

## BARRIERS TO INCLUSIVE EDUCATION IN SECONDARY SCHOOLS: A CASE STUDY OF SUPPORTING STUDENTS WITH SEND AND DIVERSE LEARNING NEEDS

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### Abstract

This systematic literature review synthesizes evidence published between 2014 and 2024 on the barriers that restrict inclusive education for secondary school students with Special Educational Needs and Disabilities (SEND) and diverse learning needs. The review draws on UK policy and empirical research while developing transferable implications for indigenous Pakistani educational contexts. This systematic literature review was conducted in accordance with the PRISMA 2020 reporting guidelines, ensuring a transparent and rigorous process for database searching, duplicate removal, title and abstract screening, full-text eligibility assessment and final study selection. Four databases were searched including PsycINFO, PubMed, Google Scholar and ResearchGate, from 871 initially identified records, 32 studies were retained for thematic synthesis. The interpretation of findings was informed by the social model of disability, Bronfenbrenner's bioecological model and Universal Design for Learning.

The review identified six major barrier domains: attitudinal barriers, physical and environmental barriers, systemic and institutional barriers, resource-related barriers, teacher-training barriers and curriculum inflexibility. UK-based evidence indicated that secondary schools continue to face significant challenges in implementing inclusive education despite the presence of strong legislative and policy frameworks such as the SEND Code of Practice 2015, the Children and Families Act 2014 and the Equality Act 2010. These challenges include insufficient teacher preparation, delays in Education, Health and Care plans, limited specialist support and the restrictive influence of exam-driven curricula. In Pakistan, these barriers are further intensified by segregated provision, cultural stigma, weak disability data systems and underfunded teacher education. The review is limited to English-language peer-reviewed studies published between 2014 and 2024 with grey literature largely excluded. The review protocol was not pre-registered on PROSPERO and the distinction between attitudinal and systemic barriers remains fluid because these barriers often overlap in practice. The findings suggested that schools should embed Universal Design for Learning, strengthen SENCo leadership and provide sustained continuing professional development for teachers. For Pakistan, the UK's graduated "assess, plan, do, review" approach and the Local Offer model may be adapted into context-sensitive

*provincial codes of practice. This review adds value by bridging UK secondary-phase SEND evidence with indigenous Pakistani policy implications and by offering a comparative framework for inclusive education reform in low- and middle-income country contexts*

## 1. Introduction

The right of every child to inclusive, equitable and quality education is enshrined in Sustainable Development Goal 4 and Article 24 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). Although the 1994 Salamanca Statement marked a major international commitment to inclusive education but students with Special Educational Needs and Disabilities (SEND) continue to encounter substantial barriers to full participation in mainstream secondary education. These barriers are not confined to lower-resource settings but they are also evident in high-income education systems such as the United Kingdom and in lower-middle-income contexts such as Pakistan (Kamran & Bano, 2023; Koutsouris et al., 2024).

In England, 434,000 children and young people held an Education, Health and Care (EHC) plan in 2024 which representing an 11.6% increase from the previous year and an 83.4% rise since 2016 (Department for Education, 2024). The secondary phase presents distinctive challenges for inclusive education as subject specialization due to the high-stakes assessment, compartmentalized timetabling and limited opportunities for co-planning make inclusive pedagogy more difficult to implement consistently than at primary level (Koutsouris et al., 2024). Despite the United Kingdom's comparatively mature legislative framework including the Equality Act 2010, the Children and Families Act 2014 and the SEND Code of Practice 0-25 (DfE & DoH, 2015), a well-documented SEND crisis persists. This crisis is reflected in rising tribunal appeals, declining EHC-plan timeliness and continuing concerns about workforce under-preparedness (Saxton et al., 2025; Smythe, 2025).

Pakistan has also made formal commitments to inclusive education. It is a signatory to the UNCRPD and its National Education Policy 2017 commits the country to inclusive provision. However, the gap between policy commitment and classroom practice remains

substantial. Fewer than 5% of school-aged children with disabilities are estimated to be enrolled in any form of education in Pakistan (Ministry of Federal Education & Professional Training, 2017). In addition, Pakistan's education expenditure, estimated at approximately 1.87% of GDP in 2023, remains well below the SDG 4 benchmark of 15-20% of public expenditure, limiting the material and institutional foundations required for inclusive schooling (World Bank, 2025; UNESCO Institute for Statistics, 2025).

