PhD-FHSE-2023-011
The Faculty of Humanities, Education and Social Sciences

DISSERTATION

Defence held on 08/02/2023 in Esch-sur-Alzette, Luxembourg

to obtain the degree of

DOCTEUR DE L'UNIVERSITÉ DU LUXEMBOURG

EN SCIENCES SOCIALES

by

Miwa CHIBA
Born on 07 November 1978 (Japan)

Comparison of Inclusive Education in Luxembourg and Japan

Dissertation defence committee

Dr Justin Powell, dissertation supervisor
Professor, Université du Luxembourg

Dr Christina Siry, Chairman
Professor, Université du Luxembourg

Dr Damien Sagrillo, Vice Chairman
Professor, Université du Luxembourg

Dr Kanae Nishioka
Professor, Kyoto University

Dr David Hebert
Professor, Western Norway University of Applied Sciences

Comparison of Inclusive Education in Luxembourg and Japan

Miwa Chiba

DOCTORAL DISSERTATION by due permission of the Faculty of Humanities, Education and Social Sciences, University of Luxembourg. Defended at University of Luxembourg on February 8, 2023.

Acknowledgement

During the four years and half of my doctoral study, I have had a privilege of being supported by very special people. I am deeply grateful to everyone whom I have had chances to encounter, and from whom I have been inspired a lot.

I would like to deeply thank to Prof. Justin J.W. Powell to give me the wonderful opportunity to conduct my master and doctoral studies in University of Luxembourg, especially with his open mindedness and strong believes to inclusive education. He offered me excellent guidance to continue my research, even during the hard time of Covid-19. I appreciate his kindness, encouragements, and patience from the bottom of my heart. I am also honored to be the co-author of the article we engaged.

I would like to thank to Prof. Christina Siry and Prof. Damien Sagrillo at University of Luxembourg, who also offered me important guidance with the expertise in their fields of educational science and musicology.

I would like to thank to the external advisors, Prof. Kanae Nishioka at Kyoto University and Prof. David Hebert at Western Norway University of Applied Sciences (HVL), who offered constructive criticism and the strong supports regardless of the physical distances.

I would like to thank to Prof. Keita Takayama and Associate Prof. Jeremy Rappleye at Kyoto University who encouraged my research with constructive feedback.

I also would like to thank to all my diverse colleagues at University of Luxembourg as well as at the intensive online seminar by HVL and the seminars at Kyoto University, indeed, the colleagues from all over the world. Through the precious interactions, I have been inspired a lot to expand and reflect my research.

Further, I would like to thank to the teachers and students whom I have encountered in the past years. They have connected my research interest with the real world.

Last but not least, I would like to thank my family and friends in Luxembourg and in Japan, who have been always there to support me and encourage me.

Luxembourg, December 29, 2022

Preface

I was born and grown up in a small town in an island country in the far east, and, by chance, I live in a small country in the center of Europe since 2014. In my life of 40+ years so far, I have lived and worked in difference places, and luckily, I had chances to encounter so many interesting and diverse people. My experiences naturally guide me to consider the meaning of diversity (diverse people, diverse views, and opinions etc.) in life. I remember, as a girl originally from a relatively homogeneous society, I've experienced a lot of shocking moments, which, in the extreme cases, destructed my ever-constructed views and knowledges, or which very often put me in the situation of 'wondering'.

In this doctoral thesis, I tackled the grandiose issue of inclusive education, wondering why it is so difficult to include diverse people in educational system, and why we have not been able to realize full inclusive educational systems (yet). With my background and living experiences, together with the good reasons to compare, I decided to select the two countries which I am most familiar with, Japan and Luxembourg. Both countries are so-called developed countries, perceived as rich countries with well-developed educational systems. However, the direction of inclusive education in both countries seems paradoxical, i.e., with movement toward inclusion but also with more and more separate experts' individual supports. I wondered why. To find potential answers, I conducted this doctoral study combining sociological approaches and educational philosophy, believing that for policy discussion, we must bear in mind the fundamental aims of education.

I also decided to have closer look at music education as one of the school subjects in the two countries, to understand the potential (issue) of inclusive education. I was inspired by Alex Lubet (2009) who warned "socially constructed disability" in music (education). As a music lover playing several instruments (piano, violin, and Koto- Japanese traditional music instrument) and a music teacher worked mainly with primary age children, I am most curious if our music education (which we take for granted) is truly inclusive or rather (consciously or unconsciously) exclusive.

The journey of this study has not been straight forward, especially due to the never-anticipated Covid-19 pandemic (from the beginning of 2020 to 2022 still ongoing). Schools had been closed worldwide, there have been travel restrictions, which made my educational comparative research extremely difficult. Even so, I believe and hope that readers can get some inspirations to reflect from this doctoral thesis for further discussion of what inclusive education system can be and how each person can act toward inclusive society.

Articles by the author included in the dissertation

Article 1

Chiba, Miwa (2021)

Comparison of Self-reflection in Humboldtian Bildung and the Kyoto School: Rethinking Assumptions on 'Reflection' in OECD Education 2030

(Published on May 31, 2021, by Nordic journal of comparative and international education)

(Updated version is the chapter of the book "Comparative and Decolonial Studies in Philosophy of Education", published in March 2023 by Springer. https://link.springer.com/book/10.1007/978-981-99-0139-5)

Article 2

Chiba, Miwa and Powell, J.W. Justin (2022)

Comparing the Paradoxical Development of Special Education and Inclusive Education in Luxembourg and Japan

Article 3

Chiba, Miwa (2022)

How Inclusive are Music Education Systems in Luxembourg and Japan?

Table of Contents

Acknowledgement **1**
Preface **2**
Articles by the author included in the thesis **3**
Table of Contents **4**
List of Tables and Figures **7**

Chapter 1: Introduction 8

1-1 Positioning the study and the researcher **8**
1-1-1 Background 8
1-1-2 Issues surrounding inclusive education 9
1-1-2-1 Varying interpretations of inclusive education 9
(1) Development of inclusive education concepts in global discourse 9
(2) Typology of inclusive education interpretations 14
1-1-2-2 Influence of world policy vs Loose-coupling/de-coupling in implementation 15
1-2 Aim of the Dissertation **16**
1-3 Structure of the thesis **17**
1-4 Overview of the articles **18**

Chapter 2: Overview of Education Systems in Luxembourg and Japan 23

2-1 General Education systems **23**
(1) Luxembourg 23
(2) Japan 25
2-2 Special Education and Inclusive Education Systems **26**
(1) Luxembourg 26
(2) Japan 28
2-3 Music Education Systems **30**
(1) Luxembourg 30
(2) Japan 32

Chapter 3: Theories and Concepts: Complexity of Inclusive Education and inter-disciplinary analytical frameworks of this thesis 33

3-1 Human rights discourse and dilemmas 34

3-2 Multiple directions of analysis and efforts to define what inclusive education means 36

3-3 Contrasting educational philosophy relating to inclusive education 41

3-3-1 Capability approach vs Utilitarian approach 41

3-3-2 Cultivation and Existential education 43

3-3-3 Transformative learning and productive struggle in learning 44

3-3-4 Reflection in learning in the West and the East 46

3-4 Sociological analytical frameworks 48

3-4-1 Powerful influence of world society and isomorphism of educational system 48

3-4-2 Neo-Institutionalism: Historical Institutionalism and Sociological Institutionalism 49

3-5 Summary: Inter-relationship of theories and concepts 51

Chapter 4: Research Questions and Research Design 53

4-1 Research Questions 53

4-2 Research Design 56

4-2-1 Philosophical worldview 56

4-2-2 Level of analysis 57

4-2-3 Research methods and data collections 57

4-2-3-1 Multiple qualitative methods 57

4-2-3-2 Comparative method 58

4-2-3-3 Data collection 59

(1) Documents 59

(2) Interviews 60

(3) Observation 63

4-3 Summary and Limitation 63

Chapter 5: Articles 64

Article 1 64
Article 2 82
Article 3 105

Chapter 6: Findings and Reflection 132

6-1 Findings 132
6-2 Reflection and implication for policy making 138

References 142
CV 153
List of Selected Presentations 154

List of Tables and Figures

Table 1: Dilemmas surrounding implementation of inclusive education 35

Table 2: Summary of research questions and sub-questions 54

Table 3: Creswell's classification of the world views 56

Table 4: Relevant laws, regulations and curriculum document in Luxembourg and Japan 59

Table 5: List of interviewees 61

Table 6: Sample guiding questions 62

Table 7: Categories and Subcategories for coding interview data 62

Table 8: Summary 137

Figure 1: Music literacy in elementary school in the guideline for NCS 33

Figure 2: Model of inclusive education 38

Figure 3: Different types of definition of inclusion and their hierarchical relations 39

Figure 4: Transformative learning and struggle in learning 45

Figure 5: Summary of inter-relationship among theories and concepts 52

Chapter 1: Introduction

1-1 Positioning the study and the researcher

Inclusion is a transformative process that ensures full participation and access to quality learning opportunities for all, respecting and valuing diversity, and eliminating all forms of discrimination in and through education. (UNESCO Cali commitment, 2019)

1-1-1 Background

For decades, influential international organizations, governments and social movements have called for improved equity and equalized and inclusive learning opportunities for all learners. As early as 1948, the Universal Declaration of Human Rights stated that "Everyone has the right to education".

The Salamanca Statement and Framework for Action in Special Needs Education (1994) is considered to be the origin of the concept of 'inclusive education'. It outlines the policy of education for all, paying attention to the needs of disabled learners for special education. The Salamanca Statement calls for countries to overcome the structural-organizational divide between regular and special education through integration to be able to meet the needs of disabled children in mainstream schools (see Kiuppis 2014). Further, the UN Convention on the Rights of Persons with Disabilities (UNCRPD) in 2006 legally binds the member states (185 countries as of May 2022) to commit to inclusive education, especially for students with disabilities, across the life course. The UNCRPD, in Article 24, requires state parties to recognize the right of persons with disabilities to education, ensuring (i) no exclusion from the general education system, (ii) access to inclusive, quality and free education on an equal basis, and (iii) reasonable accommodation and effective individual supports (see Article 24(2)).

More recently, the concept of inclusive education has been expanded, to not only focus on the needs of students with disabilities, but also the needs of students with different dispositions and backgrounds. The UNESCO Cali Commitment to Equity and Inclusion in Education (2019), for example, provides a broader concept of inclusive education, shifting from a focus on integrating students understood to have "special educational needs (SEN)" to valuing diversity in learning by including all students with their diverse characteristics, backgrounds, and aspirations, particularly

taking into account students with minority or economically disadvantaged backgrounds. Thus, the global discourse of inclusive education has been expanding from a narrow definition of integrating students with special needs into mainstream education, to transforming educational system to include all students with different needs and backgrounds. This expansion in definition is aligned to principles of the Sustainable Development Goals (SDGs), in particular Goal 4: "Ensuring Inclusive, Equitable, and Quality Education and the Promotion of Lifelong Learning opportunities for All". The notion of "Education for All" primarily gets applied to contexts of high rates of non-school going children, especially in the developing countries. However, the policy of Education for All is also critical in so-called "developed" contexts, where there remain obstacles to equal access to education and to non-discrimination and inclusions of students with different characters and backgrounds to the dominant norm.

1-1-2 Issues surrounding inclusive education

Although almost all countries worldwide have been confronted with the mandate to ensure inclusive education systems, there have been various complexities and challenges to implementation. What are the causes of such complexity? Why is it so difficult to implement inclusive education? The two main reasons for these challenges which will be outlined in below include: (i) varying interpretations of inclusive education, and (ii) loose-coupling/decoupling in global policy and implementation at the local level.

1-1-2-1 Varying interpretations of inclusive education

(1) Development of inclusive education concepts in global discourse

Origin of inclusive education focusing on students with special needs

The concept of inclusive education is highlighted in the Salamanca Statement by UNESCO in 1994, which has been recognized as "one of the most significant international treaties emerging from the field of special education" (Ainscow and Cesar 2006, referred in Hernandez-Torrano et al. 2022, p.893). The statement was successful in raising awareness of the concept of inclusion internationally (see Hernandez-Torrano et al, 2020, referred in Graham et al. 2020). The Salamanca Statement was the outcome of the World Conference on Special Needs Education in 1994, which was

organized by UNESCO's Special Needs Education department "as a response to concerns that special needs issues were being overlooked in the Education for All initiative" (Graham et al. 2020, p.3).

> More than 300 participants representing 92 governments and 25 international organizations met in Salamanca, Spain, from 7 to 10 June 1994 to further the objective of Education for All by considering the fundamental policy shifts required to promote the approach of inclusive education, namely enabling schools to serve all children, particularly those with special education needs (Preface, Salamanca Statement, 1994).

At the time of the Salamanca Statement, the international focus on "the de-institutionalization of people with disabilities" was actively discussed (Migliarini et al. 2019, referred in Graham et al. 2020, p.3). The Statement proposed not only access to education, but also participation in the same spaces attended by all learners, as well as systems of support for students with disabilities. The Statement emphasized that "school should accommodate all children regardless of their physical, intellectual, social, emotional, linguistic or other conditions" (see Introduction 3), urging countries to remove structural barriers to integrate regular and special education. Graham et al. (2020), referring to Hunt (2011), explains that "the Statement was ground-breaking because it emphasized the practical reform of ordinary school systems to create inclusive school systems, putting children with disabilities at the forefront of international education policy" (p.4).

> Assignment of children to special schools - or special classes or sections within a school on a permanent basis - should be the exception, to be recommended only in those infrequent cases where it is clearly demonstrated that education in regular classrooms is incapable of meeting a child's educational or social needs or when it is required for the welfare of the child or that of other children (Section 8, UNESCO Salamanca Statement,1994).

The concept of inclusive education was further enshrined through the binding international human rights law, namely, UN Convention on the Rights of Persons with Disabilities (UNCRPD) in 2006. Article 24 of the UNCRPD stipulates the rights of people with disabilities to education without discrimination and on the basis of equal opportunity. State parties are urged to ensure an inclusive education system at all levels to fully develop human potential and a sense of dignity and self-worth for all students, thereby respecting human rights, fundamental freedoms and human diversity.

One of the remarkable contributions of UNCRPD to the development of inclusive education is that it provided the clear guidance to interpret what inclusive education means. Inclusive education is defined as below:

> … a process of systematic reform embodying changes and modifications in content, teaching methods, approaches, structures and strategies in education to overcome barriers with a vision serving to provide all students of the relevant age range with an equitable and participatory learning experience and environment that best corresponds to their requirements and preferences. Placing students with disabilities within mainstream classes without accompanying structural changes to, for example, organization, curriculum and teaching and learning strategies, does not constitute inclusion. (UNCRPD General Comment No.4 (2016), Section 2(11)).

Graham et al. (2020) explains that the UNCRPD's clarification of the concept is further accompanied by examples incompatibilities with inclusive education, namely, exclusion (denial of access to education), segregation (education conducted in "separate environments designed to respond to particular or various impairments"), and integration (placing of people "in existing mainstream educational institutions as long as students can adjust to the standardized requirements of such institutions") (p.7).

The UNCRPD clearly rejected the dominant approach of the 'medical model' in understanding disabilities. While the medical model assumes the different characteristics of students with special needs as 'impairment' to be treated or fixed, the social model argues that society creates the difficulties for students with special needs. Instead of understanding disabilities as deficits or personal attributes, the Convention emphasized the importance of removing "social and environmental barriers that exclude people with disability from full and effective participation in society on an equal basis with others" (Graham et al. 2020, p.6).

Haegele and Hodge (2016) analyze the disability discourse, claiming that "the language people use to describe individuals with disabilities influences their expectations and interaction with them" (Barton 2009, referred by Haegele and Hodge 2016, p.194). They argue that "the medical and scientific 'cognitive authority' such as doctors and scientists replaced religious leaders and gained the role to lead discourse with respect to disability" (p.194). Consequently, disability is defined as "an individual or medical phenomenon that results from impairments in body functions or structures; a deficiency or abnormality", and treatments or services should be offered to "fix the disability to the greatest extent possible for normalizing" (p.194).

On the other hand, the social model argues that it is society that imposes disability on individuals with impairments and suggests that "constructing solutions should be directed at society", rather than the individual (see Haegele and Hodge 2016, p.197). Impairment, in this context, is "considered a form of diversity that offers a unique perspective that should be valued and celebrated" (Roush and Sharby 2011, referred by Haegele and Hodge 2016, p.197).

However, the medical and social models have both been criticized because "they largely ignore the *personal experience* of the individual within the analysis of disability" (Marks 1999, referred by Haegele and Hodge 2016, p.203). In response to this criticism, a third perspective is proposed: the 'embodied relationship'. Instead of making modifications to educational programs based on what experts (such as doctors or teachers) believe would be best for students, it is important to take students' personal experiences into consideration and invite students into the planning and assessment of education programs allowing for continuous reflections and feedbacks (p.204).

The Salamanca Statement and UNCRPD have been significant in the development of inclusive education. The research by Graham et al. (2020) shows the increased number of citations of the Salamanca Statement and UNCRPD in research in the field, while Hernandez-Torrano's et al. (2022) study shows the significant increase in research in inclusive education after the Salamanca statement, especially since the mid-2000s (p.905). Additionally, there have been many prior studies in the field of inclusive education which have also focused on students with special needs (see Allan and Slee 2008, Hernandez-Torrano, 2022, p.905).

Expanded conceptualization of inclusive education

As the global movement promoting inclusive education gains traction, it has also been further developing and defining inclusive education, as shown in the UNESCO Cali commitment (2019).

> We, the participants of the International Forum on Inclusion and Equity in Education held in Cali, Colombia 11-13 September, 2019, including young people, government officials, educators, civil society, and multilateral organizations representatives, reaffirm our commitment to the international human rights agenda reflected in the United Nations Sustainable Development Goals (SDGs), and the Education 2030 Framework for Action, which recognizes the necessity and urgency of providing equitable and inclusive quality education for all learners, from the early years through compulsory schooling, technical and vocational education and training, higher education, and lifelong learning. (Article 1, UNESCO Cali commitment[1])

While acknowledging the legacy of the Salamanca Statement, the Cali Commitment positions inclusive education beyond just the inclusion of students with disabilities. According to the Cali Commitment, inclusive education is defined as below:

[1] https://unesdoc.unesco.org/ark:/48223/pf0000370910

> We share the definition of inclusion as a transformative process that ensures full participation and access to quality learning opportunities for all children, young people and adults, respecting and valuing diversity, and eliminating all forms of discrimination in and through education. The term inclusion represents a commitment to making preschools, schools, and other education settings, places in which everyone is valued and belongs, and diversity is seen as enriching. (Article 2, UNESCO Cali Commitment)

The fundamental approach of the Cali Commitment may seem similar to that of the Salamanca Statement or UNCRPD, whereby inclusive education is understood as a transformative process of the educational system. However, notably, the Commitment does not focus singularly on people with disabilities, but rather provides in the definition that inclusive quality education is <u>for all people</u>, <u>in which</u> <u>everyone is valued and diversity is seen as enriching</u>. The Salamanca Statement and UNCRPD did also promote equality in education without discriminations for all students, but with a particular focus on students with disabilities.

This expanding of the definition of inclusive education from the particular focus on students with disabilities to education for all is particularly interesting if we look back to the international treaties before the Salamanca Statement. The UN Charter and Universal Declaration of Human Rights (1948) expressed the commitment to human rights, including the right to education. The Convention on the Right of the Child (CRC) in 1989 is another instrument which addressed the rights of all children but with some reference to children with disabilities. State parties were requested "to recognize that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community" (Article 23(1) of CRC). State parties were also asked to recognize the rights of disabled children to "special care, subject to available sources"*,* which, Mittler (2005) argues to be 'out of date' by today's standards (p.25).

Why, in the recent global discourse of inclusive education, are we removing the specificity of students with disabilities and expanding the concept of inclusive education to encompass everyone? One explanation is that there have been limitations in achievement if we only focus on students with special needs in the discussions of inclusion, where such discussion tends not to leave from the stage of 'integration' of students with disabilities based on medical model, instead of transforming the existing educational systems to fit diverse students.

In the following sections, the attempt to clarify what inclusive education means is reviewed with the example of the typology by Goransson and Nilholm (2014) to explore how inclusive education can be positioned through different interpretations.

(2) Typologies of inclusive education interpretations

Prior studies on inclusive education vary in their assumptions of what inclusive education means, resulting in a somewhat blurred interpretation of inclusive education overall. Many studies have focused on students with special needs and how to incorporate them into mainstream educational systems with (individual) support, rather than transforming the educational system to include all and valuing diversity (see Hernandez- Torrano et al 2022).

Understandably, the different perceptions of the concept of inclusive education have led to differing policy approaches as exemplified by the conversations between the UN Disability Rights Committee and Japanese government in September 2022 showing the clear discrepancy between their perceptions of inclusive education. Although the UN's recommendation[2] strongly criticizes the Japanese approach to inclusive education and urges them to 'cease the segregated system', the Japanese ministry maintains that their 'special support education system' is the way to achieve inclusive education. Such discrepancy is possible due to the different interpretations of inclusive education. Without clarifying the different interpretations, reaching consensus on an inclusive education approach will not be possible.

Among other scholars concerned with the divergent conceptualizations of inclusive education, Goransson and Nilholm (2014) make the significant contribution of classifying the different interpretations of inclusive education, based on the following typologies; a) placement definition (i.e., inclusion as the placement of pupils with disabilities in mainstream classes), b) specified individualized definition (i.e., inclusion as meeting the social/academic needs of pupils with disabilities), c) general individualized definition (i.e., inclusion as meeting the social/academic needs of *all* pupils, and d) community definition (i.e., inclusion as creation of communities with specific characteristics (p.268, italicized text is original). These typologies are frequently used as the analytical framework in other studies, such as Krischler, Powell, and Pit-ten Cate (2019). The first two types focus on how to deal with students with disabilities specifically, and the latter two consider all students. The use of the placement definition tends to exist within the framework of integration of students with disabilities into mainstream classes; therefore, instead of adjusting educational systems for special needs, students with disabilities are expected to adjust themselves to fit into the existing educational settings. The individualized definition tends to promote the use of special supports or reasonable accommodation stipulated in UNCRPD, offered by experts. The approach of the general individualized definition, however, begins with the assumption that

[2] https://www.ohchr.org/en/press-releases/2022/09/un-disability-rights-committee-publishes-findings-bangladesh-china-indonesia

'everyone is different', instead of exceptionalizing a (problematized) particular group, such as students with disabilities. The implication of this approach importantly, is that instead of trying to fit students into the existing educational settings, the educational systems as a whole needs to be transformed to match the diverse needs of students. This approach is further developed in the community definition, where the goal of inclusion is the creation of inclusive community.

The typologies of inclusive education by Goransson and Nilholm (2014) is useful when policy makers and educators reflect on their perceptions of inclusive education. The complexities of inclusive education as a concept stem from the sector's (often unconscious) assumptions of the meaning of inclusive education. Without clarifying the meaning of inclusive education, the discussions around goals, strategies, and pedagogical approaches, etc. may become incoherent and subject to manipulation due to differing interests of stakeholders.

1-1-2-2 Influences of world policy vs loose-coupling/decoupling in implementation

The global policy developments on inclusive education have significantly influenced local discussions on inclusive education (see Chapter 3, 3-5-1). However, the translation of global policies into local contexts faces common challenges. The 'loose-coupling' or 'decoupling' between global and local policy is common in many policy discussions; however, the field of inclusive education demonstrates one of the more explicit examples of this, sometimes with contradictory directions between global policy and local implementations. One of the reasons for this loose-coupling or decoupling is the persistency of the institutionalized education system in the context of society (see Chapter 3, 3-5-2).

Peters (1999) explains that 'institution' is "structural feature of a society" and has "stability over time", which affects individual behavior. As March and Olsen (1989) explain, "an institution is not necessarily a formal structure but rather a collection of norms, rules, understandings and routines" (referred in Peters 1999, p.28). The localization of the global inclusive education policy is based on local contexts, although even at the global level, as explained above, the definition varies. Thus, in local contexts where inclusive education is discussed in terms of special education, the local policy approach will be based on the historic institutionalization of special education systems. Based on their own historic institutional practice, countries interpret and rationalize the concept of inclusive education in their own way, in order to implement inclusive education within their own existing frameworks.

In case of Luxembourg and Japan, they have a history of implementing a special education agenda based on segregation and separation (see Chapter 2 and Article 2). While both countries have made efforts to implement their inclusive education policies, the path dependency of the historical developments of inclusive education and special education cannot be ignored, which have caused certain 'paradoxes'. These issues pertaining to Luxembourg and Japan are discussed in Chapter 2 and Article 2.

As above, the unclear and sometimes contradicting interpretations of inclusive education at global and local levels, together with the decoupling or loose-coupling of policies on inclusive education, make discussions and implementation challenging. Although at a theoretical) level, there is a commitment to human rights (equal access and non-discrimination), the result in reality is that there are so many differences in interpretation and implementation approaches that, unfortunately, rarely is this ideal achieved.

1-2 Aim of the Dissertation

This doctoral dissertation aims to analyze the inclusive education at the local level, with the examples of Luxembourg and Japan since the 1940s, taking into account the influence of the global discourses and the complexities surrounding interpretations and implementation of inclusive education. These two countries vary in many ways such as geographical location, size of the country and population, culture and demographics, thereby, presenting an interestingly contrasting case comparison (see Chapter 4 for more detailed explanation of the reasons for the comparison). Despite these differences, the influence of the global conversation onto local countries has become more and more significant (see Chapter 3, 3-4-1). As a consequence, in the area of (inclusive) educational policy, assimilation around the globe has been accelerated by the strong influences of international treaties and statements as well as the discourse of international governmental and non-governmental agencies. Therefore, there is an assumption that, even between these two contrasting cases, there might be similarities in how they (re)construct their educational systems for inclusive education[3]. In addition to the analysis of global influences, this doctoral thesis also analyzes the local contexts by applying the analytical frameworks of historical institutionalism (path dependency) and sociological institutionalism (organizational field). This dissertation (in Article 3) focuses on music education as an example of a school subject and reviews how music education

[3] Luxembourg signed UNCRPD in 2007 and formally ratified in 2011. Japan signed UNCRPD in 2007 and ratified it in 2014.

systems have been constructed in the two countries with a consideration of how inclusive education is understood and implemented.

While reviewing the educational systems in the two countries (Article 2 and 3), this dissertation also considers how educational philosophies are different in the two countries, focusing on reflective learning as an area recently gaining attention globally and locally[4]. Although sometimes not implicitly discussed, each educational system is based on certain educational goals and values. As Terzi (2014) argues, inclusive education should be theorized and enacted within the contexts of these core educational values (see Chapter 3, 3-3). In the comparison of inclusive education in the two countries, it is therefore unavoidable not to discuss the underlying educational goals, for which the dissertation reviews relevant theories and concepts as explained in Chapter 3, specifically focusing on reflective learning in the East and the West (see Chapter 3 and Article 1). Mitchell and Desai (2005) mention the tension between Western (individualism) and Asian philosophical assumptions (collectivism) in relating to inclusive education as below (p.195).

> Since inclusive education had its origins largely in Western education systems, it is important to consider some of the conflicts that can arise when it comes to it being adopted in Asian contexts…In particular, …there is a tension between the value placed on individualism in the Western notion of inclusion and the Asian value of collectivism…Thus, both in China and Japan, collective societal interests take precedence over individualism…" (p.195).

The dissertation questions whether similarities and differences of the inclusive education systems in the two countries are due to the 'tension' between Western and Eastern educational philosophies as stated above, or whether conflicts among different educational philosophies within a Western or Eastern country cause similar issues, and thus potentially worldwide.

1-3 Structure of the thesis

This article-based thesis is a compilation consisting of Introduction (Chapter 1), Overview of (Inclusive) Education Systems in Luxembourg and Japan (Chapter 2), Theories and Concepts (Chapter 3), Research Questions and Research Design (Chapter 4), Articles (Chapter 5), and Findings and Reflection (Chapter 6).

[4] Reflective learning is also relevant to the discussion of Haegele and Hodge's proposal of 'embodied relationship' and incorporation of personal experiences (Haegele and Hodge, 2016, p.203).

1-4 Overview of the articles

The dissertation is based on three articles on the subjects of educational philosophy (Article 1) and educational systems (Article 2 and Article 3). As explained above, the dissertation links discussions on educational philosophies relating to inclusive education, to the arguments around global influence versus local differences in the inclusive education systems. The Articles start with an analysis of educational philosophy to give an overview the potential societal and cultural differences as the background contexts of the two countries. Article 1 "comparison on self-reflection in Humboldtian Bildung and the Kyoto School: rethinking assumptions on 'Reflection' in OECD Education 2030" (Chiba, 2021) has been published in *Nordic Journal of Comparative and International Education*. The updated version of the article is published as a chapter of the book "Comparative and Decolonial Studies in Philosophy of Education" on March 18, 2023 by Springer. Articles 2 and 3 are the analysis of educational systems; Article 2 "Comparing the paradoxical development of special education and inclusive education in Luxembourg and Japan" (Chiba and Powell, 2022) and Article 3 "How inclusive are music education systems in Luxembourg and Japan?" (Chiba, 2022).

Article 1

Chiba, Miwa (2021)

Comparison of Self-reflection in Humboldtian Bildung and the Kyoto School: Rethinking Assumptions on 'Reflection' in OECD Education 2030

Aim and research question

This article is an analysis of educational philosophy, focusing on the different goals of reflection in learning by comparing that of Humboldtian Bildung in the West and the Kyoto School in the East[5]. The OECD's Education 2030 emphasizes the importance of 'reflection' in learning. The article explores the underlying assumptions of the OECD's policy, with the comparison of similarities and differences between the two schools of thought. The article tries to answer the research questions: Why have these educational philosophies placed importance on 'reflection' in learning?

[5] Luxembourgish education, although influenced from various neighborhood countries, have been heavily influenced from German education, including the idea of Bildung, especially in primary school education, where classes are conducted in German with German textbooks. The Kyoto School's thought is based on Zen Buddhism, although not directly referred in educational policy, the element of such could be observed in historical and contemporary Japanese education.

What are the implications of the Humboldtian Bildung and the Kyoto School philosophies on the current OECD's discussion of 'reflection' in learning?

Theoretical framework

The theoretical framework uses the educational philosophy of 'reflection in learning', in addition to the Humboldtian Bildung and the Kyoto School philosophies, making use of concepts of discontinuity in learning and negative education.

Method

Literature reviews of original documents as well as the prior studies.

The function of the article in relation to the overall aim of the thesis

Article 1 compares how two educational philosophies understand the 'reflection' in learning and analyze the underlying assumption of the OECD's Education 2030 policy on reflection in learning. Both schools of thought place importance on reflective experiences in learning, by emphasizing the critical role of self-reflection in learning through interaction with others in society. These ideas stem from rigorous reflection on earlier educational approaches that favored specialized knowledge acquisition. Rather than an educational approach that segregates students along certain pathways of specific knowledge and skills training, the schools identify the importance of students' own initiatives in learning in relation to others.

While Humboldtian Bildung emphasizes the importance of reflection in learning for affirmation of the self, the Kyoto School encourages reflection to challenge individuals' fixed views and prejudices, in other words, toward negation of self. This difference is based on the different perspective of the relationship between 'I and World', whereby 'I exist in contrast with World', as opposed to 'I exist as a part of World'.

The article argues that the OECD's policy is similar to the ideas of the Humboldt school of thought which positions student as agents or co-agents in learning to further affirm their own uniqueness. The Kyoto School's idea on negation of self is at odds with the OECD's self-affirmation approach. However, the Kyoto School's idea is valuable to reflect in terms of 'openness and flexibility of self' in learning.

In addition, the article identifies the risk of 'trends' or 'pre-fixed competencies' in the OECD's policy. The issues of seeing and reflecting oneself in interactions with others for learning, as well as dealing with trends or the pre-determined standards of competencies, are relevant in discussions of educational philosophy in relation to inclusive education. The article itself does not directly refer to inclusive education; however, fundamentally, these two perspectives (i.e., reflection in learning in relation with others and dealing with trends and pre-determined standards) are the crucial aspects in inclusive education policy discussion, which this thesis takes into consideration in Chapter 3 and Chapter 6.

Article 2

Chiba, Miwa and Powell, J.W. Justin (2022)

Comparing the Paradoxical Development of Special Education and Inclusive Education in Luxembourg and Japan

Aim and research question

The article depicts the development of special education and inclusive education in the global discourse since the 1940s, through the analysis of key statements on inclusive education. It explores the localization of inclusive education in Luxembourg and Japan, as two contrasting country cases, to understand the similarities and differences between them as well as gaps within the global inclusive education discourse and norms. The article questions the extent to which these countries' positions have evolved in terms of special education and inclusive education in their historical and cultural contexts.

Theoretical framework

The article applies the typologies of inclusive education as defined by Göransson and Nilholm (2014) to clarify the various influential interpretations of inclusive education. To analyze the historical development of inclusive education, the article uses the analytical framework of neo-institutionalism (historical and sociological institutionalism) to describe the changes in institutions and organizations within the special education and inclusive education sectors.

Method

The article uses literature reviews of international and domestic laws and regulations, official documents, and statistics by the United Nations, the European Agency for Special Needs and Inclusive Education, the Ministry of Education in Luxembourg and the Ministry of Education, Culture, Sports, Science and Technology (MEXT) in Japan with respect to their special education and inclusive education policies.

The function of the article in relation to the overall aim of the thesis

Article 2 firstly illustrates the historical development of global discourse on special education and inclusive educations since the 1940s.It then analyzes the historical and current developments in Luxembourg and Japan, applying the typologies of interpretation by Göransson and Nilholm (2014) to understand these countries' approaches towards special education and inclusive education. The comparison uncovers both differences (such as population size and linguistic diversity, etc.) as well as unexpected similarities, particularly, that separated special education system have, paradoxically, continued to grow despite both countries committing themselves to inclusive education as a human right. The persistent separated system in both a European and an Asian context demonstrates considerable discrepancies between global discourses and national (and local) implementation of inclusive education policies, including the UNCRPD, ratified by both countries.

A key reason for this, the article argues, is the lack of sufficient discussion, clarification, and understanding of the definition of inclusive education at all levels, as well as varying commitments to the goal of all children and youth learning together in reformed settings that value learner diversity and adapt to students' needs. The article finds that the historical institutionalization of special education prevents the flexible transformation of educational systems towards full inclusion based on recent broader conceptualizations of inclusive education.

Article 3

Chiba, Miwa (2022)

How Inclusive is Music Education in Luxembourg and Japan?

Aim and research question

The article compares music education systems in Luxembourg and Japan, analyzing how inclusive these education systems are. Contrary to global movements toward greater inclusivity, prior studies (as referred in Article 3), have concerned the continuous limitation of the participation into music education, especially for the students with special needs or marginalized populations. Comparing the two country cases, the article questions how inclusive music education systems are in Luxembourg and in Japan and uncovers some of the issues surrounding music education systems from the perspective of inclusion.

Theoretical framework

The article applies theories and concepts of historical and sociological institutionalism (organization field and form of education; formal, non-formal, and informal education) and the typologies of inclusive education by Göransson and Nilholm (2014) to form an analytical framework.

Method

Qualitative research combines document reviews of prior studies and official policy documents as well as curriculum documents, interviews with teachers in Luxembourg and in Japan, and participant observations at inclusive model schools in Luxembourg.

The function of the article in relation to the overall aim of the thesis

This article compares the music education systems in Luxembourg and in Japan, questioning how inclusive these systems are. It reviews the historical development of music education systems, the interpretations of inclusion in music education (what it means to be inclusive), and to what extent the music systems reflect global discourse and norms of inclusive education. The study is

conducted using a combined approach of document reviews, interviews, and observations, to uncover the nature of music education in the two countries through the lens of inclusion. It reveals the issue of unequal access, especially in Luxembourg, as well as narrow interpretations of inclusive education in both countries, which prevents the actualization of full inclusion.

While the first article offers philosophical discussion and the second article focuses on general policy analysis, this article uses music education in the two countries to further investigate the practices of inclusion in the education field. Additionally, it incorporates sociological concepts of organizational field and educational forms of formal, non-formal and informal education. The article proposes the call for review and reflection of the whole picture of music education systems for further discussion on inclusion in music education. While music education is used in this article as an example of a school subject, the findings of the article are relevant for other subjects beyond music education.

Chapter 2: Overview of Education systems in Luxembourg and Japan

This chapter firstly illustrates the general overview of education systems, followed by the overview of special and inclusive education systems, and music education systems in Luxembourg and Japan.

2-1 General Education systems

(1) Luxembourg

Schooling is mandatory in Luxembourg from the age of 4 to 16.[6] Primary education is divided into four cycles, i.e., cycle 1(age 4-5), cycle 2 (age 6-7), cycle 3 (age 8-9), and cycle 4 (age 10-11), while secondary education is subdivided into two levels; classic secondary education of seven years (preparing for diploma for university studies), and general secondary education of six to eight years depending on the trainings, including vocational trainings[7]. Luxembourg has 157 public primary

[6] For the number of students, see https://luxembourg.public.lu/en/publications/statec-le-luxembourg-en-chiffres.html p.21
[7] See https://men.public.lu/en/publications/divers/informations-generales-offre-scolaire/systeme-scolaire-public.html

schools over 102 municipalities of the country, there are some public primary schools with alternative pedagogical approaches (inclusive education model schools) while complying with the national curriculum, such as Eis Shoul[8] (in Luxembourg city) and Ecole Jean Jaurès[9] (in Esch-sur-Alzette)[10]. Due to the diverse population where almost half of the population is not Luxembourgish national[11], Luxembourg offers public international schools operated in the European curricula, in French, German or English-speaking sections, while in other general public primary schools, German is the main language of instruction in the primary schools, while Luxembourgish is used in daily conversation and French is taught as a subject.[12] There are also private schooling options (10 schools as of August 2022, one of which follows Luxemburgish national curriculum), such as French based school, British based school, American based school etc., which follow different curriculums than Luxembourgish or European curriculums. Mainly for the children of European officials (working in European institutions), there are primary and secondary European schools, with the divided sections depending on the (native) languages[13]. For public schools, at the end of cycle 4, the parents and the class teacher reach a mutual decision on the students' track in the secondary education, based on the students' cumulative work during the cycle 4, taking into the consideration of the students' skills, interests, and the interim results of the standard tests[14].

