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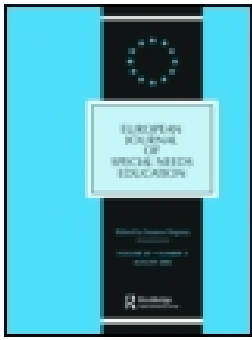
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## Same vision – different approaches? Special needs education in light of inclusion in Finland and Norway

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### ABSTRACT

This article explores two aspects of special needs education (SNE) for pupils in compulsory schools in Finland and Norway, who according to official procedures, have been granted SNE. The two aspects are *educational settings* for the implementation of SNE and *formal competence* among those who implement the SNE to which the pupils have a right. The results are based on explorative studies of official laws and regulations, available statistical data and earlier research from both countries. The results indicate that a majority of the target pupil group in Finland receive their SNE, whether full or part time, in a special class, whereas in Norway, most of these pupils receive part-time SNE, provided in regular classes or smaller groups in mainstream school. Furthermore, the results indicate that in Finland, highly qualified special education teachers are frequently engaged in the implementation of SNE, while in Norway, teacher assistants – guided by a general teacher – often seem to have greater responsibility for implementing SNE. To conclude, a redirection of SNE in both countries is needed towards working methods that are more inclusive. In Finland, educational settings need a stronger focus, and in Norway, there is a need to invest more in teachers' competence in SNE.

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Inclusive education; special needs education; Finland; Norway

## Introduction

Even though inclusion has been a guiding principle in western countries in recent decades, researchers have not reached a common understanding of inclusive education. There are differences between countries in terms of the interpretation and implementation of inclusion (Haug 2017b; Kiuppis and Hausstätter 2014). It is known that inclusive education is easier to formulate in legislation than to implement in practice, and that inclusion has led to new demands on teachers' competence (Ainscow and Sandill 2010; Haug 2017b; Pit-ten et al. 2018). In the development of inclusive principles, presented in the Salamanca Statement of 1994 (Unesco 1994), countries with similar education structures and cultures can learn from each other's pitfalls and success.

The rationale for this study lies in the fact that Finland and Norway are two Nordic welfare states and neighbouring countries, both of whom signed the Salamanca Statement and both of whom believe in the principle of inclusive education (Finnish Basic Education Act 1998, 2010; Norwegian Education Act 1998). Furthermore, both

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countries have approximately an equal percentage of pupils who have been granted special needs education (SNE) according to an official decision. In 2017–2018, 7.9% of the pupils in Norway and 8.1% of the pupils in Finland had been officially granted SNE (NDET 2018b; Statistics Finland 2019).

Despite the similarities, there also seem to be differences between the two countries, including how the principle of inclusion appears to be managed and implemented, as well as the use and frequency of special classes and schools (EASNIE 2018). Hence, in light of the principle of inclusive education, the purpose of this study is to explore and shed light on the similarities and differences regarding SNE in Finland and Norway, with a focus on two aspects:

- (1) The educational setting in which pupils receive SNE
- (2) Formal teacher competence among those who implement SNE.

In this article, the focus is on those pupils who have been officially recognised as requiring SNE, which in both countries means they have an individual education plan (IEP) in one or more subjects. In both countries, there are pupils with learning difficulties whose needs have not been granted according to an official decision but still receive additional support. Since these pupils are not documented in statistics in Norway, we have chosen to limit our focus to pupils who have been officially recognised. With regards to teacher competence, we are interested in the formal competence of those who implement the SNE.

### ***Inclusive education***

Although there remains no consensus on what inclusive education actually means (Kiuppis 2014), the effort to shut down special schools and minimise the number of pupils receiving SNE in segregated educational environments has been a common trend (Ferguson 2008). Focusing on the pupils with special educational needs (SEN) and the physical environment is often associated with a *narrow definition* of inclusive education (Ainscow, Booth, and Dyson 2006; Haug 2017b), while a *broad definition* of inclusive education focuses on the well-being of all pupils and aims to develop classrooms in which all pupils can learn and participate together. Both definitions can be regarded as problematic. The narrow definition risks neglecting how the education is implemented. The broad definition risks overlooking the unique needs of pupils with disabilities (Haug 2017b).