Against this background, the current study systematic literature review (SLR) has three aims. First, it maps the principal barriers to inclusive education in mainstream secondary schools, drawing on peer-reviewed literature published between 2014 and 2024. Second, it interprets these barriers through the combined lens of the social model of disability, Bronfenbrenner's biocological model and Universal Design for Learning (UDL). Third, it translates the synthesized findings into actionable policy, research and practical implications for Pakistan where long-standing segregated educational traditions are increasingly being challenged by emerging commitments to inclusion.

## 2. Literature Review Background

### 2.1 UK Policy Architecture

The Children and Families Act 2014 introduced a major reform of the SEND system in England. Part 3 of the Act replaced the previous Statement of Special Educational Needs with the Education, Health and Care (EHC) plan, extended support across the 0-25 age range and introduced the Local Offer, personal budgets and the graduated "Assess, Plan, Do, Review" Cycle (Curran, 2019). These reforms were intended to make SEND provision more coordinated, transparent and responsive to the needs of children and young people.

The SEND Code of Practice 2015 operationalizes these legal duties and assigns strategic responsibility to the designated Special Educational Needs Coordinator (SENCo).

Alongside this, the Equality Act 2010 places anticipatory duties on schools to make reasonable adjustments for disabled learners. Although these reforms have been described as among the most significant changes to SEND legislation in recent decades (DfE & DoH, 2015) and their implementation has remained uneven. Hellowell (2018) revealed that new performativity demands have created professional anxiety among SEND practitioners while Hodkinson and Burch (2019) argued that the Code continues to reflect neoliberal assumptions about productivity and citizenship which can limit its inclusive potential. Therefore, the existence of a mature policy framework does not automatically ensure inclusive practice at school level.

## 2.2 Pakistan Policy Architecture

Pakistan's legal and policy framework also recognizes the right to education. Article 25A of the Constitution guarantees free and compulsory education for children aged between 5 to 16. In addition, the National Policy for Persons with Disabilities 2002, Pakistan's ratification of the United Nations Convention on the Rights of Persons with Disabilities in 2011, the Islamabad Declaration 2005 and the National Education Policy 2017 collectively commit federal and provincial governments to non-discriminatory and inclusive education (MFEPT, 2017).

Despite these commitments, Pakistan continues to face serious implementation challenges. Provincial education systems still operate parallel Special Education Centres while mainstream schools often lack the infrastructure, trained teachers, assistive resources and institutional support required for meaningful inclusion. Existing scholarship consistently highlights the gap between policy aspiration and classroom reality (Kamran & Bano, 2023; Shaukat, 2023). The Rights of Persons with Disabilities Act for Islamabad Capital Territory 2020 provides a more recent rights-based legislative framework but weak enforcement continues to limit its practical impact. As a result, the inclusive education in Pakistan remains more visible as a policy commitment than as a fully realized educational practice.

## 2.3 Theoretical Frameworks

This review is informed by three complementary theoretical frameworks. The first is the social model of disability which locates disability not simply in individual impairment but in the social, attitudinal, institutional and environmental barriers that restrict participation (Murza & Buckley, 2023). From this perspective, the central concern is not how learners can be changed to fit schools but how schools can be redesigned to include diverse learners more effectively.

The second framework is Bronfenbrenner's bioecological model which explains how inclusion outcomes are shaped by nested systems of influence. These include the microsystem of the classroom, the mesosystem of home-school relationships, the exosystem of local authority structures, the macrosystem of national policy and the chronosystem of historical reform trajectories (Tong & An, 2024). This model is useful because barriers to inclusion rarely operate at one level only but they are usually produced through interactions between learners, teachers, families, institutions and wider policy systems.

The third framework is Universal Design for Learning (UDL) which translates the principles of inclusion into curriculum and classroom practice. UDL promotes flexibility at the design stage through three core principles includes multiple means of representation, multiple means of action and expression and multiple means of engagement (Almumen, 2020; Capp, 2017). Rather than treating support as a later adjustment for individual learners, UDL encourages teachers and schools to design learning environments that are accessible to a wider range of students from the outset. Together, these three frameworks provide a strong basis for analyzing barriers to inclusion and for identifying practical strategies that can support more equitable secondary education in both the United Kingdom and Pakistan.