The secondary education consists of the two levels: classical secondary education and general secondary education[15][16]. The classic secondary education of seven years aims to cultivate general knowledge and skills in human sciences and literature, mathematics and natural sciences, which prepares students for higher education or university studies. While historically the two levels guided different paths for the future education of the students (which had been criticized as the early segregation in the tracking system), in the latest secondary educational system, the general secondary education also offers diploma for higher education (university), although it also offers vocational training opportunities. Due to the complex language reality of the population, the Luxembourgish education system offers some supportive arrangements for students with weakness of particular (main) languages, such as ALLET classes (for those with weakness in German), or French plus (for those with weakness in French). [17] There is a pilot secondary school (Lycée

[8] http://www.eisschoul.lu/
[9] http://www.ecolejeanjaures.lu/contact.php
[10] https://men.public.lu/en/fondamental/offre-scolaire-organisation/offre-scolaire.html
[11] Largest foreign population in Luxembourg is Portuguese (14.8%), followed by French (7.6%), Italian (3.7%), Belgian (3%) and German (2%).
[12] Luxembourgish, German and French are the official languages in Luxembourg.
[13] https://www.euroschool.lu/site/
[14] https://www.vdl.lu/en/living/education-and-training/enrolling-your-child-school/public-elementary-schools
[15] https://men.public.lu/en/secondaire/offre-scolaire-organisation/offre-scolaire.html
[16] https://men.public.lu/en/secondaire/apprentissages-evaluation/apprentissages.html
[17] https://men.public.lu/en/themes-transversaux/scolarisation-eleves-etrangers/enseignement-secondaire.html

Ermesinde in Mersch), which offers alternative pedagogy ('autonomous full time high school' according to their words), with the interdisciplinary approach for social cohesion in diversity[18], while complying with the national curriculum. There are also private secondary and European schools for secondary education. In sum, there are varieties of options for students of families with different origins (with different languages), i.e., depending on the family situation, preference, and students' abilities, families chose the best options they think for their students.

The national curriculum provides standard guidance of the school subjects taught in the primary and the secondary education in public schools across the municipalities in Luxembourg. The curriculum is called 'Plan d'études'[19] for the primary education, and the ministry of education provides guidance and programs for each track of the secondary education[20]. The national curriculum for the primary school (Plan d'études, with the latest revision in 2011) provides what subjects and contents are taught in each cycle. Teachers are relatively flexible to choose teaching materials.

(2) Japan

Schooling is mandatory in Japan from the age of 6 to 15[21]. First six years are in elementary schools, followed by junior high schools (lower secondary). As of May 2022, there are 19,161 elementary schools (67 national, 18,851 public, 243 private elementary schools), while 10,012 secondary schools (68 national, 9164 public, 780 private secondary schools)[22]. In general public schooling, Japanese is the language of instruction[23]. There are schools for students with foreign origins (such as those for specific country of origins, e.g., Korean schools, or international schools teaching in English), some are recognized as the school fulfilling the requirement of the compulsory education under the law, while there are other schools not recognized. While increasing number of students with foreign origins attend public (local) schools, there have been concerns of non-attendance of students of foreign origins in the compulsory education[24]. Also, the ministry has been conducting

---

[18] https://lem.lu/

[19] https://men.public.lu/en/publications/courriers-education-nationale/numeros-speciaux/plan-etudes-ecoles-fondamentale.html

[20] https://portal.education.lu/programmes/#21071315-20202021

[21] https://www.mext.go.jp [Japanese]

[22] https://www.mext.go.jp/content/20220824-mxt_chousa01-000024177_001.pdf [Japanese]

[23] About 98% of the population is Japanese in Japan. According to the census in 2020, the percentage of foreigners in Japan has increased from 1.5% (2015) to 2.2% (2020), while total population has been decreased 1.5%. See https://www.stat.go.jp/info/today/pdf/180.pdf [Japanese]

[24] https://www.mext.go.jp/content/20220324-mxt_kyokoku-000021407_01.pdf [Japanese]

research how to support non-Japanese students (with limited Japanese language ability) in public schoolings[25].

The National Course of Study (NCS) provides the detailed curriculum and standards for the public schools across the country[26][27]. It is aimed to provide standardize quality of education for the public schools all over Japan, therefore, it provides detailed descriptions of the contents taught with the documents for supplementary explanation (kaisetsu). In addition, the textbooks used at schools need to be the ones authorized by the ministry of education, culture, sports, science, and technology (MEXT). NCSs have been revised almost every 10 years, and the latest NCSs have implemented in 2020 (elementary school), in 2021(junior high school), and in 2022 (high school).

2-2 Special Education and Inclusive Education Systems

(1) Luxembourg

In Luxembourg, as elsewhere in Europe, the earliest special education provided was limited albeit crucial in replacing a policy of exclusion, moving gradually to segregation (Powell, Limbach-Reich and Brendel 2017). The law of 1912 excluded the obligation for children considered to have certain impairments from compulsory education. After World War II, the awareness of fundamental human rights diffused worldwide. In 1970, Luxembourgish government started the campaign of "A School for Everyone", and the law of 1973 stipulated the right to schooling and compulsory education for children with disabilities. Further, in 1994, the so-called "Integration Law" was issued and gradually the approach shifted from children adopting the general education system to schools adopting to meet the needs of students. Since then, many organizations and services have developed to support students with special needs; however, a significant number of students with special needs are send to neighboring countries (see Limbach-Reich and Powell, 2015).

In 2007, Luxembourg signed the UNCRPD, and formally ratified it in 2011. Meanwhile, the so-called "Inclusion Law" was issued in 2009, which, for example, made it possible for mobile specialized teachers to join multi-professional teams in assisting students with special needs within public schools (Powell, Limbach-Reich and Brendel 2017). Also, some publicly funded whole day

[25] https://www.mext.go.jp/content/20221017-mxt_kyokoku-000025305_01.pdf [Japanese]
[26] https://www.mext.go.jp/a_menu/shotou/new-cs/1384661.htm [Japanese]
[27] For the historical overview of curriculum organization in Japan, see Tanaka et al. (2017), especially Chapter 2 by Kanae Nishioka.

inclusive model schools, with alternative pedagogical approach, had been established, such as Eis Schoul in Luxembourg city (established in 2008) and Ecole Jean Juares in Esch-sur-Alzette (in 2006), which emphasized the value of inclusion, diversity, and social equality (Joachim, 2013).

Lately, the law of 2018 established so-called "SEN competence centres", with the primary aim to provide specialized support services for students with special needs by qualified personnel. Reflecting the issue of insufficient expertise of educators for students with special needs, the law proposes to promote the learning of students with special needs by entrusting their education to staff especially trained for the purpose, regardless of school settings[28]. The government explained "although the government intends to promote as much as possible the educational inclusion of children and young people with special educational needs, it turns out that in more individual cases, schooling in a specialized school is an appropriate alternative to promote development"[29]. This trend might be considered to weaken the universal inclusive education on a human rights basis in favor of professional dominance- reducing pressure for transformative change of Luxembourg's traditionally selective and stratified education system (see Bakers and Hadjar, 2017).

Currently, there are 14 special schools, organized into regional centres and specialist institutes[30]. Special schools and services are for students with special education needs, including mental, emotional, sensorial, or motor issues, and who cannot attend mainstream schools. Professionals supports students, parents and teachers for academic, pedagogical, educational and/or psychological issues. The government explains that the special education system[31], with the multi-disciplinary teams of qualified people, provides tailor-made care and supports for students in need of additional support measures. Based on the recommendation by National medical-psychological schooling commission (Commission médico-psycho-pédagogique nationale), parents have right to choose the form of schooling, i.e., either mainstream education, partial integration into mainstream education, special school, or special school abroad.

As to the inclusive education, the government explains as below.

> One of the priorities of the Luxembourg government is to guarantee children and young people with special educational needs schooling in the "regular" school system and attendance

[28] Draft of Law of July 20, 2018 on the creation of SEN competence centres https://chd.lu/wps/PA_RoleDesAffaires/FTSByteServingServletImpl?path=FF4E0AA0483625980FC9EF835A89D30E2E5DA428615F4A5989929415C8663E47A60F5516B6110311D0AE315F40F35ACA$53692A9A0A23E7B3D7F4252CFE4A256D (page 4)

[29] ibid

[30] https://guichet.public.lu/en/organismes/organismes_citoyens/education-differenciee.html

[31] See also https://guichet.public.lu/en/citoyens/enseignement-formation/education-prescolaire-primaire/besoins-specifiques/besoins-specifiques.html

at childcare facilities and youth activities, where this inclusion is possible and desired by the parents. In the Grand Duchy, the percentage of pupils educated in specialized centers is less than 1%, which testifies to a high rate of inclusion[32].

The recent study by Krischler, Powell and Pit-Ten Cate (2019) on the perception of inclusive education by general public and teachers, found the interesting result that more in-depth understanding of inclusive education reported more positive attitudes for inclusive education, where teachers felt better prepared to implement inclusive practices. However, the study also showed that there had been various perceptions of what inclusive education meant (i.e., from mere placement discussion, specified individualized definition, and general individualized definition in the typology of inclusive education by Göransson and Nilholm (2014) (see Chapter 3 for the typology of inclusive education by Göransson and Nilholm).

(2) Japan

The education system for students with special needs, originally, were provided in private initiatives. According to the past research, common understanding of the first official education for students with special needs started in 1878 with the establishment of the school (Kyoto Moua In), the school for students with sight and hearing difficulties (Takahashi et al, 2014). Thereafter, other private schools, such as for intellectual disability, were established. In 1909, the first school for students with health problems was established (Tokyo-city Youikuin Anbou Bunin), where students could receive both treatment and education. In 1940, first public school for students with intellectual disability was established in Osaka (Osaka-city Shisai Gakkou). The education for students with disabilities in Japan had assumed the provision of education in separate educational settings, depending on the categories of disabilities.

After the WWII, the Japan aimed to democratize its education systems (Nishioka, 2017, p.15). Education for students with special needs become compulsory in the late 1940s and 1950s, category by category, with the influence of the global trend of 'normalization' to promote people to participate into society regardless of disabilities (Takahashi et al, 2014). In 1960s, some public elementary schools started to create special classes for students with special needs within their schools. Further in 1970s and 80s, the government tried to promote 'integration' of students with special needs. However, as Yawata (2012) reviews in her study, there had been the remaining strong arguments supporting for separated education system in special schools or special classes by experts

[32] https://men.public.lu/fr/themes-transversaux/eleves-besoins-specifiques.html

and by parents. Such arguments were based on the criticism of the issues of teacher trainings or environments in mainstream classes, concerning that simple integration may cause adverse effects for students with disabilities without sufficient adequate supports, which would infringe the rights of the students with disabilities to receive appropriate education based on their abilities (as provided in the Basic Act on Education (Article 4; equal opportunity in education)[33]. While there had been both opinions of pro-separation and pro-integration (under the normalization concept), in 1980s, the promotion of interactive activities among students with and without disabilities had been actively encouraged (Yawata, 2012, p.70). These initiatives were based on the argument that, the discussion should not be binary of pro-separation or pro-integration, but to assure flexible educational environment (p.72). The Tsu-kyu system or resource room, where students with disabilities enroll in mainstream classes still spend some hours in resource rooms, which officially started from 1993, emerged in this context. However, there had been also the criticism of such interactive learning activities, where students with and without disabilities were 'merely placed together' (p.74). Yawata (2012) argues that such issues in 1970s and 1980s have not been solved still nowadays (p.76).

In 2007, Japan signed the UNCRPD and ratified in 2014. Meanwhile, various relating laws and regulations, including Basic Act for Disabled people, Act to prevent discrimination of disabled people, Act for school education etc., had been revised to comply with the requirements. Japan aimed to shift from separation, integration toward inclusion. However, according to the statistics by MEXT, although the number of student population in Japan has been decreasing, the number of students who needs special supports have been increasing, and the students studying in special classes in mainstream schools, or students under Tsu-Kyuu system have been increasing.

As of 2020, there are 1505 special schools from kindergarten to high school level[34]. Also, there have been increasing number of special classes in the mainstream schools. In 2020, 302437 students belonged to 66,655 special classes. The number of students in 2010 was 145431.The increase has been significant for the categories of Autism and emotional disorders as well as intellectual disability. The number of students under the Tsu-kyu system has been also increasing, i.e. 60637 in 2010 and 134185 in 2019. MEXT explains that improving expertise of teachers and relating personnel (including specialized medical care teams at schools) and coordination, and individual supports for students are the key for the special support education.

[33] https://www.japaneselawtranslation.go.jp/ja/laws/view/2442 [Japanese with English translation]
[34] Report by MEXT in Feb 2021 http://www.rehab.go.jp/application/files/5216/1550/6855/2_.pdf (page 4) [Japanese] visual impairment (82), hearing impairment (118), intellectual disability (786), physically handicapped (352), physical sickness/weakness (151)

MEXT explains that inclusive education is for the formation of inclusive society, in which people with disabilities and others who have not always been able to participate fully in society are able to actively participate and contribute[35]. Referring to Article 24 of UNCRPD, it explains that inclusive education system is the system in which persons with and without disabilities study together, with the aim of strengthening respect for human diversity and enabling persons with disabilities to develop their mental and physical abilities to the maximum extent possible and to participate effectively in a free society, and it is a system in which persons with disabilities are not excluded from the general education system being given the opportunity for primary and secondary education in the area where they live, and being provided with the reasonable accommodations necessary for the individual.

As to the perceptions of special needs education and inclusive education, the study by Ozeki and Shijo (2019) conducted in 2017 found that 52% of the teachers answered inclusive education as students with and without disabilities to learn together in mainstream classes, while 22% answered as education (instruction) easily understandable for each student, and 26% answered that they were not sure what it was (p.630). Another study by Fujii (2019) argues that, according to his study conducted with public school teachers in 2017, the recognition of the meanings of the key words relating to inclusive education (such as inclusive society, inclusive education system, and reasonable accommodation) was lower than the recognition of meanings of the key words relating to special needs education (such as special schools or classes, individual supporting plan, individual instruction plan, Tsu-kyu system), although the percentages had been slightly improved compared to the similar study in 2013 (p.104).

2-3 Music Education Systems

(1) Luxembourg

Music education in Luxembourg has been historically primarily provided in separate educational organizations, such as conservatoire and local public music schools. Sagrillo (2016) explains that, many pupils interested in music are excluded; less talented are separated from the talented because they lack quick readability of music, which is considered as the main advantage for the interpretation of music. He adds, the contents of music education largely focused on technical aspects based on Solfège (music theory and literacy), which consequently limits the path to music

[35] https://www.mext.go.jp/b_menu/shingi/chukyo/chukyo3/044/attach/1321668.htm

for pupils, dividing pupils into the talented and not talented . He analyzes that this is due to the historical development of music education in Luxembourg which was, "for a long time, influenced by its neighboring countries of France and French speaking part of Belgium (Wallonia), where music education gave priority to music literacy rather than practices" (Sagrillo, 2013, p.77).

Currently, there are three conservatoies (in Luxembourg city, in Esch-sur-Alzette in the south, and in Ettelbruck in the north) and local public music schools and courses by municipalities and the Union Grand-Duc Adolphe Association (UGDA). As of 2019, total number of 16,000 students attended the conservatoires and public music schools, supervised by 700 teachers attended the conservatoires and public music schools/classes[36]. According to the statistics of the numbers of students by the government, there was about 56,500 primary school students and 47,200 secondary school students in 2018/2019[37], therefore, about 15% of school population learn music at conservatoires and public music schools.

While music education has been mainly conducted in the separate specialized music educational organizations as above, the national curriculum (*plan d'etudes ecole fundamental)* provides guidance to include 3 hours of art classes per week in general public primary schools. The guideline recommends that, throughout the school years, both technical and creative aspects in music education should be developed[38]. Recently, the government decided to make music education in conservatoires and public music schools free of charge (from September 2022)[39]. This initiative intends to expand the access to music education, trying to include larger number of students in the music education. There have been also some collaborative activities between public music school (teachers) and general schools, for example, music teachers in public music schools provide mini lessons using plastic trumpets at general schools or after school facilities.

In the non-formal or informal settings, historically, the village (wind) bands called Fanfare or Harmonie and community choir have been active in the society. Even a small village has its own bands, which plays an important role in communal ceremonies and events. There have been some amateur music clubs. The professional musicians have been also active to support non-formal or informal music educations, such as those by Orchestre Philharmonique Luxembourg (OPL)[40], or

[36] (Lëtzebuerger Land dated 18.01.2019) https://www.land.lu/page/article/048/335048/FRE/index.html (original in German).
[37] https://gouvernement.lu/dam-assets/documents/actualites/2020/09-septembre/200909-chiffres-rentree.pdf (page 2 and 4)
[38] https://men.public.lu/fr/publications/courriers-education-nationale/numeros-speciaux/plan-etudes-ecoles-fondamentale.html (see page 40-)
[39] https://luxembourg.public.lu/en/living/education/studying-music.html
[40] https://www.philharmonie.lu/en/education

Foundation EME[41], offering the opportunities for public to listen to or participate in the music workshops.

(2) Japan

Music education has been provided in general school settings. Public music education in Japan has been developed since the Maiji period (1868-), when the government tried to modernize the country. Music education became a part of the official curriculum for primary and secondary education based on Western models (Ogawa 1994). After the WWII, Japan restructured its education under the supervision of the United States. New curriculum called National Course of Study (NCS) were issued, and music education became one of the compulsory subjects. Koyama (2016) analyzes, while the music education before WWII mainly focused on moral education, the guideline of 1947 explained that music education should be an aim itself, not the tool[42]. The 1951 guideline recommended that students to develop deep aesthetic sentiments as well as rich sense of humanity and amicable personality through music education at school so that they can become desirable members of society (Koyama 2016, p.77).

Currently, the general purpose of music education under National Course of Study (NCS)[43] contains (i) knowledge and skills to understand musical themes and structures, to develop musical views and ways of thinking, and to develop competencies relating to sound and music in life and society; (ii) thoughtfulness, judgement, and expressions to devise musical expression and to be able to listen to music deeply, and (iii) attitudes toward learning and humanity to develop a love of music and sensitivity to music as well as to cultivate an attitudes of familiarity with music and rich emotionality. There are detailed guidelines for the contents taught in music classes at general schools[44], together with authorized music textbooks to be used in the classes. The following figure shows the basic music literacy taught in the elementary school level.

---

41 https://www.fondation-eme.lu

42 This is due to the fact that music education (songs) was mainly strongly connected to nationalism during the WWII.

43 Elementary school https://www.mext.go.jp/component/a_menu/education/micro_detail/__icsFiles/afieldfile/2019/03/18/1387017_007.pdf , junior high school https://www.mext.go.jp/component/a_menu/education/micro_detail/__icsFiles/afieldfile/2019/03/18/1387018_006.pdf

44 The guideline provides the standard hours of music classes per school year in elementary schools as follows; 68 units (year 1), 70 units (year 2), 60 units (year 3 and 4), 50 units (year 5 and 6). One unit consists of 45 minutes. (https://www.mext.go.jp/component/a_menu/education/micro_detail/__icsFiles/afieldfile/2019/03/18/1387017_007.pdf page 145)

Figure 1: Music literacy in elementary school in the guideline for NCS

Source: NCS guideline[45]

In addition to the music education in general school setting, there have been a wide variety of formal, non-formal and informal organizations contributing to music education. One of the most distinctive characters in non-formal music education is that of extra-curricular activities and clubs at general schools after the school hours. In addition to the general music education equally accessible by general population, there are experts' music education including those in music universities and colleges and private music schools.

Chapter 3: Theories and Concepts: Complexity of Inclusive Education and inter-disciplinary analytical frameworks of this thesis

In this chapter, I review the theories and concepts which are relevant to the analysis and arguments of this thesis. This doctoral thesis combines inter-disciplinary viewpoints to analyze such a complex issue of inclusive education. To start, human rights discourse and dilemmas is reviewed, followed by the multiple directions and various interpretations of inclusive education. Thereafter, the discussion on inclusive education and educational philosophy is reviewed. After reviewing this complexity in interpretation and educational philosophies, theories and concepts relating to

45 https://www.mext.go.jp/component/a_menu/education/micro_detail/__icsFiles/afieldfile/2019/03/18/1387017_007.pdf (page 167)

additional complexity of historical and social contexts which cause assimilation as well as de-coupling or loose-coupling between the global and local levels are reviewed.

3-1 Human Rights Discourse and Dilemmas

The fundamental value of inclusive education, as we see in the Salamanca Statement, is human rights and equality. Florian (2007) suggests understanding inclusive education "both as human rights and a means of achieving human rights" (p.8). Barton & Armstrong (2007) also states "the question [of inclusive education] is "fundamentally about issues of human rights, equity, social justice and the struggle for a non-discriminatory society" (referred in Terzi (2014), p. 483). Biermann (2022) explains, in relation to UNCRPD, that the vision (of inclusive education) is based on two foundational human rights principles: the norms of nondiscrimination and equal opportunity (p.13). Inclusive education has been commonly understood as human rights as well as creation of democratic society respecting human rights.

However, regardless of the discussions of individual human rights or democratic community in promoting inclusive education, the discussions linking inclusive education with human rights, equality, or democracy might have tended to remain in the ideological level, thus agreeing on the fundamental principle may not necessarily guide the common implementations of inclusive education in practice immediately. How can we guarantee human rights for students with different characteristics? What is the democratic society? Answering to these fundamental questions are not straight forward as we expect, because, depending on the perspectives, one may answer very differently. As such, there exist the dilemmas in discussion of inclusive education.

Terzi (2014), referring to Norwich explains the three main dilemmas surrounding implementation of inclusive education; (i) dilemma of difference, (ii) dilemma of participation vs protection, and (iii) tensions which emerge in relation to elements of choice and equality (p.482). The following table is the summary of the dilemmas.

Table 1: Dilemmas surrounding implementation of inclusive education (Terzi 2014)

(1) Dilemma of difference and commonality	Tension between (a) recognizing children's differences in order to enhance provision with the risk of negative connotations, and (b) emphasizing commonalities with the risk of less-appropriate provision
(2) Participation vs protection	Full social and educational participation may only be achieved by enacting forms of protection for some children. Tension arises between the value of children's participation in terms of expressing their views on educational matters, and the possible limitations which might be experienced by children with 'learning disabilities'.
(3) Tensions in choice of educational environment and equality	Legitimation of choice of schools (i.e., a special over a local, mainstream school, etc.)

Source: Terzi 2014

All the three aspects are relevant in consideration of the question of "What is human rights we are talking about?". Is it to treat everyone (regardless of differences) in the same way? Is it to provide special protection and care for students with special needs? Is it to let children with disability to study in special schools or special classes so that they can receive special supports or to place children in mainstream schools or mainstream classes so that they can fully participate together with other students, even when they might not follow standardized educational activities? All these questions have been asked everywhere in the world, and people are struggling to find out "So, what is human right?" and "How can we (re)construct inclusive community?".

3-2 Multiple directions of analysis and efforts to define what inclusive education means

Hernandez-Torrano et al. (2022) argue that the progress of inclusive education research has been developed in multiple and varying directions (p.894). According to their study, the interest on inclusive education has risen from the Salamanca Statement to date, with inclusive education research as a global phenomenon. They analyze that intellectual structure of inclusive education research consists of a) system and structures, b) special education, c) accessibility and participation, and d) critical research. Referring to the study by Allan and Slee (2008), they also argue that the scholars tend to work on special education research, school improvement/reform, disability activism, and critical research. They also explain that a considerable proportion of the most important journals publishing research in inclusive education belong to the area of special education and disability studies. They suggest that "this result may seem paradoxical due to the notable differences in the philosophical and paradigmatic approaches to special education and inclusive education (p.905) [46]

Florian (2019) explains such paradox of special education and inclusive education, clarifying the different conceptualization as below.

> Special education, according to the International Standard Classification of Education, is designed to "facilitate learning by individuals who, for a wide variety of reasons, require additional supports and adaptive pedagogical methods in order to participate and meet learning objectives in an education program. It positions special needs education as a resource-based response that is provided when individual learners require something different from or additional to what is on offer to everyone else" (Florian 2019, p.693).
>
> Inclusive education is an alternative approach. It assumes that (local) school education should be provided for all learners, and schools should educate all children together (Florian, 2019, p.696).

However, he concerns what it means to educate all children together could vary, and in some cases, the approach tends to end up with the discussion of how to include children with disabilities in mainstream schools (p.696).

The multiple directions and levels of analysis is the evidence of the increasing interests of wider actors in the field of (inclusive) education, however, it causes further challenges to understand

[46] They argue that the plausive explanation could be that research on inclusive education has never completely detached from special education beliefs and is still rooted in its principles. (Erten and Savage 2012; Florian 2019; Armstrong 2002, as referred in Hernandez-Torrano (2022), p.905).

what inclusive education is, how we can conceptualize inclusive education, and how we can implement it.

> [Developments of inclusion education research] in multiple and varying directions, make it extremely challenging to harmonize the diversity of existing theoretical, conceptual, and methodological approaches into an integrated framework that enables the field to move forward (Göransson and Nilholm 2014, Hardy and Woodcock 2015, Korsgaard and Mortensen 2017, as referred in Hernandez-Torrano 2022, p.895).

Nevertheless, there have been efforts made to conceptualize what inclusive education mean. Many scholars, including Mitchell (2005) explain the importance of consideration of conceptualization of inclusive education. Mitchell (2005) suggests the first step to clarify the definition of inclusive education is to distinguish integration and inclusion (p.4). He explains that "integration implies that the student with a disability has the status of a visitor, with only conditional access to a regular classroom, and primary membership of a special class or resource room" (p.4). Inclusion, on the other hand, "donates a student with disability unconditionally belonging to and having full membership of a regular classroom in a regular school and its community" (p.4). Secondly, acknowledging that inclusive education is not merely the placement issue, Mitchell (2005) categorizes the characteristics of placements in different educational systems in the world in three main types: one-track (serving all students in one system), dual-track (serving students with special needs in one system and all others in another, main system) and multi-track (serving various groups in different, parallel systems) (p.5). He categorizes Japan in the two-track system (with two distinct educational systems, with separate placements in special schools or special classes for students with special educational needs who follow a different curriculum to their non-disabled peers), and although he does not mention, Luxembourg might fit in the multi-track with parallel systems.

Considering the comprehensive approach to inclusive education, Mitchell further developed the following model of inclusive education which is the useful guide to discuss inclusive education. (2015, p.11).

Figure 2: Model of inclusive education

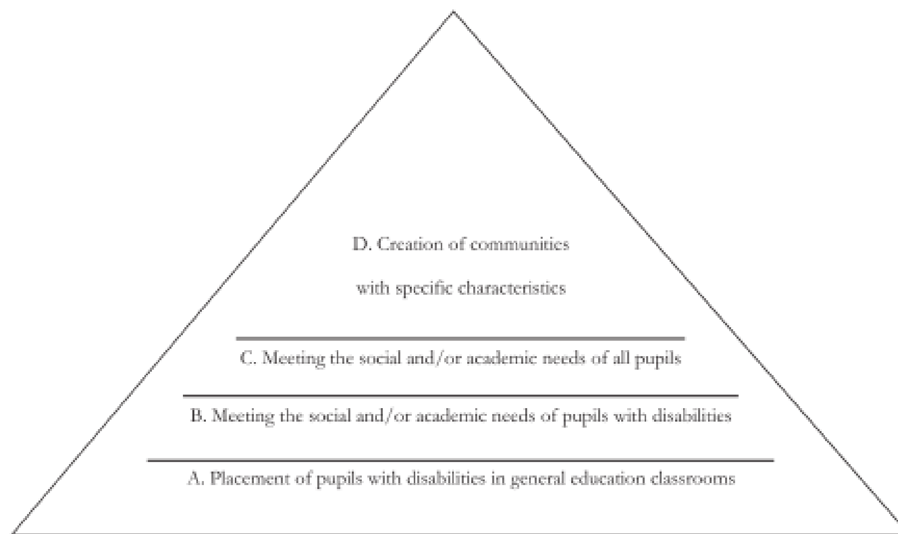
Source: Mitchell (2015, p.11)

Mitchell (2015) argues that inclusive education involves the "transformation of schools" to cater for all children (p.11). His conceptualization of inclusive education involves multiple elements as shown in the above figure to transform the educational system.

Göransson *and* Nilholm (2014) further clarify the concept of inclusive education. In their study, they examined the various definitions of inclusive education used in prior research[47]. They findings guide them to label four different categories of definitions of inclusive education as shown in the following figure.

[47] For this conceptual analysis, they explain that purposeful sampling of research literature was employed to identify different definitions of inclusion (p.267)

Figure 3: Different types of definition of inclusion and their hierarchical relations



Source: Göransson *and* Nilholm (2014, p.268)

According to their study, some literatures explicitly or implicitly define inclusive education as placement of students with disabilities in general education classrooms (The category A). The category B, while only focusing on students with disabilities, moves a step forward to consider how to meet the social and/or academic needs of students with disabilities. However, importantly, the two categories (A and B) only focus on students with disabilities. They argue that up to category B, the focus is special-educational-needs discourse, rather than within a general education discourse (p.269). Category C, on the other hands, expand the scope toward all students in general schooling discourse. They refer to several scholars including Thomazet (2009) with the statements as below (Göransson *and* Nilholm 2014, p.269).

- Inclusive education makes school the place of education of all children.
- Inclusive education meets the needs of each pupil better.
- Inclusive education is a process which leads the school to seek solutions for educating all children in as ordinary a way as possible.

Further, Category D focuses on characteristics of culture/group as a whole rather than to the situation of individual subject only (p.270). The central notion is the (inclusive)

community, which, for example, respects equity, care, and/or justice, and values diversity[48]. They discuss that there have been varieties of interpretations on inclusive education and raise the question "who should decide what version of inclusion should be the goal of schooling?"[49].

Their contribution is significant because, in the discussions of inclusive education, such assumptions of understanding of inclusive education sometimes tend to be unconscious, jumping to the policy discussions focusing on specific aspects.

More recently, Felder (2022), revisits the confusing plethora of definition of inclusive education. She explains varieties from three main perspectives; i) systematic scope, ii) social scope and the focused group, and iii) levels addressed (p.50). As to the systematic scope, she reviews that one extreme of the spectrum are definitions limited to the physical placement discussion (placement definition by Göransson *and* Nilholm 2014), while at the other end, there are definitions emphasizing the transformation of educational system. Secondly, as to the focused social group, on the one hand, there are the focus on pupils with disabilities or special needs, while on the other hand, some define inclusion of all pupils. Thirdly, in terms of the levels, many are based on the level of individuals, while others relate directly or indirectly to the community or society as the unit of consideration (p.50).

While recognizing such varieties of definition of inclusion, she also reflects that many of definitions are problematic in either ways that they are too utopian and normative or they are too descriptive and restrained, and often excessively one-sided (p.57). While reflecting the various definitions of inclusion, she proposes the understanding of inclusion based on the four pillars as below (p.62).

1. The aspect of structural involvement of individuals in social systems…, for example, education and training system.
2. The aspect of participation, which includes both having access to and sharing in social goods and resources such as education.
3. The aspect of integration, i.e. the nature and extend of individuals' involvement in social relationship as well as the degree of social solidarity or cohesion of communities, groups and societies.
4. The aspect of a sense of subjective involvement and individual well-being in and related to social contexts.

---

[48] They explain that there is scope for significant variations within Category D, on how the characteristics of the community are specified (p.270).
[49] They states " We believe that this is to a large extent a political issue" (p.275).

She also reflects that inclusion and inclusive education are not only the questions of teaching methods and ways of dealing with diversity in the classrooms, which seemed to be precise, target-oriented and pragmatic, but they are interwoven with deeper and more general, complex issues that are at stake in the pursuit of inclusion, such as the means and goals of education itself (p.4). Referring to Göransson and Nilholm's (2014) observation, Felder argues that differences in the way inclusion is defined often arise from divergent views on what schools can and should achieve (p.4).

3-3 Contrasting Educational Philosophy relating to inclusive education

As reviewed in the previous subsection, inclusive education contains various elements of consideration (see the model of inclusive education by Mitchell (2015), for example). One of the important elements is "Vision" or educational goal underlying in the inclusive education systems.

Felder (2022) referring to Pring (2007) argues that it is crucial both to think philosophically and to engage in philosophical thinking to penetrate the surface of the phenomenon known as inclusion or inclusive education (p.2). Referring to Reindal's argument (2010), Terzi (2014) also argue that inclusive education should be theorized and enacted within the contexts of core educational values.

Indeed, the varieties of interpretations seem to be based on different educational values and aims. In this section, the prior studies on i) capability approach vs utilitarian approach and ii) cultivation vs existential education are reviewed, with further review of the theories of reflection in learning, to understand how these theories and concepts are relevant for discussion of inclusive education.

3-3-1 Capability approach vs Utilitarian approach

Terzi (2014) argues that 'rethinking questions of inclusive education in the light of the value of educational equality – specifically conceived as *capability equality*, or genuine opportunities to achieve educational functioning – adds some important insights to the current debate on inclusive education' (p.479). Terzi re-considers the fundamental aims of education for quality education as well as core value of society with reference to the capability approach by Amartya Sen. She explains

that Sen's approach is an alternative to utilitarian or preference-based models of social distribution (Terzi 2010, p.387).

> In asking the question 'what can people do?' (rather than how much do they have), Sen directed attention to forms of empowerment (Terzi 2010, p.387).
>
> Sen argues that the justice of social and institutional arrangements should be evaluated in terms of capability, and hence in terms of people's effective opportunities to lead good lives (Terzi 2014, p.485).

In consideration of the element of human differences, Sen calls the different 'conversion' of resources into well-being (Terzi 2014, p.485). Terzi explains that the capability approach is important because of the comprehensive view of human diversity (p.486). In Sen's argument, social and institutional arrangements should seek to equalize people's capabilities[50], or their effective opportunities for functioning[51] (p.486).

> It follows therefore, that individuals with disabilities, if their disabilities are limited, should receive appropriate resources in order to enjoy equal, effective opportunities to achieve the functioning they have reason to value, thus, to achieve well-being, as a matter of justice (Terzi 2014, p.486).
>
> A fundamental educational entitlement -what we owe to each child- consists of equal, effective opportunities to achieve the educational functioning necessary to participate in society as equals (Terzi 2014, p.487).

In this argument, for children with disabilities and difficulties to equally participate in society as much as reasonably possible, overcoming limitations in opportunities, they should receive additional resources that will secure their equal functioning (Terzi 2014, p.487)[52].

The approach suggests that we should focus on what students can do, instead of what students cannot do at the moment (which is understood as a common feature in utilitarianism model). In order for children to 'function' with their potential capabilities, education should provide appropriate resources for equal participation in the society. While this approach suggests alternative model for planning and assessing students' development than the utility model, it should be noted that the target of education in this approach is considered as how to supports students with additional resources to 'function' in society. Therefore, one should bear in mind that there is

[50] Terzi remarks that Sen has avoided compiling a list of capabilities which should be equally provided (2014, p.486).
[51] Functioning are the modes of doing and being, or actions and states that people want to achieve and engage in. (Terzi 2014, p.485).
[52] Terzi (2014) further argues that this entitlement is needed where competing demands of equality for children with disability and difficulties and other learners are evaluated comparatively (p.487).

a risk that such 'functioning' could be pre-determined by authorities or social trends, in such case, although there are differences of focuses on what they (potentially) can do and what they cannot do (as in utilitarianism model), consequently, the educational approach could result in similar to that of utilitarianism approach, unintentionally focusing on what they cannot do (therefore, how to fix such with additional supports).

3-3-2 Cultivation and Existential Education

Reindal (2021), sketches out the concepts of cultivation versus existential education in discussion of diversity in (special) education. She shares the critique of Pring (2012) that education is dominated by a language of performance management, and target-setting culture, leading to a language of 'depersonalization' in the school environment. Her concern is synchronized with the Pring's viewpoint that the narrow conception of successful learning (which is understood as academic success) led to a failure in respect of what it means to be and grow as a person (p.371). Standing on this critique, Reindal further develops her argument that the paradigm of cultivation which we typically recognize as educational tasks, human flourishing, learning outcomes, developing opportunities and capacities etc. is not sufficient to the quest for subjectification (the question of the 'I') (p.374). She argues that, in order to respond to self-respect and opposition to social structures, a paradigm of existence is essential, where the question of the 'I' is foregrounded, encouraging the how of human life (p.374). She considers that the significance of foregrounding the 'I' is vital regarding the issue of diversity (p.375).

> Seeing the task of education and children from an existential paradigm, foregrounding the 'I', and not viewing them as a 'thing' which a teacher/parent shall cultivate, opens up different approaches regarding the question of diversity relating to disability and interpretation of educational changes (p.375).

She tries to raise a question if the task of education should be primarily viewed as cultivation, where particular abilities and the achievement of specific functioning have been focused, often in combination with individual and medical interpretations of disability (p.375).

Her argument of existential approach as opposed to ready-made and de-personalized cultivation approach is compatible with the transformative learning approach, which is recently frequently proposed. Transformative learning is defined as "an orientation which holds that the way learners interpret and reinterpret their sense experience is central to making meaning and hence learning" (Mezirow, 1991). It is one theory of learning where a student transforms their knowledges

and views in their experiences in interactions with others. OECD Education 2030 also refers to the transformative competencies, focusing on AAR process, which is Anticipation, Action and Reflection. In this approach, reflection in learning is essential instead of passively receiving knowledges and skills as in the traditional instructive learning or cultivation by teachers in Reindal's words. Therefore, in the next subse ction, the concept of reflection in learning in relation to inclusive education is further reviewed, which is one of the core topics in this thesis, and which is the focus of Article 1.