Inclusion can be understood as an ongoing process that seeks to find better ways in general education to respond to diversity and to facilitate all pupils, and thus the narrow and broad understandings should not be regarded as opposites; rather, they depend on each other for success (Ainscow, Booth, and Dyson 2006; Kiuppis 2014). As such, inclusion involves numerous aspects, including participation, equality, quality, social justice and democracy (Ainscow, Booth, and Dyson 2006; Haug 2017a, 2017b). These aspects are based on the right of all pupils to participation and common education, but they are also centred on the importance of an equal education based on pupils' individual needs (Haug 2017b).

### ***Teacher competence and special educational knowledge in an inclusive school***

Researchers claim that teacher competence has a strong impact on the learning, development and achievement of pupils (Glass 2000; Hanushek 2014; Hattie 2009), not at least

when it comes to inclusive education (Pit-ten et al. 2018). The concept of *teacher competence* includes areas such as attitudes, knowledge and skills (EASNIE 2012). EASNIE (2012) defined an inclusive teacher profile as having four core values needed by every teacher entering the education system regardless of their specialism. The four core values are (1) valuing learner diversity, (2) supporting all learners, (3) collaborating with other professionals and (4) developing as a professional. The ability to welcome and teach all learners by means of general educational knowledge and collaboration with other professionals is emphasised by researchers in the field (Ainscow and Sandill 2010; Pantic and Florian 2015).

Researchers have explored whether there is a need for a particular competence in SNE beyond a general educational competence in an inclusive school, as well as how competence in SNE can be utilised (Ainscow and Sandill 2010; Brownell et al. 2010; Florian 2008, 2014; Haug 2017b). A couple of decades ago, special education teachers (SETs) were mainly expected to teach pupils with SEN in segregated classrooms, and the education provided by them focused on the different learning disabilities of the pupils (Brownell et al. 2010). Haug (2017b) claims that a strong focus on disability knowledge may serve to maintain the view that pupils with learning difficulties or disabilities should be taught in special groups and thus is not in harmony with the principle of inclusive education. Furthermore, Haug (2017b) and Florian (2014) claim that pupils who receive SNE benefit from general teaching strategies. This indicates a shift in emphasis from special expertise to general educational expertise within an inclusive context (cf. Florian 2008).

Some studies confirm the importance of ensuring that pupils with learning difficulties receive support from teachers who are specialised in SNE (McLeskey and Waldron 2011). Special educational competence, including assessments, interventions and technological adaptations for pupils in the fields of reading, writing and mathematics, seems to be important, especially when teaching pupils with extensive learning disabilities (Björn et al. 2016; Brownell et al. 2010). Thus, besides the inclusive competence that all teachers need, there is also a need for teachers to have specialised knowledge about learning disabilities and assessments. In an inclusive school, the support delivered by specialised SETs can be offered as part of the ordinary educational system instead of in segregated educational settings (Florian and Linklater 2010). A redirection of special educational knowledge towards the general education setting has highlighted the importance of collaboration between SETs and general education teachers (GETs) (Ainscow and Sandill 2010). Researchers have recommended a *co-teaching* model in order to improve inclusive education. In this model, a GET and a SET teach all the pupils in a classroom together (Friend et al. 2010; Saloviita 2018). Co-teaching seems to benefit all pupils, especially those who struggle with learning disabilities (King-Sears, Jenkins, and Brawand 2018; Scruggs, Mastropieri, and McDuffie 2007).

### ***The role of teaching assistants***

The use of teaching assistants (TAs) to manage inclusive education in mainstream classrooms has been widespread in several countries (Sharma and Salend 2016). Even though TAs do not have teacher competence and thus cannot take full responsibility for the education provided, they are often highly involved in teaching and in pupils' learning processes. The extensive use of TAs in SNE and the possible negative impact on pupils and