## 3. Methodology

### 3.1 Review Design

This systematic literature review was conducted in accordance with the PRISMA 2020 reporting guidelines to ensure transparency, methodological rigour and replicability in the

review process (Page et al., 2021). The review question was developed using the SPIDER framework which is particularly suitable for qualitative and mixed-methods evidence synthesis. The sample included mainstream secondary school students with Special Educational Needs and Disabilities (SEND), diverse learning needs and relevant education stakeholders. The phenomenon of interest was the range of barriers affecting inclusive education. The review considered qualitative, quantitative and mixed-methods empirical studies as well as relevant policy analyses. The evaluation focused on the identification, classification and interpretation of barriers to inclusion while the research type included peer-reviewed primary studies, systematic reviews and authoritative policy documents.

### 3.2 Search Strategy

A structured literature search was conducted between 1 February and 31 March 2025 with verification updates completed in April 2025. Four databases were searched: PsycINFO, ResearchGate, Google Scholar and PubMed. For Google Scholar, the first 200 results were reviewed for each search query, ordered by relevance. The search strategy used a combination of Boolean operators and key terms related to inclusive education, SEND, secondary schooling, barriers to inclusion and relevant policy contexts. The main search string was:

*("inclusive education" OR "inclusion") AND ("SEND" OR "Special Educational Needs and Disabilities" OR "diverse learning needs") AND ("secondary school" OR "high school") AND ("barrier" OR "challenge") AND ("UK" OR "England" OR "Pakistan") AND ("SEN Code of Practice" OR "EHC plan" OR "Universal Design for Learning" OR "teacher attitudes").*

To strengthen the comprehensiveness of the search, reference lists of key reviews and highly relevant studies were also hand-searched. This supplementary process helped identify

additional sources that may not have appeared in the initial database search.

### 3.3 Inclusion and Exclusion Criteria

Studies were included if they were published between 2014 and 2024, written in English and appeared as peer-reviewed journal articles, systematic reviews or authoritative policy documents. To be eligible, studies had to focus on the secondary phase, broadly defined as ages 11-19 or include substantial secondary-phase data. Studies were also required to examine barriers to inclusive education or the implementation of inclusive education policy. Studies were excluded if they were opinion pieces, editorials or commentaries without sufficient analytical content. Research focused exclusively on early years education, primary education or higher education was also excluded unless it provided relevant secondary-phase evidence. Duplicate records, non-English texts and studies limited to a single impairment category without broader analytical relevance to inclusive education were removed from the review.

### 3.4 Screening and Data Extraction

Titles, abstracts and full texts were screened using a structured Rayyan protocol. Two reviewers independently assessed the records against the inclusion and exclusion criteria. Any disagreements during screening were resolved through discussion until consensus was reached. This process helped reduce selection bias and improve the reliability of study selection. Data were extracted using a structured extraction framework. The extracted information included author name, year of publication, country, research design, sample characteristics, theoretical framework, identified barriers and key recommendations. This approach enabled consistent comparison across studies and supported the later thematic synthesis of evidence.