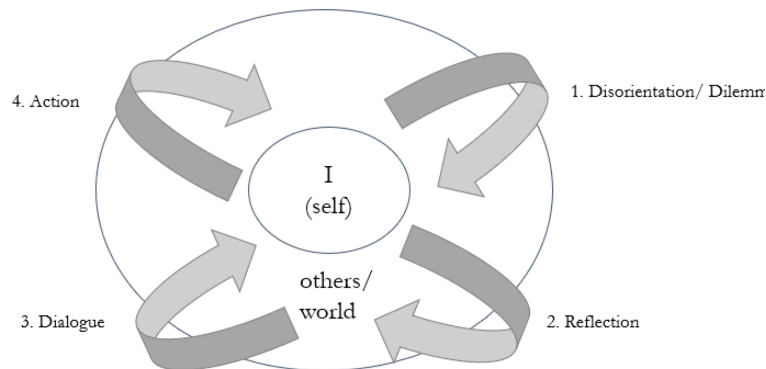
3-3-3 Transformative learning and productive struggle in learning

Murdoch et al. (2020) links the concept of inclusive education with the philosophy of transformative learning, and the concept of productive struggles in their latest essay[53]. They explain that "productive struggle" elicits students' thinking around the topic[54] that they do not yet understand, or are coming to understand, thereby getting learners to explicate their confusions, puzzlements, doubts and the like, verbally or in writing. On the other hand, "unproductive struggle" is those that either simplify the task, thereby underchallenging learners, or tell learners the right answer (p.658). They argue that all learners need to be given access to opportunities to struggle productively during learning and that learning does not merely refer to an "outcome", but rather to a process that involves "struggle" in which one engages effortfully to understand something unfamiliar. They refer to John Dewey's proposal of struggle in learning that learning involves not only "doing" (taking an action in the world) and "undergoing" (suffering the response from the world) but also, importantly, the individual's reflection on the connections between what was done and what was undergone (p.661).

The following figure conceptualizes the transformative learning and struggle in learning when one encounters unfamiliarity.

[53] They explain that the essay in particular deals with the philosophy of transformative learning of John Dewey and phenomenology (p.653).
[54] Mathematics is the topic in the case of the essay.

Figure 4: Transformative learning and struggle in learning



Source: Johnson & Olanoff (2020, p.739) adopted by the author

English (2013) also argues the importance of struggling in learning. She claims that discontinuous experiences, such as uncertainty and struggle, are essential to the learning process. She questions the common conception of learning as merely a series of positive steps toward the acquisition of knowledge (p.xxii).

> Unfortunately, current trends in educational policy tend to frame learning as merely the continuous step-by-step achievement of predefined outcomes. On such models, the student's difficulties, frustrations, or doubts are considered signs of a halt in learning process and are associated with the learner's failure. Accordingly, the student's difficulties with a particular subject matter in school are viewed by teachers and administrators as undesirable and problematic. In this way, the concept of learning has become dramatically simplified and reified (p.xxii).

She further argues the issue of the current trends on teaching.

> These current trends have serious implications for teaching. Teaching is increasingly construed as transmitting predetermined outcomes to students and then using standardized testing to verify that students have achieved these outcomes. In practice, teachers are pressured to eliminate any signs of student failure from the classroom, at the risk of losing employment or resources. The result is that students' difficulties are not perceived as meaningful for their learning process. The danger is that teachers may entirely overlook the educative value of

> difficulty and doubt, that is, of forms of discontinuity and negativity in experience and learning (p.xxii).

She criticizes that, in present-day mainstream educational discourse, “the emphasis on outcomes and results certainly implies urgency, and this urgency let learners either seek to avoid unexpected situations, or if not avoidable, seek to get back on course with little hesitation” (p.55).

She explains that for Dewey, this realm of the in-between is essential for learners in the learning process, in which the learners can find possibilities for experimenting with the new and develop new learning experience (p.56). She argues that Dewey’s proposal of reflective experience illuminates the in-between realm of learning, relating an individual’s ability to interact with the world (p.65).

> When our experience is opened up by interruption, by undergoing the world as other, such that our prior knowledge and ability is called into question, we enter into an in-between realm of experience and learning (p.65).

In reflection, learners ask themselves “Why am I confused, in doubt, or perplexed?” (English 2013, p.69). She explains that in the process of reflectively searching, one tries to establish connections between what he has done and what he has undergone- that is, between self and world (p.69). [55]

3-3-4 Reflection in learning in the West and the East

The value of reflection in learning has gained more attention in the recent global discourse, for example, as explained in the OECD Education 2030 policy. In Luxembourg, although the terms ‘reflection in learning’ or ‘productive struggles’ were not explicitly used, Siry and Kremer (2011), in their study on science education in Luxembourg, also emphasize the importance of children’s participation and conversations in and around science investigations (p.643). They argue that ‘science is socially and culturally enacted’ (p.643), and ‘learning is a social act’ (p.644). They conceive of science as emergent from young children’s interactions, and young children’s

[55] As reviewed, there have been discussions of the importance of reflective experiences, especially in struggle encountering something different, in learning process. Nevertheless, Murdoch et al. (2020) warn that such struggle can also overwhelm a person who is not prepared for or accustomed to feelings of uncertainty and resistance (p.663). They explain the risk of learning through productive struggles. Feeling of resistance could develop in two ways; one is that the learner may feel resistance in confronting something new that he or she does not yet understand, and another is that the learner may feel resistance in confronting oneself, questioning one’s own identity (p. 665).

understanding develop from a complex interaction between their everyday experiences in the world (p.644).

Nevertheless, the educational thought of importance of reflection in learning in interaction with others has been discussed both in the West and the East since long time. In this sub-section, to illustrates the interesting differences based on social and cultural contexts, the ideas of the Humboldtian Bildung and of the Kyoto School are compared (see Article 1 for more details).

Wilhelm von Humboldt's neo-humanistic Bildung placed the great importance on self-cultivation in human development through reflective experiences. In contract to the earlier educational reformers, Humboldt thought education should provide not only the knowledge and skills targeting specific purposes, but more importantly should provide the individuals the opportunity to cultivate their unique abilities (Sorkin 1983, p.63). Although the concept of Bildung (which is relevant for Luxembourgish education) are translated into various ways, Koller (2011) explains that "for Humboldt, Bildung is not *training* in the sense of preparing for certain purposes which are set from the outside, but, rather the most comprehensive and balanced development of human talents" (p.376). Humboldt argued the importance of alienation (or isolation) and freedom in the process of self-cultivation. Alienation or isolation is not meat in the sense that one should be isolated from others in learning, rather, one should link the self and the world, nevertheless, one should not lose him/herself and reflect (from the world) into inner being ((Løvlie & Standish, 2002, p. 318).

The Kyoto School's educational philosophy (represented by Kitaro Nishida) synthesizes such idea of self-cultivation in the process of reflection in relation with others. According to the Kyoto School, education is not necessarily about training to acquire skills, as the Latin *eduationem* might indicate, nor it is merely socialization of child, or a maturing of the immature, or the expanding continuity of experiences (Sevilla 2016, p.642). Nishida put emphasis on awakening the drive which lies dormant in the depths of the heart of each student (Jacinto 2016, p.187). However, rooted in the Zen Buddhism thought, the school proposed the ultimate status of human development to be toward nothingness, i.e., human development is considered to start from ego-self (mind) to non-self (casting-off), and finally to true-self (no-mind or formless self) (Sevilla 2016, p.646).

In contrast to the Western idea (e.g. Humboldt's Bildung) which considers that the purpose of human activity is to improve oneself and add value for self-essence (affirmative), where I (subject) and World (object) are conceptualized as if they are binary opponents, the Eastern

(Nishida's) thought position I within the World, therefore, the ultimate goal should be negation of self or I and World to be unified.

How can we analyze (potential and risk of) inclusive education from the viewpoint of these ideas? How can reflection in learning be beneficial and dangerous to inclusive education? These questions are further discussed in Chapter 6.

3-4 Sociological analytical frameworks

3-4-1 Powerful influence of world society and isomorphism of educational system

When we compare things, one tends to ask "So, what are the differences?". This is especially true when we compare something which we believe very different (contrasting cases), for example, educational systems in Luxembourg and Japan as discussed in this thesis. However, as already pointed out in prior studies, the global influence, including but not limited to those policies and discourses by the supra-governmental organizations such as UNESCO or OECD, has huge impact on national or local policies.

Meyer (2000) explains that globalization has a number of dimensions, among which, we see "the expanded flow of instrumental culture around the world" (p.233). He continues "Put simply, common models of social order become authoritative in many different social settings." (p.234). Specifically on education, he explains as below.

> Education, linking both ideologies of human rights and of social progress, has been highly scripted with enormous impact on educational expansions around the world. Educational curricula show the same scripted and standardized qualities, both at the mass and at the elite levels (p.234-235).

Ramirez (2006) also mentions the educational expansion or massification of schooling, of standardization of educational goals, organization, curricula, pedagogy, of a rise of educational expertise "without borders" (p.125). He argues "As nation-states seek to enact a world-validated 'imagined community' pursuing standardized progress and justice goals much national and educational isomorphism ensues" (p.125).

The perspectives on globalization on education is also argued by Rizvi (2009). He explains as below.

> …the values that national systems of education now promote through policy are no longer determined wholly by policy actors within the nation-states but are forged through a range of complex processes that occur in transnational and global networked space.
>
> International organizations such as the World Bank and the OECD have now become major policy players, determined to influence national education policies and their evaluation (p.22).

Baker (2014) also explains the powerful (global) influence. He calls the cultural phenomenon of expansion of education as "education revolution". In the education revolution, he argues, there are two distinct characteristics: mass-schooling (where people believe that formal education is the best way to develop all humans and capacities) and creation of extensive and robust culture of education (p.2). These relates to his concept of 'schooled society', where people believe that "education is human actualization, educational development of individuals is a central source of the collective good, academically instilled higher-order thinking is the superior human capacity" etc. (p.280). Further, such educational institutionalization reinforced the beliefs that "education is a human right" and "cognitive ability is the supreme skills" (p.280).

The policies and discourses of special education and inclusive education are not the exceptions. While there are differences in implementation in contexts of local national systems (which is explained more in the following subsection on Neo-institutionalism), one cannot ignore the powerful influence of global policies and discourses, or, of course, even stronger binding international treaties. As I reviewed in the Article 2, the two countries have actually experienced very similar path on special education and inclusive education, i.e., from segregation, separation, integration toward inclusion, at least in the policy level. This is, undoubtedly, the influence of the global ideology, discourse and international pressures, for example, considering the fact that both countries signed the UNCRPD at similar timings.

3-4-2 Neo-Institutionalism: Historical Institutionalism and Sociological Institutionalism

Although, as discussed, the influence of world society has become more and more significant in the various policy making including educational policy, we cannot ignore the historical and social contexts of local country in analyzing the changes and persistence of educational systems. For the special education and inclusive education, we have to understand how these have been historically *institutionalized* in the societies. Institution, in this sense, is not the synonym of organization. Neither it does not refer to the institutionalization (or hospitalization) of people with disabilities. Peters (2012) explains that institutions are structural features of society. March and Olesen (1998) explains

that "an institution is a collection of norms, rules, understandings, and perhaps most importantly routines" (cited by Peters 2012, p.28). Peters (2012) further explains that the institutions have stability over time, which affect individual behaviors, and which provide some sense of shared value and meaning among the members of the institution (p.18).

Hall and Taylor (1996) explain that the term 'new institutionalism' appears with growing frequency, however there is considerable confusions what it is (p.5). They explain that it does not constitute a unified body of thought, rather it provides mainly three different analytical lenses: historical institutionalism, rational choice institutionalism, and sociological institutionalism (p.5)[56].

Historical institutionalism takes the assumption of conflict among groups in the institution, which cause inequalities. They explain that "institutional organization…structures conflict so as to privilege some interests while demobilizing others" (p.6). Historical institutionalists define institutions as "the formal or informal procedures, routines, norms and conventions embedded in the organizational structure of the polity" (p.6). They "emphasize the asymmetries of power associated with the operation and development of institutions", and they tend to emphasize "path dependence and unintended consequences" (p.7). The institutions affect individual in the way that individuals "seek to maximize the attainment of a set of goals given by a specific preference function" (calculus approach), or although not fully strategically chosen by individuals, institutions create culture where individuals "turn to established routines or familiar patterns of behavior to attain their purposes" (culture approach) (p.7-8). While acknowledging that institutions are not the only causal forces for polity or policy making, the view of historical institutionalism suggests the importance of historical path and persistency in institutions in analyzing social systems.

Sociological institutionalism "arose primarily within the subfield of organizational theory" (p.13). Instead of relying on a formal means-ends 'rationality' of organizations for explanation of their policy making, sociological institutionalism take into consideration of 'culturally specific practices and the transmission of cultural practices (p.14). In analyzing a field of organizations, questioning why organizations take on specific sets of institutional forms, procedures or symbols, the view emphasizes how such practices are diffused in the culture of the field. Instead of the rational choice of individuals or organizations, the sociological institutionalism sees individuals or organizations to seek and express their identity in socially appropriate ways (p.16). In other words,

[56] They explain that all of the three approaches have been developed in reaction to the behavioral perspectives that were influential during the 1960s and 1970s and all seek to elucidate the role that institutions play in the determination of social and political outcomes (p.5).

in this view, the question of 'legitimacy' or 'social appropriateness' is the key for the institutional arrangements.

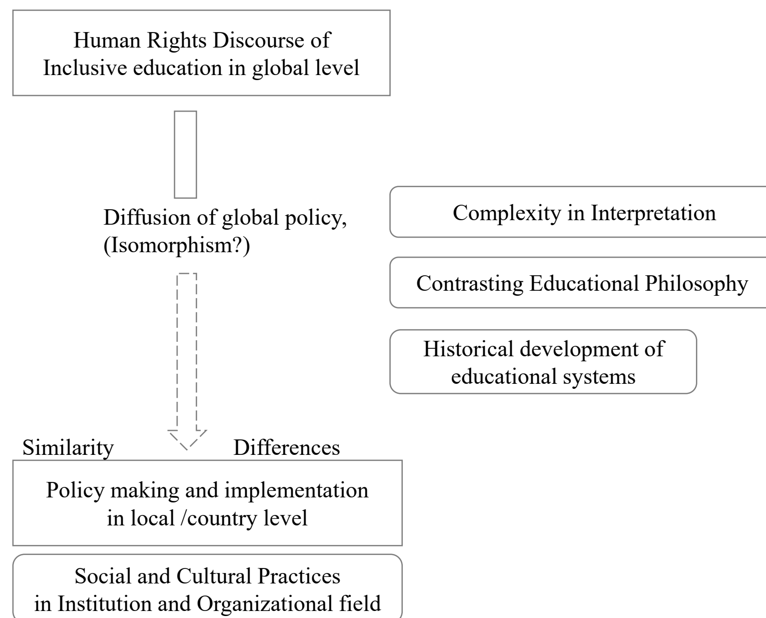
In consideration of these historical and sociological institutionalism, how can we analyze inclusive education systems in local countries? The thesis, in the Article 2 and Article 3, review the historical path of development of education systems in the two countries, and analyze what are the underlying historical and social or cultural practices which cause some persistence in their policy reforms, which has (re) constructed 'their' inclusive education systems. Combining the world policy diffusion (although this process is also not straight forward due to the complexity of interpretation of inclusive education) together with historical and sociological institutionalism makes visible of the complexity of the issue of inclusive education and why the concept of inclusive education (in different interpretations) has been entangled.

3-5 Summary: Inter-relationship of theories and concepts

This thesis offers the multi-disciplinary analysis of education systems, combining educational philosophies relating to education and the systematic analysis based on the historical and sociological institutionalism. This inter-disciplinary approach is unique, however, somehow not easily understandable at the first glance, how they are inter-related. Therefore, in this subsection, I summarize how I see those theories and concepts inter-related in the analysis in this thesis.

As reviewed in this chapter, it has been mostly acknowledged that inclusive education is about human rights and democratic society. However, the is that there have been different interests and various dilemmas in understanding human rights (how to implement and achieve). Due to these dilemmas, there have been different perceptions and interpretations of inclusive education and how to develop the inclusive education systems based on different (sometimes conflicting) underlying educational goals. While there have been various focuses in the global level, when the global policies are transferred to the local (country) level, the issue of inclusive education become even more complex, due to the historical institutionalization of educational systems and social and cultural practices. The following figure illustrates the multi-relationship this study analyzes.

Figure 5: Summary of inter-relationship among theories and concepts



Source: author

In comparison, the thesis reveals the similarities and differences in the development of inclusive education in the two countries, based on the different interpretations, underlying educational philosophy, historical path as well as social and cultural practices. In Chapter 6: Discussion, the thesis summarizes and discusses a potential explanation of the situation of inclusive education based on these theories and concepts as the analytical frameworks.

Chapter 4: Research Questions and Research Design

4-1 Research Questions

The issue of inclusive education is complex, and prior studies have been conducted in different levels and from the different understanding of inclusive education. The motivation of this study is to deal with the puzzles as below.

- What are the different models of inclusive education developed?
- How have inclusive (music) education systems implemented in Luxembourg and in Japan?
- Why is it difficult to make changes?

For the analysis of these rather bigger questions, the study focuses on the angles of (i) interpretation, (ii) underlying educational philosophy and goals, and (iii) existing institutionalization of special and inclusive education which leads persistency. The study compares the two contrasting countries of Luxembourg and Japan as the case study.

(1) How have the two countries interpreted inclusive education?

Both countries have signed the UNCRPD[57], since when the countries have endeavored to implement inclusive education with domestic reforms in laws and regulations as well as educational policies. The study (Article 2) reviews how inclusive education has been understood in the two countries, with the document reviews of official documents, prior studies and curriculum documents. Further, the study, referring to the typology of Göransson and Nilholm (2014), clarify their perceptions of inclusive education.

(2) What could be the explanation of understanding and implementation of inclusive education in the two countries in light of the underlying educational philosophy?

The study (Article 1) reviews the similar but different educational philosophy in the West (Humboldtian Bildung) and the East (the Kyoto School's thought). Although these are not the sole representatives of educational philosophies in the west and the east, the comparison of these

[57] Luxembourg signed the UNCRPD in 2007 and ratified in 2011, while Japan signed the UNCRPD in 2007 and ratified in 2014.

philosophies highlights the social and cultural differences in the goals of the reflection in learning with others. Considering the results of the Article 2 and Article 3 (i.e., how inclusive education has been implemented in the two countries), In Chapter 6, I discuss further how different implementation of inclusive education could be explained by the different educational philosophies and goals, sometimes contrasting or contradicting.

(3) How has the existing institutionalization influence on reforms/ preservation toward/against inclusive education in the two countries?

With the historical and social institutionalism as the analytical framework, the study reviews the historical development of special education and inclusive education (Article 2), as well as music education (Article 3), to analyze the current system. The study refers to the laws and regulations as well as official policy documents and statistics published. In Article 3, the organizational fields of music education in the two countries have been also reviewed for the analysis of potential and obstacles of inclusive educational system for music education.

The following table summarizes the research questions and sub-questions in each Article.

Table 2: Summary of research questions and sub-questions

Puzzles		Research Questions	Sub-questions
Why, even after nearly 30 years of Salamanca Statement, are we still struggling to develop inclusive education?	(1) Is the implementation of inclusive education difficult and different in/within various countries because there are (conflicting) underlying educational philosophies?	What is the contrasting (educational) philosophy underlying or justifying current inclusive education system?	How different interpretations of inclusive education could be understood in line with different educational philosophies which underly or justify such interpretation? (Article 1)
			What is the implication of transformative learning approach to inclusive education? What is the implication of reflection in learning to inclusive education? (Chapter 6)
	(2) Is the implementation of inclusive education	How have different policies of inclusive education developed in	How have Luxembourg and Japan reacted to the global model(s) of inclusive education?

	difficult and different in/within various countries because the historical and social contexts based on (conflicting) societal values and different?	the historical and social contexts in country level?	(Article 2)
			What kind of organization(s) relating to inclusive education have Luxembourg and Japan developed? (Article 2)
			Have Luxembourg and Japan developed inclusive education, if yes, in which sense and to what extent? (Article 2)
		How (inclusive) has music education been developed in the historical and social contexts in country level?	How have music education systems historically developed in Luxembourg and Japan? What are the characteristics of music education in the two countries? (Article 3)
			What kind of music education organizations have been developed in the two countries? (Article 3)
			What are the interpretations of inclusive education in the music education systems in the two countries? (Article 3)
			What could be the problems and potentials for inclusion in music education in the two countries? (Article 3)

Source: author

4-2 Research Design

4-2-1 Philosophical world view

Creswell (2009) states that research can be conducted from different standpoint (in other words, philosophical world views), which is the key standing point to explain and show the stance of the researcher. He classified four types of worldviews (Creswell 2009, p.6): Post-positivism, Constructivism, Advocacy/Participatory, and Pragmatism world views. The below is the summary of the characters of each type.

Table 3: Creswell's classification of the world views

Post-positivism	Constructivism
Determination Reductionism Empirical observation and measurement Theory verification	Understanding Multiple participant meanings Social and historical construction Theory generation
Advocacy/Participatory	**Pragmatism**
Political Empowerment Issue-oriented Collaborative Change-oriented	Consequences of actions Problem-centered Pluralistic Real-world proactive oriented

Source: Creswell 2009, p.6

This thesis stands in the constructivism and advocacy world view. While post-positivism world view assumes that there are laws or theories that govern the world and these need to be tested or verified, as often leads the qualitative research approach, my study does not intend to test or verify specific idea(l). Rather, my interest exists in reviewing and analyzing how have the two countries developed 'their' inclusive education systems in what kind of perceptions. It focuses on the social and historical (re)construction of special education and inclusive education in the contexts of the two countries, assuming multiple meanings of inclusive education. Although it is not intended to generate any specific theories, the thesis will suggest further implication toward how we can

understand inclusive education (Chapter 6). The finding of the thesis would contribute to further discussion in policy making.

4-2-2 Level of analysis

This thesis focuses on the analysis of global level of discourse of inclusive education and its influence on and implementation in the local country (national) level. The analysis of inclusive education system can be conducted in different levels as reviewed in the previous section. For the analysis of the educational systems, Bray and Thomas (1995) offered the useful framework to define the level of analysis. This thesis mainly refers to the Level 1 and Level 2 (geographic/location level)[58] and policy reform in special education and inclusive education (aspect of education and society). While some research on special education and inclusive education target specific groups such as students with disabilities, ethnic minorities, gender group etc., this thesis intentionally does not focus on categorized groups, with the position that inclusive education is not only for certain groups but for all students with different characters (and everyone is different).

4-2-3 Research Methods and Data collections

4-2-3-1 Multiple Qualitative methods

This thesis (with the three articles) is conducted with qualitative approach. Qualitative approach assumes that reality is socially constructed, and constantly changing in contexts and perceptions, while quantitative approach often regards a social reality as object fact (Bryman 2004). Taking the qualitative approach, the thesis prepared the open-ended questions as explained in the previous subsections. To answer the questions, the methods of document reviews (laws, regulations, policy document as well as curriculum documents), interviews and small participatory observation were conducted, as explained more in detail in the latter subsection.

[58] Interviews with teachers and participatory school observation were conducted, mainly to supplement the findings of the organizational field of music education in the countries and the national policy (curriculum), with which the author found the loose coupling of the national level policy and the implementation.

4-2-3-2 Comparative method

Comparison, as the strategy of research, has been very frequently chosen, but 'methodologically fragmented and pluralistic' (see Cummings, 1999, p.413). There have been different reasons why and how a research compare phenomenon. Sartori (1994) explains the reasons of comparative study as (i) to control (verify/falsify), (ii) to understand, and (iii) to learn from other's experience and so on (p.15-16). For this thesis, there are mainly two different reasons to compare. Firstly, it analyses how and to what degree has/have international norm(s) of inclusive education been spread to local countries (i.e., verification purpose plus understanding purpose). Secondly, it reviews the similar and different (unique) characters of the perceptions and policy making of inclusive education in the two countries (i.e., understanding purpose)[59].

Cummings (1999) explains that the initial softer field approach of comparative research (respecting differences in the practice of education in different settings) began to decline in the 1960s in social and policy sciences such as economics, sociology, political science, and even anthropology, instead, harder social science with scientific methodology of variables and measurement characteristics has increased, and many researchers decided to do more focused work in more limited settings (p.416). However, I believe both softer and harder approach bring comparative research more meaningful. Bartlett & Vavrus (2017) explains the importance of *heuristic* (a Greek word that means 'to discover') comparative case study approach (p.6). They consider the comparative case study as the process of discovery or problem solving (p.6). Takayama (2018) explains other perspectives on comparative research from the different tendencies in the (dominant and paradigmatic) west and the east. He remarks that comparative education in Japan situates very often in the area-studies, with the primary focus on the description of unique features of a given area, rather than the discovery of 'universal' laws and theories (p.82). Since comparative research could contribute to diverse directions, I believe approach and focus should not be standardized but open. In this thesis, I choose comparative approach to discover similarities and differences as well as their contextual backgrounds with the two unique countries.

Next, why does the thesis compare Luxembourg and Japan, the countries to be considered very different (for example, in terms of size, population, geographical location, languages, homogeneous/heterogeneous, the western/eastern culture etc.)? Are they comparable? There could be several explanations for this. Firstly, it makes perfect sense to compare such different countries to examine the global influence onto local countries. Both countries signed UNCRPD at

[59] It should be noted that the complexities of comparison exist due to the different interpretations of inclusive education 'within' international discourse as well as 'within' each country, in this sense, the thesis also analyses within-case comparison.

the similar timings, and it is interesting to find out if, even with such differences, the countries have experienced similar trajectory and dilemmas toward inclusive education in the dialogue with the global norm. Secondly, these are the good cases to compare the cultural differences (especially traditions of educational philosophy), which could explain different understanding or implementation of inclusive education. Thirdly, both countries are considered to be highly developed wealthy countries, which are the members of OECD, still stays in the persistent system of dual or parallel system of mainstream and segregation/separation for students with special needs, which may not be economically efficient. It is aimed to analyze why such systems remain in the two countries. Finally, this is the unique comparison of the two countries which fulfills the research gap and the study, therefore, is innovative.

As Michael Sadler explains that the practical value of studying the foreign systems of education is that it will result in better understanding of our own (referred by Philipps 2014). The contrasting case comparison can be the reflective experience to understand own educational systems and why it has been (re)constructed in that way (among other options).

4-2-3-3 Data collection

For this qualitative research, mainly three types of data are used.

(1) Documents

While Article 1 mostly uses the original archives and prior studies in relation to the educational philosophies, Article 2 and Article 3 mostly use the publicly available documents, including the relevant laws and regulations, policy and curriculum documents. The below table is the list of relevant main documents.

Table 4: Relevant laws, regulations and curriculum document in Luxembourg and Japan

	Luxembourg	Japan
Special Education, Inclusive Education	▪ Law of 1994 (Integration law) ▪ Law of 2009 (Inclusion Law)	▪ 2006 Act for school education ▪ 2011 Basic Act for Disabled people ▪ 2013 Act to prevent discrimination of disabled people

	▪ Law of July 20 2018, on the competence centers (including the drafts)	▪ Reports by Ministry of Education, Culture and Sports, Science and Technology of Japan regarding special education and inclusive education
Music Education	▪ Law of April 28 1998, on harmonization of music education in municipal sector ▪ Law of May 27 2022, on reform of music education and relating policy documents ▪ Plan d'etudes ecole foundamental issued by Ministry of education of Luxembourg based on the reglement grand-ducal (11 August 2011) ▪ L'enseignement fondamental Descriptif détaillé issued by Ministry of education of Luxembourg ▪ Official explanation of the aim and program of Conservatoire	▪ National course of study for music education at schools issued by Ministry of Education, Culture and Sports, Science and Technology of Japan

Source: author

The documents in the lists are not exclusive, the study also covered the media reports and a media conference relating to the policies in the two countries. In addition to the national documents, the thesis also reviewed the international treaties and statements, reports by the UN and European agencies evaluating the situation in the two countries.

(2) Interviews

For Article 3, the study conducted the interviews with teachers in public schools and public music schools. Also, a questionnaire was sent to Inclusive education promotion section of

education committee of a prefecture in Kanto area in Japan. The below table shows the list of the interviewees.

Table 5: List of interviewees

	Code	Organization type
Luxembourg		
1	LPS1	Public primary school actively promoting the inclusive education
2	LPMS1	Public music school, Head office locates in Luxembourg city, but with local music schools all over the country
3	LPMS2	Public music school in the north of Luxembourg
4	LPC	Public Conservatoire
5	LPMS/NGO	Public music school in the south of Luxembourg, the music teacher is actively supporting activities with NGOs as well
Japan		
6	JPS1	Public primary school in Metropolitan Tokyo
7	JPS/ NGO	The university professor who was formerly the public primary school teacher as well as teacher at a public special school for students with disabilities
8	Inclusive education promotion section of education committee of a prefecture in Kanto area in Japan	

Source: author

The interviewees were selected based on the purposive sampling from different educational organizations relating to music education. Some interviewees were added based on the snow-ball sampling, which was helpful to understand the connections of different institutions, although it acknowledges that result based on snow-ball sampling might not be generalized. The interviews were conducted in 2018, due to the restriction of the Covid, the study used the relatively older data, however, the study added the latest updates on the reform of music education for which I had a chance to do an informal interview with a teacher at the conservatoire in 2022. Due to the locational restriction, the interview with the teacher in Japan was conducted remotely, and the questionnaires were distributed to supplement. The interviews in Luxembourg were conducted face to face.

The semi-structured interviews were conducted with the guiding questions. The below table shows the sample guiding questions.

Table 6: Sample guiding questions

- About the organization (goal, background of establishment, funding, membership etc.)
- Activity of the organization (in general and for music education)
- Unique characteristics of the organization
- Core value and attitudes toward inclusion (What does inclusion mean?)
- How can music education be inclusive?
- How music can be used as a tool for inclusion?
- Difficulties in implementation of inclusive education?

Source: author

The interviews were guided by these questions, although the study tried to encourage free-style conversation during the interviews, so that the interviewees can present even unexpected outcomes.

For the analysis, the recorded interview data was coded in accordance with the categories and subcategories listed in the below table.

Table 7: Categories and Subcategories for coding interview data

Category	**Sub-category**
1.Oranization	1.1 Mission/Core Value
	1.2 Backgrounds/ History
	1.3 Funding
	1.4 Membership
	1.5 Number of Students/Teachers
	1.6 Activities
2. Inclusion (in general)	2.1 meaning of inclusion (inclusion of whom?)
	2.2 Mission / Strategy
	2.3 Activities
3. Music for inclusion	3.1 Activities/ program for promotion of inclusion
	3.2 Challenges

	3.3 Collaboration with other organization
	3.4 Future plan / suggestions

Source: author

(3) Observation

In addition to the interviews with teachers, the participatory observation was conducted in LPS1 (inclusive model school) in Luxembourg. The author was allowed to observe the music workshop held at the school, where around 15 students with different ages formed the groups of 3 or 4 and experienced music making (combining different sounds of instruments), using iPad. Due to the unfortunate circumstances of Covid pandemic, I have not been able to do as much field works as expected. However, I have lived and worked in both of the countries, I have been involved especially recently in the field of (non-formal or informal) music education. All my experiences in the two countries influence and motivate this study, which enabled this unique comparative study to be conducted.

4-3 Summary and Limitation

In this section, research questions and research design are explained. Under the constructivist and advocacy world view, the thesis does not intend to explore absolute (sole) model of inclusive education, neither tries to reveal the best practice of inclusive education. The thesis, instead, reviews the developments of special education and inclusive education in the two contrasting countries to verify how strong the global influence is, at the same time, how similar and different the implementation of inclusive education has been in the two countries based on the historical, social, and cultural contexts. The study acknowledges that the findings cannot be generalized, which is not the aim of this thesis. Nevertheless, I believe that the findings in this thesis can be inspiring, offering discussion frameworks for the comprehensive inclusive education system reform, as explained later in Chapter 6.

Chapter 5: Articles

This chapter shows the three articles for this doctoral thesis.

Article 1

Comparison of Self-reflection in *Humboldtian* Bildung and the Kyoto School: Educational implications in light of OECD frameworks

Miwa Chiba

PhD Candidate, University of Luxembourg

Abstract

This article focuses on the importance of reflective experiences in education. It firstly reviews and compares the Humboldtian *Bildung* and the Kyoto School, represented by Nishida Kitaro. Both philosophies emphasize the importance of reflective experiences in education, criticising the specific knowledge-skill-based instruction approach. In this sense, the two views are similar. However, this article further explains the significant difference in how *self* is considered in relation to *world* within each thought, and therefore, how each educational approach is different, namely as seen in the idea of *negative education* from the Kyoto School. In the latter section, this article develops the discussion of reflection in the process of learning provided in the OECD Education 2030 framework, which was initiated in 2015 and that is still ongoing. Criticising didactic learning as the sole approach for knowledge and skill acquisition, the OECD Education framework advocates instead for the importance of student self-reflection in relation to society to support a broader development of necessary competencies. By comparing the two schools of thought, the article reveals the underlying assumption of *self* in Western mainstream educational philosophy, and it argues for the importance of open-mindedness toward the other worldview.

Keywords: Self-reflection; Humboldtian (neo-humanistic) *Bildung*; the Kyoto School; negative education, OECD Education 2030

Introduction

The importance of reflective experiences in education has been discussed across human history and has been of central interest to scholars and educators around the world. In this article, the ideas of the Humboldtian *Bildung* and the Kyoto School (represented by Nishida Kitaro) are reviewed comparatively, based on which the article further considers the implication of those ideas to the current discussion of reflection in the process of learning in the OECD Education 2030 framework.

The reason why the two ideas in the West and the East are reviewed and compared is that while both focus on the importance of reflective experiences in education, the position of *self* is different within each idea, and the ultimate goal of the reflective experiences is different as a result of varying cultural contexts. As Phillips and Schweisfurth (2014) referring to Michael Sadler argue, comparative study helps achieve a better understanding of ourselves (p. 15). Through the comparative lens, the unique characteristics of each school of thought are better understood. Furthermore, looking into the OECD 2030 educational framework in light of these approaches regarding reflection helps to reveal the underlying assumptions of the OECD 2030 educational framework.

The Humboldtian (neo-humanistic) Bildung

Background

Wilhelm Von Humboldt (1767-1835) is widely regarded as the most representative philosopher of neo-humanistic *Bildung*, having made a crucial contribution to the development and canonization of the German conception of self-formation or self-cultivation (Sorkin, 1983, p. 55).

At the time when the neo-humanist interpretation of *Bildung* emerged, Prussian society was in flux after the defeat in the war against Napoleon in 1806. Before the educational reform of Humboldt, the Prussian educational system was based on the idea of Utilitarianism linked to professional skills and knowledge considered to be useful in society. This was in the movement of the German enlightenment,[60] as seen in the thought of educational reformers such as J. B. Basedow (1724-1790), who insisted that education should encourage the development of useful

[60] Humboldt's childhood tutors introduced him to the *Aufklarung*, and the tutors who prepared him for university studies were eminent representatives of the last wave of the Berlin Enlightenment (see Sorkin 1983, p. 57).

abilities (rather than searching for truth), or J. H. Campe (1746-1818), who argued that education should teach students knowledge and skills to prepare for their future professions (Okawa, 2005, p. 40). Campe proposed to close the Universität, and instead to establish *Spezialfachschule* (a professional school directly linked to future professions), and the government widely accepted this idea. As a result, not only in Prussia but in all of Germany, schools that specialized in certain professions such as agriculture, mining, medicine, craft, etc. were established, and from 1794, comprehensive universities began to decline and even cease activity (Okawa, 2005, p. 41). However, facing the uncertainty of its very existence after the war, Prussia needed to conduct large reforms to rebuild the country. Humboldt was placed in charge of educational reform in Prussia, which brought a paradigm shift in education.

Core Concepts of Humboldtian *Bildung*

Humboldt's philosophy placed great importance on self-cultivation in human development. For Humboldt, education is not something given by somebody, but something a person participates in of their own volition. According to Humboldt, *Bildung* is understood as harmonic growth and development, the unfolding of all inner forces and potentials of the human being (Danner, 1994, p. 8).

In contrast to earlier educational reformers, Humboldt thought education should provide not only the knowledge and skills targeting specific purposes, but more importantly should provide the individuals the opportunity to cultivate their unique abilities with increasing freedom in moving up the educational ladder (Sorkin, 1983, p. 63). Koller (2011) explains that "for Humboldt, *Bildung* is not *training* in the sense of preparing for certain purposes which are set from the outside, but, rather, the most comprehensive and at the same time most balanced development of human talents" (p. 376). In Humboldt's opinion, the schools were divided into two units, elementary school where students learned basic skills, and high school where students are taught to be intellectually independent. The curriculum aimed to show students both how to learn as well as to learn specific material. In his opinion, a student was considered mature when "he had learned enough from others to be able to learn by himself" (*Gesammelete Schriften*, referenced in Sorkin, 1983, p. 63). Humboldt explained, "Based on mathematics, classical languages and history, the curriculum's goal was to provide a general education (*allgemeine Menschenbildung*) which would respect the individual development of each student. Only after such a general education would students proceed to specialized training."[61]

[61] *Gesammelete Schriften* (referenced in Sorkin, 1983, p. 63)

In his opinion, all the schools established by the government for the public should aim at universalism in education with self-cultivation as its sole purpose, whereas the knowledge and skills necessary for living or individual professions should be taught after finishing such general education. Those two aims of education, i.e., universal education (*allgemeine bildung*) and skill/professional based education (*specielle bildung*), in his opinion, should not be mixed, otherwise, both would become incomplete (Okawa, 2005, p. 47). Humboldt argued that universal education strengthens the individual human him/herself, and professional education without universal education would only enable humans to learn skills for simple use without understanding any deeper reasons.[62]

In the process of self-cultivation, two fundamental concepts for Humboldt were *alienation/isolation* and *freedom*. *Alienation* or *isolation* is not meant in the sense that one should be isolated from others during learning. Rather, for Humboldt, "*Bildung* is about linking the self to the world…and the student should not lose himself in the alienation (from the world) but rather should reflect back into his inner being" (Løvlie & Standish, 2002, p. 318). Humboldt explained in *The Limit of State Action* that one develops through the voluntary interchange of one's individuality with that of others. Self-formation, in other words, requires social bonds. However, as discussed, he regarded *Bildung* as the initiative coming from one's own inner forces, and he regarded the importance of one's own reflection and understanding through the interaction with others in society.

One of Humboldt's essential arguments in *Bildung* is the freedom of the individual[63]. For him, this freedom entails limitations to State intervention in education. Specifically, he argued:

> the State must wholly refrain from every attempt to operate directly or indirectly on the morals and character of the nation… Everything calculated to promote such a design, and particularly all special supervision of education, religion, sumptuary laws etc., lies wholly outside the limits of its legitimate activity (Limit of State Action, 1852, p. 65).

Humboldt argued that education should serve the person, not the citizen,[64] and an egalitarian system should be created which suits the person rather than the citizens, by providing an

[62] "Understanding, acquisition of knowledges…should not be from outside condition, but it should be from inside of the students" according to Humboldt (Okawa, 2005, p. 48).