**Table 1.** Policy documents concerning educational settings and competence in SNE.

Finland	Norway
Finnish Basic Education Act 628. (1998). Helsinki: Finnish Ministry of Justice. Finnish Basic Education Act. Amendments 1136/2010. Finnish Ministry of Justice. Decree on Qualifications Required for Teaching Staff. 1998/986. Finlex. Finnish National Agency of Education (2016). National Core Curriculum for Basic Education 2014. Helsinki: Opetushallitus.	The Education Act with Amendments 1998. Ministry of Education and Research. Norwegian Directorate for Education and Training (NDEC). (2014). Guidelines for Special Needs Education. Norwegian Directorate for Education and Training (NDET). (2018a). What do we know about special needs education and special support? Notes on statistics 6/2018. Ministry of Education. Official Norwegian Report 2014/7

their learning have concerned researchers in the field (Bennett, Ng-Knight, and Hayes 2015; Blatchford, Webster, and Russell 2012). For example, Blatchford, Webster, and Russell (2012) found in a large-scale study that pupils who received extensive support from TAs seemed to make significantly less academic progress than did pupils who received most of their support from the teacher. Webster, Blatchford, and Russel (2012) claim that the negative impact is a result of the way in which TAs are prepared and guided. Thus, reassessing the use of TAs may contribute to school improvement.

## Materials and methods

This study explores the implementation of SNE for pupils who have been granted SNE according to an official decision in compulsory school, with a focus on the educational setting and teachers' competence. In Finland, compulsory school lasts nine years (starting at the age of 7 and ending at the age of 16), and in Norway, compulsory school lasts ten years (starting at the age of 6 and ending at 16 years). The data include national educational policy documents, educational statistics, and relevant research concerning both countries. The educational policy documents that we found relevant are listed in Table 1.

There is a recognised gap between the principles described in policy documents and the practical implementation of inclusive education (Haug 2017b), as well as difficulties in comparing policy documents from different countries (Jahnukainen 2015). Therefore, we also use official statistical data from both countries. The relevant statistical information regarding SNE is collected in slightly different ways in Finland and Norway, which affects validity and reliability. Thus, we also use relevant research that helps to shed some light on the statistical data.

## Results

### *Educational settings for pupils receiving SNE according to policy documents*

The Finnish Basic Education Act (1998, 2010) emphasises the importance of early and immediate support of all pupils when difficulties in a subject are noticed, stipulating that support is to be organised through a three-tiered framework for SNE called 'Support for Learning and Schooling'. This study focuses on the third tier of support, 'special support'. To receive special support, pupils must receive official recognition of their need for support from their educational provider. They will then receive an IEP. Special support

is available for pupils when the first and second tiers of the framework have shown to be insufficient, or when there is a need for individualised goals in one or several subjects. The decision is based on an extensive assessment made by the school; this assessment can be supplemented by psychological, medical or social reports. The pupil's primary teaching group and specifications concerning the provision of support are meant to be included within the decision.

Even though Finland signed the Salamanca Statement in 1994, the term 'inclusion' has historically been avoided in Finnish policy documents. In the most recent curriculum (Finnish National Agency of Education 2016), the concept of 'inclusion' was used for the first time, where it is stated that the 'development of basic education is guided by the inclusion principle' (Finnish National Agency of Education 2016, 19). It is also stated in law, as well as in curricula, that pupils in need of special support should receive their support in an ordinary school and classroom through the use of *flexible support methods* if it is not in the pupil's best interest to receive this support in another group (Finnish Basic Education Act 2010; Finnish National Agency of Education 2016). The flexible support methods described include differentiation in the classroom, part-time SNE, co-teaching, and assistant service (Finnish National Agency of Education 2016). Although the inclusion principle is highlighted, it is still possible to teach pupils receiving special support in special classes.

According to the Norwegian Education Act (1998), all education in compulsory schools is to be adapted to the pupils' abilities and aptitudes, and pupils who do not benefit sufficiently from general education are entitled to SNE. A pupil's need for SNE is assessed by the Educational and Psychological Counselling Service (EPCS), an independent expert authority. The EPCS recommends whether an application for SNE should be granted or rejected, and it specifies how much SNE and what kind of SNE the pupil should be given. Norway's official guidelines for SNE also state that the EPCS's assessment should primarily give advice on the educational settings that will contribute to the pupil's class affiliation (NDET 2014). When considered to be necessary, the school or EPCS may request assistance from other professionals, such as medical experts or professionals from one of several National Resource Centres for Special Needs Education, during different parts of the process.