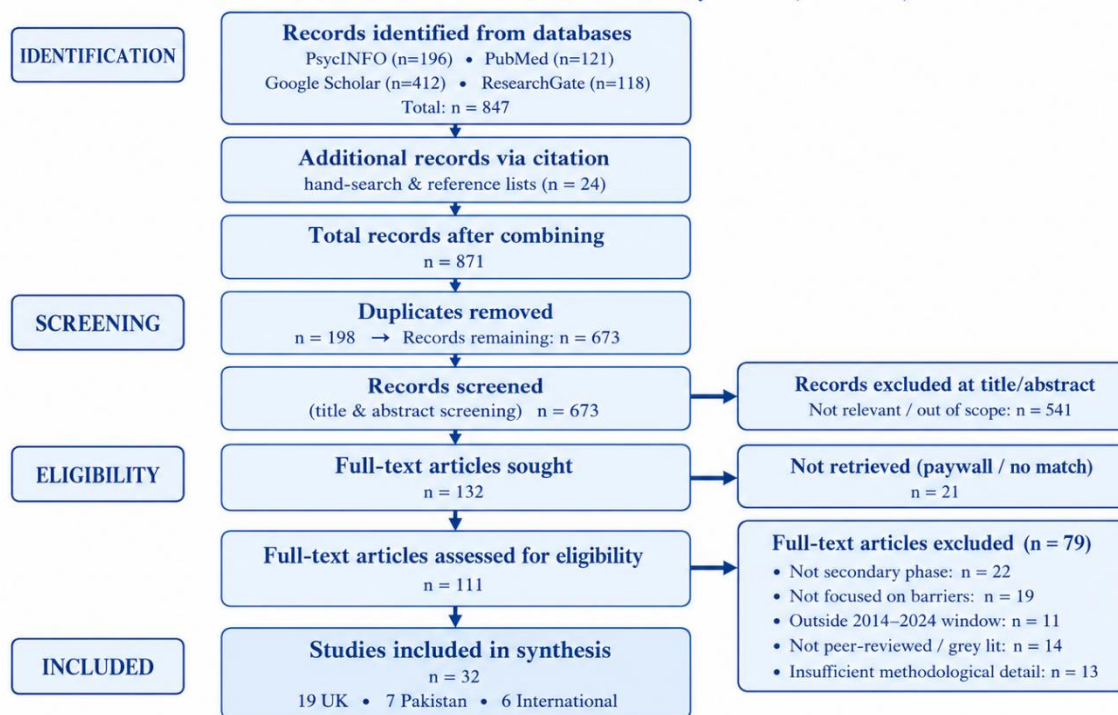


Figure 1. PRISMA 2020 Flow Diagram showing the identification, screening, eligibility and inclusion stages of the systematic literature review. Based on Page et al. (2021). The PRISMA 2020 statement: An updated guideline for reporting systematic reviews. *BMJ*, 372, n71. <https://doi.org/10.1136/bmj.n71>

### 3.6 Quality Appraisal and Synthesis

The methodological quality of the included studies was assessed using the Mixed Methods Appraisal Tool (MMAT, 2018 version) and it is useful for appraising qualitative, quantitative and mixed-methods research within the same review. Following quality appraisal, the evidence was analyzed through thematic synthesis as outlined by Thomas and Harden (2008). This process enabled the identification and organization of recurring barriers to inclusive education across the included studies. Six major barrier domains were developed through a combination of deductive and inductive analysis. Some categories were informed by existing literature on inclusive education while others emerged directly from the reviewed studies.

## 4. Results

### 4.1 Characteristics of Included Studies

A total of 32 studies met the inclusion criteria and were included in the final synthesis. Of these, 19 studies originated from the United Kingdom, primarily England, seven focused on Pakistan and six were drawn from comparable international contexts including Ireland, Greece, Saudi Arabia and Australia. These international studies were included to support cross-contextual comparison and validation of the emerging themes. The included studies represented a range of methodological designs. 14 studies used qualitative designs, 8 employed quantitative survey methods, 6 adopted mixed-methods approaches and 4 were systematic reviews or meta-analyses. Table 1 provides a thematic summary of representative studies included in the review.

Table 2. Thematic Analysis Results of Representative Included Studies

Authors	Country	Design	Sample	Primary Barriers	Focus/ Framework
Webster & Blatchford (2019)	England	Qualitative shadowing	49 Year (9 individuals)	Resource barriers and TA over-reliance	EHC plans and mixed delivery

Curran (2019)	England	Phenomenologica l	SENCoS	Systemic barriers and workload	SEND Code of Practice and SENCo role
Hellawell (2018)	England	Qualitative	SEND professionals	Attitudinal barriers and performativity	SEND Code of Practice 2015
Hodkinson & Burch (2019)	England	Critical discourse analysis	SEND Code of Practice text	Systemic and ideological barriers	Children and Families Act
Done & Knowler (2021)	England	Mixed methods	SENCoS during COVID-19	Resource barriers and exclusionary practice	Roll management
Koutsouris et al. (2024)	Internati onal	Systematic review	47 studies	Curriculum barriers and teacher training	Secondary inclusive education pedagogy
Smythe (2025)	England	Qualitative	17 teacher educators	Teacher training, ITT	Inclusive pedagogy
Goodall (2020)	England	Survey	93 teachers	Resource and attitudinal barriers	Mainstream inclusion concerns
Saxton et al. (2025)	England	Qualitative	22 parents	Systemic barriers and communicatio n	EHC system barriers
Norwich (2014)	UK / Internati onal	Conceptual	NA	Dilemmas of difference	Theoretical framework
Florian & Beaton (2018)	UK	Conceptual and empirical	Teachers	Pedagogy and assessment	Inclusive pedagogy
Marsh (2022)	England	Policy analysis	All local authorities	Systemic barriers, appeals and deprivation	SEND Tribunal 1994-2021
Kazmi et al. (2023)	Pakistan	Quantitative SEM	230 teachers	Attitudinal barriers and self-efficacy	Teacher attitudes
Kamran & Bano (2023)	Pakistan	Systematic review	30 studies	Policy barriers and teacher training	Inclusive education in Pakistan
Shaukat (2023)	Pakistan	Narrative review	Not applicable	Cultural stigma and budget constraints	Disability education in Pakistan
Rafique & Hameed (2021)	Pakistan	Quantitative	51 schools	School culture and resources	Implementatio n in Pakistan
Malik et al. (2022)	Pakistan	Household survey	Rural Punjab	Enrolment barriers and data invisibility	Children with disabilities