[63] Östling, J., Josephson, P., & Karlsohn,(2014) explain the core idea of Humboldt in relation to university education that "knowledge is a collective and joint concern, and one that should take place at a certain distance from society", referring to Humboldt's idea of "isolation and freedom (Einsamkeit unt Freiheit) " (p. 2).

[64] His contrast between citizen and human is influenced by the idea of Moses Mendelssohn (1729-1786), according to Naka (1989, p. 15-16).

education in an atmosphere of freedom (Sorkin, 1983, p. 63).

With this brief review of the Humboldtian perspective on *Bildung* as a background, it is now possible to consider how this common European view differs in important ways from the most notable alternative view to emerge from Japan in recent centuries, that of the Kyoto School's educational philosophy.

The Kyoto School of Educational Philosophy

Background

The Kyoto School (*Kyōto-gakuha*) is the Japanese philosophical movement centred at Kyoto University that assimilated Western philosophy and religious ideas and used them to reformulate religious and moral insights unique to East Asian cultural tradition in the twentieth century.[65]

The term "Kyoto School" was first used in the article by Tosaka Jun in 1932.[66] The Kyoto School had been developed in mutual criticism among the philosophers in the school, therefore, it is difficult to find clear borders to establish the school. According to Fujita (2009), referring to the article by John C. Maraldo (2005), there are six characteristics to confirm the scope of the Kyoto School: (i) connection with Nishida, (ii) relationship with Kyoto University, (iii) relationship with Japanese/East Asian intellectual tradition, (iv) relationship with political thoughts, nation-state, and the problem of war at that time, (v) relationship with Buddhist tradition, (vi) Evaluation of absolute nothingness.

The school's first generation included distinguished philosophers such as Nishida Kitaro (1870-1945), Tanabe Hajime (1885-1962) and Nishitani Kenji (1900-1990). During the era of this first generation of the Kyoto School philosophers, Japan was in the middle of its efforts to modernize the country. People were trying to import Western thought and find ways to incorporate it into the culture and practices of Japan. In this context, it is not surprising that the Kyoto School philosophers, as represented by Nishida, tried to mix Western thought and Japanese traditions.

Nishida Kitaro started his career as a teacher, and then became a professor of philosophy

---

[65] http://www.kyoto-u.ac.jp/ja/about/public/issue/research_activities/documents/2013/vol3no3/RA2013-3-4.pdf

[66] Tosaka did not use this term to positively evaluate Nishida's or Tanabe's philosophy which he thought was rather abstract. Fujita concludes that the Kyoto School is not a philosophical school where the philosophers started to establish a particular thesis, but a group that naturally developed at the time when Japanese philosophy started to become independent in accepting Western philosophy (Fujita, 2009, p. 36).

at Kyoto University.[67] Since a young age, he had practiced *Zen* Buddhism with his best friend, Suzuki Daisetsu, who later became a renowned *Zen* Buddhist scholar. Naturally, Nishida's ideas are based on the ideas of *Zen* Buddhism, which he mixed with Western philosophy in his thinking.

Core Concepts of Kyoto School Educational Philosophy

Similar in some ways to the aforementioned *Bildung* concept by Humboldt, central to the Kyoto School educational thought was the concern of how best to cultivate the self. The Kyoto School developed an original perspective that stood between Western philosophy of *being* and the *Zen* Buddhism conception of *nothingness*.[68] The core educational concept of the Kyoto School, which is *investigation of self*[69], is rooted in *Zen* Buddhism, which explains that essential to the process of the self-becoming manifested is a *denial* of the self. Okamoto (2015) explains this as the process whereby one regards the self as the existence of a deep mystery without bottom (*Jiko no Muteisei*), and seeing this bottomless existence in the self and the other, then considers how self should be in mutual interaction. Here, Okamoto points out that the process is different from that of the Western view, where self-investigation assumes the existence of the self as self-evident (p. 172).

In the Kyoto School educational philosophy, the ultimate status of human development is toward nothingness, i.e., human development is considered to start from ego-self (mind) to non- self (casting-off), and finally to true-self (no-mind, or formless self) (Sevilla, 2016, p. 646). To understand this idea of ultimate non-self or true-self, it is necessary to understand Nishida's idea of *place (ba)* and the relationship of *self* and *place* which led him to the idea of *absolute nothingness (zettai mu)*. Nishida, contrary to Western philosophy, reconsidered realism from the perspective of the predicate. While Western philosophy, as represented by Aristotle, confirms existence based on the subject (i.e., the most basic component is the distinction between the subject and the predicate), Nishida reconsidered this fundamental conceptualisation and

[67] The Kyoto School is not solely focusing on philosophy of education, however, as pointed out by Sevilla (2016), looking at their thought is relevant for the discussion of educational philosophy, because they discussed human transformation not only as scholars but also as educators themselves.

[68] http://www.kyoto-u.ac.jp/ja/about/public/issue/research_activities/documents/2013/vol3no3/RA2013-3-4.pdf Also, see https://www.youtube.com/watch?v=OeOTbyy7uYE

[69] In Genjokoan by Dogen Zenji, it is explained that "learning self is forgetting self or leave from one's attachments". While self-reflection is often considered to be the conscious activity to investigate one's mind, self-investigation in Zen Buddhism is different in the sense that, through self-investigation (for example, in the practice of Zazen), one tries to let go of oneself and to be unified with its experiences or environment.

reached the view that existence can be confirmed based on the predicate. Abe (1995) explains that, while "Aristotle seeks true Reality and the formation of judgement in the direction of the grammatical subject", "Nishida was convinced that in order for the individual as the grammatical subject (Substance) to be known, there must exist that which encompasses it, the place in which it lies, and that this place must be sought in the plane of the 'transcendent predicate', not in the direction of the logical subject" (p. 168). From this perspective, he placed importance on the concept of *place (ba)*, as the basic component that reflects oneself infinitely. In his opinion, no-self includes infinite presence (Nishida, 1927). In the status of non-self, Nishida considered that subjectivity reflects everything in the mirror of *place (ba)* inside of the self as the shadow. He proposed to *see without the subjectivity to see* and *listen without the subjectivity to listen* (Yokoyama, 1981, p.95, 97). Nishida argued that we should think of the world not from outside of it, but that we, as the thinkers ourselves, are part of the world (Nishida, 1937). Nishida considered that a human being is not a closed unit (or in the Kyoto School terminology, a solid self or ego) and through letting go of the self, of the attachment to the subject, the self is able to open up to reality in its fundamentally paradoxical nature (Sevilla, 2016, p. 643).

In terms of educational aims, Nishida put emphasis on awakening the drive which lies dormant in the depths of the heart of each student (Jainto, 2016, p. 187). According to the Kyoto School, education is not necessarily about training to acquire skills, as the Latin *educationem* might indicate, nor it is merely socialisation of the child, or a maturing of the immature, or the expanding continuity of experience (Sevilla, 2016, p. 642). In this context, the School proposes the way of *negative education*. While education, especially school education, is generally seen in the light of *being*, whereby learning is an addition, a further solidification of the self, and the path of education march towards the fulfilment of the selfhood of the human being, the Kyoto School of thought focuses on a flexible self (toward true selflessness) in relation to the surroundings or outside influences without fixing the aims and goals in human developments (Sevilla, 2016, p. 645). In a recent essay by Takayama, the Kyoto School notion of *negative education* is explained as follows:

> affective experiences of discomfort, perplexity and confusion as an important catalysis for generative learning and unlearning….Learning to let go of the familiar language and frame of seeing the world and embracing disruption as a critical moment for new learning (Takayama, 2020, p. 79).

The Kyoto School educational philosophy focuses on individual self-investigation. However,

at the same time, the School (at least some of its philosophers, including Nishida) explained that the development of self should be in unification with the environment (including society or nation). This point can be seen from Nishida's speech below, from March 1940:

> In short, creation is impossible only by oneself. There must be a thought of predicate, but there is a subject and environment, and their relation is what creates. And this subject and environment correlate, as in the subject makes an environment, and the environment makes a subject, and this is how creation works… So, that is, every human being can create, and because every human being can create, human being has creativity. Furthermore, this unified world, the world which environment correlates and integrates, has a trend, a trend of era. Action toward this trend creates history and the historical world. And to participate in this creation and will to create would explain the morals of human being, in other words, a purpose of culture.[70]

This statement is a good example of how the Kyoto School understands *self* in *environment*. This uniqueness of understanding of *self* and *world* is one of the keys in comparing the goal of reflective experiences in Hunboldt's *Bildung* and in the Kyoto School, which is going to be explained in more detail in the following section.

Comparison

Knowledge and Skill-based approach vs Awakening of inner drive

As reviewed in the former section, the Humboldtian (neo-humanist) *Bildung* places importance on reflective experiences in learning for human development, focusing on the inner forces of a human being. It emphasizes the critical role of self-reflection in interaction with others in society. A rather similar idea is seen in the Kyoto School educational philosophy, as formulated by Nishida.

Both views stemmed from critical reflection on earlier educational approaches that favoured specialised knowledge acquisition. Rather than an educational approach that

[70] Nishida's speech in March 1940, broadcasted in NHK radio on April 30, 2018, in the program called "radio archives". The speeches were recorded in the year before Japan participated in the war. The recording was not published at the time, due to the different interpretations which could be supportive (or not supportive) of participation in the war. In the postwar period, it was often discussed whether Nishida or the Kyoto School supported participation in the war.

segregated students along certain pathways of specific knowledge and skill training, Humboldt argued for the importance of general education in order for students to prepare for further developments of themselves, learning how to become intellectually independent as free individuals. He emphasized that education should not be something given by somebody (i.e., coming from outside conditions), but should be initiated from within. Similarly, Nishida emphasised awakening the drive within each student. He was critical of education that only focused on the acquisition of special skills as indicated by *educationem*, stressing instead the importance of initiatives by students themselves. Here, we see the similarity of their ideas in understanding the aims of education.

I and World in reflective experiences

However, there is a difference between the thought of Humboldt's *Bildung* and the Kyoto School in terms of how they proposed the positioning of self.

Both philosophies focus on the importance of reflective experiences in education. This similarity might be understood from the viewpoint of the influence of German Idealism, particularly seen in the thought of Fichte (1762-1814). Ito (2014) explains the commonality in Humboldt and Fichte's understanding of the two concepts, *I* and *World* (p. 25). As Ito explains, for Humboldt, the purpose of human activity is to improve oneself (ability by nature) and to add value for self-essence, and for that, there is a need for materials (or objects) which Humboldt named *World (Welt)* or *not oneself (NichtMensch*), in contrast with *I (Ich*). Both Humboldt and Fichte paid attention to the relationship between *I* and *World*, in the interaction between the internal self and the external world, where one experiences reflection from the World into the internal self and then deeply reflects on oneself. In this process, one confirms who he/she is, since otherwise, absent such reflection, there is a danger of the self-becoming buried in the World.

Nishida also appreciated the ideas of Fichte. He stated, "I think Fichte created the new conceptualization of Realism with substantiation of subjective recognition."[71] Indeed, if we consider Nishida's idea of the process of self to non-self and then true-self, it is arguable that his thought was highly influenced by Fichte.

However, Nishida took a different position from Fichte in the sense that Fichte argued the concept of absolute self. In further developing his thought, Nishida explained his position as follows:

[71] Section II 13 work of Nishida Kitaro. "About philosophy of Descartes"

> Philosophy starts with the contradiction of self. Doubting itself is the issue. I think there are two ways to go from here, because of our self-contradictions. One is the direction toward affirmation of self, and the other is the direction toward negation of self. It can be said that Western culture went to the former direction, and Eastern culture has the strong point in the direction toward the latter. [72]

Therefore, in contrast with the absolute self as proposed by Fichte, Nishida reached the concept of *Absolute nothingness*. This is influenced by his familiarity with *Zen* Buddhism. In Buddhism, *non-self (Muga)* means the state of being that self is not coerced by one's own desires or judgements, or in other words, is removed from one's fixed ideas and prejudices.[73] [74] In Western culture, as Nishida saw, although the process of reflection on interaction with the World is acknowledged as important by some educational philosophers, the fundamental assumption of the process is that the being *I* exist, and *I* is to be affirmed in such reflective experiences. Komatsu and Rappleye (2020) argue "The western liberal ontology begins with the presumption of selfhood as substance, one grasped on the higher plane of reason." and "the substantive self remains the primarily educational project of Western modernity, liberal, and otherwise" (p. 22-23)

Nishida challenged the Western view based on his *Zen* Buddhist experiences, arguing that when human beings are born, the only existing thing is *Pure consciousness/Pure experience* (*Junsui Ishiki/Keiken*). Accordingly, it is assumed that at this stage that there is no distinction between subject and object (*Shukyaku Mibunri*), and only afterwards, in the process of growing up, a human being somehow misunderstands that there is subject and object in binary opposition. Moreover, how the subject sees an object is based on a limited awareness (*Gentei teki na Jikaku*), which is not absolute but changes in the relationship to *world*. Nishida's idea is that *world* creates self as a part of *world*, and neither is static. Therefore, for Nishida, what is important is that one becomes not limited, but released from a misconception of self, and the ultimate goal of humans should be a denial of self so the border between self and *world* can disappear.

Based on this, the Kyoto School proposed the importance of *negative education*. As opposed

[72] Section II 13 work of Nishida Kitaro. "About philosophy of Descartes"

[73] See, for example, Digital Daijisen (Japanese dictionary) or Encyclopaedia Nipponica by Shougakukan Inc.

[74] Nakagawa (2015) in his article of Buddhism and Holistic Education, explains that Buddhist thinkers recognise the mind's ability to create distinctions between things, but at the same time they underline that such an ability is the primary cause of our delusive perceptions, false attachments, and therefore, suffering (p. 47). He explains "when we revisit education, it is important to recognise that Buddhism provides not only moral and religious teachings to be taught at schools but also offers fundamental worldviews or frameworks, upon which a whole edifice of education can be built" (p. 46).

to positive education, where knowledge and skills are added for students' development, instead, they valued the moment of negativity in education where students experienced disruptions and uncomfortableness, allowing them to separate from their familiarities (fixed- self) toward non-self, which leads students to open their mind as unified with their environment (world).

The idea of negative education itself is not solely unique to the Kyoto School. For example, Rousseau explained a similar concept in his educational thought (as referred in his book Emile). English (2013) in her book 'Discontinuity in Learning' also explains the importance of the moment of disruption, unexpectedness, doubt which leads to discontinuity in learning. However, while these Western educational philosophies also value the importance of negativity of education and self-reflection, the fundamental difference between these and that of the Kyoto School seems to be that Western thought orients self-reflection toward the development of learner self-determination. The Kyoto School's proposal of negative education is different from Western thought, with the educational goal being the development of students who are self- determined, independent, and ultimately free and autonomous in the environment, with self- reflection leading to self-enrichment.

Implications for the current discussion of OECD Education 2030

The roles and influences of supranational organizations on education policies have recently undergone expansion in a global society. Rizvi and Lingard (2009) explain that the values that national systems of education promote through policy are no longer determined wholly by policy actors within the nation-state but are forged through a range of complex processes that occur in transnational and globally networked spaces (p. 22) [75] . They further argue that globalization represents both an ideological formation and a social imaginary that now shapes the discourse of education policy (p. 23). Li and Euan (2020) illustrate the development of OECD's educational focuses, explaining the shift of agendas and approaches based on the historical circumstances and processes in which OECD has adopted and expanded its educational activities. They claim that, in contrast with its approach during the 1950s-1990s (i.e., education for economic recovery and growth) or 1990s-2010 (i.e., neo-liberal globalisation and development of international comparisons), OECD's approach in post-2015 can be interpreted as a humanitarian turn (p. 504). While expanding PISA's relevance to establish it as

[75] Rinne (2008) also argues that the trends of internationalization and globalization have had unavoidable impacts on steering and guiding the decisions of national policymakers and the direction of national education policies (p.665) As to OECD, he explains that it has become a kind of global bench maker of standards and in this way also a power in educational decision-making and governance (p. 668).

a truly global metric (such as PISA-D), it expands the scope of the assessment into non-cognitive domains (i.e., transformative competencies) (p. 509). OECD explains that meta-cognitive dimensions of learning (such as social skills, creativity, resilience, and responsibility) are needed for current and future generations in an unpredictable and uncertain society.

The OECD Education 2030 project, initiated in 2015, aims to provide a common understanding of the knowledge, skills, attitudes and values students need in the 21st century[76]. Carefully accepting some criticisms to earlier educational policies, such as PISA and knowledge-skill based competencies that tend to focus on particular aspects of learning outcomes, the 2030 learning framework and compasses issued in 2019 reflect the importance of the relatively *holistic developments* of learners[77], including the transformative competencies which include values and attitudes such as creativity, reconciling tensions and dilemmas and taking responsibility. As for the competencies, the OECD explains that learners need to develop both cognitive and meta-cognitive skills (such as critical thinking, creative thinking, learning to learn and self-regulation), social and emotional skills (such as empathy, self-efficacy and collaboration), and practical skills (such as using new IT devices). Additionally, the OECD notes that each competency is intricately interrelated with the others, and the ability to develop competencies is itself something to be learned using a sequenced process of reflection, anticipation, and action (OCED The Future of Education and Skills, Education 2030, p. 6).

Importance of Reflective experiences in the process of learning

The process of Anticipation, Action and Reflection (AAR) is strongly encouraged in the learning framework and the learning compass 2030 by the OECD. This is the constructive cycle of planning, experience and reflection, and this kind of learning often takes place within a community and in interaction with others (Vygotsky & Cole, 1978, in the OECD learning conceptual learning framework-Concept note: Anticipation-Action-Reflection cycle for 2030, p. 120).

Hatti (2020) states that the AAR approach helps to focus on the phases of learning much

[76] https://www.oecd.org/education/2030-project/about/

[77] According to the report by MEXT on the OECD Education 2030 project, it is explained that the Japanese experts have joined the project since the beginning and contributed to the proactive discussion, especially with the proposal in the viewpoint of holistic development of learners which Japanese education has traditionally put importance on.

https://www.oecd.org/education/2030-project/about/documents/OECD-Education-2030-Position-Paper_Japanese.pdf

deeper than the usual claims about high achievement – as if the latter happens without the former[78]. He emphasizes that reflection does not mean looking back to where we think we have been, but rather, it is the process of seeing your learning through others' eyes, seeking and using feedback about progress, checking our cognitive biases (especially confirmation bias), and adjusting our learning to more effectively attain the expectations developed in the anticipation phase.

Implications of the two philosophies

The direction of the OECD's recent development of Education 2030 appears to be in line with the educational thought proposed in the Humboldtian *Bildung* and the Kyoto School. Based on the reflection of the limitation of the knowledge-skill based educational approach where students do not deeply understand what they are learning, nor how to use what they learnt in their real lives (and further, how to flexibly adjust and re-create what they learnt), these schools of thought, as well as the recent OECD's discussion, propose the importance of reflection in learning. In this section, the OECD's policy is further reviewed in light of the *Bildung* and the Kyoto School from two important perspectives, i.e., (1) student as agent and co-agency, and (2) consideration of Trends.

(1) Student as agent and co-agency

The OECD Learning compass 2030 emphasises the need for students to learn to navigate by themselves through unfamiliar contexts and find their direction in a meaningful and responsible way, instead of simply receiving fixed instructions or directions from their teachers (OECD Learning Compass 2030, p. 6). The policy is based on the student-centred approach. Agency is defined as the competency to think, initiate and act intentionally and responsibly to shape the world toward individual and collective well-being (OECD Future of Education and Skills 2030, Concept note: Anticipation-Action-Reflection cycle for 2030, p. 123). Students are expected to learn to exercise their sense of purpose and responsibility while learning to influence people, events and circumstances around them for the better (OECD Learning Compass 2030, p. 6). Students are to be equipped to act rather than be acted upon; shape rather than be shaped; make responsible decisions and choices rather than accept those determined by others (OECD Future of Education and Skills 2030, Concept note: Student Agency, p. 4).

[78] https://www.oecd.org/education/2030-project/teaching-and-learning/learning/aar-cycle/Thought_leader_written_statement_Hattie.pdf

It is argued, however, that a student is not acting solely as an agent-based on his/her autonomy or choice, but most importantly needs to grow and exercise their agency in social contexts[79]. OECD conceptualizes student agency which is different from student autonomy or student choice (OECD Future of Education and Skills 2030, Concept note: Student Agency, p. 4). OECD warns of the risk that the concept is misinterpreted as students acting and functioning in social isolation, or solely in their self-interests (p. 4). It emphasizes that, especially for the students with disadvantageous backgrounds (such as lower socioeconomic family backgrounds), carefully designed supports are necessary for the students to safeguard their future well-being in the society, as student agency is not a personality trait; it is something malleable and learnable (p. 4, p. 6). Further, the OECD Learning compass explains the important concept of co-agency. (OECD Learning Compass 2030, p. 6). Since the development of an agent is a relational process, not only the students but also the surrounding agents (such as teachers, families, or a wider community) are expected to work together for the development of the society.

These concepts of student agency and co-agency as a student's position and role are similar to the idea of self in the Humboldtian *Buildung*. As Humboldt emphasized, education is not something given by somebody, but something a person participates in of their own volition for empowerment. And education should provide the individual the opportunity to cultivate their unique abilities with increasing freedom. Moreover, in self-reflection for student development, they should not lose themselves in alienation but should reflect the world into their inner selves. Nishida's thought, however, as discussed in the previous section, appreciated non-self as the ultimate stage of the development of a person. Although the OECD's concept covers the aspect of the relationship with society (i.e., agency is different than autonomy), Nishida suggested further based on his understanding of self and place. He emphasised the openness of the self to be flexible[80] and changeable, unified with the environment.[81] It can be said that Nishida's thought may contribute further to the discussion of how to

---

[79] In the experts meeting held by MEXT in December 2018, the characteristics of OECD's concept of Agency was explained by the ministry as contextual, non-linear, and multi-dimensional. The Japanese ministry, referring to the latest revision of the national course of study, emphasized the position of student agency in a society, reconfirming the importance of working together with others to solve issues and reach to agreements.
https://www.mext.go.jp/b_menu/shingi/chousa/shotou/142/shiryo/
icsFiles/afieldfile/2019/01/28/1412759_2.pdf

[80] In terms of being flexible, OECD, as referred above, use the term malleable which could imply a similar concept. However, the term needs to be carefully interpreted, because it may also indicate the meaning of being pressed into shape, training or being controlled/influenced by others, which would not be the intention of OECD.

[81] In the OECD concept framework report, the definition and understanding of 'agency' are explained to be culturally different. It explains that, in Asian cultures, including Japan and China, agency rather means the harmonious actor in a community, while in Western culture, it links more for personal goals. (OECD Future of Education and Skills 2030, Concept note: Student Agency, p. 7).

understand and position self in
reflective learning in OECD's policy.

(2) Consideration of *Trends*

Another aspect to be considered is the argument of the OECD learning compass, which states the importance of having an understanding of the trends shaping our world (OECD Learning Compass 2030, p. 8). This is reminiscent of the statement by Nishida of situating self in the world.

OECD argues that understanding the *trends* helps us to prepare for the future and identify the kinds of competencies today's students will need to thrive. (p. 8) It is somehow contradictory that, while the compass emphasizes the individual's role as an agent to create the society of the future, the learning should nevertheless be in line with the (current) trends of the society. Especially concerning the nature of OECD (i.e., industry-driven, economy-focus), there is a risk that the trends could be (intentionally or unintentionally) narrowly interpreted. Also, as OECD itself understands, the most challenging nature of current and future education is that the future is *uncertain and rapidly changing*. In that case, how can we foresee such a future based on the trends? Similarly, OECD argues for the importance of well-being[82] in the learning compass, noting that economic prosperity accounts for only one part of an individual's or society's well-being (p. 8). However, it may not be denied that the OECD framework for measuring well-being is still focused more on economic aspects, rather than on individual character.

As Humboldt argued, we need to carefully ask how students would not be lost within the (current) society. Instead, they should/can develop themselves in relation to society, creating their own future for their own well-being. It might be worth carefully reviewing what kind of trend(s) we are discussing here, and to make sure that we do not take such trend(s) for granted. Referring to Hattie's (2020) statement, policymakers and educators themselves also should not fall into the trap of confirmation bias in reflection of trends.

[82] J. Rappleye et al. (2020) criticises the understanding of well-being by OECD's measure of student well-being, in consideration with the Asian cultures. They analyse the OECD 2017 report that most significant parts of student well-beings is measured based on individual characteristics, and relations with others denoted as proximal (i.e., near to but not actually the centre) (p. 263). They argue that this 'biased' understanding of the well-being shows misperception of students' well-beings in Asian countries including Japan.

Conclusion

This essay initially attempted to compare the educational thought of the Humboldtian *Bildung* and the Kyoto School focussing on Nishida's thought. Both in the Humboldtian *Bildung* and the Kyoto School, reflective experiences during interaction with others in society are considered to be the core of education. Both criticised the systems where knowledge-skill-based education was the sole aim. However, there are significant differences in terms of the ultimate status of the self. The Kyoto School of educational philosophy proposes non-self as the desired outcome, whereas the Humboldtian concept of *Bildung* focuses on an affirmation of self in relationship to others in society.

The latter section of the essay reviewed the current discussion of the OECD Education 2030, focusing on the aspect of self-reflection. In reviewing the policy by OECD, it concluded that, while the thought of Humboldt and Nishida originated in different eras and contexts, the two main themes of *self-development in freedom* and *interaction in society* are keys for education.

Nishida's idea of *non-self* might sound contrary to mainstream Western thought around *being*. However, it can be said that, although the ultimate goals expressed in the two philosophies are different based on their cultures, their concerns are nevertheless similar: *how to develop self in relation to society*. This essay does not intend to conclude which approach is better. However, understanding each of the philosophies, including backgrounds and underlying concerns, and integrating these approaches may be advantageous especially when considering the current and future education in the 21st century facing increasing globalization and diversity.

References

Abe, M. (1995). The Logic of Absolute Nothingness as Expounded by Nishida Kitaro. *The Eastern Buddhist. NEW SERIES*, *28(2),* 167-174.

Danner, H. (1994). 'Bildung' A basic term of German education. *Educational Sciences*. 9/1994. http://www.helmut-danner.info/pdfs/German_term_Bildung.pdf

English, A. (2013). *Discontinuity in Learning- Dewey, Herbart, and Education as Transformation*. Cambridge University Press.

Fujita, M. (2009). What is the Kyoto School [in Japanese] 京都学派とは何か. *Journal of Japanese Intellectual History [in Japanese] 日本思想史学. 41*, 35-48.

Humboldt, W. von (1852). *The Limit of State Action (The Sphere and Duties of Government)*. Translated from German to English by Joseph Coulthard in 1854. John Chapman.

Ito, A. (2014). Naturphilosophische Voraussetzungen in der Bildungslehre Wilhelm von Humboldts [in Japanese] フンボルト陶冶論における自然哲学的前提. *Studies in sociology, psychology and education: inquiries into humans and societies [in Japanese] 慶応義塾大学大学院社会学研究科紀要：社会学心理学教育学：人間と社会の探究*. *77*, 19-38.

Jacinto, Z. A. (2016). Nishida Kitaro's Views on Education: 1895-1935. *Journal of Nishida Philosophy Association, 13*,191-171.

Koller, H.C. (2011). The Research of Transformational Education Processes: Exemplary Considerations on the Relation of the Philosophy of Education and Educational Research. European Educational Research Journal, *10*(3), 375–382. https://doi.org/10.2304/eerj.2011.10.3.375

Komatsu, H. & Rappleye, J. (2020). Reimagining Modern Education: Contributions from modern Japanese philosophy and practices? *ECNU Review of Education, 3*(1), 20-45. https://doi.org/10.1177/2096531120905197

Li X. & Euan A. (2020). A historical perspective on the OECD's 'humanitarian turn': PISA for Development and the Learning Framework 2030. *Comparative Education*, *56*(4), 503-521. https://doi.org/10.1080/03050068.2020.1781397

Løvlie, L., & Standish, P. (2002). Introduction: Bildung and the Idea of a Liberal Education. *Journal of Philosophy of Education, 36*, 317-340.

Naka, N. (1989). Freedom and Bildung of Humboldt [in Japanese] フンボルトにおける自由と陶冶. *German Literature [in Japanese] ドイツ文學*. *82*, 13-21. https://doi.org/10.11282/dokubun1947.82.13

Nakagawa Y. (2015). Buddhism and Holistic Education. *Journal of International Buddhist Studies*, *6*(1), 45-55.

Nishida Kitaro (1927). From things working to things seeing [in Japanese] 働くものから見るものへ. in Nishida Kitaro's complete works. 西田幾多郎全集IV. Iwanami Shoten. 岩波書店

Nishida Kitaro (1937). Logic and Life. [In Japanese] 論理と生命. in Nishida Kitaro's complete works. 西田幾多郎全集 VIII. Iwanami Shoten. 岩波書店

OECD (2018). *The Future of Education and Skills- Education 2030.* https://www.oecd.org/education/2030/E2030%20Position%20Paper%20(05.04.2018).pdf

OECD (2019). *OECD Future of Education and Skills 2030. Conceptual Learning Framework- Learning Compass 2030.*

OECD (2019). *OECD Future of Education and Skills 2030. Conceptual learning framework – Student Agency for 2030.* http://www.oecd.org/education/2030-project/teaching-and-learning/learning/student-agency/Student_Agency_for_2030_concept_note.pdf

OECD (2019). *OECD Future of Education and Skills 2030. Conceptual learning framework- Concept note: Anticipation-Action-Reflection cycle for 2030.* https://www.oecd.org/education/2030-project/teaching- and-learning/learning/aar-cycle/AAR_Cycle_concept_note.pdf

Okamoto, T. (2015). Potential of the Kyoto Philosophy [in Japanese] 京都哲学のポテンシャルをめぐって. *Forum on Modern Education.* History of Educational Thought Society, *24*, 172-173. https://doi.org/10.20552/hets.24.0_170

Okawa, I. (2005). Educational Philosophy of Humboldt [in Japanese]フンボルトの教育理念. *German Literature Review [in Japanese] ドイツ文學研究. 50*, 31-77.

Östling, J., Josephson, P., & Karlsohn, T. (2014). The Humboldtian tradition and its transformations. In P. Josephson, T. Karlsohn, & J. Östling (Eds.), *The Humboldtian Tradition: Origins and Legacies* (Vol. 12). Brill Academic Publishers.

Phillips, D., & Schweisfurth, M. (2014). *Comparative and International Education.* Bloomsbury. Rappleye J., Komatsu, H., Uchida, Y., Krys, K., & Markus H. (2020). 'Better Policies for better lives'? Constructive critique of the OECD's (mis)measure of student well-being'. *Journal of Education Policy, 35*(2), 258-282. https://doi.org/10.1080/02680939.2019.1576923

Rinne, R. (2008). The Growing Supranational Impacts of the OECD and the EU on National Educational Policies, and the Case of Finland. *Policy Futures in Education, 6(6),* 665–680. https://doi.org/10.2304/pfie.2008.6.6.665

Rizvi, F. & Lingard, B. (2009). *Globalizing education policy.* Routledge

Sevilla, A. L. (2016). Education and Empty Relationality: Thoughts on Education and the Kyoto School of Philosophy. *Journal of Philosophy of Education, 50*(4), 639-654. https://doi.org/10.1111/1467-9752.12159

Sorkin, D. (1983). Wilhelm Von Humboldt: The Theory and Practice of Self-formation (Bildung), 1791-1810. *Journal of the History of Ideas, 44*(1), 55-73. https://doi.org/10.2307/2709304

Takayama, K. (2020). An invitation to 'negative' comparative education. *Comparative Education, 56*(1), 79-95. https://doi.org/10.1080/03050068.2019.1701250

Yokoyama, R. (1981). Philosophy of Nishida Kitaro [in Japanese] 西田幾多郎の哲学説. *Hitotsubashi Kenkyuu [in Japanese] 一橋研究. 6*(4), 91-107.

Article 2

Comparing the Paradoxical Development of Special Education and Inclusive Education in Luxembourg and Japan

Miwa Chiba[83]* and Justin J.W. Powell[84]

Abstract

For decades, powerful international organizations, supranational governments, and global social movements have called for improved equity and equalized learning opportunities for all learners in diverse societies. Yet, there have been challenges to develop inclusive education, not least due to shifting and divergent understandings of inclusive education. We sketch the development of special education and inclusive education in the global discourse since the 1940s, represented by key statements of inclusive education. Applying the typology of inclusive education definitions by Göransson and Nilholm (2014, 2017) helps to clarify the various and most influential dimensions of inclusive education. Then, we analyze the situation in Luxembourg and Japan, two contrasting country cases, to understand (dis)similarities between them and gaps with the global inclusive education discourse and norms. We analyze the extent to which these countries' positions and systems have evolved in terms of special and inclusive education in their historical and cultural contexts. The comparison uncovers both differences, such as in population size and linguistic diversity as well as unexpected similarities, in particular, that special education in separate settings has, paradoxically, continued to grow even after these countries committed themselves to inclusive education as a human right. Instead of transformation toward inclusive education, special education simultaneously expands.

Keywords: special education, inclusive education, schooling, settings, Japan, Luxembourg

[83] Corresponding author: Miwa Chiba, Department of Social Sciences, Faculty of Humanities, Education and Social Sciences, University of Luxembourg. 11 Porte des Sciences, L-4366 Esch-sur-Alzette, Luxembourg.miwapaco@gmail.com _ORCID: **0000-0002-6280-3357**

[84] Justin J.W. Powell, Department of Social Sciences, Faculty of Humanities, Education and Social Sciences, University of Luxembourg. 11 Porte des Sciences, L-4366 Esch-sur-Alzette, Luxembourg. justin.powell@ uni.lu ORCID: 0000-0002-6567-6189

1. Introduction

For decades, powerful international organizations, supranational governments, and global social movements have called for improved equity and equalized learning opportunities for all learners in diverse societies. Whether from a human rights or human capital perspective, influential international organizations (IOs), such as UNESCO, the OECD, and the World Bank, have placed inclusive education on their agendas (see, e.g., Peters 2004, Heyer 2021, Zahnd 2021), reflecting their increasing influence in educational governance generally (Zapp 2021). Early on, the Salamanca statement and Framework for Action in Special Needs Education (1994) stated the idea(l) of education for all, with attention to disability and special education (see Kiuppis 2014). Since 2006, the UN Convention on the Rights of Persons with Disabilities (UNCRPD) legally binds the member states—182 as of 2021—to commit to inclusive education, especially for students with disabilities, across the life course. The Sustainable Development Goals (SDG) also emphasize many dimensions related to education and disability, capabilities, and well-being, in particular "Quality Education" (SDG 4). Furthermore, in recent decades, the concept of inclusive education has been broadened from a focus mainly on how to integrate students understood to have "special educational needs (SEN)" to the endeavor to transform education systems to include all students with their diverse characteristics, backgrounds, and aspirations.

While there have been developments of the idea(l)s and norm of education for all and inclusive education, the discourse frequently changes more quickly than do policies or the realities of schooling. Shifting and divergent understandings of what inclusive education is (should be), causes confusion and challenges the promotion of inclusive education for all in both policymaking and school practice. First, we sketch the development of the discussion of special education and inclusive education in the global discourse since the 1940s. To analyze such ideational institutional change, we first present the well-known typology of key definitions of inclusive education, derived from research contributions, proposed by Göransson and Nilholm (2014). These definitions facilitate a more encompassing understanding of inclusion and of change in educational models in an era of human rights (Heyer 2021). Next, we compare the relationship between special and inclusive education in the contrasting national contexts of Luxembourg and Japan. These countries exhibit varieties of differences (for example, in terms of size, population, geographical location, languages homogeneous/heterogeneous, the western/eastern etc.). One may question if these countries are comparable. However, it makes perfect sense to compare such different countries to examine the global influence onto local countries. Both countries signed UNCRPD at the similar timings and it is interesting to find out if, even with such differences, the countries have experienced similar trajectory and dilemmas toward inclusive education in dialogue with the global norm. Below the discursive level of global ideas and human rights, how have these countries interpreted and implemented inclusive education, to which they have committed themselves? To what extent do traditional special education structures persist or are education systems being transformed to be more inclusive?

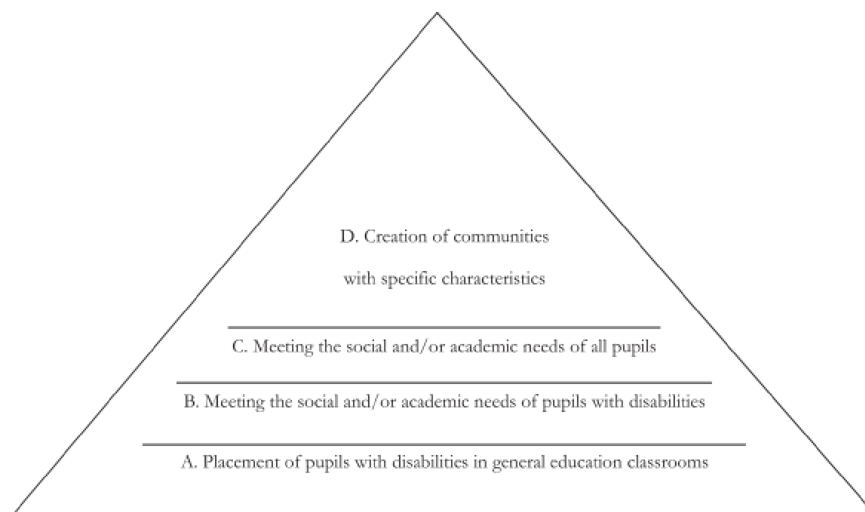
The study reported here, applying a comparative education approach, blends historical within-case based on literature synthesis and documentary analysis with cross-case institutional analysis, especially of special and inclusive policies. Both are informed by years of first-hand

involvement of the co-authors in the two education systems and in educational research of varying dimensions of the two countries.

2. Conceptual clarifications: A typology of inclusive education definitions

Before reviewing the evolving international discourse and uncovering the two country-specific developmental pathways of special and inclusive education, we review ubiquitous definitions of inclusive education. Such differentiation is especially crucial because of the evolving positions found within complex discourses. While at world level abstract educational policy tenets regarding special education and inclusive education have continuously developed, among the challenges are different and often vague understandings of what exactly 'inclusive education' means, with shifts is understanding and prioritizing due to professional training and teaching experience (Krischler, Powell & Pit-ten Cate 2019). Among the scholars who have clarified such ambiguity surrounding this 'fuzzy' concept, Göransson and Nilholm (2014, 2017) propose four categories in their typology of definitions of inclusive education found in research contributions: (A) Placement: inclusion as *placement* of students with disabilities in general education classes; (B) Specified individual definition: inclusion as meeting the social and academic needs of *students with disabilities*; (C) General individual definition: inclusion as meeting the social and academic needs of *all students*; or (D) Community definition: inclusion as the creation of communities with specific characteristics.