The principle of inclusive education is central to Norwegian policy documents and applies to all pupils (Norwegian Education Act 1998). The pupils must attend groups or classes that meet their needs of social belonging. Furthermore, under Norwegian law, there are certain restrictions regarding a school's ability to organise education by dividing the pupils into groups based on their abilities, gender or ethnic affiliation. Despite this, the school can allow a group of pupils who have, for example, reading difficulties to receive intensive training in reading outside of the class for a limited period of time (Ministry of Education 2014). Subject to the EPCS's assessment, the school principal makes an official decision regarding a pupil's SNE application. The decision may be appealed and is legally binding in the event of a lawsuit. Pupils who are granted SNE receive an IEP (Norwegian Education Act 1998).

### ***Educational settings for pupils receiving SNE in practice***

During recent decades, the number of special schools in Finland have decreased (Jahnukainen 2015). In 2018, 0.7% of all Finnish pupils in compulsory school attended

special schools. In addition, 2.1% of all pupils in compulsory school were placed in full-time special classes at mainstream schools. Of those pupils receiving special support, 8.6% attended special schools, while 27% were in full-time special classes. This means that a total of 35.6% of Finnish pupils who received special support in 2018 were placed in a special school or special class on a full-time basis. The remainder of these pupils were educated at least part-time in a regular class (Table 2). The number of pupils placed on a full-time basis in special schools or special classes has decreased in the last five years from 40.0% in 2014 to 35.6% of pupils receiving special support 2018 (Statistics Finland 2014, 2019).

As can be seen in Table 2, in 2018 in Finland, 21.3% of pupils receiving special support were placed in a regular class on a full-time basis, with 20.2% of these pupils receiving the majority of their education in a regular class. The pupils who attended a regular class on a full-time basis often received part-time SNE (Finnish National Agency of Education 2016). Part-time SNE in Finland is delivered on a flexible basis, with pupils being occasionally taught outside of the regular classroom for a few hours a week by an SET. In Finland, this is a common method of delivering support that is close to regular education (Sundqvist, Björk-Åman & Ström 2019).

In 2018, approximately 41% of pupils receiving special support received part-time SNE (Statistics Finland 2019). According to a recent study (Author<sup>1</sup> et al. 2019), the most common method of delivering part-time SNE is through small-group teaching, followed by individual teaching and co-teaching. Co-teaching is highlighted in Finnish policy documents as a suitable model for delivering part-time SNE within regular classrooms (Finnish National Agency of Education 2016). Despite the fact that it is not yet fully established, co-teaching and collaboration between SETs and GETs is becoming more prevalent in Finnish schools (Saloviita 2018; Sirkko, Takala, and Wickman 2018; Sundqvist et al. 2019).

In Norway, the process of shutting down special schools began in 1975, and mainstreaming has had a strong impact on school development. In 2017–2018, 0.65% of all Norwegian pupils, which equates to 8% of all pupils who received SNE, received their education either at a special school or in a special class within a mainstream school (NDEC 2018a; Nordahl 2018). This means that the remaining 92% of all the pupils who received SNE attended regular classes and mainstream schools. In recent years, the Norwegian authorities have recorded how the SNE for pupils in compulsory school is organised. The organisation is classified into four different categories. Despite some possible inaccuracies in the reported figures, Table 3 (below) shows how the SNE was organised for pupils during 2017–2018 in Norway (NDET 2018a).

Table 3 shows that 40.2% of all pupils in compulsory schools who received SNE did so within their regular classes. This represents a significant increase since 2014, when the

**Table 2.** Formal educational settings and time (%) spent in these settings for Finnish pupils receiving SNE, 2018.

100% of time in special school	100% of time in special class at mainstream school	51–99% of time in special class at mainstream school	51–99% of time in a class at mainstream school	100% of time in a class at mainstream school
8.6%	26.9%	23.1%	20.2%	21.3%

Source: Statistics Finland (2019).



figure was 27.6%. The table also shows that 46.9% of pupils received their SNE mainly in smaller groups, while 12.9% of pupils received it alone with a TA or with a teacher (NDET 2018a). Considering that the majority of the pupils receive seven or fewer hours of SNE per week, even many of those who receive most of their support either in smaller groups or alone with a TA or a teacher still receive most of their education in their regular classes (Nilsen 2017).

