overshadowed by national pressures to conform. The broad democratic understanding of inclusion long-cherished by Scottish educators is being hollowed out as aspirations for education narrow.
CONCLUSION

The tensions between market-driven, neo-liberal policies espoused by OECD and the broader educational aims articulated by UNESCO will be familiar to educators in many contexts. Here, we have tried to show how these different global influences play out in the vernacular policies of social justice in two UK countries. As indicated earlier, England and Scotland present their education systems quite differently, with the Scottish Nationalist Government particularly keen to characterise the divisions as a wide policy chasm. In general, English policy is seen as largely neo-liberal in orientation, whereas Scottish education is regarded as contributing to social democracy and enriching civic society alongside its economic purpose. However, an examination of the policies for inclusion and additional support reveal that there are many similarities between the two countries, with a mixture of policy discourses operating in both settings. While England makes no secret of privileging economic drivers in its policymaking, it has also developed sensitive, child-centred policies in the field of inclusion which acknowledge diversity and aim for increased participation. Scotland, which lays claim to a long history of egalitarian education, has recently taken a sharp turn toward increased accountability and the conflation of social justice with the requirements of the marketplace. Although the two countries have arrived at their current situations through different policy routes, there is evidence in both countries of a ‘sedimentation’ of policy discourses over time (Pickard, 2010), which can lead to tensions, inconsistencies and dilemmas for those who enact policies in schools.

However, the chapter also highlights that vernacular responses to international directions and understandings of education and inclusion are also required at a more local level within each country. Northern areas of both countries have distinctive cultures and economic imperatives. National policies that emphasise standardised curricula and assessment processes lose the flexibility that teachers need to work productively within the diverse cultures and communities that can be encountered across the country. In both countries, distinctive societal and educational challenges require a more local response that accounts for the geographical, linguistic and cultural contexts of ‘northerliness’.
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