Figure 1. Typology of Definition of Inclusive Education by Göransson and Nilholm (2014)



Source: Göransson and Nilholm (2014, 268)

These different categories distinguish the extent of inclusion, ranging from the physical spaces or settings of schooling to the educational and social groupings targeted, and to the relationships and communities created. Such conceptual clarification is helpful to analyze educational policy relating to special education and inclusive education in particular contexts because, while policymakers actively discuss how to (re-)construct education systems to facilitate inclusive education, they tend not to conceptually clarify their basic assumptions about inclusive education—or the necessary elements to realize it.

In the recent article "Segregated education as a challenge to inclusive process", Göransson et al. (2022) examines the different (teachers') view on inclusive education, referring to the theoretical conceptualization of increased focus on goal achievements vs egalitarian view of goal of schooling. They argue that different goals and purposes of education often cause contradictory policies, legislation, and national curricula (1368). The tendency to focus on goal achievements may construct an inclusive education system which may be contrary to the idea of inclusive education.

In the following section, we review the development of international discourse of inclusive education, applying the relevant typology by Göransson and Nilholm (2014). This supports an understanding of the focus of each international instrument—a precondition for analyzing how these have, in turn, been interpreted within national-level policymaking and implementation in practice.

3. Education for all and inclusive education: Evolving international discourses

Globalization has influenced nation-states in different dimensions; education is no exception, even if the educational construction of citizens is most often viewed in national terms (Schreiber 2014; Tröhler 2016). As Meyer (2000, 233) argues, globalization has created common models of social orders, which become authoritative in many different social settings. Education, linking ideologies of social progress and human rights, has been highly scripted, with enormous impact on educational expansion around the world (Meyer 2000, 234); we now live in "schooled societies" (Baker 2014).

This perspective, applied to the development of special education and inclusive education worldwide since the 1940s, emphasizes that while for the latter half of the twentieth century, global notions of social progress have included provision of special education, in more recent decades the ideal has instead shifted toward inclusive education (Richardson & Powell 2011). Yet in what "inclusive education" should consist, what its relationship to existing structures of special and general education should be, and how forcefully it should be implemented are among the contested dimensions in this domain. Supranational organizations have continuously issued important international charters with respect to education for all, non-discrimination, and inclusive education; a selection is discussed next.

The 1948 Universal Declaration of Human Rights expressed the right to (free) education for everyone as one of the most important human rights (Article 26) but without the yet-to-be defined notion of inclusive education. Four decades later, the 1989 UN Convention on the Rights

of the Child (UNCRC) employed a broad definition of non-discrimination far beyond "disability".

Then, the influential 1994 Salamanca statement urged renewed commitment to Education for All, especially calling for the necessity to provide education for students with special (educational) needs within the regular education system (Article 1). In Article 2, the statement argued that the education system should be designed to take into consideration the diverse needs of students, and the regular schools with inclusive orientation were the most effective means of combating discriminatory attitudes, creating welcoming communities, building an inclusive society, and achieving education for all. Powerfully, the Salamanca statement emphasized that instead of forcing children to adapt to schooling structures, teaching must be adapted to the needs of children.

Two decades later, but influentially, the further evolving ideas of inclusive education were incorporated into legally binding international human rights treaties. The UN Convention on the Rights of Persons with Disabilities (UNCRPD) since 2006 has built upon the activism and advocacy of the global disabilities (rights) movement, mandating that persons with disabilities should not be excluded from the general education system on the basis of disability (Article 24-2(a)); persons with disabilities can access an inclusive, quality and free primary and secondary education on an equal basis with others in the communities in which they live (Article 24-2(b)); reasonable accommodation of each individual's requirements should be provided (Article 24-2(c)); persons with disabilities receive the support required, within the general education system (Article 24-2(d)); and effective individualized support measures should be provided in environments that maximize academic and social development, consistent with the goal of full inclusion (Article 24-2(e)). Within fifteen years, most of the world's countries (182) have ratified the UNCRPD, committing themselves to these tenets of inclusive education, regardless of the different structures and cultures of their education systems and the developmental pathways taken. Unsurprisingly, contextual differences persist—and comparative education research is needed more than ever to understand institutional and organizational change at the nexus of special and inclusive education across world regions (Köpfer, Powell & Zahnd 2021). Unfortunately, while the UNCRPD has certainly placed inclusive education on education policy agendas worldwide, there has also been backlash, with bolstering of segregated settings in the face of the inclusion challenge (Powell, Edelstein & Blanck 2016), a development we return to in the case studies.

The latest discussion on inclusion and equity is well-summarized in the "Global Education Monitoring Report 2020: Inclusion and Education–All Means All" published by UNESCO (2020), which also organized an international forum in Cali, Colombia in 2019, to show pathways of further development. The year 2019 marked the 25th anniversary of the Salamanca statement, with the forum reviewing the progress made—and discussing the current and future conceptualization of inclusive education. It emphasized persistent barriers for vulnerable and marginalized groups; therefore, further progress toward education systems that "leave no one behind" is needed. While Salamanca opened a window of hope, and had worldwide impact, what is needed now is to revise the thinking of inclusive education to truly represent the rights of

everyone (UNESCO 2019, 5). Florian (2019, 692) argues that over time, the conceptualization of inclusive education was broadened to encompass anyone who might be excluded from or have limited access to the general education system within a country. The Cali report argues that it is essential to move away from the vision that inclusion is restricted to disability, which neglects other groups traditionally excluded on the grounds of age, gender, ethnicity, religion, and socio-economic status, among others. It states that inclusion is a process of involving the fundamental transformation of education systems and that changing education necessarily involves rethinking society.

The above review demonstrates that supranational governments and global social movements have actively developed the policy ideas relating to education for all and inclusive education, with the latter expanded beyond the focus on students with disabilities. We summarize these different emphases and aspects in international discourse below, highlighting key statements with relevant categories of inclusion in accordance with the typology of Göransson and Nilholm (2014) (Table 1).

Table 1. Definitions and foci of inclusion in global human rights charters and statements

Treaty/Policy	statement	Focus	Category of Göransson and Nilholm (2014) Typology
UNCRC (1989)	• teach child without discrimination of any kind, irrespective of his/her race, colour, sex, language, religion, political opinion, national, ethnic, social origin, disability, birthplace, etc.	• Human rights • Anti- discrimination • Variety of differences	(C)
Salamanca statement (1994)	• provide education for students with special needs in the general education system • education system to consider diverse needs of students • leaning must be adapted to the needs of children	• Education system should consider different needs of students • Special supports in general educational settings (placement) • From general diversity to more of a focus on disabled children	(A)(B)
UNCRPD (2006)	• persons with disability should not be excluded from general education system	• Anti-discrimination (disability)	(A)(B)

	• reasonable accommodations and individualized support to be provided to maximize academic and social development	• Disabled students should be placed in general educational system with special supports for academic and social achievement • Focus: disabled children	
UNESCO Cali statement (2019)	• new vision of education: the rights of everyone should be discussed (all means ALL) • broaden the definition of inclusive education (inclusion is not only about helping children with physical or learning difficulties; age, gender, ethnicity, religion, socio-economic status, etc., should be also considered) • transformation of society as a whole is necessary	• Education for ALL students • Inclusion of all students (diversity) • Transformation of society	(C)(D)

Source: Authors' summary based on UNCRC (https://www.unicef.org/child-rights-convention/convention-text), Salamanca statement (https://unesdoc.unesco.org/ark:/48223/pf0000098427), UNCRPD(https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html), and UNESCO Cali commitment (https://www.european-agency.org/news/cali-commitment-equity-and-inclusion-education)

Applying the typology proposed by Göransson and Nilholm (2014), the UNCRC (1989) provided broad goals for education for all, referencing the full diversity of students (category C). The Salamanca statement (1994) and UNCRPD (2006) were interpreted as focusing more narrowly on students with disabilities, and also special (individual) supports for academic and social development was emphasized (category A, B), rather than inclusion of all forms of diversity in education systems or even in broader society. The Salamanca statement and UNCRPD mainly refer to categories A and B, while the latest UNESCO stance has evolved to more fully specify categories (C) and (D). Regarding the significance of Salamanca, Florian (2019, 692) argues that its achievement has been three-fold. It challenged the idea that some children do not belong in regular or mainstream schools; it called into question the structures of schooling that rely on different forms of provision or different types of learners, and it introduced the idea of inclusive education to the wider education community. In that sense, Salamanca covered all four definitions of this inclusive education typology. However, as seen in the development since Salamanca, the main focus in interpreting Salamanca by policymakers and others has been on

students with disabilities and the discussion of placement, with the latter idea(l)s of comprehensive changes of education systems and broadened understanding of inclusive education in the wider community relatively neglected. Thus, these definitions were then explicitly emphasized in the Cali statement a quarter-century later.

These international charters and statements, with different and evolving assumptions and understandings of inclusive education, contribute to the challenge of coming to one consensual, encompassing definition of inclusive education and fail to address the ambivalent and at times conflictual relationship of special and inclusive education. In global discourse, especially in the 1990s and 2000s, the Salamanca statement and UNCRPD were more narrowly interpreted, defining inclusive education as targeting specific groups of students with SEN, especially those understood to have disabilities, focused on placement and settings, and emphasizing special individual supports (provided by 'specialists,' sometimes in separate or segregated settings) while prioritizing academic and skill development. By contrast, in the latest documents, Cali statement and 2020 Global Monitoring Report (UNESCO 2020), the goals and targets of inclusive education are explicitly broadened. The Cali statement calls for a "new vision" of inclusive education and education for all, harkening back to the universal idea(l) to include and equalize members of marginalized or disadvantaged groups first discussed in the 1940s. The necessary transformation of society to realize inclusion is made explicit.

Having reviewed the evolution and usage of definitions, we turn now to national developments and interpretations in the contrasting cases of Luxembourg and Japan, to contrast two very different countries—one in Europe, the other in Asia—in their institutionalization pathways in special and inclusive education.

4. Origins and Development of Special Education and Inclusive Education in Luxembourg and Japan

4.1 Luxembourg: From segregation to integration, toward inclusive education with development of special supports by "qualified experts"

In Luxembourg, as elsewhere in Europe, the earliest special education provided was limited, albeit crucial in replacing a policy of exclusion; moving gradually to segregation (Powell, Limbach-Reich & Brendel 2017). Not atypically, the law of 1912 stipulated that compulsory schooling excluded the obligation of education for children considered to have certain impairments.

After World War II, the awareness of education as one of the fundamental human rights diffused worldwide. For Luxembourg, the year 1970 was key, as the government started the campaign of "A School for Everyone". The 1973 law stipulated the right to schooling and compulsory education for children with disabilities, who had previously been entrusted to charities or even congregations. In 1994, the so-called "Integration Law" (*loi du 28 Juin 1994*), promoted the integration of students identified as having SEN within general schooling.

Gradually, emphasis began to shift from children adapting to the general education system to schools adapting to recognizing and meeting "special educational needs" of children. Since then, many organizations and services have developed to support students with special needs; however, a significant number of students, especially those with considerable support needs, are sent to neighboring countries, a practice that must be taken into account when comparing segregation rates (see Limbach-Reich & Powell 2015).

In 2007, Luxembourg signed the UNCRPD, formally ratifying in 2011. Meanwhile, in 2009, the so-called "Inclusion Law" was issued, which, for example, made it possible for mobile specialized teachers to join multi-professional teams (*equipe multiprofessionell*) in assisting students with SEN within public schools (Powell, Limbach-Reich & Brendel 2017). Further, some publicly-funded whole day model schools had been established, such as Eis Schoul in Luxembourg city (established in 2008)[85] and École Jean Jaurès in Esch-sur-Alzette (in 2006),[86] which emphasize values of inclusion, diversity, and social equality (Joachim 2013).

The 2018 law (*loi du 20 Juli 2018*) established so-called "SEN competence centres". The primary aim of these structures, as discussed in parliament, is to provide specialized support services for students with special needs by qualified personnel. The law states that "the purpose is to promote not only the right to schooling, or to inclusive education, but also above all confirming the right to education of the target population".[87] Thus, the emphasis is on specialists' professional preparation in the field, self-critically reflecting that the former differentiated educational provision was often not accompanied by sufficient expertise. Thus, the law proposes, above all, to promote the learning of students with SEN by entrusting their education to staff especially trained for this purpose, regardless of school setting.[88] The government explains that, although they recognize the importance of promoting schooling of students with SEN in regular education classes, in certain cases, participation (such as when students become adults) may only be possible in separate educational structures, at least temporarily. It continues that "Although the government intends to promote as much as possible the educational inclusion of children and young people with specific educational needs, it turns out that in more individual cases, schooling in a specialized school is an appropriate alternative to promote development". Thus, the legal basis for universal inclusive education on a human rights basis has been weakened considerably in favor of professional dominance—reducing pressure for transformative change of Luxembourg's traditionally selective and stratified education system (see Backes & Hadjar 2017).

The recent study by Krischler, Powell and Pit-Ten Cate (2019) on the perception of inclusive education by general public and teachers, found the interesting result that more in-depth

[85] http://www.eisschoul.lu/
[86] http://www.ecolejeanjaures.lu/index.php
[87] Draft of Law of July 20, 2018 on the creation of SEN competence centres https://chd.lu/wps/PA_RoleDesAffaires/FTSByteServingServletImpl?path=FF4E0AA0483625980FC9EF835A89D30E2E5DA428615F4A5989929415C8663E47A60F5516B6110311D0AE315F40F35ACA$53692A9A0A23E7B3D7F4252CFE4A256D (page 3)
[88] Draft of Law of July 20, 2018 on the creation of SENcompetence centres https://chd.lu/wps/PA_RoleDesAffaires/FTSByteServingServletImpl?path=FF4E0AA0483625980FC9EF835A89D30E2E5DA428615F4A5989929415C8663E47A60F5516B6110311D0AE315F40F35ACA$53692A9A0A23E7B3D7F4252CFE4A256D (page 4)

understanding of inclusive education reported more positive attitudes for inclusive education, where teachers felt better prepared to implement inclusive practices. However, the study also showed that there had been various perceptions of what inclusive education meant (i.e., from mere placement discussion, specified individualized definition, and general individualized definition in the typology by Göransson and Nilholm (2014). With the mixed and sometimes contradictory understanding of what inclusive education means, the direction toward inclusive education varies in different goals.

Nevertheless, the long-term historical development of the special and inclusive education in Luxembourg, the country experienced gradual institutional change from segregation and integration toward inclusion, yet without eliminating—indeed strengthening—special education "expertise" and to an extent maintaining segregated settings, both within Luxembourg and outside its borders.

4.2 Japan: From segregation and normalization toward integration with the Tsu-kyu system; special education to special support education

The education system for students with special needs in Japan has a long history[89]. Traditionally, in Japan, education for students with SEN started with private initiatives for specific categories. These initiatives were expanded with public initiatives in the 1940s. However, the public view of disabilities did not change dramatically in Japan until after World War II (Murakami & Meyer 2010, 206). Thereafter, Japan aimed to democratize its education system (Nishioka 2017, 15). In 1947, the first National Course of Study was issued and the School Education Act of 1947 mandated attendance of students with disabilities, yet within special education, although there were exceptions for students with "severe disabilities". Not until 1979 would regulations mandate that *all* students with disabilities attend school.[90] This can be viewed as the influence of the global trend of "normalization"—the idea to promote participation in society regardless of disability (Takahashi & Matsuzaki 2014). Murakami and Meyer (2010) argue that there was a gradual movement toward establishing human rights and empowering people with disabilities since World War II, visible in various legislative changes; however, public fear toward disability remained prevalent (on the evolution of Japanese education and disability laws, see Yoshitoshi & Takahashi 2021, 4).

During the 1960s, some public elementary schools gradually established classes for students with SEN. And in the 1970s and the 1980s, the government continued to discuss how to promote "integration".However, as Yawata (2012) reviews, there had been the remaining strong

[89] According to the prior research, common understanding of the first official education for students with special needs started in 1878 with the establishment of the school called Kyoto Moua In, the school for students with sight and hearing difficulties (Takahashi et al, 2014).

[90] Discussing the paradox of the mandatory implementation of the special school education for children with disabilities in 1979, Yoneda (2020, 1032) argues that, until implementation, children with disabilities had been allowed to attend regular schools, yet that the new mandate resulted in children with disabilities being forcibly transferred to special (segregated) schools.

arguments supporting for separated educational settings for students with SEN by experts and parents. Such arguments were based on the criticism of the issues of teacher trainings or environments in mainstream schools/classes, concerning that simple integration (placement) may cause adverse effects for students with SEN without adequate supports[91]. In this context, in 1993, the resource room system called "Tsu-Kyu system" was officially launched, where students with SEN enroll in mainstream classes still spend some hours in resource rooms to receive additional supports based on their needs.

Japan signed the UNCRPD in 2007 and ratified in 2014. In between, several legal reforms, included the revision and ratification of the Basic Act for Persons with Disabilities (2011), the Act for Eliminating Discrimination of Persons with Disabilities (2013), and the Ordinance for Enforcement of the School Education Act (2013). All of these reflect the idea of prevention of discrimination and inclusion of disabled people required under the UNCRPD. However, as Forlin, Kawai and Higuchi (2015) emphasize, persistent barriers to inclusion include the lack of understandings of inclusion and training in inclusive approaches to teaching. Renaming the "Special Education" system "Special Needs/Support Education" does not resolve such crucial issues, as MEXT continues to discuss how to reform the system to better understand each individual's needs and provide appropriate guidance and supports—instead of addressing fundamental education reforms. Also, teachers' perception on inclusive education tends to focus on special needs. According to the study by Fujii (2019) which was conducted with public school teachers in 2017, the recognition of meaning of the key words relating to inclusive education (such as inclusive society, inclusive education system, and reasonable accommodation) was lower than the recognition of meanings of the key words relating to special education (such as special schools/classes, individual supporting plan, individual instruction plan, Tsu-kyu system), although the percentages on inclusive education had been slightly improved compared to the similar study in 2013[92].

The persistent understanding of Japanese way of 'inclusive education' might be due to the very strong focus on goal achievement as explained in Section 2, referring to the article by Göransson et al. (2022). In order for maximum individual achievements of students with or without SEN to comply with the educational standards, the Japanese policy of inclusive education seems to tend to focus on separating students, believing that it is the most efficient and effective ways. Further, the strong culture historically persistent in Japan based on "Noryokushugi (Abilityism)", combined with meritocratic concept of equality of educational

[91] Yawata (2012) argues that such issues in 1970s and 80s have not been solved still nowadays (p.76).

[92] Smith & Gorard. 2012. analyse that, compared to the result of England, the Japanese students perceive that teachers do not give extra help to those students who need it (36). Their study also reveals that the Japanese students feel that "teachers are kind to those who have good marks", while the English students "tend to be more concerned that their peers who were less academically successful or who misbehaved in class claimed the lion's share of the teachers' attention and praise" (38). At least, teachers' understandings of special education or special supports might have been increased, while the understanding of inclusive education has not been sufficiently developed yet.

opportunity[93] (as referred by Okada, 1999) could have been the backbone of such policy discussion.

In September 2022, the recommendation by the UN Disability Rights Committee[94] strongly criticized the Japanese approach to inclusive education and urged them to "cease the segregated system". The Japanese ministry maintains their arguments that their special support education system is the way to achieve inclusive education, which causes the discrepancy due to the different interpretations of inclusive education. Without clarifying the different interpretations, reaching consensus on an inclusive education approach will not be possible.

4.3 Comparison

Although Luxembourg and Japan have many differences, such as size and demography, world region, diversity of cultures and languages spoken, the two countries have developed their special and inclusive education in surprisingly similar phases, at least in terms of special and inclusive educational policymaking sketched above. Summarizing the similarities in the processes of developing special and inclusive education, we find the common direction of institutional change: from segregation post-WWII to mandatory education for students with disability to integration (1970s). Finally, while both have recently moved (in discourse and ratifying human rights charters) towards inclusive education (2007–), they have also strengthened special education institutionalization emphasizing formally qualified experts and the professional support services. Further, both countries have maintained a categorical approach to SEN (and disabilities). Early signers of the UNCRPD (2007), both countries ratified (2011/2014), yet face considerable challenges in implementing its principles.

In the next section, we contrast the current situation of special and inclusive education in Luxembourg and Japan on the basis of publicly-available information and apply the Göransson & Nilholm (2014) typology to these policies, as we did above for the international documents.

5. Contemporary Situation of Special Education and Inclusive Education in Luxembourg and Japan

5.1 Luxembourg: Integration of diverse students into general schools with support by special organizations, a few inclusive all-day schools

Since 1994 (Integration law) and 2007 (Inclusion law), children with special needs in Luxembourg are to be included (totally or partially) in general education settings, especially children with

[93] Okada, 1999, explains that the meritocratic view holds that once external barriers are removed, success or failure in school primarily depends upon each individual pupil; thus this concept supports educational selection, by which allocation of children into diversified tracks is assume to be desirable (175).

[94] https://www.ohchr.org/en/press-releases/2022/09/un-disability-rights-committee-publishes-findings-bangladesh-china-indonesia

minor, sensory, intellectual and emotional difficulties.[95] According to data collected by the European Agency for Special Needs and Inclusive Education (EASNIE),[96] in Luxembourg, most children[97] are enrolled in general settings or spend at least 80% of their schoolday in these. Those enrolled in general education may receive support and assistance from the service for special education or a special education center. The 15 July 2011 law (*loi modifiée du 15 juillet 2011*) regulates SEN students' access to educational and vocational qualifications. Students with SEN are entitled to accommodations and supports to better follow regular education programs and to pass assessment tests.[98] The law of 2018, which established the "SEN competence centers," further encourages categorical experts to provide such services. Within the jurisdiction of the Ministry of Education, these "competence centers" provide category-based services: Center for Speech Therapy, Center for the Development of Vision Skills, Center for Motor Development, Center for Children and Youth with Autism Spectrum Disorder, Center for Intellectual Development (with 9 local "annexes"), Center for Socio-Emotional Development, Center for Learning Development "Grand Duchess Maria Teresa", Center for Children and Young People with High Potential, and the Agency for the Transition to Independent Living.[99] Some of these structures existed previously under other names: others were newly founded. They provide services and support for general (inclusive) education to succeed, but also exert a pull function out of general education as they maintain or establish segregated settings (sometimes sharing school campuses).

With respect to admission procedures and school choice, each case of a student with SEN is brought to the regional commission for school inclusion (CIS – *Commission d'inclusion scolaire régionale*), where, subject to parents' approval, the members draw up a diagnosis of the child's needs and propose an individual support plan. The report by CIS proposes the educational settings that would be desirable for each child and is submitted to the National Medico-Psycho-Pedagogical Commission (*commission médico-psycho-pédagogique nationale,* CMPPN), where experts confirm the contents and send their opinions to the parents/guardians for approval. Parents, within two months of receiving the opinions, decide which school should provide for their children. (If no decision is made by parents, the decision follows the CMPPN's proposal.) Should parents wish to re-enroll their children in general elementary education, they need to submit a request, with the final decision subject to approval by the Ministry.[100] The total number of students in special schools in Luxembourg numbered 875 in 2016/2017, with half in various "SEN competence centers" and a third in the center for speech therapy, around 7% each in the institutes for children with autism and cerebral palsy.[101] The gender distribution—not surprisingly

---

[95] https://www.european-agency.org/country-information/luxembourg/systems-of-support-and-specialist-provision
[96] https://www.european-agency.org/data/luxembourg/datatable-overview#tab-population_and_enrolment
[97] The number includes children living in Luxembourg and also children living in surrounding countries who go to the schools in Luxembourg.
[98] https://eacea.ec.europa.eu/national-policies/eurydice/content/special-education-needs-provision-within-mainstream-education-40_en
[99] Ministry of Education https://men.public.lu/fr/support/annuaire.html?idMin=5097
[100] https://eacea.ec.europa.eu/national-policies/eurydice/content/separate-special-education-needs-provision-early-childhood-and-school-education-40_en
[101] https://statistiques.public.lu/en/publications/theme/social-conditions/key-figures-education/key-figures.pdf

as it well reflects international patterns—is two-thirds male to one-third female (Limbach-Reich & Powell 2015).

According to the latest report,[102] 1,771 students are currently receiving special education services to access the curriculum. Of these, nearly half (818) of the students exclusively attend one of the eight "SEN competence centers" and 916 students receive hourly care by professionals in teams based in competency centers while attending general schools. 37 students spend some days of the week in the general schools while mainly attending the competence centers, and 72 students are enrolled schools in neighboring countries (a reduction since the high of ca. 260 in the years 2007-09, prior to signing the UNCRPD).

While Luxembourg has lower segregation rates than its neighboring countries and much more cultural and linguistic diversity, it has not been widely recognized as a pioneer in inclusive education. Nevertheless, several schools have been developing the structures and alternative methods that do represent "inspiring practices" in inclusive pedagogy (see Powell et al. 2018). For example, Eis Schoul in Luxembourg city and École Jean Jaurès in Esch-sur-Alzette are all-day schools that value diversity and social equality in their student bodies. Generally, schools in Luxembourg's main cities cater to extraordinarily international communities in which half or more of the pupils have a migration background. The latter school exemplifies at local level that inclusive cultures and practices—from multilingual language learning to learning portfolios to peer learning processes—can develop even in education systems that are not fully inclusive, especially when a school is embedded in its community (see Powell et al. 2018). The all-day school is situated as a living space for students, and, in addition to teaching the key curricular subjects, offers various extra-curricular activities, such as workshops joined by students of various ages and backgrounds. The school aims to provide education for students to "live together and learn together" in an inclusive environment. While there are not many such model schools, demand for these is growing.[103] By contrast, the overall system remains selective and maintains numerous school types, demanding students to adapt (integration) to a highly complex and stratified system (Backes & Hadjar 2017). Having portrayed our European case, we turn now to Japan.

5.2 Japan: Increasing number of students are categorized as having SEN, and persistent separation in special classes in general schools or segregation in special schools to receive "special support education"

Since 2007, the so-called "special support education" was renewed in Japan. Considered by many to be the key to the inclusive society, this form of education aims to improve learning opportunities and increase understanding of disabled people through exchange and collaborative learning (Yuasa 2018, 28). According to Japan's Ministry of Education (MEXT), special needs

[102] Report by Janina Strötgen (https://www.reporter.lu/author/janina-stroetgen/) 9 November 2021 (original in German)
[103] RTL news on May 12, 2018 http://www.rtl.lu/letzebuerg/1178317.html

education[104] is defined as "education for students with disabilities, in consideration of their individual educational needs, which aims at full development of their capabilities and at their independence and social participation". Special Needs Education is carried out in various forms, including in resource rooms, in special classes (both are in regular schools), and in special schools named "Schools for Special Needs Education".[105]

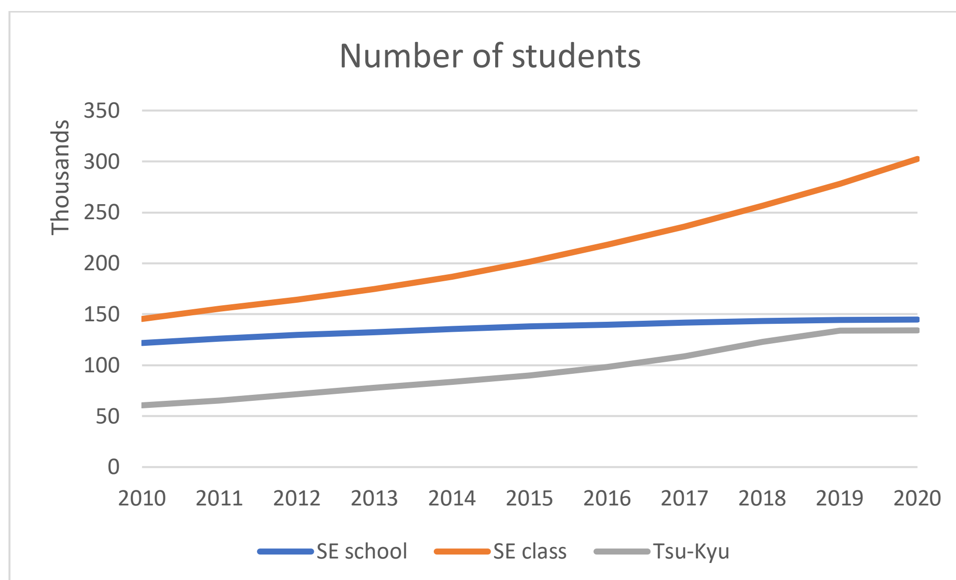
Special needs/support education, according to MEXT, can be provided in schools for special needs education, special classrooms in general schools, Tsu-kyu or resource rooms[106] in which children with SEN may spend a few periods a week while mostly attending general classrooms. MEXT reported that, in FY 2020, the number of students from pre-school to junior high school enrolled in special education schools was 144, 800[107] (0.8% of all students), while the number of students enrolled in special classes in general schools was 302,500[108] (3.1 % of all students), while the number of students utilizing the Tsu-kyu system (i.e. students who spend the majority of their school day in general classrooms with some support provided in separate settings) was 134,200[109] (1.4% of all students). Comparing these numbers in each category to 2010, the numbers in all the three categories have increased (x1.2, x2.1, x2.5).[110]

With increasing numbers in all settings from 2010 to 2020 (see Figure 2), the highest were in newly-introduced categories: ADHD, learning difficulties, and Autism.[111] The increasing number of students with SEN deserves attention especially as the overall student population in Japan has been decreasing (MEXT).

---

[104] In Japanese, the official name is 特別支援教育 (Tokubetsusien-kyoiku), more accurately translated as "special support education," even if MEXT uses the term "special needs education" in its English version.
[105] https://www.mext.go.jp/en/policy/education/elsec/title02/detail02/1373858.htm
[106] The disabilities covered in this program are speech impairment, autism, emotional disturbance, low vision, hard-of-hearing, Learning Disabilities (LD), Attention-Deficit/Hyperactivity Disorder (ADHD), and others.
[107] Double counted in case of multiple symptoms, (pre-primary 1,300, primary 46,300, junior-high 30,600, high 66,600 students)
[108] Primary 218,000, junior-high 84,400 students.
[109] Primary 116,600, junior-high 16,800, high 800 students.
[110] http://www.rehab.go.jp/application/files/5216/1550/6855/2_.pdf
[111] These categories were introduced in 2006, previously included in "emotional disorders". Yoshitoshi and Takahashi (2021) analyze enrolment statistics of students with disabilities in compulsory education (6-12 years old), finding numerous reasons for the increase, but changes in the education law pertaining to school placement beginning 2002 (where decision-making has involved local board of education and expert (2002), parents (2007 (initial school decision) and 2013 (decision of transfer)) have impacted these patterns.

Figure 2. Increasing of number of students with SEN in all settings (2010–2020)



Source: MEXT report 'Current situation of special education students in Japan and projects in 2021 ' (2020) http://www.rehab.go.jp/application/files/5216/1550/6855/2_.pdf

In Japan, the school selection decisions are made through the discussion and consultation with the municipal/local educational authority.[112] MEXT explains that comprehensive discussions should consider the students' disabilities, supports needed, educational system in the region, opinions of the students and parents, opinions by experts, among other aspects. After entering elementary schooling, discussions should continue, and, if appropriate, changes of educational setting may be considered.

According to MEXT,[113] in 2016, 54,146 students were examined by the municipal educational authorities as to whether they need special support education (at age five, one year before starting the elementary school education). After consideration, 10,281 students were recognized to have special support needs, of which 70% (7,192) started their elementary school education in public special support schools. These public school elementary entry proportions of 70% special school to 30% for general school are stable.

This shows that inclusive education has been interpreted as the expansion of integration of students with disabilities. While aspects of inclusive education have developed in Japan, special support education remains dominant and focused on disability, with the discussion of inclusive

[112] Based on Article 5 of Enforcement Regulations for the School Education Law https://elaws.e-gov.go.jp/document?lawid=328CO0000000340
Han et al. (2013,114) argues that this article implies the segregation in education for students with disabilities.
[113] https://www.mext.go.jp/kaigisiryo/2019/09/__icsFiles/afieldfile/2019/09/24/1421554_3_1.pdf

education within that context (Yuasa 2018, 28). Yuasa (2018) claims that, unlike the international movement of inclusive education, Japan has focused on how to support disabled students within existing structures and on incremental improvements in teaching and learning relying on "disability experts". This reflects "integration" of students with disabilities more than transformative inclusive education. The number of students categorized as "having SEN" has been increasing, even in recent years, especially as new disability categories emerged. While some students with disabilities are integrated into general schools, many others continue to learn in separate settings (in separate classes within general schools) or in segregated special support schools. Clearly, this is not commensurate with having ratified the UNCRPD.

5.3 Comparison

Reviewing the current situation of Luxembourg and Japan, we find four main similarities. Firstly, the integration of students with SEN into existing structures, not their inclusion within transformed education systems that welcome all forms of diversity (with few exceptional schools[114]). Secondly, overall, we find persistent separation or segregation of students with SEN in separate classes or segregated schools to receive special supports from categorically-oriented special educators. Thirdly, there are increasing numbers of students in new disability or SEN categories and the resultant discussion of how experts will accommodate these students within general settings. Finally, both countries have ratified the UNCRPD, but have not developed a comprehensive model or reform of existing school structures, with raised awareness about SEN tending to support expansion of existing structures—even if these contradict the human right to inclusive education.

In sum, reviewing the historical and current developments of special education and inclusive education, we find two dissimilar countries with similar gradual movements over decades towards inclusive education, yet with a current focus on "special supports" for those individual students diagnosed as having SEN. The situation seems paradoxical because while inclusive education has been actively promoted in both countries, the separation or segregation of students with disabilities or SEN (to be supported by experts) persists. Thus, we next analyze this paradox on (supra-)national levels.

6. The Paradox of Simultaneous Inclusion and Separation

Special education has grown to provide additional resources to help students with disabilities, learning difficulties, and disadvantages to access the curriculum and succeed in school: Diverse programs have served a population of students, especially poor boys, children belonging to racial, ethnic, migrant, or linguistic minority groups, and disabled children (Powell 2011, 23). However, in many societies, such learning support has been provided in environments (far) removed from the general classroom. Indeed, as shown above, in both Luxembourg and Japan, there are

[114] In Japan, there are private schools with different characters, including those focus on inclusion. One of the public schools which has gained attention recently is Ozora elementary school in Osaka, with the philosophy of inclusion, not as integration of SEN students but with the basis that all the students are different in their characters. (http://swa.city-osaka.ed.jp/swas/index.php?id=e731673) However, the school's position is unique in the public school system in Japan.

contrary developments in special and inclusive education that reflect the paradox of countries simultaneously promoting integration and inclusion (especially in terms of placement), even as they further strengthen support systems run by experts with categorical disability knowledge (and often working in separate organizations). In Luxembourg, the co-existence of general schools and alternative (all-day) schools exemplifies the on-going struggle of interpreting what is inclusive education. While the general schools with the support by experts reflects the arguments in the Salamanca statement and UNCRPD, the alternative inclusive schools take the position of a broader understanding of inclusive education, not only focusing on students with recognized disabilities or SEN per se, but rather assuming that every student is unique and diversity is something to be valued in education with benefits for everyone.

Fundamentally, the paradoxical situation is exacerbated by the lack of clear understandings and consensus among stakeholders of definitions (and ideals) of inclusive education.[115] Depending on the discourse and justified differently according to specific interests, this fuzzy concept has been interpreted differently. With reference to the overarching UNESCO definition, the definitions in Luxembourg and Japan exhibit important differences (Table 3 shows how the two countries define inclusive education).

Table 3. Definition of Special and Inclusive Education in Luxembourg and Japan

	Special education	Inclusive education (system)	Category of Göransson and Nilholm (2014) typology
Global discourse	Article 24 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) stipulates that countries must take steps to ensure that persons with disabilities access an inclusive, quality and free primary and secondary education on an equal basis with others in the communities in which they live.	Inclusive education systems remove the barriers limiting the participation and achievement of all learners, respect diverse needs, abilities and characteristics and eliminate all forms of discrimination in the learning environment.[116]	(C)(D)
Luxembourg	Special education (*Education Differencéee*)	One of the Luxembourg's	(A)(B)

[115] Ceng (2019, 33) argues that the Japanese policy simply connects the special support education with inclusive education without fundamental discussions of the concept of inclusive education.
[116] https://en.unesco.org/themes/inclusion-in-education

	Special schools and services are for pupils with SEN who, due to their mental, emotional, sensorial or motor issues, are unable to attend mainstream education. Learners with **special or specific educational needs** (EBS; élèves à besoin particuliers ou spécifiques) are those for whom the education provision offered by the teacher in a general class or specifically adapted.	governmental priorities is to guarantee children and young people with special educational needs schooling in general school system and attendance at childcare facilities and youth activities, where this inclusion is possible and desired by parents. In Luxembourg , the percentage of pupils enrolled in specialized centers is less than 1 per cent, which indicates a relatively high rate of inclusion.	
Japan	Special Needs Education is education for students with disabilities, in consideration of their individual educational needs, which aims at full development of their capabilities and at their independence and social participation. SNE is offered in various forms, including resource rooms, special classes (both are in general schools), and special schools named "Schools for Special Needs Education".	In inclusive education, while pursuing to learn at the same place together, it is important to provide instructions most appropriately responding to educational needs of students with SEN so that they will be independent, and they will be able to participate in society. It is important to provide flexible and continuous systems such as studying at regular classes, Tsu-kyu system, special classes or special schools.	(A)(B)

Source: Authors' summary based on the official documents listed below.
UNESCO's policy on education for persons with disabilities (https://en.unesco.org/themes/inclusion-in-education/disabilities)
UNESCO's policy on inclusion in education (https://en.unesco.org/themes/inclusion-in-education)
Luxembourg's policy on special education and inclusive education
(https://guichet.public.lu/en/organismes/organismes_citoyens/education-differenciee.html ,

https://eacea.ec.europa.eu/national-policies/eurydice/content/special-education-needs-provision-within-mainstream-education-40_en , https://men.public.lu/fr/themes-transversaux/eleves-besoins-specifiques.html)
Japan's policy on special needs education and inclusive education
(https://www.mext.go.jp/en/policy/education/elsec/title02/detail02/1373858.htm,
https://www.mext.go.jp/b_menu/shingi/chukyo/chukyo3/siryo/attach/1325884.htm)

Explanations of inclusive education, in both Luxembourg and Japan, focus on students with disabilities instead of all learners as defined by UNESCO. The term inclusive education is often not clearly defined in official statements, and that might be one of the causes of confusion in discussions of special education and inclusive education.[117]

Applying the typology of definitions of inclusive education by Göransson and Nilholm (2014) as explained above, UNESCO's definition of inclusive education ultimately aims to define inclusive education pairing a general individual definition (C) and a community-building definition (D). This understanding of inclusive education is clearly stated in the latest Cali statement, while the focus of the Salamanca statement and UNCRPD led to interpretation of inclusive education in the categories (A) and (B). Luxembourg and Japan remain focused on definitions referring to placement / settings (A) and the specified individual definition that considers how to support the individual's particular needs (B). Given their historical developments of SNE and the lack of a more transformative approach to inclusive education, special support education[118] persists rather than attention to concrete steps necessary to re-construct the education system for diverse students, as suggested and emphasized by UNESCO in the SDGs, the Global Monitoring Report 2020, and the Cali statement.