### Competence in SNE

In Finland, all teachers, including SETs, must obtain a master's degree. Qualified SETs represent a specific profession in Finland and in Finnish schools. There are two ways to become an SET: (1) by a direct degree master's programme majoring in SNE or (2) by becoming a class or subject teacher first (again requiring completion of a full master's degree programme), after which a roughly one-year postgraduate programme is required (Decree on Qualifications Required for Teaching Staff 1998). The core of SETs' training focuses on learning difficulties and behavioural and emotional difficulties. However, during the last decade, a focus on communication, collaboration and inclusive teaching methods has increased. This means that SET students are provided with the tools to educate pupils with SEN as well as tools for inclusion and collaboration (Takala, Nordmark, and Allard 2019).

SETs in Finnish schools are trusted professionals who have extensive autonomy when it comes to implementing SNE (Author<sup>1</sup> et al. 2019; Rätty, Vehkoski, and Pirttimaa 2019). They identify the needs for SNE and then plan, carry out and evaluate intervention programmes and education for pupils in need of support, often in collaboration with other teachers. They have a specific responsibility to be involved in the assessments and teaching of pupils receiving special support and are also expected to offer GETs consultation and co-teaching (Björn et al. 2016; Sundqvist et al. 2019).

In Norway, there is no official professional title for SETs. Despite this, most schools have a special educator, usually a GET with some level of formal competence in SNE, who is responsible for teaching pupils and supporting GETs and TAs who are involved in teaching pupils who have the right to SNE (Cameron and Lindqvist 2014). There are no specific competence criteria for teaching SNE in Norway. Researchers have criticised the lack of competence requirements for those who plan, carry out and assess SNE, arguing that this may contribute to poor learning outcomes for pupils receiving SNE (Haug 2017c; Kvande et al. 2019). However, it is possible to gain competence in SNE. There are two common ways: (1) attending a direct degree programme majoring in SNE or (2) becoming a class or subject teacher first (since 2017, requiring a master's degree), after which a one- or two-year postgraduate programme is required to qualify for teaching special education.

The curricula at the institutions that offer studies in SNE do not share a common core of content (Cameron et al. 2018). Cameron et al. (2018) criticise some Norwegian SNE

**Table 3.** The organisation of SNE for pupils (%) in Norway, 2017–2018.

Mainly in regular class	Mainly in groups of six or more pupils	Mainly in groups of two to five pupils	Mainly alone
40.2%	8.1%	38.8%	12.9%

Source: Grunnskolen informasjonssystem (GSI) (Norwegian Directorate for Education and Training 2019).

education programmes for focusing on various kinds of learning and behavioural difficulties rather than inclusive education methods.

The special educators in Norwegian schools mostly give direct support to pupils, but a consultation role and teamwork is also visible (Cameron and Lindqvist 2014). Co-teaching between GETs and teachers with SNE competence is not a frequently used model in Norway; SNE and general education often seem to operate as two parallel systems (Nilsen 2017).

### *The role of TAs in SNE*

In Norway and Finland, pupils sometimes receive support from TAs. In Finland, 58.8% of pupils recognised as requiring special support receive a form of additional support referred to as an 'interpretation and assistant service' (Statistics Finland 2019). According to Finnish educational policy documents, a qualified teacher is always responsible for planning, teaching and educating their pupils. This means that TAs may guide and support a single pupil or a group of pupils with different tasks according to the teacher's instructions, but they are not allowed to have educational responsibility for pupils (Finnish National Agency of Education 2016). Results from a Finnish study showed that TAs mainly used their time assisting individual pupils 'not too much, but enough' and looked to help the pupil become as independent as possible (Takala 2007). Takala (2007) claimed that TAs were often given too much responsibility. However, a more recently conducted study showed that either a GET or SET is usually responsible for the daily implementation of support, thus indicating that it is uncommon for TAs to have substantial responsibility (Sundqvist et al. 2019). The level of teaching responsibility that TAs have probably differs from school to school, and we do not have a complete picture of how TAs are used.