Hanif et al. (2022)	Pakistan	Content analysis	Policy documents	Policy-practice gap	Pakistan curriculum
Singal (2016)	India / Pakistan	Critical review	15-year period	Systemic exclusion	South Asian inclusive education policy
Tong & An (2024)	International	Conceptual review	Bioecological studies	Multi-level systemic barriers	Bronfenbrenner framework
Capp (2017)	International	Meta-analysis	18 studies	Curriculum barriers and UDL	UDL effectiveness

**Note.** SEND=Special Educational Needs and Disabilities; SENCo=Special Educational Needs Coordinator; SENCos=Special Educational Needs Coordinators; EHC=Education, Health and Care; TA=Teaching Assistant; ITT=Initial Teacher Training; SEM=Structural Equation Modelling; UDL=Universal Design for Learning; UK=United Kingdom; COVID-19=Coronavirus Disease 2019; NA=Not applicable.

## 4.2 Challenges

### 4.2.1 Attitudinal Barriers

Teacher attitudes emerged as one of the most consistent predictors of inclusive practice across both the United Kingdom and Pakistan. Evidence from England indicated that deficit-based views of persons with SEND remain present among mainstream secondary teachers with attitudes reported to be less favorable than those found among primary school teachers (Goodall, 2020). Koutsouris et al. (2024) similarly found that attitudinal resistance and pedagogical rigidity tend to increase at higher grade levels, making inclusion more difficult in secondary education.

In Pakistan, attitudinal barriers are shaped by both school-level and wider social factors. Kazmi et al. (2023) reported that teachers' self-efficacy for inclusion is weakened by limited confidence in supporting learners with complex needs. Shaukat (2023) further revealed that disability can be associated with social stigma and families may view a disabled child as an economic burden. Such attitudes can reinforce exclusion at both household and school levels.

### 4.2.2 Physical and Environmental Barriers

Physical and environmental barriers also restrict inclusive participation although their form differs between the United Kingdom and Pakistan. In the UK, accessibility issues are often less visible but still significant. These include difficulties related to departmental movement,

timetabling, transitions between classrooms, examination arrangements and sensory environments.

In Pakistan, physical inaccessibility is more widespread and structural. Many schools lack ramps, accessible toilets, assistive technology and basic environmental adaptations. These challenges are particularly severe in rural areas where a large proportion of Pakistan's population resides and where school infrastructure is often more limited (Malik et al., 2022; UNICEF, 2021).

### 4.2.3 Systemic and Institutional Barriers

Systemic and institutional barriers were strongly evident in the UK literature. In 2024, only 46.4% of new EHC plans were issued within the statutory 20-week timeframe representing the lowest recorded proportion (Department for Education, 2024). SEND Tribunal appeals have also increased substantially, reaching 11,000 in 2021/22 (Marsh, 2022). Saxton et al. (2025) found that parents frequently experienced system failures, weak communication between services and limited professional understanding of SEND.

Other studies suggest that policy reform has also been constrained by broader ideological pressures. Hellawell (2018) and Hodgkinson and Burch (2019) argue that SEND policy has been shaped by performativity, accountability and employability agendas, which can weaken a rights-based approach to inclusion. In Pakistan,

systemic barriers include the continued separation of special education centres from mainstream schooling, the absence of EHC-equivalent planning tools and under-developed inter-departmental coordination mechanisms (Kamran & Bano, 2023).