7. Discussion

Reviewing developments of special education and inclusive education in Luxembourg and Japan since the 1940s, the education systems in both countries exhibit similarities in gradual shifts in the long-term transition from special to inclusive education. A major influence in the development of policymaking and implementation over the past several decades has been the rising salience of global discourses and norms as well as human rights charters that emphasize the importance of inclusion; sometimes narrowly and sometimes more broadly defined. However, this global discussion and pressure has not yet transformed these national systems to become more inclusive. Instead, paradoxically, we find maintained separation and segregation as well as the strengthening of category-based SNE, which are not completely commensurate with inclusive education.

To better understand the complex relationship of special and inclusive education and measure the status of inclusive education on various levels, the typology presented by Göransson

[117] Florian (2019, 693) argues that distinguishing the two concepts of special and inclusive education is essential to future developments that support a good quality education for everyone and calls for a post-Salamanca decoupling of inclusive education from special education on the grounds that the twenty-first century challenge of SDG 4 requires renewed engagement with the contested conceptual problems associated with inclusion and equity in education.

and Nilholm (2014, 2017) has proven useful, as it helped uncover the layers in evolving discourses and more concrete reform processes in contrasting cultural contexts of Luxembourg and Japan. We analyzed both international charters and national policies using this typology.

Examining the past and current policies in both countries, embedded in the global discourse, we find the rhetorical commitment and the rising importance of inclusion of diverse students (a broadened notion of diversity, beyond "special educational needs"). Yet, on the other hand, special education supports and services—provided by (more or less) qualified experts—have been expanded, with persistence in separate or even segregated educational provisions. This maintenance of a continuum of settings in both a European and an Asian context emphasize considerable discrepancies between global discourses and national (and local) implementation of inclusive education policies, including the UNCRPD, ratified by both countries. A key reason, we argue, is the lack of sufficient discussion, clarification, and understanding of the definition(s) of inclusive education at all levels—and considerable differences in commitments to the full realization of inclusive education when understood as *all* children and youth learning together in reformed settings that value learner diversity and adapt to students. This newer conception of system change to be inclusive and adapt to diverse students stands in marked contrast to older concepts and practices of integration and mainstreaming that require students to adapt to existing structures. To further discussion on how to develop inclusive education, it is essential for diverse actors at all the levels to reflect their understandings of inclusive education and identify discrepancies between particular definitions central in discourses, policies, and school realities.

Disclosure statement

No potential conflict of interest was reported by the authors.

Notes on contributors

Miwa Chiba received her PhD in 2023 from the University of Luxembourg. Her comparative education research has recently appeared in the *Nordic Journal of Comparative and International Education*.

Justin J.W. Powell is Professor of Sociology of Education and Head of the Department of Social Sciences at the University of Luxembourg.

References

Backes, S. & Hadjar, A. 2017. "Educational trajectories through secondary education in Luxembourg: How does permeability affect educational inequalities?" *Schweizerische Zeitschrift für Bildungswissenschaften* 39(3): 437–460.

Baker, D.P. 2014. *The Schooled Society*. Stanford: Stanford University Press.

Ceng, M. 2019. "Analysis on the process of design and implementation of special support education." *Public Educational System Research* 18; 29–46. [in Japanese]

Florian, L. 2019. "On the Necessary Co-existence of Special and Inclusive Education." *International Journal of Inclusive Education* 23(7-8): 691–704, DOI:10.1080/13603116.2019.1622801

Forlin, C., Kawai, N. & Higuchi, S. 2015. "Educational reform in Japan towards inclusion: Are we training teachers for success?" *International Journal of Inclusive Education* 19(3): 314–331, DOI: 10.1080/13603116.2014.930519

Fujii, Yoshihiro. 2019. "Awareness of elementary school teachers on inclusive

education and study toward future improvement". Bulletin of Faculty of Education and Culture, Akita University.74. 99-106. [Japanese]Göransson, K. & Nilholm, C. 2014. "Conceptual Diversities and Empirical Shortcomings – a Critical Analysis of Research on Inclusive Education" *European Journal of Special Needs Education* 29(3): 265–280, DOI: 10.1080/08856257.2014.933545

Göransson, K. & Nilholm, C. 2017. "What is meant by inclusion? An analysis of European and North American journal articles with high impact". *European Journal of Special Needs Education.* , 32:3, 437-451, DOI: 10.1080/08856257.2017.1295638

Göransson, K., Bengrsson, K., Hansson, S., Klang, N. Lindqvist, G., & Nilholm, C. 2022. "Segregated education as a challenge to inclusive process: a total population study of Swedish teachers' views on education for pupils with intellectual disability". I*nternational Journal of Inclusive Education* 26:14. 1367-1382.

Han, C. et al. 2013. "The Current Situation and Issues of inclusive education for special needs education in Japan." *Bulletin of Faculty of Education, University of Ryukyu* 83; 113–120. [in Japanese]

Heyer, K. 2021. "What is a Human Right to Inclusive Education? The Promises and Limitations of the CRPD's Inclusion Mandate." In Köpfer, A., Powell, J. and Zahnd, R. (Eds.) *International Handbook of Inclusive Education* (45-57). Verlag Barbara Budrich.

Joachim, P. 2013. *Evaluation eines Ganztagsschulversuchs. Die Jean-Juarès-Grundschule in Luxemburg.* Münster: Waxmann.

Kanamaru, A. 2020. "Positioning and Transition of the Term and Concept of 'Formation of Relations between People with and without disabilities' and 'Understanding and Recognition for people with Disabilities' in 'Exchange Program' or 'Exchange and Collaborative Learning' of Course of Study." *Kobe University Department Bulletin* 13(2). 59–71. [in Japanese]

Kiuppis, F. 2014. "Why (Not) Associate the Principle of Inclusion with Disability? Tracing Connections from the Start of the 'Salamanca Process'" *International Journal of Inclusive Education* 18(7): 746-761. DOI: 10.1080/13603116.2013.826289

Krischler, M., Powell, J.J.W., & Pit-Ten Cate, I.M. 2019. "What is Meant by Inclusion? On the Effects of Different Definitions on Attitudes toward Inclusive Education" *European Journal of Special Needs Education* 34(5): 632–648. DOI: 10.1080/08856257.2019.1580837

Larsen, T.C., Holloway, J., & Hamre, B.F. 2019. "How is an Inclusive Agenda in an Excluding Education System: The Danish Dilemma." *International Journal of Inclusive Education* 23(10): 1049–1064. https://doi.org/10.1080/13603116.2019.1626497

Limbach-Reich, A. & Powell, J.J.W. 2015. "Schülerinnen und Schüler mit besonderem Förderbedarf im luxemburgischen Bildungssystem [Pupils with Special Educational Needs in Luxembourg]." *Bildungsbericht Luxemburg* 2015 [*National Education Report Luxemburg 2015*]. Luxembourg: MENJE/University of Luxembourg, 91–97.

Magnússon, G., Göransson, K., & Lindqvist, G. 2019. "Contextualizing Inclusive Education in Educational Policy: The Case of Sweden" *Nordic Journal of Studies in Educational Policy* 5(2): 67–77. DOI: 10.1080/20020317.2019.1586512

Meyer, J.W. 2000. "Globalization: Sources and Effects on National States and Societies." *International Sociology* 15(2), 233–248. DOI: 10.1177/0268580900015002006

Murakami, Y. & Meyer, H.-D. 2010. "Culture, Institutions, and Disability Policy in Japan." *Comparative Sociology* 9: 202–221.

Nilholm, C., & Göransson, K. 2017. "What Is Meant by Inclusion? An Analysis of European and North American Journal Articles with High Impact." *European Journal of Special Needs Education* 32: 437–451. DOI: 10.1080/08856257.2017.1295638.

Nishioka, K. 2017. "Historical overview of curriculum organization." In Tanaka, K., et al., *Curriculum, Instruction and Assessment in Japan* (11–27). New York: Routledge.

Okada A. 1999. "Secondary Education Reform and the Concept of Equality of Opportunity in Japan." *Compare: A Journal of Comparative and International Education* 29:2, 171-189.

Powell, J.J.W., Edelstein, B. & Blanck, J.M. 2016. "Awareness-raising, Legitimation or Backlash? Effects of the UN Convention on the Rights of Persons with Disabilities on Education Systems in Germany." *Globalisation, Societies and Education* 14(2): 227–250.

Powell, J.J.W., Limbach-Reich, A. & Brendel, M. 2017. "Grand Duchy of Luxembourg." *The Praeger International Handbook of Special Education* vol. 2, 296–309. Santa Barbara, CA: ABC-CLIO.

Richardson, J.G. & Powell, J.J.W. 2011. *Comparing Special Education: Origins to Contemporary Paradoxes*. Stanford: Stanford University Press.

Schreiber, C. 2014. "Curricula and the Making of the Citizens. Trajectories from 19th and 20th Century Luxembourg." PhD diss., University of Luxembourg. http://hdl.handle.net/10993/18878

Smith, E. & Gorard, S. 2012. "Teachers are kind to those who have good marks: a study of Japanese young people's views of fairness and equity in school." *Compare: A Journal of Comparative and International Education* 42:1, 27-46.

Takahashi, J. and Matsuzaki, H. 2014. "The Changes and Problems in Inclusive Education." *Fukushima University Department Bulletin* 19: 13–26. [in Japanese]

Tröhler, D. 2016. "Curriculum History or the Educational Construction of Europe in the Long Nineteenth Century." *European Educational Research Journal* 15(3): 279–297. https://doi.org/10.1177/1474904116645111.

UNESCO 1994. Salamanca statement and Framework for Action in Special Needs Education https://unesdoc.unesco.org/ark:/48223/pf0000098427

UNESCO 2019. Final report of the international forum on inclusion and equity in education: every learner matters. Cali, Colombia, 11-13 September 2019. https://unesdoc.unesco.org/ark:/48223/pf0000372651

UNESCO 2020. Global Monitoring Report on Inclusive Education. Paris.

Yoneda, H. 2020. "Development of the Japanese Inclusive Education System: From Special Schools to Curriculum Modification for Special Needs Education in Regular Schools." *Advances in Social Science, Education and Humanities Research* (464): 1031–1040.

Yoshitoshi, M. & Takahashi, K. 2021. "A critical analysis of court decision on mainstream school attendance of a child with medical care needs in Japan: A long way towards inclusive education." *International Journal of Inclusive Education* DOI: 10.1080/13603116.2021.1888322

Yuasa, T. et al. 2019. *Inclusive education*. Kyoto, Japan: Minerva Publishing. [in Japanese]

Yawata, Yukari. 2012. "Inclusive education in our country- based on the historical background of integrated education." Research bulletin of Naruto University of Education 27. 65-79. [in Japanese]

Zapp, M. 2021. "The authority of science and the legitimacy of international organisations: OECD, UNESCO, and World Bank in global education governance." *Compare* 51(7): 1022–1041. DOI: 10.1080/03057925.2019.1702503

Article 3

How Inclusive is Music Education in Luxembourg and Japan?

Miwa Chiba

Abstract

How inclusive is music education in Luxembourg and Japan? Awareness of inclusive education has risen globally with the expanded concepturalization of inclusive education, and expectations for music education to include a greater diversity of students have similarly increased. However, the issues surrounding inclusion in music education are complex. There are concerns that existing music education systems – contrary to movements towards greater inclusivity – continue to structurally limit the equal access and full participation of diverse individuals. This study emphasizes that music education is historically and socially constructed. The study compares the two very different and rarely compared countries of Luxembourg and Japan. Reiewing the historical construction of the countries' respective music education systems and their characters (based on historical institutionalism as the analytical framework) as well as the organizational field of music education (based on sociological institutionalism together with the concepts of formal, non-formal

and informal education as the analytical framework), this study analyzes how inclusive each music educaton system has been and what opportunities and obstacles toward full inclusion exist. In analyzing how inclusive the music education systems have been, this study applies the typology of inclusive education by Göransson *and* Nilholm (2014), which clarifies different (and sometimes contradicting) perceptions and interpretations of inclusive education in the different discourses. Also, the study takes into consideration the global influence of inclusive education and music education on their local developments to examine how powerful the global discourses have been. The study finds that unequal access to music education in general school systems remains. It also finds that the standardized approach to music education based on (a particular) aim of music education prevents the full and diverse participation of students in music education. Further, the study suggests the limitations of the inclusive music education approach based on the categorization of students into particular groups. The study proposes for policy makers and educators to critically reflect how they perceive inclusive music education in their existing systems, and to discuss the transformation of the music education systems considering the whole organizational field of music education for full inclusion of students with diversity.

Key words: music education; inclusive eudcation; neo-instituitonalism; organizational field; Luxembourg; Japan

1. Introduction: Music Education and Inclusion

The concept of inclusive education has developed dramatically around the globe especially since the Salamanca Statement and Framework for Action in Special Needs Education (1994) (Salamanca Statement) and the UN Convention of the Rights of Persons with Disabilities (UNCRPD) (2006). Although the concept was originally developed in response to the call to integrate students with disabilities into mainstream educational systems, importantly, the concept of inclusive education has been recently broadly expanded to cover not only learners with disabilities but also all learners – irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status[119][120].

Music is often said to drive the inclusion of a diversity of people. The role that music can play is underscored at the global level by organizations such as UNESCO who stress the role of music in fostering a diverse and cohesive society. This is evidenced by projects

[119] UNESCO Cali commitment (2019) https://unesdoc.unesco.org/ark:/48223/pf0000370910
[120] UNESCO Guidelines for Inclusion: Ensuring Access to Education for All (2005)

such as Symphony 2030 or Voices of the World,[121] which is strategically aligned with Goal 4 (Quality Education) of the United Nations Program for Sustainable Development to 2030. At the local level, for example, the El Sistema model, initiated in Venezuela, has spread widely around the globe to include vulnerable people in society into music education and music experiences, although there have been some criticisms (see, for example, Baker G, 2014, Kertz-Welzel, 2018, p.44).

However, as Lindgren (2016) and others have shown, the issues of inclusion in music education are more complex than they might at first appear. The issue of inclusion in music is not only about supporting students in difficult circumstances through music, nor is it simply about placing students with different characteristics in the same place of learning music. Lindgren et al (2016) emphasize the concern that music and music education do not automatically serve democracy, because musical and cultural activities can never be regarded as politically neutral as they are always, explicitly or implicitly, anchored in some kind of social and cultural viewpoint. In other words, music education is socially (re)constructed based on focused values and selected aims of music education. Lubet (2009, p. 729-730) argues that there has been a "socially constructed disability" in music education, especially in the music education system focusing on 'talent'. He is concerned that the typical music education is based on a "talent culture", and that this culture is the most exclusionist form of music education, which we see in conservatoires and music universities as well as even in public schools and community music schools. Churchill and Laes (2021) argue that, in the field of music education (and other areas of education), prevailing discourses call for formalized standards as a means of cohering the field, with an emphasis on growth, productivity and the shaping of well-disciplined bodies or minds (p.132). They warn against the potential marginalizing effect of this discourse enforced through the "competence" which music educators seek from their students, and the trend of education-as-competition (p.132). As seen, concerns about contradictions between what music education is expected to offer (inclusive experiences) and what music education might have offered (exclusive experiences) persist – in many contexts.

In this study, I compare the music education systems in Luxembourg and Japan, as a contrasting comparative case study through a sociological lens. The two countries may seem to be too different to compare – due to the differences in geographical location, size

[121] UNESCO and the Andrea Bocelli Foundation joint forces to promote arts education in support of disadvantaged children (2019) https://en.unesco.org/news/unesco-and-andrea-bocelli-foundation-join-forces-promote-arts-education-support-disadvantaged

and population and the Western and the Eastern cultural backgrounds for a start – and one may ask if there is any significance in comparing the two. However, their comparison makes perfect sense for two main reasons: i) to review the powerful global influence on the conceptualization of inclusive education and music education, even on such countries with so much differences (commonality); ii) to analyze the persistent institutionalization of the music education system in the local contexts in the two countries (differences). The author's own experiences living and working in both countries allow her to carry out this comparative study. Responding to Michael Sadler's (referred in Phillips and Schweisfurth, 2014) invitation that the practical value of studying the foreign systems of education is that it will result in a better understanding of our own system, the analyzing of similarities and differences in this study further contributes to a better understanding of the characteristics of music education systems in the two countries. Comparative education is interested in understanding what education in different countries looks like and how the international flow of ideas works (Kertz-Welzel, 2018, p.49). Not only aiming to describe educational systems, this study attempts to propose educational improvements (as urged by Holmes referred by Kertz-Welzel, 2018, p.52), through a reflection on the music educational systems in both countries from the perspective of inclusion. The results presented in this article will be useful to policy makers working on inclusion in music educational systems.

2. Theoretical frameworks and Concepts

This study applies the analytical frameworks of (i) the global influence on education, (ii) neo-institutionalism (Historical and Sociological Institutionalism), and (iii) the typology of inclusive education by Göransson and Nilholm (2014). First, it analyzes how music education systems have been developed in the two countries based on the global influence and the historical institutionalism. Second, it analyzes the organizational field of music education i.e., what kinds of formal, non-formal and informal music educational organizations exist based on the sociological institutionalism. It further discusses how the music educational fields can be developed for inclusion in music education. For the discussion, it is important to clarify what inclusive education means. For clarification of the term, the study refers to the typology of inclusive education by Göransson and Nilholm (2014). Through the analysis based on these frameworks, the study discusses the similarities and differences in the two countries and how to further (re) construct full inclusive music education.

(1) Global influence of inclusive (music) education and discourse changes

Many scholars have already pointed out that globalization has had a huge impact on national or local policies (see Meyer 2000, Ramirez 2006, Rizvi 2009, Baker D 2014, for example). Kertz-Welzel (2018) states "globalization is not an easy phenomenon and is characterized by opposite tendencies, such as homogenization and heterogenization, also exemplifying the dialectics of the global and the local" (p.3).

How have global policies and discourses influenced inclusive education and music education in local countries? While it would be inappropriate to oversimplify, there appear to be some similar tendencies in how globalization has impacted both inclusive education and music education worldwide.

In terms of inclusive education, powerful global discourses on human-rights and anti-discrimination of people with disabilities have played an important role in the (re) construction of local polities of inclusive education. There have been a large number of prior studies focusing on special education or disability studies in the context of the discussion of inclusive education (see Allan and Slee 2008, Hernandez-Torrano, 2022, p.905), and the increasing number of the countries signing UNCRPD. Nevertheless, the more recent global policy discourses have changed in approach. Instead of focusing only on students with disabilities and considering how to integrate students with disabilities into the mainstream, it places importance on the need to recognize and value diversity of all students (based on the assumption that everyone is different) and transform educational systems which include all.

As to music education, globalization has been evident in the wide-spread westernization of music education in the world – which Kertz-Welzel (2018, p.9) call the "dominance of Anglo-American music education" or focus on European classic music education". More recently, there have been calls for the reconsideration of music education to (re) connect music education with the needs of students, "helping students use music for their individual lives more effectively and fostering abilities needed in today's world, such as creativity, or learning how to handle diversity in everyday life" (Kertz-Welzel 2018). [122]

This study reviews the music educational systems and the conceptualization of music and inclusion in the two countries, in consideration of both complex global influences.

[122] See also UNESCO's report 'The protection and promotion of musical diversity' (2006)

(2) Historical institutionalism (path dependency and persistent structural features) and Sociological institutionalism (organizational field)

Music education can be provided in different forms by different organizations. However, we tend to take our existing music education systems for granted, without questioning how they have been developed in that ways but not in other ways.

Historical institutionalism proposes the analysis of path dependencies in the (re) construction of systems, which are often at the root of persistence in the system. Based on the understanding that institutions do not simply mean the organizations but are a "collection of norms, rules, understandings, and routines" (March and Olsen 1998, cited by Peters 2012, p.28), this study analyzes how music education systems have been constructed in the two countries. Institutions, in this framework, are understood as the "structural features of society, having stability over time, which affects individual behavior, which provides shared value and meaning among the members of the institution" (Peters 2012, p.18). This study reviews such persistent structural features as well as the constructs of shared value and meaning that characterize the respective music education systems in the societies of Luxembourg and Japan, and crucially, how these institutions encourage or discourage inclusion in music education in each case.

It is important to note that music education is not only provided in formal school organizations, but also in other non-formal or informal settings.[123] For a discussion about full inclusion in music education systems, it is crucial to get an overview of different music educational organizations involved in the organizational field of music education systems (Sociological institutionalism). According to DiMaggio and Powell (1983), an organizational field consists of organizations that on aggregate constitute an area of institutional life. The emergence of an organizational field is a socially constructed process, and the pre-existing structures with different organizations and boundaries are transformed to adopt environmental factors or powerful ideas (see Zapp and Powell, 2016, p. 541). This study

[123] Reference to the definition of formal, non-formal, and informal by Gonzalez & Bonal (2021). "Formal education refers to traditional schooling. Non-formal education refers to any organized educational activity, designed for a particular learning group with clear learning objectives, outside the established formal system. Informal education refers to experience-based and often accidental learning, occurring e.g., at home or during a leisure activity". Similar definition by La Belle (1982) and The Council of Europe: https://www.coe.int/en/web/european-youth-foundation/definitions.

firstly conceptualizes the mapping of different organizations in the field of music education, and thereafter proposes how we can discuss further for inclusion in music education.

(3) Clarification of definition of "inclusive music education"

To discuss how inclusive music education systems have been characterized, it is crucial to clarify what "inclusive music education" means. Without clarifying the definition, the discussion can go a number of directions at different levels of analysis[124]. The term inclusive education has been widely, and sometimes contradictorily, used in different contexts. As mentioned, even the global discourse has changed in relation to inclusive education from a narrow understanding of inclusion (i.e., the integration of people with disabilities into mainstream educational settings) toward broader understanding of inclusion (i.e., to a diversity valuing environment that transforms educational system to include people with different characters).

Prior studies have pointed out the complexities in defining inclusive education[125], among which, Göransson and Nilholm (2014) have offered valuable clarification. They propose four categories in their typology of definitions of inclusive education: (A) Placement – inclusion as *placement* of students with disabilities in general education classes. (B) Specified individual definition – inclusion as meeting the social and academic needs of *students with disabilities*. (C) General individual definition –inclusion as meeting the social and academic needs of *all students*. (D) Community definition – inclusion as the creation of communities with specific characteristics. With respect to music education, Lindgren et al. (2016), referring to Wright's (2014) assertion, question if inclusion is only making music education more widely available, or, simply inviting students from disadvantaged backgrounds to partake in music activities, provided it is in keeping with certain styles and norms (e.g., western classic orchestra). This study clarifies the interpretation of inclusion in music education in each type of organization in the field of music education.

[124] See Hernandez-Torrano et al. (2022) for multiple directions in the research of inclusive education. Also, see Florian (2019) for the paradoxical development of special education and inclusive education.
[125] See Felder (2022) "In aiming to determine the exact content and meaning of inclusion, we find a very fragmented field of discourse in education, where the term is defined in myriad ways. The orientations and focal points of these definitions vary greatly" (p.50).

3. Research Questions and Research Design

(1) Research Questions

This study aims to analyze how inclusive music education been developed in the two countries. The research questions are as follows.

- How have music education systems historically developed in Luxembourg and in Japan? What are the characteristics of music education systems in the two countries?
- What type of (formal, non-formal, and informal) music education organizations have been developed in the two countries?
- What is(are) the interpretation(s) of inclusive education in the music education systems in the two countries? How has global conceptualization influenced the countries?
- What could be the potentials for and obstacles against inclusion in music education in the two countries?

(2) Research Design

This study is based on the constructivism and advocacy worldview as classified by Creswell (2009, p.6). Instead of testing or verifying a specific model, the construction of the music education systems in the two countries is reviewed and analyzed comparatively. Although it is not intended to generate any specific theories, this study does suggest frameworks for discussion and policy implications toward (full) inclusion in music education. This study is conducted using multiple qualitative research approaches, combining document reviews and interviews. A small participatory observation is also conducted to supplement the understanding of inclusive approaches in a model school in Luxembourg.[126] The data is collected from publicly available documents including law, regulations and policy documents issued by the Ministry of Education and related organizations in the music education fields in both Luxembourg and Japan. It compares music education in the national curricula of the two countries, i.e., the *plan d'etudes école fondametal*[127] issued by the Luxembourgish Ministry of Education and based on the *Reglement Grand-ducal* (August 11, 2011) as

[126] The author has lived, worked (including in the music educational field) and studied in the two countries, and all the experiences of the author in the two countries also influence on conducting this study.
[127] https://men.public.lu/en/publications/courriers-education-nationale/numeros-speciaux/plan-etudes-ecoles-fondamentale.html

well as the National Course of Study (NCS)[128] issued by the Japanese Ministry of Education, Culture, and Sports, Science and Technology (MEXT) (latest version implemented in 2020). The interviews drawn on here are conducted with teachers at public primary schools (including the public inclusive model school), the public music schools (conservatoire and local music schools), and with representatives from non-governmental organizations working in music and inclusive education. In total, eight interviews were conducted in 2018. The interviewees were purposively selected from each category with random and snowball sampling. Due to the locational restriction, the interviews with the teachers in Japan were conducted via online video meetings. The interviews with teachers in Luxembourg were conducted in English,[129] while the interviews with Japanese teachers were conducted in Japanese. The semi-structured interviews were conducted in response to the guiding questions as below, although free-style conversation was encouraged during the interviews.

Table: Guiding interview questions

- About the organization (goal, background of establishment, funding, membership etc.)
- Activity of the organization (in general and for music education)
- Unique characteristics of the organization
- Core value and attitudes toward inclusion (What does inclusion mean?)
- How can music education be inclusive?
- How music can be used as a tool for inclusion?
- Difficulties in implementation of inclusive education?

Source: author

Cummings (1999) explains that the initial softer field approach of comparative research (observing differences in the practice of education in different settings) began to decline in social and policy sciences such as economics, sociology, political sciences, and even anthropology, instead harder social science with scientific methodology of variables and measurement characteristics has increased, and many researchers decided to do more focused work in more limited settings (see p.416). Bartlett and Vavrus (2017) argue, a heuristic comparative case study approach is valuable,

[128] https://www.mext.go.jp/a_menu/shotou/new-cs/1387014.htm
[129] The interviewees were non-native English speakers (Luxembourgish, German, or French as native languages). The interviews used the common language of English.

stating "Derived from a Greek word that means 'to discover', heuristic can be defined as a method that comes from experience and aids in the process of discovery or problem-solving. It is not a recipe or a set of rules" (p.6). I aim to use the comparative approach to discover and reflect the characteristics of each music educational system and warn the taken-for-granted views on them, further suggesting the open discussion toward inclusion in music education.

(3) Limitation of the study

This study focuses on a sociological analysis of (inclusive) music education systems. The level of the analysis is mainly at the global and country (policy and system) levels[130]. Therefore, this study does not cover the scope of implementation of music education at a school or classroom level and related pedagogical aspects, which are areas for future potential study.

4. Comparing Luxembourg and Japan

In this section, the article compares Luxembourg and Japan from three perspectives; i) the development of a music education system to understand the respective contexts, ii) organizations in the music educational field and their collaboration(s), and iii) what inclusive music education means in these two countries.

4.1 Luxembourg

(i) Development of formal music education system in Luxembourg

Music education in Luxembourg has been primarily provided in separate educational organizations, such as conservatoires and local music schools. Traditionally, music education in Luxembourg was not for the whole population but was rather reserved for a special group of people who intended to become professional musicians (Sagrillo, 2016, p. 124). Accordingly, the contents of music education largely focus on technical aspects based on Solfège (music theory and literacy), which consequently limits the path to music for pupils, dividing pupils into the "talented" and "not talented" (p. 124). This is due to the historical development of music education in Luxembourg which was, for a long time, influenced by its neighboring countries of France and the French

[130] See Bray and Thomas (1995, p.475)

speaking part of Belgium (Wallonia), where music education gave priority to music literacy rather than practice (Sagrillo, 2013, p. 77).

The *Conservatoire* of Luxembourg city was established in 1906 with a donation from a generous patron to foster the career development of future professional musicians. The *Conservatoires*, then opened their doors to the wider population in the 1960s. Since the 1967, they experienced a "skyrocketing" in enrolments and the premises grew to include various annexes.[131][132]

In addition to the *Conservatoires*, the Union Grand-Duc Adolphe Association (UGDA)[133] plays an important role in Luxembourg's music education. The association was established in 1863 to be the umbrella organization of all the country's music clubs.[134] In 1958, the association introduced Solfège examination and started conducting music courses. The official establishment of UGDA music schools[135] for the benefit of the public was in 1991.

Currently, there are three conservatoires in Luxembourg city, Esch-sur-Alzette (south), and Ettelbrück/Diekirch (north) and the local public music schools and courses created by municipalities as well as the UGDA music schools and courses in communes, all of which receive public funding[136]. The law of April 28, 1998, provides that these public organizations are the official providers of music education in Luxembourg, standardizing music education for the following purposes:

---

[131] Sagrillo (2013) explains that almost 15,000 pupils (17.3% of the total school population) attend extracurricular music courses at music schools. This is a remarkable number compared to the dramatically low proportions of France (1.9%) or Germany (2.03%), although the percentage is higher in Switzerland (19.2%) and Austria (18.9%).
[132] Website of Conservatoire of Luxembourg http://www.conservatoire.lu/?page_id=83
[133] https://www.ugda.lu/
[134] In Luxembourg, there have been active fanfares (wind bands) in almost every town. According to an interview conducted with a music teacher in 2018, the fanfares are good opportunities for life-long learning to enjoy music, however there are limits to participation for those not living close by. The interviewee explained her own experience that many of the members of fanfares (especially in small villages) are those living in the area for a long time.
[135] In 2016-2017, 1,775 students enrolled in music courses and 3,975 students enrolled at UGDA music schools. There were about 200 music teachers as of 2017 (UGDA brochure 2017/2018). In the news article, the total number of students in conservatoires and public music schools is stated as being 16,000 pupils supervised by 700 teachers and attending classes at three conservatoires, eight regional music schools, four conventional UGDA music schools and 27 other UGDA courses. (Lëtzebuerger Land dated 18.01.2019) https://www.land.lu/page/article/048/335048/FRE/index.html (original in German). This is about 15% of the primary and secondary school population.

[136] In Luxembourg city, the public C*onservatoire* covers residents in the city, which offers a music education, including Solfège and courses on instruments. Due to the high demand, conservatoires use entrance exams to select students to start learning instruments, and for popular instruments, such as the piano, there are long waiting lists to enter the school. Once accepted to learn to play instruments at the conservatoire, it is obligatory to study Solfège in parallel to learning instruments (or before learning instruments in case there is no vacancy for instrument courses). In the UGDA schools, both Solfège and instruments are taught. To start learning instruments, students need to finish fundamental Solfège courses first. Both in the *Conservatoires* and the UGDA schools, examinations are conducted to move to the next level.

- To awaken, develop and cultivate a knowledge and taste of music in young people in order to enable them to participate in musical life;
- To provide young people with specialised training in the various musical disciplines in order to enable them to purse advanced music studies at a higher or university level[137]; and
- To provide adults with training and development courses

While, as described, music education in Luxembourg is mainly offered by separate music educational organizations, the national curriculum (*plan d'etudes école fundamental*) provides guidance to include 3 hours of art classes per week in general public primary schooling, of which music is a part.[138] According to the guidelines, throughout the cycles[139] in primary schools, it is recommended that both technical and creative aspects in music education are developed.[140]

Nevertheless, according to the interviews conducted with music teachers at public music schools, in practice, how music education is offered in general public-school education may vary depending on each teacher's capabilities and priorities. The interviews revealed that teachers lacked sufficient music education in public primary schools[141] and had insufficient support for teaching materials. As one interviewee reported:

> *"If the teachers do not have music in their life, they don't sing with kids. First of all, they don't know what to sing, secondly, they may have CDs to listen [to], but they don't want to show their students that they cannot sing. So, and then, they try with kids "Sing along with CDs!" (laugh) but of course, if the teacher does not sing, kids do not want to sing. So, after 10 minutes, the teacher would say "OK, kids, if you don't want to sing, we do math."* (Interview 1)

Also, the underlying assumption of teachers' autonomy may prevent teachers' collaboration in this subject.

[137] Unlike the conservatoires in other countries, the conservatoires in Luxembourg do not offer advanced higher education at university level. Students seeking advanced musical training at a higher level go to other countries to continue their education.
[138] The first curriculum of music education in general schools was created in 1964, however, the teachers were not given any methodological tools to implement the curriculum (Sagrillo, 2020, p.205).
[139] Cycle 1: 3-6 years old, cycle 2: 6-8 years old, cycle 3 : 8-10 years old, cycle 4: 9-13 years old.
[140] This study focuses on public primary school education. There are several private schools in Luxembourg such as European schools and international schools with different curriculum and extra-curricular activities.
[141] The issue of teacher education has been recognized and the University of Luxembourg with support for the conservatoires establishing the degree of BA music education to develop music teachers from 2021 onwards. https://wwwen.uni.lu/university/news/slideshow/university_will_offer_a_bachelor_in_music_education_in_september_2021

"Teachers at primary schools, some are doing very good music lessons, but some are not. It's an issue of the autonomy of teachers. And that can be very good. But most of the times, not, to be honest, because most of them are not qualified even if they have good will, even when they are interested in [it], they don't know how to teach music." (Interview 3)

The interviews revealed the potential issue of teacher training and the competencies that they require to teach music in general public schools, and how teachers in general public schools and public music schools can complement one another. [142]

(ii) Diverse organizations in music education field

There are diverse formal, non-formal and informal organizations in the field of music education. One of the notable non-formal organizations in Luxembourg are the village (wind) bands called Fanfare or Harmonie, inviting children and adults living in the area to participate. Even a small village has its own bands, which play an important role in communal ceremonies and events. While less due to the size of the country, there are also some amateur orchestras.[143] Some music clubs are active, such as the accordion club.[144] Importantly, most of the music associations are members of the Union Grand-Duc Adolphe Association (UGDA).[145] There are also some choirs and choral associations[146]. The Institut European de Chant Choral (INECC)[147] offers singing workshops for children and adults, as well as workshops for choir trainers. These organizations are non-formal organizations, with accessibility (membership) varying depending on the policies of the organization. In many cases, especially for associations of instruments, membership requires a technical audition, although there are some workshops and projects inviting open

142 The issue of teacher training for music education in general schools has been discussed and struggled for a long time. See, for example, the article on Martin Straus, who tried to create and implement music curriculum in general schoolings in inclusive approach (Sagrillo, 2019).

143 For example, Luxembourg Philharmonia is one of the amateur orchestras with members from secondary school students to persons over 90 years old (https://www.philharmonia.lu/). There is also the youth orchestra (https://onj.lu/) for young people. Recently, Luxembourg Philharmonie (with support from professional orchestra members) created an opportunity for amateur musicians over 18 years old which is called Orchestre de la Place de l'Europe Philharmonie Luxembourg (https://www.philharmonie.lu/en/ope).

144 Sagrillo (2012) had concerns that the participation by non-Luxembourgers in amateur music clubs had not been active.

145 UGDA https://www.ugda.lu/fr/federation/centre-de-documentation-musicale/le-centre-de-documentation-de-lugda

146 https://www.chouer.lu/all-chorus-luxembourg/

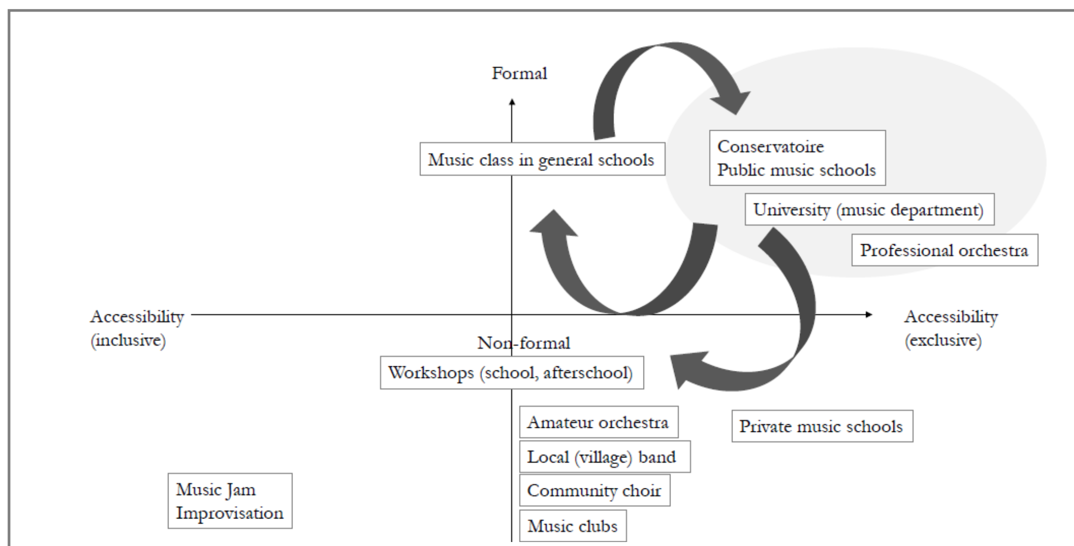
147 INECC https://www.inecc.lu/

participation, such as Home Sweet Home by INECC,[148] which allows anyone – regardless of music literacy or experience – to participate.