According to official statistics, approximately 47.4% of pupils who received SNE in Norway in 2017–2018 were granted licence to receive SNE through the support of a TA (NDET 2018a). Even though TAs are not allowed to take full responsibility for pupils' education, they often seem to have extensive responsibility for the implementation of the support (Nordahl 2018). Research indicates that this lack of prioritisation of SNE competence contributes to poorer learning outcomes of the pupils affected. A recent study has questioned the quality of SNE because its effect on pupils' academic performance in mathematics and reading and writing was found to be potentially non-existent or negative (Kvande et al. 2019). Nordahl (2018) highlight the extensive use of TAs as a significant explanation for the frequent failure of pupils receiving SNE in Norway to realise their learning potential. Research also indicates that teaching collaborations involving GETs and TAs are often preferred over a co-teaching model that includes a GET and SNE teacher (Hannås and Strømsvik 2017).

According to the Norwegian Education Act (1998), all teachers must possess adequate and formal education within the subjects they are teaching. However, the school's principal may exempt from the competence requirements for those who deliver support to pupils in need of SNE; if SNE involves the use of TAs, this has to be clearly stated in the principal's individual decision regarding SNE (NDET2014). Norwegian laws and regulations make it perfectly clear that TAs have to be under the surveillance of a formally qualified teacher (i.e. a GET) but not necessarily a teacher with SNE competence.

Established official procedures further guarantee that each provision of SNE is based upon individual assessments and recommendations regarding scope, content and preferable educational settings that are stated by independent and qualified EPCS professionals. Despite these various formal regulations and precautions, the quality of SNE in Norway is still subject to numerous concerns, most of them related to what is described as the widespread practice of the extensive use of TAs and the lack of SNE competence (Haug 2017c; Kvande et al. 2019; Nordahl 2018).

Despite these critical voices, we do not know exactly how much of the SNE in Norway is being provided by TAs. The Norwegian Educational Board has estimated that approximately 50% of SNE is being carried out by TAs. Public statistics further confirm that the use of TAs in SNE has been increasing for a long time. From 2010 to 2017, the increase exceeded 80% (Nordahl 2018).

## Discussion

The findings show that even though inclusive education is a central principle in both countries, Finland and Norway seem to handle similar challenges related to SNE in different ways.

### *The physical settings regarding SNE: a Norwegian strength*

Inclusive education represents a guiding principle in policy documents in Finland and Norway, possibly with a stronger emphasis in Norwegian documents on avoiding the use of special classes. Under Finnish laws, pupils receiving special support (who have been the focus of this paper) can still be placed in a special class on a full-time basis (Finnish National Agency of Education 2016). By contrast, Norwegian legislation and policy documents highlight the pupils' right to belong to a regular group or class in order to meet their need for social belonging, and official legislation and documents also contain restrictions regarding the option of dividing pupils into permanent groups based on specific criteria (Ministry of Education 2014). Our study confirms that Norway has surpassed Finland in terms of the educational settings and participation of pupils officially recognised as requiring SNE. For example, in 2018, 35.6% of Finnish pupils receiving special support attended a special school or a special class at a mainstream school on a full-time basis. Official Norwegian statistics state that only 8% of pupils receiving SNE were in special classes or schools on a full-time basis (Statistics Finland 2019; NDET 2018a). This shows that pupils receiving full-time SNE outside of regular educational settings are more common in Finland than in Norway.

The statistical information from the two countries is not entirely comparable. Nevertheless, looking at the numbers (Tables 2 and 3), the most apparent similarities between the countries appear to be that small-group education for a few hours a week represents the most common way to organise the SNE. This may indicate that what Haug (2017b) describes as 'impairment-focused teaching strategies' still hold a rather strong position in both countries. A similar focus on impairment is also visible in SET education in both countries, even though an increase in content on collaboration and inclusive education models has been observed (Cameron et al. 2018; Takala et al. 2019). The use of co-teaching as a collaboration between GETs and SETs, which is considered an inclusive

teaching method, seems to have increased in both countries, but it is still in its early stages in Finland and appears as a rather limited and casual teaching method in Norway (Sundqvist et al. 2019; Nilsen 2017; Saloviita 2018).