#### **4.2.4 Resource-Related Barriers**

Resource limitations were another major theme across the reviewed evidence. In England, real-terms per-pupil SEN funding has declined while high-needs costs have continued to rise, contributing to financial pressure within many local authorities (House of Commons Education Committee, 2019). Webster and Blatchford (2019) suggested that, in under-resourced secondary schools, pupils with EHC plans may receive much of their direct instructional support from Teaching Assistants rather than qualified teachers. This can result in a restricted or “stuck” curriculum experience particularly where Teaching Assistants become substitutes for specialist pedagogical support.

In Pakistan, resource constraints are more severe. National education spending remains approximately 1.87% of GDP among the lowest levels globally and fewer than 5% of school-aged children with disabilities are estimated to be enrolled in any educational institution (MFEPT, 2017). These constraints limit the availability of trained personnel, accessible infrastructure, specialist support and assistive technologies.

#### **4.2.5 Teacher-Training Barriers**

Teacher preparation was identified as a central barrier to inclusive education. In England, a survey of more than 6,000 teachers found that approximately 69% believed students with SEND were being ineffectively supported (Pearson, 2023, as reported by Tes, 2023). A separate survey of 75 initial teacher training providers found that 65% considered graduates insufficiently prepared to meet the increasing complexity of SEND needs in mainstream schools (NASBTT, 2025, as reported by Education Business, 2025). Smythe (2025) also identifies under-preparation in initial teacher training as a commonly cited barrier, often leading schools to rely on informal or ad hoc solutions.

In Pakistan, teacher-training barriers are particularly significant. Kamran and Bano (2023) and Rafique and Hameed (2021) reported that mandatory inclusion-focused modules are often absent from pre-service teacher education. As a result, many teachers enter classrooms without sufficient preparation to identify, support and adapt teaching for learners with SEND or diverse learning needs.

#### **4.2.6 Curriculum Inflexibility**

Curriculum inflexibility was also identified as a major barrier, particularly in secondary education. In England, GCSE and A-Level accountability structures encourage an exam-focused performance culture which can restrict the use of flexible and inclusive pedagogy. Koutsouris et al. (2024) found that high-stakes assessment, subject compartmentalization and limited opportunities for co-teaching all make inclusive practice more difficult in secondary schools. Although Universal Design for Learning is increasingly discussed in professional development and international policy literature and it remains under-implemented in mainstream English classrooms (Almumen, 2020; Capp, 2017). In Pakistan, the challenge is compounded by a textbook-centred national curriculum and a strong emphasis on rote memorization. This leaves limited space for differentiated instruction, flexible assessment and learner-centred approaches that could support students with diverse learning needs (Hanif et al., 2022; Singal, 2016).

## **5. Discussion**

### **5.1 Theoretical Understanding**

The six barrier domains identified in this review can be interpreted effectively through Bronfenbrenner’s bioecological model. Attitudinal and pedagogical barriers are most visible at the microsystem level because they shape the daily interactions between teachers and learners in the classroom. These classroom experiences are then influenced by the mesosystem where collaboration between SENCos, parents, health services and schools affects the consistency of support. At a wider level, local authority funding and EHC-plan administration operate within the exosystem while national legislation, policy commitments

and wider educational priorities form part of the macrosystem. The post-2014 reform period can also be understood through the chronosystem because it shows how policy changes over time continue to shape inclusive education practice (Tong & An, 2024).

This layered interpretation showed that barriers to inclusion do not exist in isolation. Instead, they are produced through the interaction of classroom practice, institutional systems and national policy conditions. When these findings are viewed through the social model of disability then the focus shifts away from “fixing” pupils with SEND and moves towards redesigning curricula, learning environments and professional cultures (Murza & Buckley, 2023). In this sense, exclusion is not caused only by individual impairment. It is also created by the attitudes, structures and systems that restrict participation.

Universal Design for Learning (UDL) offers a practical way to respond to these barriers. It supports inclusive education by encouraging teachers to plan for multiple means of representation, action, and expression and also engagement from the beginning of curriculum design rather than treating support as a later adjustment (Almumen, 2020; Capp, 2017). This approach is important because it connects theory with classroom practice. It also has strong potential for both UK secondary schools and Pakistani classrooms, although its implementation would need to reflect the different resources, training systems and policy conditions in each context.