As for the workshops for children, there have been some initiatives by public music teachers, for example, with the *Maison Relais* (childhood education and care offered in afterschool facilities). Also, professional musicians (under the initiative by Philharmonie – which is the concert venue with the professional orchestra called Orchestre Philharmonique du Luxembourg) occasionally provide opportunities for children to experience and learn music.[149] There are some music jams and improvisation sessions for young adults (such as university students.[150]

Mapping the organizations in the field of music education shows the diversity of settings for music education (see Figure 4.1). The map is not absolute or static and the purpose of the map is to visualize the existing organizations outlined by whether they are formal-nonformal-informal (along the vertical axis) and accessibility (along the horizontal axis). Although there are many different organizations involved, the music educational field in Luxembourg is strongly influenced by the formal organizations such as the conservatoire, music schools, and professional musicians. This relates to strong beliefs in the aesthetic value of music, and peoples' understanding that learning music is learning "good" music from experts.

Figure 4.1: Map of organizations in the field of music education (Luxembourg)



[148] Home Sweet Home (INECC) https://inecc.lu/en/ensembles/home-sweet-home
[149] Philharmonie of Luxembourg https://www.philharmonie.lu/en/education;
[150] https://wwwen.uni.lu/students/culture_art_sports_well_being/espace_cultures2/unijam

Source: Author

(iii) What inclusive music education means?

In formal settings, the Government has decided to make music education in *Conservatoires* and public music schools free of charge from September 2022.[151] This initiative is intended to expand the access to music education, including more students in music education. In parallel, there have already been some collaborative projects between public music schools and general public schools, for example, music teachers in public music schools go to general public schools to provide mini lessons using plastic trumpets, or music teachers at public music schools offer music activities in after school facilities.[152] Inclusion, in this sense, is understood as inviting a wider population to participate in formerly quite exclusive music education. However, the interviews revealed some concerns. One of the biggest concerns is the process of enrolment either at the public music schools or at the after-school facilities while limited resources are identified as another challenge.[153] An interviewee also revealed a concern about the difference in the implementation of music education in different areas of the country.

On the other hand, the meaning of inclusive (music) education in the public inclusive model school in Luxembourg[154] appears to be more than a mere question of access. A teacher explained that,

> *"Inclusive education for us isn't only the focus of disability or learning difficulties, it's a case of difference which we think [is] something very positive. We are all different. And we try to do what best [we can given our differences]. We learn together. We are not focusing on a specific group, for us, [it is the] creation of [a] learning community which makes possible to learn from each other [that] is important"* (Interviewee 4).

During the music workshop the author observed at the school, students of different ages working together to compose music using an iPad. The activity was not complicated and was without any music literacy required. The students could choose sounds of different

---

[151] https://luxembourg.public.lu/en/living/education/studying-music.html
[152] An interview revealed differences of opportunities in different cities and towns. There are certain cities and towns that are very active with such collaborations and some schools invite music teachers and professional musicians.
[153] For example, one of the interviewees explained the challenge of buildings (limited space of rooms, access by students).
[154] There are two public inclusive model schools in Luxembourg for primary education. These schools were established in 2006 and 2008 as whole day schools accepting students with different characteristics to learn together.

instruments and combine the sounds to make a piece of music. Some students took more initiative than the others, and sometimes there were small conflicts due to different opinions among the participants, however, at the end, each group presented a music piece which they had composed together. The music teacher explained to the author that, unfortunately, the school did not have many music instruments,[155] however, this activity had the advantage of allowing anyone to participate in the music making process. They explained that the school was trying to provide a sense of possibility that all students in the school could learn music and express themselves through music.

Next, what does inclusive music education mean in non-formal and informal settings? In the Philharmonie, conservatoires, and other local music venues, there have been various concerts throughout the year. One of these, explicitly named "Inclusion Gala: Art and culture without barriers" is part of a program for Special Needs Awareness Week, organized by Luxemburg City's Special Needs Participative Committee and associations supporting people with special needs.[156] Various artists, including those with disabilities and those working for people with disabilities, were invited to show their performances and to raise awareness about the importance of inclusion. Another important initiative for inclusion in Luxembourg is that of Foundation EME, which, according to their mission statement, "has been working to bring well-being, inclusion, and dignity to people who are fragile or in distress, while respecting their diversity".[157] The foundation explains that – with support from talented musicians and the Philharmonie Luxembourg – the organization has coordinated nearly 600 events for disabled children, the elderly, refugees, prisoners, autistic teenagers, and single parents each year. There are also some participatory music activities, including, for example, the Home Sweet Home project (as explained in the previous section), or the *Mir wëllen iech ons Heemecht weisen* (We want to show you our homeland) project,[158] which aims to include people from different backgrounds (such as refugees) to interact together through music. These examples show that inclusion in this setting is understood to support (socially) vulnerable or marginalized people (such as disabled people or refugees and migrants) and their integration into society.

[155] The school had xylophone and handbells. However, the other teacher at the school explained that any objects in the classroom such as ping-pong balls, glasses etc. could be used as instruments to make and experience music. They also have a students' choir at the school.

[156] Brochure (in French) https://www.vdl.lu/sites/default/files/media/document/SENSIBILISATION_2022_FR_accessible_v3.pdf

[157] Fondation EME https://www.fondation-eme.lu/en/praesentation , https://www.sistemaeurope.org/Network-Members/Fondation_EME_El_Sistema_Luxembourg/

[158] Mir wëllen iech ons Heemecht weisen https://onsheemecht.lu/

4.2 Japan

(i) Development of formal music education system in Japan

The history of development of music education in Japan is one of extending music education for all within general school education settings. Public music education in Japan has been developed since the Meiji period (1868–) when the government tried to modernize the country, opening the doors to the world. This became part of the official modern curriculum, based on Western models, from 1873 (Gakusei, meaning Fundamental Code of Education), in which music (called *Shoka* or 'singing' in elementary school and *Sogaku* or 'playing music' in junior high school) was included as one of the required subjects in both elementary and junior high schools (Ogawa, 1994).[159]

After World War II, Japan restructured its education under the supervision of the United States. A new education law and national curriculum (National Course of Study) were issued, and "music education" became one of the compulsory subjects at general schooling. While the purpose of music education in general public schools before World War II was mainly for moral education (Koyama 2016), after World War II the purpose of music education was modified, as the guideline in 1947 explained, that music education should be an aim in itself, not merely a tool. In 1951, the Ministry of Education guidelines recommended music education to encourage students to develop deep aesthetic sentiments, as well as a rich sense of humanity and an amicable personality, so that they would become desirable members of society (Koyama, 2016, p. 77). Since the 1970s, some experts criticized music education for emphasizing technique, which led to the 1997 national course of study focusing on the feelings of students and their creativity (Koyama, 2016).

Currently, the general purposes of music education under the latest National Course of Study contains (i) knowledge and skills to understand musical themes and structures, to develop musical views and ways of thinking, and to develop competencies related to sound and music in life and society; (ii) thoughtfulness, judgement, and expression to devise musical expression and to be able to listen to music deeply; and (iii), attitudes toward learning and humanity to develop a love of music and sensitivity to music as well as to cultivate an attitude of familiarity with music and cultivate rich emotionality.

[159] See Ogawa (1994) for a detailed explanation of how the Japanese government developed music education in public education with the efforts of Izawa Shuji, Luther Whiting Mason, and other experts.

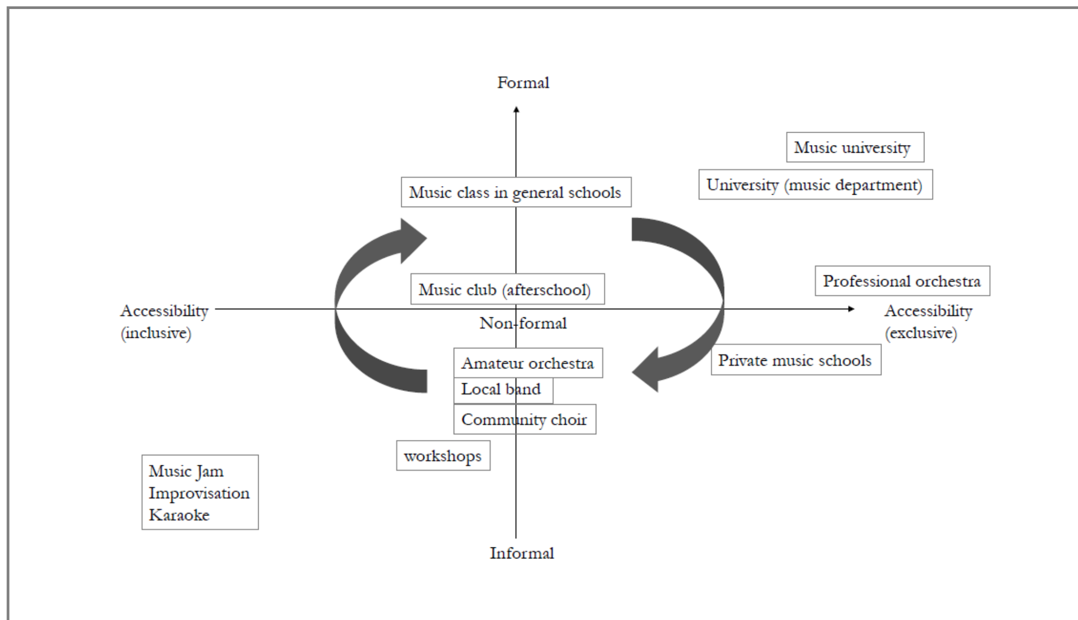
Although there have been discussions and a change in the aim(s) of music education, it is notable that music education has remained one of the subjects of compulsory education in general schools in Japan.

(ii) Diverse organizations in music education field

In addition to music education in formal general school settings, a wide variety of organizations are active in the field of music education in Japan. In non-formal music education, music club activities are offered at schools after school hours. From elementary schools to high schools, there are innumerable music clubs at general schools, such as wind bands.[160] At the same time, there are literally thousands of amateur orchestras for youth and adults[161] as well as community choirs.[162] Reasons for such a highly active non-formal and informal music education environment in Japan can be explained by the foundation provided to music education in general schools for all students as well as the wider culture in which children, especially girls, learn to play an instrument from a young age, notably the piano.[163] This strong Japanese culture supports the wider population to participate in various music activities in society. Although numerous opportunities to appreciate professional and high-level musicians in formal settings exist, Japan also supports many grassroots activities at local level.

[160] For a detailed explanation of wind band culture, see Hebert (2012).
[161] The Federation of Japan Amateur Orchestras is one of the umbrella organizations, however, not all the amateur orchestras are registered with this organization. https://www.jao.or.jp/
[162] Japan Choral Association, one of the umbrella organizations, initiates the competitions and festivals among members. https://jcanet.or.jp/
[163] This could be the influence of famous music instrument manufactures in Japan, such as Yamaha and Kawai, and also the private schools such as Yamaha music schools or Suzuki Methods schools.

Figure 4.2: Map of organizations in the field of music education (Japan)



Source: Author

(iii) What inclusive music education means?

In formal settings, the term "inclusive education" is used mostly synonymously with special (support) education.[164] Yuasa (2018) claims that, while some aspects of inclusive education have been developed in Japan, special (support) education remains dominant, and, in sometimes controversial discussions of inclusive education, people focus on disability instead of broader conceptions of disadvantage and accessibility. This tendency has been found in prior studies about inclusive education and music. For example, Ozaki (2016) explains his experiences in music education and inclusion focusing on students with special needs where he discusses the "incompatibleness" of students with special needs in existing music education and proposes a modification, or flexible adjustment, of the standardized approach toward universally designed curricula for the holistic academic development of all students. Recently a few studies question this narrow definition in the context of including students with disabilities, such as Enjoji et al (2017, p.135) with their statement that "if we look at the purpose of inclusive education, inclusive education systems are not only for students with disabilities but for the construction of an educational system in which all

[164] According to the explanation by the Ministry, referring to UNCRPD, inclusive education is defined to be the system where students with and without disabilities learn together under the purposes of enhancement, with respect for diversity and to maximize the ability of people with disabilities. Here, it is emphasized that individual reasonable accommodation should be provided. See Toward society living together by MEXT (https://www.mext.go.jp/b_menu/shingi/chukyo/chukyo3/siryo/attach/1325884.htm)

students, in their diversity, can exsert their own strength". Their study covers field work with both students with disabilities and students with differing personality types – such as if a student prefers to be under strict rules or whether they rather prefer more unstructured guidance, or if a student pro-actively presents their opinions and wants over others. The purpose of their study is to develop the music lessons which assure the value of diversity and collaborations, especially, utilizing educational materials which students themselves are familiar with (like everyday items to create music instruments).

Nevertheless, the interviews in this study confirm that a pattern of a narrow understanding of inclusive music education exists, as interviewees explain their views of inclusive education solely from the perspective of special needs education – i.e., how to integrate students with special needs *into* mainstream classes or how to guarantee that students with and without disabilities will learn together. Such an approach of inclusion of students with special (educational) needs may cause the unexpected "separation" or segregation of these students, for example, as one of the interviewees explains, sometimes it is better to use "partitions" in instrumental class to separate students with disabilities for their benefit so that they do not feel embarrassed that they cannot play at the same level as others. One may argue that the narrow interpretation of inclusive education can be justified with the reasonable accommodation (adequate individual support) required by the UNCRPD. However, the policy of "reasonable accommodation" combined with too much standardized curriculum and educational materials could cause separation.

In addition to the inclusive music education from the disability discourse, Isoda (2021) presents the case of music education in an elementary school in the Korean town district in Osaka, cultivating a positive ethnic identity of Zainichi Korean students. Aiming to foster social integration, the elementary school offers the extended model to include Korean culture throughout the general curriculum (p.32). Inclusion in this sense is understood as inclusion of an ethnic minority. While appreciating the unique approach, Isoda points out some issues which need further attention, i.e., the clear division or explicit boundary of students with ethnic groups (Japanese as the majority norm and Zainichi Korean as the other) (p.35). She concludes that "it is necessary to provide opportunities for children to work together" (p.37).

In non-formal and informal settings, inclusion in music education is also commonly understood as the integration of children or adults with disabilities. The report by the Agency for Cultural Affairs, Government of Japan (2021) reviews various case studies of

inclusion of people with special needs[165]. There have also been projects conducted by different non-profit organizations, such as those using body-percussion [166] or hand gestures[167] into informal and non-formal settings. Also, like in the case of Luxembourg – and in relation to music learning in non-formal or informal settings – inclusion and music have also been frequently connected with the integration of marginalized groups of people (or people in disadvantaged conditions) such as people of foreign origin in society. [168]

4.3 Comparison

The review of the music education systems in the two countries provides interesting similarities and differences.

Similarities

- Both countries have a written curriculum for music education at general school education level (mostly based on the western/European classical music education model).
- There are diverse (formal non-formal and informal) music educational organizations in the field of music education with different educational goals, accessibilities (closed or opened membership) and approaches.
- The perception and the interpretation of inclusive music education vary between and within the countries. However, in general, inclusion in music is understood to integrate certain groups of populations (such as students with disabilities, migrants or refugees and students from disadvantaged socio-economic family backgrounds)

[165] See the report by Agency for Cultural Affairs, Government Japan (2021) 障害者による文化芸術活動推進事業事例集 [Case studies of projects to promote cultural and artistic activities by people with disabilities]. https://www.bunka.go.jp/seisaku/geijutsubunka/shogaisha_bunkageijutsu/kyosei/pdf/r2_shogaigeijutsu_jirei.pdf

[166] One of the interviewees in Japan explained his project of body percussion, where students with and without disabilities enjoyed music together. He started this project at a school when he was working as a schoolteacher in the 1980s (at the beginning, other teachers and education committees were sceptical about it, with some people criticizing that it is not a proper music education). He nevertheless continued and expanded it to non-formal school activities. Thereafter, the project received great attention from the public. The initiative is now in the authorized textbook of music education to implement in primary schools in Japan. https://www.tebyoushi.com/

[167] White hands chorus. https://www.elsistemajapan.org/whitehands

[168] See, for example, Hugh de Ferranti et al. (2019) "Music Communities of Ethnic and Cultural Minorities in and from Japan" for the discussion of potential and issues of music for coexistence of people from different cultures in Japan.

into mainstream music education, which shows the powerful influence of global discourse of inclusive education.

Differences

- The curriculum of music education in general school settings in Japan is standardized with authorized textbooks, while the curriculum in Luxembourg for music education at general school settings only has general descriptions and therefore its implementation depends on each teacher and their varying practices. There is a large and loose coupling between policy and practice in Luxembourg.
- Formal music education system in Luxembourg has been heavily influenced in the historical contexts of the development of specialized music schools (Conservatoires and public music schools) where the focus has been to cultivate music literacies and skills which not all students have access to (due to the enrolment requirements and practical logistical burdens). On the other hand, while there have been specialized music educational organizations in Japan, comparatively, the music education system in general schools (under compulsory education) assures a certain degree of equal access to music education for everyone, although in Japan, the music education have been historically entangled between the competing aims of music education for music itself and music education as a tool for wider human development in society.
- In the music educational field, specialised music schools have had a stronger influence on other organizations in Luxembourg. This is due to the historical structural features, where Conservatoire/public music schools and UGDA link music activities to other non-formal or informal organizations (such as the Fanfare, amateur orchestra, or music clubs).

5. Discussion

How inclusive is music education in Japan and Luxembourg?

This study firstly revealed the different historical constructions of the formal music systems in the two countries which influence the current offering of music education. The study concerns the situation in Luxembourg where, although music education is supposed to be provided in general school settings under the written policy (curriculum) level, the

practices vary depending on teachers (loose-coupling). At the same time, the historically constructed specialized music schools (Conservatoires and public music schools) have been so powerful in the field of music education and therefore, the goals and benefits of music education have been narrowly understood and have focused on knowledge and skill acquisition. Such music education systems structurally prevent the inclusion of a diversity of students within music education. It limits access for those who cannot manage to go to the music schools for a number of reasons (not only financial but also logistical, cultural and demographic), and also limits the participation of students with different characteristics into music making because of their limited goals in music education.

Compared to the situation in Luxembourg, the system in Japan where music education has been offered at general schools (under compulsory education), at least, gives opportunities for all students to learn music, although there have been discussions about the limited contents and pedagogies of this education. The study concerns too much standardization of the curriculum which narrows down the wider potential of music education. Also, the study concerns that, students who cannot cope with the (standardized) expectation and evaluation by teachers may be, intentionally or unintentionally, separated. There have been initiatives in research and practice to transform music education, however, discussion is still under way to construct inclusive music education where students with different characteristics learn together. Slow progress in this regard could be due to a narrow definition of inclusion which fragments student populations into different categories, trying to and integrate them into the mainstream.

In the full picture of the organizational field of music education, there have been varieties of non-formal or informal organizations constructed in the field. These organizations have been offering music education (in the broader sense) to "include" people especially from disadvantaged backgrounds. Having said that, while appreciating all the efforts and contributions of these informal and non-formal organizations, their understanding of inclusion in music education is nonetheless limited. Reflecting on the typology of inclusive education by Göransson and Nilholm (2014), it seems that "inclusion" viewed from their perspective is an attempt to include a certain group into their music education, rendering music a tool for the integration of people into the mainstream community. To avoid any misunderstandings, I should make it clear that I appreciate the values of such activities for social inclusion, and I have participated in some of those activities myself. However, this way of understanding inclusion tends to remain in the typology of (A) or (B), which are the extension of integration of people with specific

character into mainstream (or pre-determined/standardized musical educational goal), and which sometimes result in the unexpected separation.

As discussed, the current limitations of inclusion stem from the narrow interpretation of inclusive education – in (A) or (B) – which is due to the strong influence of the global discourse of inclusive education. The concept of inclusive education has been further expanded toward (C) and (D) in recent global discourse, and music education can go far beyond the skill and knowledge acquisitions (based on the traditional music educational methods often linked to western classic music). Policy makers and educators should take this as an opportunity to reflect on what "inclusion" they are discussing based on the ways they interpret inclusive music education and educational goal(s). The case of the inclusive model school in Luxembourg, based on the interpretation of inclusive education in type (C) and (D) may give us some clues. We could consider inclusive music education as an opportunity in which students speak with their own unique voices and take control of the music and of their learning (Lindgren et al. 2016). For a (D) inclusive music fostering community, we might tend to simply think that creating an inclusive community is to invite diverse groups of people (such as those with disabilities or in disadvantaged conditions) to participate in the pre-determined style(s) of music making. However, this tendency may, on the contrary, cause unexpected issues of division between different groups, unintentionally creating an "us" and "them" dynamic.

Music education has tremendous potential for fostering inclusion. It is the responsibility of policy makers and educators to understand their own approaches and underlying assumptions, as well as the useful and harmful consequences that each approach brings to society. As each organization in the music education field has a particular aim(s) in music education with limited resources, it might not be possible for only one type of organization to fulfill full inclusion – covering all of (A) to (D). Therefore, this study proposes that policy makers and educators reflect on the existing organizations (with their perceptions of inclusion) in the field as a whole and collaboratively discuss how to make the giant task of full inclusion in music education possible together.

References

Allan, Julie., & Slee, Roger. (2008). *Doing Inclusive Education Research.* Sense Publishers. Rotterdam.

Baker, David P. (2014). *The Schooled Society*. Stanford University Press.

Baker, Geoffrey. (2014). *El Sistema: Orchestrating Venezuela's Youth.* Oxford University Press.

Bartlett, Lesley & Vavrus, Frances. (2017). Comparative Case Studies: An Innovative Approach. *Nordic Journal of Comparative and International education*, 1(1), 5-17.

Bray, Mark & Thomas, R. Murray. (1995). Levels of comparison in educational studies. *Harvard Educational Review*, 65(3), 472-490.

Campbell, Patricia Shehan. (2020). At the nexus of ethnomusicology and music education: pathways to diversity, equity, and inclusion. *Arts Education Policy Review*, 121(3), 106-110.

Churchill and Laes (2021). Made In/visible: Erasing disability in music education. In: Kallio (Eds): *Difference and Division in Music Education*. Routledge. New York.

Convention on the Rights of Persons with Disabilities (CRPD). (2006). United Nations. https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html

Creswell, John W. (2009). *Research Design: Qualitative, quantitative, and mixed methods approach*es 3rd ed. Sage Publications Inc. California.

Cummings, William K. (1999). The institutions of education: Compare, compare, compare!. *Comparative Education Review*, 43(4), 413-437. The University of Chicago Press.

DiMaggio, Paul J. & Powell, Walter W. (1983). The iron cage revisited: Institutional isomorphism and collective rationality in organizational fields. *American Sociological Review*, 48(2), 147-160.

Enjoji. Sachiko et al. (2017). 多様性と協働を保障する授業の開発：インクルーシブな視点による音楽活動を中心に [Development of lesson plans to enable diversity and collaboration: Framing musical activities from the viewpoint of inclusive education.] *Research bulletin. Hiroshima University*, 45, 135-145.

Felder, Franziska. (2022). *The ethics of inclusive education*. Routledge.

Ferranti, Hugh et al. (2021). 音楽コミュニティとマイノリティ ——多文化共生の実践と課題—— [Music Communities of Ethnic and Cultural Minorities in and from Japan.] (Open access) http://www.musicminoritiesinterculturalexperience.hdf.ila.titech.ac.jp/ (accessed on December 22, 2022)

Florian, Lani. (2019). On the necessary co-existence of special and inclusive education. *International Journal of Inclusive Education*, 23(7-8), 691-704.

Göransson, K. & Nilholm, C. (2014). Conceptual Diversities and Empirical Shortcomings – a Critical Analysis of Research on Inclusive Education. *European Journal of Special Needs Education*, 29(3), 265–280.

González, Sheila & Bonal, Xavier. (2021). Covid-19 school closures and cumulative disadvantage: Assessing the learning gap in formal, informal and non-formal education. *European Journal of Education*, 56(4), 607-662.

Hall, P.A. & Taylor R.C.R. (1996). Political Science and the Three New Institutionalisms. *Political Studies*, XLIV, 936-957.

Hebert, David G. (2012). *Wind Bands and Cultural Identity in Japanese Schools. Landscapes: The Arts, Aesthetics, and Education*. Springer.

Hernandez-Torrano, Daniel, Somerton, Michelle, & Helmer Janet. (2022). Mapping research on inclusive education since Salamanca Statement: a bibliometric review of the literature over 25 years. *International Journal of Inclusive Education*, 26(9), 893-912.

Isoda, Mitsuko (2021). Zainichi Korean Students and Korean Music in Japanese Elementary School: Cultivating a Positive Ethnic Identity and Building Relationships between Koreans and Japanese. In: Kallio (Eds): *Difference and Division in Music Education*. Routledge. New York.

Jank Werner. (2009). Moving in a Field of Conflicting Forces: Problems of Music Education Policy in Germany. *Arts Education Policy Review*, 110(4), 14-21.

Jones, Sara. K. (2020). Making Music: A Community-school music partnership. *Arts Education Policy Review*, 121(2), 63-73.

Kertz-Welzel, Alexandra. (2018). *Globalizing music education: A framework*. Indiana University Press. Indiana.

Koyama, Hanae. (2016). 戦後音楽科教育の発展史 [The History of the Development of School Music in Postwar Japan.] *Research Bulletin. Naruto Educational University*, 31, 76-87.

La Bell, Thomas J. (1982). Formal, Nonformal and Informal Education: A Holistic Perspective on Lifelong Learning. *International Review of Education*, 28(2), 159-175.

Lindgren, Monica, Bergman, Åsa & Sæther, Eva. (2016). The Construction of Social Inclusion through music education: Two Swedish ethnographic studies of the El Sistema Programme. *Nordic Research in Music Education*. Yearbook, 17, 65-81.

Lubet, Alex. (2009). The inclusion of music/the music of inclusion. *International Journal of Inclusive Education,* 13(7), 727-739.

Meyer, John. W. (2000). Globalization: Sources and Effects on National States and Societies. *International Sociology*, 15(2). 233–248.

Ogawa, Masafumi. (1994). Japanese Traditional Music and School Music Education. *Philosophy of Music Education Review*, 2(1), 25-36.

Ogawa, Masafumi. (2010). Japan: Music as a Tool for Moral Education? In: Gordon Cox and Robin Stevens (Eds.): *The origins and Foundations of Music Education: Cross-cultural Historical Studies of Music in Compulsory Schooling*. London: Bloomsbury Academic, 205-220.

Ozaki, Yuji. (2016). 音楽科でのインクルーシブ教育における「学力保障」の観点：「拡大したコアカリキュラム」への着目 [The view point of 'academic ability security' in music departments as part of an inclusive education system: with focus on 'expanded core curriculum'.] *Bulletin of Joetsu University of Education*, 36, 217-227.

Peters, B. Guy. (2012). *Institutional Theory in Political Science - The New Institutionalism 3rd edition*. London: Continuum.

Phillips, David., & Schweisfurth, Nichele. (2014). *Comparative and International Education*. Bloomsbury Publishing Plc. London.

Powell, Justin J.W., Arthur Limbach-Reich, & Michelle Brendel. (2017). Grand Duchy of Luxembourg. In: Wehmeyer, M.L. & J.R. Patton (Eds.): *The Praeger International Handbook of Special Education*. 2, 296–309. Santa Barbara, CA.

Ramirez, Francisco. (2006). Growing commonalities and persistent differences in higher education: universities between global models and national legacies. Meyer & Rowan ed. *The new institutionalism in education.* State university of New York Press. Albany.

Rizvi, Fazal. & Lingard, Bob. (2009). *Globalizing education policy.* Routledge

Salamanca Statement and Framework for Action on Special Needs Education. (1994). UNESCO. https://unesdoc.unesco.org/ark:/48223/pf0000098427

Sagrillo, Damien. (2012). El Sistema. Ein Modell für Luxemburg? [El Sistema, A model for Luxembourg?] Die Musik in der Erziehung (conference material, unpublished). https://orbilu.uni.lu/handle/10993/8785

Sagrillo, Damien. (2013). Music Education in Luxembourg: A Critical Review. In: Gabriela Karin Konkol & Roman Nieczyporowski (Eds.): *International Aspects of Music Education, in Teaching and Learning Processes*, 1. 76-88. Gdansk.

Sagrillo, Damien. (2016). Solfège and Musical Sight Reading Skills in a European Context. In: Leo Kestenberg und Musikalische (Eds.): *Bildun in Europa, Werzburger Hefte zur Musikpadagogik,* 8, 115-127. Germany: Margraf Publishers GmbH.

Sagrillo, Damien. (2019). Martin Straus, ein europäischer Musikpädagoge aus Luxemburg. [Martin Straus, a European Music Pedagugue from Luxembourg.] Ars Inter Culturas. 8. 203-216.

Shively, Joseph. (2015). Constructivism in Music Education. *Arts Education Policy Review,*116(3), 128-136.

UNESCO. (2006). *The Protection and promotion of musical diversity.* https://unesdoc.unesco.org/ark:/48223/pf0000215412 [accessed on December 22, 2022]

Zapp, Mike and Powell, Justin J.W. (2016). How to construct an organizational field: Empirical educational research in Germany 1995-2015. *European Educational Research Journal*, 15(5), 537-557.

Yuasa, Takamasa. et al. (2019). インクルーシブ教育 [*Inclusive education.*] Kyoto, Japan: Minerva Publishing.

Chapter 6: Findings and Reflection

This article-based doctoral thesis, on the issue of inclusive education, has analyzed the complex causes of why it is difficult to implement inclusive education. The article chose two contrasting countries to understand their inclusive educational systems based on i) the global influence of conceptualizations of inclusive education onto local countries, and ii) the local differences and unique characteristics that have developed through the path dependencies of historical institutionalization and the sociological organizational field. In doing so, it applied the typology of inclusive education by Göransson and Nilholm (2014) to clarify different perceptions of inclusive education. Also, in understanding the underlying educational goals in each interpretation of inclusive education, this thesis has applied the frameworks of educational philosophy relating to inclusive education – including the discussion of capability versus the utilitarian approach as well as cultivation and existential education – that demonstrate the importance of transformative learning and reflection in learning for the broader inclusion of a diversity of students.

The problems that this dissertation has endeavored to tackle, as explained in Chapter 4, are, "What are the different models of inclusive education developed in accordance with global influences and local contexts?", and "How are inclusive (music) education systems constructed in Luxembourg and in Japan, and why are they similar/different?".

6-1 Findings

(1) Global influence of interpretations of inclusive education and the construction of inclusive education systems

Although the two countries have many differences in size, population, languages, cultures, and the homogeneous or heterogeneous characteristics of each society, with which one may expect to find differences in inclusive education systems, both have experienced surprisingly similar paths at similar timing in terms of the construction of inclusive education systems at least at a policy level; from segregation, separation and integration toward inclusion (see Article 2). The common direction of the institutional change – from segregation post-WWII to mandatory education for students with disability to integration (1970s) and the movement toward inclusion (2007-) (especially emphasizing education by formally qualified experts and professional support services)

– has been confirmed in this study. Further, both countries maintain the categorical approach to special needs education and disabilities. Reviewing the current situation of Luxembourg and Japan, this article has found four main similarities between the two; i) the approach to integrate students with special needs into existing structures remains in both (with few exceptional inclusive model schools), ii) both see a persistent separation or segregation of students with special needs into separate classes or segregated schools to receive special supports from categorically-oriented special educators, iii) there is an increasing number of students in newly categorized disabilities, iv) and both, despite having ratified the UNCRPD, see a lack of a comprehensive model for reform of existing school structures. These findings imply the strong path-dependency in policy making on special education and inclusive education both in the two countries, where inclusive education is considered to be the extension of special education, and inclusive education has been discussed based on the existing structures to include formerly excluded students, such as students with SEN, instead of fundamentally change the educational structure to be more inclusive.

These movements evidence the powerful influence of global conceptualization and frameworks of inclusive education policy especially based on the Salamanca Statement and UNCRPD. Although these instruments do not intend to limit the scope of inclusion for students with disabilities, both Luxembourg and Japan have understood inclusive education from the perspective of special needs education, i.e., how to ensure students with disabilities are included in the mainstream educational system. As discussed in Article 2, such a narrow definition of inclusive education – typology (A) and (B) as classified by Göransson and Nilholm (2014) – was not originally intended in the Salamanca Statement or UNCRPD. However, the strong emphasis on the disability and inclusion discussion has caused state parties to focus on inclusion (or integration) of students with disabilities with adequate support – although there still remain issues on implementation of individual support mainly due to limited resources.

In the meantime, the recent global discourse of inclusive education – as proposed in the 2019 UNESCO Cali Commitment – has expanded the concept of inclusive education, reflecting that inclusive education is not only for students with disabilities, but should be expanded to recognize humans' individual differences equally and re-construct an inclusive educational system which values diversity. Unfortunately, the two countries have not yet reached a systematic transformation toward this expanded concept of inclusion (although Luxembourg's public inclusive model schools have made notable strides over the past 15 years).

Reflecting the shift within the global discourse, we notice that the discrepancies (or at least the cause of inconsistency in different policies on inclusive education) already exist at the global

level (although not originally how they were intended). The discourse is guided by a focus on students with disabilities in the Salamanca statement and the UNCRPD led the discussion of inclusive education in typology (A) and (B), while the recent discourse requests inclusive education to be understood in terms of typologies (C) and (D) by Göransson and Nilholm (2014). It can be analyzed that loose coupling in understanding of inclusive education exists both within the global discourse and between global and national policy levels. Consequently, there have been "paradoxes" in the development of inclusive education and special education in both countries, as discussed in Article 2, where efforts toward inclusive education have been increased, but at the same time, more and more students are (newly) classified into special needs categories have been receiving special (individual) supports by experts often in separate settings.

(2) Differences in interpretation of inclusive (music) education and how to construct an inclusive (music) education system based on the historical path and sociological organizational field of education

Article 3 of this dissertation discussed local characteristics in understanding inclusive education with examples from the comparison of formal music education systems in Luxembourg and Japan.

In Luxembourg, music education in formal setting has historically been offered in separate public music schools – like conservatoires and public music schools with the optional participation after school hours – instead of at general school settings. The expertise in music education remains powerfully and therefore, those music schools stay in dominant positions for music education in the organizational field of music education. Although the national school curriculum requests general public schools to provide music classes, this dissertation finds that implementation of music education in general school settings has varied depending on teachers' experiences and capabilities. Under this situation, inclusion in music education, and in formal education in Luxembourg, has been considered to invite more students to public music schools where the educational goal has been rather limited to the musical knowledge and skill developments, focusing on learning the music literacy (solfège). Due to this structural characteristic of formal music education system in Luxembourg, even with the recent innovative reform of the public music schools to make education free of charge, the access issue remains.

In addition to music education in the formal settings, in Luxembourg, there have recently been more active efforts for non-formal or informal music education opportunities, such as music activities in Maison Relais (afterschool facilities) which are organized by music schoolteachers,

along with other opportunities provided by professional musicians. Nevertheless, the entire music educational field, as shown in the map, is largely influenced by the powerful formal organization of music education – conservatories, public music schools and teachers or professional musicians. There have however been more grass-roots level projects developing, inviting a broader interest in music, even without music literacy. Inclusion in these activities is, very often, considered to invite vulnerable or marginalized groups of people such as those with disabilities and people with migrant or refugee backgrounds to integrate into the broader community. However, these are still exceptional as many music clubs require music knowledge and experiences to join, and some, like fanfares and village choirs, require the local residency due to their original characters and roles in the community, as discussed in Article 3.

Compared to the situation in Luxembourg, the access issue (for all students) may be less of a concern in the case of Japan where music education has been offered in general school settings as a compulsory subject, although, depending on family backgrounds, privileged students may gain additional opportunities in private music schools. Nevertheless, music education provided in general schools in Japan has revealed some concerns due to the potential separation of students with special needs who cannot manage to do the same as others in mainstream settings. This could be due to the overly standardized curriculum as well as the perception of special support education which is considered to be the equivalent of inclusive education in Japan – i.e., inclusive education is intended to support students with disabilities so that they can be integrated into mainstream education. Understanding that inclusive education is the extension of the special individual support education for students with special needs, such approach easily results in separation, being justified by the arguments of the necessity of the individual supports.

A wide variety of organizations are active in the field of music education in Japan, as illustrated in the map of organizations in the field of music education in Chapter 3 (Article 3). In non-formal music education, after school music club activities such as wind bands have been offered at general schools from elementary to high school level. There have been literally thousands of amateur orchestras, choirs and music clubs for youth and adults in local communities. Reasons for such a highly active non-formal and informal music educational environment in Japan can be explained by the foundation of music education in general schools for all students, together with the wider culture of music learning for children. In non-formal and informal settings, inclusion in music education tends to be considered as an effort to integrate students with disabilities. Other activities aim to include people of foreign origin in Japanese society. Therefore, inclusion in music education, similarly to the case of Luxembourg, is understood to be for the social inclusion of vulnerable or marginalized people.

(3) Educational philosophy and inclusive educational systems – differences in the two countries?

As discussed in Chapter 3, 3-3, this dissertation argues that each inclusive education system (based on a particular interpretation of inclusive education), assumes particular educational goal(s). When inclusive education is discussed in typology A (placement), the focused underlying goal tends to be "care" and "protection" of students with disabilities. This perception still remains after nearly 30 years of the Salamanca Statement, where some believe that, for the benefit of students with disabilities, it is better to separate them from the mainstream settings (as Japan being criticized by the UN committee). On the other hand, the capability approach may free the potential of students with special needs from the fixed view of care or protection, looking at what they can (potentially) do instead of what they cannot do. However, if the approach is combined with the pre-determined standardized targets of achievements, the approach may result in the separation of students for "additional reasonable" supports (as in typology B). Reviewing the current situation in Luxembourg and Japan, this dissertation argues that both the two countries remain mostly at these stages of inclusive education – i.e. (A) or (B) as illustrated in Article 2 and Article 3. In other words, inclusive education in the two countries is based either on the philosophy of care and protection, or on additional support for capability building for the pre-fixed targets of achievements of knowledge and skills.