### *Formal competence in SNE: a Finnish strength*

In Finland, there is a strong focus on SET competence. This includes a fairly long tradition of promoting research-based master's education for SETs (Decree on Qualifications Required for Teaching Staff 1998). SETs are employed and work at schools, and they are highly trusted experts in relation to SNE assessment and teaching (Räty, Vehkoski, and Pirttimaa 2019). While Norwegian schools may have teachers with some SNE competence, Norway does not prioritise or require formal SET competence in the same way that Finland does. Due to the lack of official requirements, the contents of the education are slightly different, which means the competence of those who implement SNE in Norway varies significantly. Furthermore, the lack of requirements for formal competence among those who teach SNE seems to have contributed to the common practice of handing a considerable part of the responsibility over to TAs (Nordahl 2018). Since TAs have neither teacher education nor SNE competence, this is a highly questionable practice. The use of TAs is also common in Finland (Statistics Finland 2019), but while TAs often support single pupils (Takala 2007), recent research indicates that the support in Finnish schools is usually carried out or supervised by an SET (Sundqvist et al. 2019). Thus, the practice of handing responsibility over to TAs seems more widespread in Norway. Different approaches and attitudes towards qualified competence in SNE may thus partly explain why Norwegian pupils who receive part-time SNE do not improve their academic outcomes, whereas Finnish pupils seem to benefit considerably from their part-time SNE (Björn et al. 2018; Kvande et al. 2019; Panula 2013; Savolainen, Timmermans, and Savolainen 2018).

Norwegian SNE is currently receiving criticism because of the extensive use of TAs and the corresponding lack of competence in SNE (Nordahl 2018). However, in Finland, the extensive use of special classes indicates that schools are still managing SNE in an exclusionary way. This practice may be explained, but cannot be defended, by the fact that pupils who receive SNE in special classes are being taught by highly skilled SETs. Competence in SNE among those who teach pupils in need of SNE undoubtedly represents a strength for Finland, but the competence could be redirected more towards regular classes.

### *Implications and future research*

Participation and equality are central aspects of inclusion (Ainscow, Booth, and Dyson 2006). Our conclusion is that when discussing inclusive education and SNE, the issue of participation in terms of physical educational setting is important but should not overshadow the quality of SNE. This is because quality in terms of competence among those who provide SNE is a question of equality. Finland and Norway seem to have different strengths in relation to SNE in this regard. Finland seems to put a greater emphasis on securing equality in SNE, since a qualified SET is always involved in the implementation of special support. In Norway, the emphasis on inclusion has been on participation instead.

The Finnish challenges comprise minimising the considerable number of pupils receiving their education in special classes and redirecting SET competence towards more inclusive teaching models. The Norwegian challenges comprise minimising the use of TAs and increasing professional competence among those who implement SNE. In line with this, the Norwegian Ministry of Education (2019a) has just announced that it intends to introduce a number of measures to enhance SNE pupils' chances of being taught by professionals with the relevant competence. In spring 2021, the government intends to propose and enact new amendments to the Education Act (Ministry of Education 2019b). Furthermore, in its latest White Paper, the Norwegian Ministry of Education (2019a) has announced that it will establish a new centre for research on SNE and inclusion.

The extensive use of small-group teaching indicates that neither Norway nor Finland has succeeded in developing inclusive classrooms in which all pupils can participate and learn together. Co-teaching between SETs and GETs is highlighted as a valuable teaching method for pupils who receive SNE (Friend et al. 2010;). Finland seems to be one step ahead of Norway in this regard. The rather slow development of co-teaching as an alternative to SNE in exclusionary settings in both countries may be explained by belief in well-established small-group teaching and by teachers' lack of knowledge regarding how to effectively collaborate and co-teach. Thus, the universities offering studies in SNE have a responsibility to ensure that their students have the knowledge and practical skills for inclusive methods and collaboration.

Pupils with SEN have the right to differentiated education according to their individual needs (Haug 2017b; McLeskey and Waldron 2011) and should thus be entitled to high-quality education. However, pupils with SEN are also entitled to social participation by sharing experiences and activities with their peers. Whether the sense of belonging can be achieved while pupils receive SNE for limited periods in smaller groups is a question that deserves further investigation and discussion. Furthermore, there is a need for more research to examine how GETs and SETs can collaborate to guarantee pupils high-quality SNE within regular classrooms. For example, there is a lack of Norwegian and Finnish research that explores how collaboration through co-teaching models can enhance or influence pupils and their learning and inclusiveness. We also recommend that both countries engage in more research to examine the role of TAs and determine how the resources provided by TAs can be used in an appropriate way within inclusive classrooms.

## Disclosure statement

No potential conflict of interest

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