### 5.2 The UK SEND Code of Practice: A Partial Success Ten Years On

The SEND Code of Practice 2015 introduced important reforms to the education system in England. These included person-centred

planning with aged ranged 0 to 25 and the Education, Health and Care plan. Early qualitative evidence suggested that SENCOs welcomed the stronger professional recognition associated with the Code because it gave greater legitimacy to their role within schools (Curran, 2019).

However, the promise of reform has been weakened by wider structural pressures. Marketized schooling, performativity measures, underfunded local authorities and an increasingly adversarial legal culture have limited the extent to which the Code has transformed everyday practice (Hellowell, 2018; Hodkinson & Burch, 2019). As a result, the policy has created a stronger legal and procedural framework for inclusion but it has not fully resolved the practical barriers faced by schools, families and pupils. Ten years after its implementation, the Code can therefore be understood as a partial success. It has strengthened the language of rights, participation and coordinated support but the evidence suggested that legislation alone is not enough to secure genuine inclusion. Declining EHC-plan timeliness, rising tribunal volumes and continued under-preparation in initial teacher training showed that policy reform must be supported by sustained investment, professional development, institutional accountability and cultural change within schools.

### 5.3 Comparative Analysis

Table 2 presents a comparative analysis of ground-level realities across eight barrier domains in the UK and Pakistan. This comparison helps distinguish between barriers that may appear similar on the surface but require different intervention strategies in each context.

Table 2. Comparative Analysis Results

Barrier Domain	UK Ground Reality	Pakistan Ground Reality
Attitudinal barriers	Deficit-based views remain present among mainstream secondary teachers. Attitudes are often less favourable than those of primary colleagues with concerns commonly linked to classroom	Cultural stigma can frame disability as family shame or divine punishment. Community attitudes may encourage concealment while teachers often report low self-efficacy for inclusive

Physical and environmental barriers	disruption and workload (Goodall, 2020; Koutsouris et al., 2024).	practice (Kazmi et al., 2023; Shaukat, 2023).
Systemic and institutional barriers	Most school buildings are formally accessible but practical barriers remain. These include timetabling, exam-room logistics, sensory environments and transitions between departmental spaces. The EHC-plan process has become increasingly adversarial. In 2024, only 46.4% of new EHC plans were issued within the statutory timeframe and tribunal appeals have more than doubled since 2015. Accountability across local authorities, schools and health services remains fragmented (Saxton et al., 2025; Marsh, 2022).	Physical inaccessibility is widespread. Many schools lack ramps, accessible toilets and assistive technology with rural schools especially under-resourced (UNICEF, 2021; Malik et al., 2022). Parallel Special Education Centres continue to operate separately from mainstream schooling. There is no equivalent individual education planning system, inter-departmental coordination remains weak and a unified national disability database is absent (Kamran & Bano, 2023).
Resource-related barriers	Real-terms per-pupil SEN funding has declined while high-needs costs have increased. Schools often rely heavily on Teaching Assistants as primary sources of support for pupils with SEND (Webster & Blatchford, 2019).	Education spending remains approximately 1.87% of GDP, well below the SDG 4 benchmark. Fewer than 5% of disabled children are estimated to be enrolled in education and teacher-pupil ratios remain difficult to manage (Ministry of FE&PT, 2017; World Bank, 2025).
Teacher-training barriers	Many initial teacher training providers report that graduates are not sufficiently prepared for the complexity of SEND in mainstream schools. School-based CPD often fills gaps informally while the SENCo role remains under-supported (Smythe, 2025; Curran & Boddison, 2021).	Inclusion is not consistently embedded as a mandatory component of pre-service teacher education. B.Ed. programmes rarely address diverse learning needs in depth, and disability-specific expertise remains concentrated in Special Education Centres (Kamran & Bano, 2023; Rafique & Hameed, 2021).
Curriculum inflexibility	GCSE and A-Level accountability structures promote an exam-focused culture. UDL remains under-implemented and subject specialization limits co-teaching opportunities (Koutsouris et al., 2024; Capp, 2017).	The national curriculum remains largely textbook-centred with rote memorization as a dominant pedagogy. Provincial curricula do not yet provide a clear UDL framework (Hanif et al., 2022; Singal, 2016).
Data infrastructure	SEND data are available through school census systems but local authority reporting remains inconsistent. EHC-plan timeliness data are publicly available, yet compliance remains low.	Reliable national prevalence data on school-aged disability are lacking. Census categories exclude many conditions, and family under-reporting remains common (Malik et al., 2022; Shaukat, 2023).
Policy-practice gap	The SEND Code of Practice 2015 contains a strong rights-based discourse but its implementation is constrained by performativity, accountability pressures and inspection frameworks that do not sufficiently reward inclusive school	The National Education Policy 2017 includes commitments to inclusive education, but provincial implementation remains under-developed. Existing special education structures may also slow the transition