If we understand inclusive education in the broader sense – typology C and D which values the true respecting and valuing of the diversity of everyone – inclusive education could mean something different. In this way, the desired educational goal is to learn from diversity, cope with diversity and further improve diversity, where transformative learning with students' reflective experiences in relation to one another is the key. This is the inclusive education which the recent global policies are proposing which can also be linked to the suggestion of the Anticipation, Action, and Reflection (AAR) process in OECD Education 2030. Nevertheless, as Article 1 argues, the goals of reflection in learning can vary depending on the societal and cultural contexts. For example, in the Humboldtian Bildung, the reflection is aimed to affirm the self through interactions with others. While in the Kyoto School's idea, the reflection ultimately aims to negate self in accordance with the trends in the society. Therefore, in relation to inclusive education, reflection in learning can be both beneficial and risky. Affirming self without taking consideration of "others" conflicts with the principle of inclusive education and inclusive society, while negating self in accordance with the trends, can cause assimilation and the loss of diversity. The issue of why we cannot realize full inclusion (from the educational philosophical point of view) might be, ultimately, because of this dilemma, which exists both in Luxembourg and in Japan.

(4) Summary

This dissertation has analyzed the complex issue of inclusive education comparing Luxembourg and Japan, while applying multiple level analysis (i.e., global and national level with the example of school level analysis), and combining multiple lenses (i.e., educational philosophy, sociology, and music education), under the guiding typology of inclusive education by Göransson and Nilholm (2014). The below table summarizes the findings as explained above.

Table 8: Summary

		Luxembourg and Japan	*Recent global discourse*
Interpretation of inclusive education (Typology by Göransson and Nilholm (2014))	-	mainly (A)(B)	(C)(D)
Form	Exclusion, Segregation	Separation, Integration Categorization Individual Special Supports	Inclusion
Educational Philosophy	Utilitarian model	Care and protection Capability approach (for pre-determined knowledge and skill acquisition)	Existential education (students' experience in center) Transformative learning, reflection of self in diversity

Source: author

While the recent global discourse has been expanded the interpretation of inclusive education to the typology C and D by Göransson and Nilholm (2014), both Luxembourg and Japan primarily remain in the interpretation of inclusive education along with the typology A and B by Göransson and Nilholm (2014). Consequently, both countries continue to separate students with special needs, categorizing their difficulties and providing individual special supports. This is due to the focus of educational philosophy of care and protection, or capability approach (for pre-determined standardized knowledge and skill acquisition). Instead, the recent global discourse is requesting to transform the mind-set and re-consider the educational philosophy underneath, focusing on existential education and transformative learning.

The "fuzzy" concept of inclusive education is difficult to clearly outline and varies based on the kind of educational philosophies and goals applied to it. In the wake of increased global pressure to see the implementation of inclusive education, discussions about whether or not a school system is inclusive tend to become unnecessarily defensive with regards to the existing educational systems. Such a tendency makes it more difficult to reflect and further transform the educational system – although, as is importantly repeated, inclusive education is not trying to fit students into the existing educational systems but to transform the educational systems as a whole to include a diversity of students.

6-2 Reflection and implications for policy making and research

This dissertation, through a comparative study of Luxembourg and Japan with regards to inclusive music education systems, has reconfirmed the complexity of inclusive education and also the potential for further transformation of educational systems towards the full inclusion of a diversity of students. Paradoxical developments with certain models of inclusive education shows that if we only discuss inclusive education from a certain perspective, the discussion remains within the parameters of the discourse, and in turn, upholds the status quo. This section finally reflects and provides implications for policy making and research beyond the findings of this dissertation. Although the dissertation chose Luxembourg and Japan to compare, the finding of this dissertation could be applicable for other countries to reflect their inclusive education.

(1) Reflection and implication for policy making

In reviewing the development of inclusive education policy in the two countries, I critically observe that policy discussions tend to be rather defensive of the existing inclusive education systems. This

defensiveness is often explicit. For example, in the latest conversation between the UN committee and Japan, instead of "reflecting" on their educational systems in light of the other insights brought to them, the arguments by Japan tend to result in a justification of their system, trying to find how they can find a simpler solution within the existing system. However, if the discussion remains in the existing interpretation and system of inclusive education (mostly focusing on separate individual supports of students with special needs), the fundamental idea of inclusive education respecting and appreciating diversity in education for inclusive society could be unheard. Simply assuming that separate individual special supports is the best way might limit the discussion if such system is truly the best even for students with special needs themselves as well as for other students, limiting the potential of development of inclusive society.

I argue that "reflective learning" is important also in policy making for inclusive education especially considering how complex the issue is. As reconfirmed in this dissertation, there have been different perspectives suggested for inclusive education based on different interpretations and educational goals. I therefore firstly argue that it is important for policy makers to open their minds to other insights and learn from the "reflecting experiences" in pursuing a more transformation-based system for inclusion, instead of replying and justifying the existing educational systems as status quo.

Secondly, since one organization in the educational field, as reviewed in this dissertation, may be constrained in offering full inclusion due to limited resources and priorities, it is important that policy discussions go beyond each organization. In other words, policy makers should look at the organizational field of the music education system and clarify the current and potential roles of each organization in the field, as well as how they can possibly collaborate. It is challenging to coordinate the different interests of each organization, and precisely because it is so, policy makers should consider the organizational field for the attainment of full inclusion.

Related to this, and thirdly, diverse participants in the policy discussion are crucial for the creation of diverse educational environments. This does not merely mean that it is enough to invite representatives from different groups with categorized characteristics into the policy discussion and establish separate opportunities to meet their needs – as this would cause further segmentations. Importantly, for an inclusive music education system, the discussion should not be only for the (so-called) experts in the field of music education. Since music education is for everyone (even those without music literacy), policy makers should involve a "non-expert" who can provide insights other than the pre-existing assumptions of music education. One of the good candidates could be those teachers in general schools who feel themselves "not competent" to teach music

(in the case of Luxembourg). We can ask why they think they are not competent, and what competencies they feel they need in the existing music education system, and question if such competency is really the sole competency required for inclusive music education. Perhaps their alternative insights could be helpful to review the existing curriculum and further improve its implementation in practice. Those involved in non-formal or informal educational settings, as organizers or as participants, should also be included in the policy discussion.

This process of *inclusive policy construction* is key for fully inclusive education. This dissertation chose music education as an example for the analysis, but the findings can also be applied to other school subjects to reflect if their education system and approaches are truly inclusive for diverse students.

(2) Reflection and implication for research and researchers in the field of inclusive education

The research in the field of inclusive education has been developed based on different perceptions at different levels as illustrated in Chapter 3, 3-2. Nevertheless, a large number of prior studies in the field of inclusive education have focused on special education or disability study. This is probably a natural consequence in the course of developments of the concept and policy of inclusive education globally and locally, as reviewed in this dissertation. However, clarifying the different definitions of inclusive education – and with the expanded notion of inclusive education in the recent global discourse – it is not sufficient to discuss inclusive education only from the viewpoint of special education or disability studies. Likewise, it is not sufficient to discuss it from the perspective of integration of marginalized groups of people into mainstream society. Above all, it is important for researchers to clearly position their studies, instead of simply assuming inclusive education is what they understand.

Secondly, as this dissertation has illustrated, the constructivist world view allows a more flexible and open analysis than the post-positivist world view, because the former aims to understand the phenomena rather than to verify or measure them based on a particular theory, as in the case of the latter. As Cummings (1999) pointed out, the softer approach of (comparative) research respecting differences in the practice of education in different settings has declined in social and policy science. Instead, a harder social science with a scientific methodology of variables and measurement characteristics has increased, and many researchers have decided to do more focused work in more limited settings (see 4-2-3-2). Such a "hard approach" is, of course, useful

to verify or falsify particular policy implementation. However, using this approach only means that we cannot go beyond the existing policy frameworks, as it results in the confirmation and continuation of the (pre-)existing systems. Therefore, I argue that the comparative and softer approach should be valued, especially for the complex and transforming inclusive education system.

Thirdly, as reviewed in the dissertation, inclusive education, as a concept or system, contains many contradictions. Therefore, for researchers, it may be easier to strategically ignore such contradictions and make clear arguments within a limited scope that purposely exclude other aspects. Nevertheless, I believe that it is also an important role of researchers to acknowledge and make such contradictions explicit and untangle the complexity, creating pathways for further discussion.

References

Abe, Masao. 1995. "The Logic of Absolute Nothingness as Expounded by Nishida Kitaro." *The Eastern Buddhist. NEW SERIES*, *28(2),* 167-174.

Allan, Julie. 2008. "Foucault and the art of transgression." *Rethinking inclusive education: The philosophers of differences in practice.* 85-97. Springer Dordrecht.

Backes, Susanne. & Hadjar, Andreas. 2017. "Educational trajectories through secondary education in Luxembourg: How does permeability affect educational inequalities?" *Schweizerische Zeitschrift für Bildungswissenschaften* 39(3). 437–460.

Baker, David P. 2014. *The Schooled Society*. Stanford: Stanford University Press.

Baker, Geoffrey. 2014. *El Sistema: Orchestrating Venezuela's Youth.* Oxford University Press.

Bartlett Lesley & Vavrus Frances. 2017. "Comparative Case Studies: An Innovative Approach". *Nordic Journal of Comparative and International Education*. 1(1). 5-17.

Biermann, Julia. 2022. *Translating Human Rights in Education.* University of Michigan Press.

Bray, Mark & Thomas, Murray. 1995. "Levels of comparison in educational studies: different insights from different literatures and the value of multilevel analysis" Harvard educational review. 65(3). 472-490.

Bryman, Alan. 2004. *Social Research Method* 2nd edition. Oxford University Press. Oxford.

Campbell, Patricia Shehan. 2020. "At the nexus of ethnomusicology and music education: pathways to diversity, equity, and inclusion." *Arts Education Policy Review,* 121(3). 106-110.

Churchill and Laes. 2021. Made In/visible: Erasing disability in music education. In: Kallio (Eds): *Difference and Division in Music Education*. Routledge. New York.

Convention on the Rights of Persons with Disabilities (CRPD). (2006). United Nations. https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html

Creswell, John W. 2009. *Research Design: Qualitative, quantitative, and mixed methods approach*es 3rd ed. Sage Publications Inc. California.

Cummings, William K. 1999. "The institutions of education: Compare, compare, compare!". *Comparative Education Review. 43*(4). 413-437. The University of Chicago Press.

Danforth, Scot. 2019. "Dewey and philosophy of inclusion". Schuelka et al. ed. *The sage handbook of inclusion and diversity in education.* SAGE Publication Ltd. London.

Danner, Helmut. 1994. "'Bildung' A basic term of German education." *Educational Sciences*. 9/1994.

DiMaggio, Paul J. & Powell, Walter W. 1983. "The iron cage revisited: Institutional isomorphism and collective rationality in organizational fields." *American Sociological Review*, 48(2). 147-160.

Elliott, David. 2012. "Music Education as/for Artistic Citizenship" *Music Educators Journal.* 99(1). 21-17.

English, Andrea. 2013. *Discontinuity in Learning- Dewey, Herbart, and Education as Transformation*. Cambridge University Press. Cambridge.

Enjoji. Sachiko et al. 2017. "Development of lesson plans to enable diversity and collaboration: Framing musical activities from the viewpoint of inclusive education." *Research bulletin. Hiroshima University.* 45. 135-145. [in Japanese]

Felder, Franziska. 2022. *The Ethics of Inclusive Education.* Routledge.

Ferranti, Hugh et al. 2021. "Music Communities of Ethnic and Cultural Minorities in and from Japan." (Open access) http://www.musicminoritiesinterculturalexperience.hdf.ila.titech.ac.jp/ (accessed on August 22, 2022) [in Japanese]

Florian, Lani. 2007. "Reimagining special education". *The Sage Handbook of Special Education.* 8-21. Sage Publications Ltd.

Florian, Lani. 2019. "On the Necessary Co-existence of Special and Inclusive Education." *International Journal of Inclusive Education* 23(7-8). 691–704. DOI:10.1080/13603116.2019.1622801

Forlin, C., Kawai, N. & Higuchi, S. 2015. "Educational reform in Japan towards inclusion: Are we training teachers for success?" *International Journal of Inclusive Education* 19(3).314–331. DOI: 10.1080/13603116.2014.930519

Fujii, Yoshihiro. 2019. "Awareness of elementary school teachers on inclusive education and study toward future improvement". Bulletin of Faculty of Education and Culture, Akita University.74. 99-106. [Japanese]

Fujita, Masakatsu. 2009. "What is the Kyoto School" *Journal of Japanese Intellectual History* .41. 35-48. [in Japanese]

González, Sheila & Bonal, Xavier. 2021. "Covid-19 school closures and cumulative disadvantage: Assessing the learning gap in formal, informal and non-formal education." *European Journal of Education.* 56(4). 607-662.

Göransson, Kerstin. & Nilholm, Claes. 2014. "Conceptual Diversities and Empirical Shortcomings – a Critical Analysis of Research on Inclusive Education" *European Journal of Special Needs Education* 29(3). 265–280. DOI: 10.1080/08856257.2014.933545

Göransson, K. & Nilholm, C. 2017. "What is meant by inclusion? An analysis of European and North American journal articles with high impact". European Journal of Special Needs Education. , 32:3, 437-451, DOI: 10.1080/08856257.2017.1295638

Göransson, K., Bengrsson, K., Hansson, S., Klang, N. Lindqvist, G., & Nilholm, C. 2022. "Segregated education as a challenge to inclusive process: a total population study of Swedish teachers' views on education for pupils with intellectual disability". International Journal of Inclusive Education 26:14. 1367-1382.

Graham, Linda J. et al. 2020. "Beyond Salamanca: a citation analysis of the CRPD/GC4 relative to the Salamanca Statement in inclusive and special education research". *International Journal of Inclusive education*. DOI: 10.1080/13603116.2020.1831627

Green, Lucy. 2005. "Musical meaning and social reproduction: a case for retrieving autonomy". Educational Philosophy and Theory. 37(1). 77-92. DOI: 10.1111/ j.1469-5812.2005.00099.x

Haegele, Justin A. & Hodge, Samuel. 2016. "Disability Discourse: Overview and Critiques of the Medical and Social Models". *Quest*. 68(2). 193-206.

Hall, P.A. & Taylor R.C.R. 1996. "Political Science and the Three New Institutionalisms." *Political Studies*, XLIV, 936-957.

Han, Changwan et al. 2013. "The Current Situation and Issues of inclusive education for special needs education in Japan." *Bulletin of Faculty of Education, University of Ryukyu*. 83. 113–120. [in Japanese]

Hebert, David G. 2012. *Wind Bands and Cultural Identity in Japanese Schools. Landscapes: The Arts, Aesthetics, and Education*. Springer.

Hernandez-Torrano, Daniel, Somerton, Michelle, & Helmer Janet. 2022. "Mapping research on inclusive education since Salamanca Statement: a bibliometric review of the literature over 25 years." *International Journal of Inclusive Education*. 26(9). 893-912.

Heyer, Katharina. 2021. "What is a Human Right to Inclusive Education? The Promises and Limitations of the CRPD's Inclusion Mandate." In Köpfer, A., Powell, J. and Zahnd, R. (Eds.) *International Handbook of Inclusive Education*. 45-57. Verlag Barbara Budrich.

Humboldt, W. von. 1852. *The Limit of State Action (The Sphere and Duties of Government).* Translated from German to English by Joseph Coulthard in 1854. John Chapman.

Isoda, Mitsuko. 2021. Zainichi Korean Students and Korean Music in Japanese Elementary School: Cultivating a Positive Ethnic Identity and Building Relationships between Koreans and Japanese. In: Kallio (Eds): *Difference and Division in Music Education*. Routledge. New York.

Ito, Atsuhiro. 2014. “Naturphilosophische Voraussetzungen in der Bildungslehre Wilhelm von Humboldts” *Keiko University Research Bulletin -Studies in sociology, psychology and education: inquiries into humans and societies 77*. 19-38. [in Japanese]

Ito, Shun. 2019. “Discussion Paper on Inclusive Education Research: Based on the Four Elements of Inclusive Education”. *Journal of Education and Culture*. 14. 22-31. Osaka University. [in Japanese]

Jacinto, Z. A. 2016. “Nishida Kitaro’s Views on Education: 1895-1935” *Journal of Nishida Philosophy Association*. 13. 191-171.

Jank Werner. 2009. “Moving in a Field of Conflicting Forces: Problems of Music Education Policy in Germany.” *Arts Education Policy Review,* 110(4). 14-21.

Joachim, Patrice. 2013. *Evaluation eines Ganztagsschulversuchs. Die Jean-Juarès-Grundschule in Luxemburg*. Münster: Waxmann.

Johnson, Kim. & Olanoff, Dana. 2020. “Using transformative learning theory to help prospective teachers learn mathematics that they already ‘know’”. In A. Appova, R. M. Welder, and Z. Feldman, (Eds.), Supporting Mathematics Teacher Educators’ Knowledge and Practices for Teaching Content to Prospective (Grades K-8) Teachers. Special Issue: *The Mathematics Enthusiast*. 17 (2-3). 725–769.

Jones, Sara. K. 2020. “Making Music: A Community-school music partnership.” *Arts Education Policy Review*. 121(2). 63-73.

Kanamaru, Akitoshi. 2020. “Positioning and Transition of the Term and Concept of ‘Formation of Relations between People with and without disabilities’ and ‘Understanding and Recognition for people with Disabilities’ in ‘Exchange Program’ or ‘Exchange and Collaborative Learning’ of Course of Study.” *Kobe University Department Bulletin*. 13(2). 59–71. [in Japanese]

Kertz-Welzel, Alexandra. 2018. *Globalizing music education: A framework*. Indiana University Press. Indiana.

Kiuppis, Florian. 2014. “Why (Not) Associate the Principle of Inclusion with Disability? Tracing Connections from the Start of the ‘Salamanca Process’” *International Journal of Inclusive Education* 18(7). 746-761. DOI: 10.1080/13603116.2013.826289

Koller, Hans Christoph. 2011. “The Research of Transformational Education Processes: Exemplary Considerations on the Relation of the Philosophy of Education and Educational Research.” *European Educational Research Journal*. 10(3). 375–382. https://doi.org/10.2304/eerj.2011.10.3.375

Komatsu, Hikaru. & Rappleye, Jeremy. 2020. “Reimagining Modern Education: Contributions from modern Japanese philosophy and practices?” *ECNU Review of Education*. *3*(1). 20-45. https://doi.org/10.1177/2096531120905197

Koyama, Hanae. 2016. "The History of the Development of School Music in Postwar Japan." *Research Bulletin. Naruto Educational University*. 31. 76-87. [in Japanese]

Krischler, M., Powell, J.J.W., & Pit-Ten Cate, I.M. 2019. "What is Meant by Inclusion? On the Effects of Different Definitions on Attitudes toward Inclusive Education" *European Journal of Special Needs Education* 34(5). 632–648. DOI: 10.1080/08856257.2019.1580837

La Bell, Thomas J. 1982. "Formal, Nonformal and Informal Education: A Holistic Perspective on Lifelong Learning." *International Review of Education*. 28(2). 159-175.

Larsen, Tobias Colling, Holloway, Jessica, & Hamre, Bjørn Frithiof. 2019. "How is an Inclusive Agenda in an Excluding Education System: The Danish Dilemma." *International Journal of Inclusive Education*. 23(10). 1049–1064. https://doi.org/10.1080/13603116.2019.1626497

Li Xiaomin. & Euan Auld. 2020. "A historical perspective on the OECD's 'humanitarian turn': PISA for Development and the Learning Framework 2030." *Comparative Education*. *56*(4). 503-521. https://doi.org/10.1080/03050068.2020.1781397

Limbach-Reich, A. & Powell, J.J.W. 2015. "Schülerinnen und Schüler mit besonderem Förderbedarf im luxemburgischen Bildungssystem [Pupils with Special Educational Needs in Luxembourg]." *Bildungsbericht Luxemburg* 2015 [*National Education Report Luxemburg 2015*]. Luxembourg: MENJE/University of Luxembourg. 91–97.

Lindgren, Monica, Bergman, Åsa & Sæther, Eva. 2016. "The Construction of Social Inclusion through music education: Two Swedish ethnographic studies of the El Sistema Programme." *Nordic Research in Music Education. Yearbook*. 17. 65-81.

Løvlie, Lars, & Standish, Paul. 2002. "Introduction: Bildung and the Idea of a Liberal Education." *Journal of Philosophy of Education*. 36. 317-340.

Lubet, Alex. 2009. "The inclusion of music/the music of inclusion." *International Journal of Inclusive Education*. 13(7). 727-739.

Lubet, Alex. 2011. *Music, Disability, and Society*. Temple University Press. Philadelphia.

Magnússon, G., Göransson, K., & Lindqvist, G. 2019. "Contextualizing Inclusive Education in Educational Policy: The Case of Sweden" *Nordic Journal of Studies in Educational Policy*. 5(2). 67–77. DOI: 10.1080/20020317.2019.1586512

Mahoney, James & Thelen Kathleen. 2010. *Explaining Institutional Change*. Cambridge University Press.

Mellizo Jennifer & Cabedo-Mas Alberto. 2022. Global mindset and music education: a comparison of curriculum documents in the United States and Spain. Arts Education Policy Review. Routledge. DOI: 10.1080/10632913.2022.2070887

Meyer, John. W. 2000. "Globalization: Sources and Effects on National States and Societies." *International Sociology*. 15(2). 233–248. DOI: 10.1177/0268580900015002006

Mezirow, Jack. 1991. *Transformative Dimensions of Adult Learning*. Sanfrancisco. Jossey-Bass.

Mitchell, David. 2005. "Introduction: sixteen propositions on the contexts of inclusive education". Mitchell David ed. *Contextualizing Inclusive Education*. 1-21. Routledge. London and New York.

Mitchell, David. 2015. "Inclusive education is a multi-faced concept". *C.E.P.S. Journal*. 5(1). 9-30.

Mitchell David & Desai Ishwar. 2005. "Diverse socio-cultural contexts for inclusive education in Asia". Mitchell David ed. *Contextualizing Inclusive Education*. 166-201. Routledge. London and New York.

Mittler, Peter. 2005. "The global context of inclusion: the role of the united nations". Mitchell D. ed. *Contextualizing Inclusive Education*. 22-36. Routledge. London and New York.

Miyoshi, Masahiko. 2009. "A study on contact between Special Support Education and Inclusive Education: possibility of establishment of Inclusive Educational practice in Japan". *Study of Human and Environment*. 18. 27-37. Kyoto University. [in Japanese]

Murakami, Yui & Meyer, Heinz-Dieter. 2010. "Culture, Institutions, and Disability Policy in Japan." *Comparative Sociology*. 9. 202–221.

Murdoch, Diana et al. 2020. "Feeling heard: Inclusive education, transformative learning, and productive struggle". *Educational theory*. 70(5). 653-679.

Naka, Naoichi. 1989. "Freedom and Bildung of Humboldt" *German Literature*. 82. 13-21. https://doi.org/10.11282/dokubun1947.82.13 [in Japanese]

Nakagawa Yoshiharu. 2015. "Buddhism and Holistic Education" *Journal of International Buddhist Studies*. 6(1). 45-55.

Nakauchi, Toshio. 2001. The principles of education: A critical notes on pedagogy. Selected works of Nakauchi Toshio. Vol.1. [in Japanese] Fijiwara Shoten. Tokyo.

Nilholm, C., & Göransson, K. 2017. "What Is Meant by Inclusion? An Analysis of European and North American Journal Articles with High Impact." *European Journal of Special Needs Education*. 32. 437–451. DOI: 10.1080/08856257.2017.1295638.

Nishida Kitaro. 1927. "From things working to things seeing" [in Japanese] *Nishida Kitaro's complete works IV*. Iwanami Shoten.[in Japanese]

Nishida Kitaro. 1937 "Logic and Life" *Nishida Kitaro's complete works VIII*. Iwanami Shoten. [in Japanese]

Nishioka, Kanae. 2017. "Historical overview of curriculum organization." In Tanaka, K., et al., *Curriculum, Instruction and Assessment in Japan*. 11–27. New York: Routledge.

OECD. 2018. *The Future of Education and Skills- Education 2030*. https://www.oecd.org/education/2030/E2030%20Position%20Paper%20(05.04.2018).pdf

OECD. 2019. *OECD Future of Education and Skills 2030. Conceptual Learning Framework- Learning Compass 2030*.

OECD. 2019. *OECD Future of Education and Skills 2030. Conceptual learning framework – Student Agency for 2030*. http://www.oecd.org/education/2030-project/teaching-and-learning/learning/student-agency/Student_Agency_for_2030_concept_note.pdf

OECD. 2019. *OECD Future of Education and Skills 2030. Conceptual learning framework- Concept note: Anticipation-Action-Reflection cycle for 2030*. https://www.oecd.org/education/2030-project/teaching- and-learning/learning/aar-cycle/AAR_Cycle_concept_note.pdf

Okada A. 1999. "Secondary Education Reform and the Concept of Equality of Opportunity in Japan." Compare: A Journal of Comparative and International Education 29:2, 171-189.

Okawa, Isamu. 2005. "Educational Philosophy of Humboldt" *German Literature Review. 50*, 31-77 [in Japanese]

Ogawa, Masafumi.1994. "Japanese Traditional Music and School Music Education." *Philosophy of Music Education Review*. 2(1). 25-36.

Ogawa, Masafumi. 2010. "Japan: Music as a Tool for Moral Education?" In: Gordon Cox and Robin Stevens (Eds.): *The origins and Foundations of Music Education: Cross-cultural Historical Studies of Music in Compulsory Schooling*. London: Bloomsbury Academic. 205-220.

Okamoto, Tetsuo. 2015. «Potential of the Kyoto Philosophy» *Forum on Modern Education*. History of Educational Thought Society. 24. 172-173. https://doi.org/10.20552/hets.24.0_170 [in Japanese]

Östling, J., Josephson, P., & Karlsohn, T. 2014. "The Humboldtian tradition and its transformations." In P. Josephson, T. Karlsohn, & J. Östling (Eds.), *The Humboldtian Tradition: Origins and Legacies* (Vol. 12). Brill Academic Publishers.

Ozaki, Yuji. 2016. "The view point of 'academic ability security' in music departments as part of an inclusive education system: with focus on 'expanded core curriculum'" *Bulletin of Joetsu University of Education*. 36. 217-227. [in Japanese]

Peters, B. Guy. 1999/2012. *Institutional Theory in Political Science - The New Institutionalism*. London: Continuum.

Phillips, David., & Schweisfurth, Nichele. 2014. *Comparative and International Education*. Bloomsbury Publishing Plc. London.

Powell, Justin. J.W. 2014. "Comparative and International Perspective on Special Education". *The Sage handbook of special education*. Sage Publication Ltd.

Powell, Justin.J.W., Edelstein, B. & Blanck, J.M. 2016. "Awareness-raising, Legitimation or Backlash? Effects of the UN Convention on the Rights of Persons with Disabilities on Education Systems in Germany." *Globalisation, Societies and Education*. 14(2). 227–250.

Powell, Justin J.W., Arthur Limbach-Reich, & Michelle Brendel. 2017. Grand Duchy of Luxembourg. In: Wehmeyer, M.L. & J.R. Patton (Eds.): *The Praeger International Handbook of Special Education*. 2. 296–309. Santa Barbara, CA: ABC-CLIO.

Pring, Richard. 2007. "Reclaiming philosophy for educational research". *Educational Review*. 59(3). 315-330.

Pring, Richard. 2012. "Putting persons back into education". *Oxford Review of Education*. 38(6). 747-760.

Ramirez, Francisco. 2006. "Growing commonalities and persistent differences in higher education: universities between global models and national legacies". Meyer & Rowan ed. *The new institutionalism in education*. State university of New York Press. Albany.

Rappleye J., Komatsu, H., Uchida, Y., Krys, K., & Markus H. 2020 " Better Policies for better lives? Constructive critique of the OECD's (mis)measure of student well-being" *Journal of Education Policy*. 35(2). 258-282. https://doi.org/10.1080/02680939.2019.1576923

Reindal, S. Magnus. 2021. Considering diversity in (special) education: disability, being someone and existential education. *Studies in philosophy and education*. 40. 365-380.

Richardson, J.G. & Powell, J.J.W. 2011. *Comparing Special Education: Origins to Contemporary Paradoxes*. Stanford: Stanford University Press.

Rinne, Risto. 2008. "The Growing Supranational Impacts of the OECD and the EU on National Educational Policies, and the Case of Finland." *Policy Futures in Education*. 6(6). 665–680. https://doi.org/10.2304/pfie.2008.6.6.665

Rizvi, Fazal. & Lingard, Bob. 2009. *Globalizing education policy*. Routledge

Sagrillo, Damien. 2013. "Music Education in Luxembourg: A Critical Review." In: Gabriela Karin Konkol & Roman Nieczyporowski (Eds.): *International Aspects of Music Education, in Teaching and Learning Processes*. 1. 76-88. Gdansk.

Sagrillo, Damien. 2016 a. "Solfage and Musical Sight Reading Skills in a European Context." In: Leo Kestenberg und Musikalische (Eds.): *Bildun in Europa, Werzburger Hefte zur Musikpadagogik*. 8. 115-127. Germany: Margraf Publishers GmbH.

Sagrillo, Damien. 2016 b. "Solfège as a Reason for the Drop Out of Music School Pupils" In: Leo Kestenberg und Musikalische (Eds.): *Bildun in Europa, Werzburger Hefte zur Musikpadagogik*. 8. 115-127. Germany: Margraf Publishers GmbH.

Sagrillo, Damien. 2019. "Music education in general schools. Teachers and their Anxiety Facing the Task". Kodály Symposium on 10 April 2019 by John-von-Neumann University in Kecskemét, Hungary. https://orbilu.uni.lu/handle/10993/39471

Sartori, Giovanni. 1994. "Compare Why and How". *Comparing Nations*. 14-34. Oxford: Blackwell Publishers.

Schreiber, C. 2014. "Curricula and the Making of the Citizens. Trajectories from 19th and 20th Century Luxembourg." PhD diss., University of Luxembourg. http://hdl.handle.net/10993/18878

Sevilla, Anton. Luis. 2016. Education and Empty Relationality: Thoughts on Education and the Kyoto School of Philosophy. *Journal of Philosophy of Education,* 50(4). 639-654. https://doi.org/10.1111/1467- 9752.12159

Slee, Roger. 2013. "How do we make inclusive education happen when exclusion is a political preposition?" *International journal of inclusive education*. 17(8). 895-907.

Shaw, Ryan & Auletto Amy. 2022. "Is music education in tune with the pursuit equity? An examination of access to music education in Michigan's schools". *Journal of Research in Music Education*. 69(4). 364-381.

Shively, Joseph. 2015. Constructivism in Music Education. *Arts Education Policy Review*. 116(3). 128-136.

Shinzano Masakazu et al. 2017. "An outline of the reform of National Course of Study by MEXT and arguments concerning music classes" Research Bulletin of Aichi Education University. 66. 1-9. [in Japanese]

Siry, Christina & Brendel, Michelle. 2016. "The inseparable role of emotions in the teaching and learning of primary school science". *Cultural Studies of Science Education*. 11. 803-815.

Siry, Christina & Gorges, Anna. 2020. "Young students' diverse resources for meaning making in science: leaning from multilingual contexts". *International Journal of Science Education*. 42(14). 2364-2386.

Siry, Christina & Kremer, Isabelle. 2011. "Children Explain the Rainbow: Using young children's ideas to guide science curricula". *Journal of Science Education and Technology*. 20(5). 643-655.

Smith, E. & Gorard, S. 2012. "Teachers are kind to those who have good marks: a study of Japanese young people's views of fairness and equity in school." Compare: A Journal of Comparative and International Education 42:1, 27-46.

Sorkin, David. 1983. "Wilhelm Von Humboldt: The Theory and Practice of Self-formation (Bildung), 1791-1810" *Journal of the History of Ideas*. 44(1). 55-73. https://doi.org/10.2307/2709304

Takahashi, Junichi. and Matsuzaki, Hirofumi. 2014. "The Changes and Problems in Inclusive Education." *Fukushima University Department Bulletin*. 19. 13–26. [in Japanese]

Takayama, Keita. 2018. "Toward a new articulation of comparative educations: cross-culturalising research imaginations" *Comparative Education.* 54(1). 77-93.

Takayama, Keita. 2020. "An invitation to 'negative' comparative education" *Comparative Education.* 56(1). 79-95. https://doi.org/10.1080/03050068.2019.1701250

Terzi, Lorella. 2010. *Justice and equality in education: A capability perspective on disability and special educational needs.* Bloomsbury Publishing Plc. London.

Terzi, Lorella. 2014. Reframing inclusive education: educational equality as capability equality. *Cambridge Journal of Education.* 44(4). 479-493.

Tröhler, Daniel. 2016. "Curriculum History or the Educational Construction of Europe in the Long Nineteenth Century." *European Educational Research Journal.* 15(3). 279–297. https://doi.org/10.1177/1474904116645111.

UN Convention on the Right of Persons with Disabilities (UNCRPD). 2006. https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html

UNESCO 1994. Salamanca statement and Framework for Action in Special Needs Education https://unesdoc.unesco.org/ark:/48223/pf0000098427

UNESCO 2019. Final report of the international forum on inclusion and equity in education: every learner matters. Cali, Colombia, 11-13 September 2019. https://unesdoc.unesco.org/ark:/48223/pf0000372651

UNESCO 2020. Global Monitoring Report on Inclusive Education. Paris.

Wright, Ruth. 2014. "The fourth sociology and music education: Toward a sociology of integration". *Action, Criticism and Theory for Music Education.* 13(1). 12-13.

Wright, Ruth. 2019. "Envisioning real Utopias in music education: prospects, possibilities, and impediments". *Music Education Research.* 21(3). 217-227.

Yawata, Yukari. 2012. "Inclusive education in our country- based on the historical background of integrated education." Research bulletin of Naruto University of Education 27. 65-79. [in Japanese]

Yokoyama, Reiko. 1981. "Philosophy of Nishida Kitaro" *Hitotsubashi Kenkyuu.* 6(4). 91-107 [in Japanese]

Yoneda, Hiroki. 2020. "Development of the Japanese Inclusive Education System: From Special Schools to Curriculum Modification for Special Needs Education in Regular Schools." *Advances in Social Science, Education and Humanities Research.* 464. 1031–1040.

Yoshitoshi, M. & Takahashi, K. 2021. "A critical analysis of court decision on mainstream school attendance of a child with medical care needs in Japan: A long way towards inclusive education." *International Journal of Inclusive Education* DOI: 10.1080/13603116.2021.1888322

Yuasa, Takamasa. et al. 2019. *Inclusive education*. Kyoto, Japan: Minerva Publishing. [in Japanese]

Zapp, Mike and Powell, Justin J.W. 2016. How to construct an organizational field: Empirical educational research in Germany 1995-2015. *European Educational Research Journal*. 15(5). 537-557.

Zapp, Mike. 2021. "The authority of science and the legitimacy of international organisations: OECD, UNESCO, and World Bank in global education governance." *Compare*. 51(7). 1022–1041. DOI: 10.1080/03057925.2019.1702503

Curriculum Vitae

Education:

2018.9- current	University of Luxembourg, Doctoral study in Social and Educational Sciences
2016.9-2018.6	University of Luxembourg, Master in social sciences and Educational Sciences
2001.4-2003.3	Osaka University, Master in international public policy
1997.4-2001.3	International Christian University, Bachelor of Liberal Arts
1999.9-2000.6	Durham University (UK), Exchange student

Work Experience:

2018.9 – 2020.6	St. Georges International School Luxembourg (part time)
2014.8- 2018.3	Rakuten Europe Sarl
2013.8- 2014.7	Rakuten Inc.
2012.5- 2013.7	Covidien Japan
2003.4- 2012.5	Panasonic Corporation

Articles

Book Chapter:

Chiba, Miwa (2023)
Comparison of Self-reflection in Humboldtian Bildung and the Kyoto School: Rethinking Assumptions on 'Reflection' in OECD Education 2030, David Hebert eds, Comparative and Decolonial Studies in Philosophy of Education, Springer https://link.springer.com/book/10.1007/978-981-99-0139-5

Articles:

Chiba, Miwa (2021)
Comparison of Self-reflection in Humboldtian Bildung and the Kyoto School: Educational implications in light of OECD frameworks, Nordic Journal of Comparative and International education, vol.5(2), 8-21.

Chiba, Miwa and Powell, J.W. Justin (2022)
Comparing the Paradoxical Development of Special Education and Inclusive Education in Luxembourg and Japan

Chiba, Miwa (2022)
How inclusive is Music Education in Luxembourg and Japan?

Selected presentations by the author relevant to the thesis

Miwa Chiba (November 2019) Comparative Analysis of School Curricula in Luxembourg and Japan - Exploring School Curricula for Inclusive Education. Luxembourg Educational Research Association (LUXERA) Emerging Researchers' Conference, University of Luxembourg, Luxembourg.

Miwa Chiba (May 2020) Bildung and the Kyoto School of philosophy. Online intensive doctoral seminar: Non-Western Educational Philosophy and Policy by Prof. David Hebert of Western Norway University of Applied Sciences, Bergen, Norway.

Miwa Chiba (November 2020) Comparative Analysis of School Curricula in Luxembourg and Japan - Exploring School Curricula for Inclusive Education. LUXERA Conference, University of Luxembourg, Luxembourg.

Miwa Chiba (November 2021) Comparing Paradoxes in the Development of Special Education and Inclusive Education in Luxembourg and in Japan. LUXERA Emerging Researchers' Conference, University of Luxembourg, Luxembourg.

Miwa Chiba (December 2021) Comparing Paradoxes in the Development of Special Education and Inclusive Education in Luxembourg and in Japan. MAMACO Conference on Inclusion, University of Luxembourg, Luxembourg.

Miwa Chiba (March 2022) Music Education and Inclusion in Luxembourg and Japan. Colloquium "Inclusive Knowledges Societies", University of Luxembourg, Luxembourg.

Miwa Chiba (June 2022) Comparison of Self-reflection in Humboldtian Bildung and the Kyoto School. Seminar coordinated by Prof. Keita Takayama and Associate Prof. Jeremy Rappleye at Kyoto University, Japan.

Miwa Chiba (November 2022) Comparison of Inclusive Education in Luxembourg and Japan. Colloquium "Inclusive Knowledges Societies", University of Luxembourg, Luxembourg.

Miwa Chiba (February 2023) Comparison of Inclusive Education Systems in Luxembourg and Japan, the Annual Meeting of the Comparative and International Education Society (CIES) 2023, online and Washington D.C., USA.