cultures (Hodkinson & Burch, 2019; towards mainstream inclusion (Hanif et al., 2022).  
Hellawell, 2018).

**Note.** UK=United Kingdom; SEND=Special Educational Needs and Disabilities; SEN=Special Educational Needs; SENCo=Special Educational Needs Coordinator; EHC=Education, Health and Care; CPD=Continuing Professional Development; GCSE=General Certificate of Secondary Education; UDL=Universal Design for Learning; SDG=Sustainable Development Goal; B.Ed.=Bachelor of Education; FE&PT=Federal Education and Professional Training.

The comparative analysis revealed three key structural patterns. In the UK, barriers are mainly concentrated around system administration including delays in EHC plans, tribunal pressures, teacher-training gaps and curriculum rigidity. In Pakistan, the barriers are more foundational including weak disability data systems, physical inaccessibility and cultural stigma, which must be addressed before advanced models of graduated support can be effectively adapted. Both contexts also share common attitudinal and teacher-training challenges suggesting that evidence-based professional development in Universal Design for Learning and inclusive pedagogy could be useful if adapted to local realities. However, the scale of resource constraint differs sharply. England's high-needs funding crisis is serious but it operates within a relatively established public education system, whereas Pakistan's inclusion agenda is limited by deeper structural under-investment. Therefore, any transfer of UK policy models to Pakistan must be careful, selective and context-sensitive.

#### 5.4 Ethical Considerations

Systematic literature reviews raise several ethical issues that require careful consideration. The first is knowledge production bias. Because this review is restricted to English-language sources it may exclude important Pakistani, Urdu-medium and minority-language scholarship. This creates a form of epistemological exclusion and may under-represent local knowledge. Future reviews should include translated sources and involve indigenous researchers in data collection, interpretation and synthesis in line with decolonial methodological principles discussed in South Asian inclusive education scholarship (Singal, 2016).

A second ethical issue concerns the representation of disabled people in research. Many studies included in this review were

conducted by non-disabled researchers on disabled populations. Participatory and emancipatory research approaches, in which students with SEND help design research tools and interpret findings, remain under-developed in both contexts (Florian, 2014). The social model of disability requires a shift from research on SEND learners towards research with and where possible by disabled learners themselves. Third, data protection and anonymity require attention. The qualitative studies included in this review used different ethical standards. UK studies commonly reported adherence to British Educational Research Association ethical guidance whereas some Pakistani studies provided limited detail on anonymization procedures. Reviewers must therefore take care when presenting findings from studies with weaker ethical reporting and avoid reproducing potentially identifiable participant information. Fourth, cross-national comparison carries the risk of producing deficit narratives particularly when comparing Pakistan with the UK. Presenting barriers across both countries within the same framework could unintentionally imply that Pakistan's education system is institutionally deficient. To avoid this, the present review interprets differences in relation to historical trajectories, differential resourcing, colonial legacies and wider structural pressures rather than inherent institutional incapacity. Fifth, researcher positionality must be recognized. Systematic reviews do not simply collect neutral evidence so they also organize and interpret scholarship shaped by political, theoretical and ideological positions. The authors therefore acknowledge that advocacy for inclusive education can influence how evidence is selected, categorized and discussed. Transparent inclusion criteria and MMAT-based quality appraisal reduce this risk but they cannot remove it entirely.

Finally, publication bias is also relevant. By focusing mainly on peer-reviewed literature, the review may over-represent studies with positive, significant or publishable findings. Future reviews should consider including grey literature, such as Ofsted reports, accessibility audits and provincial inspection reports from Pakistan. However, such sources would require careful quality appraisal because standards of evidence and reporting vary widely.

## 6. Implications

### 6.1 Policy Implications

For the UK, policy reform should focus on reducing the adversarial nature of the EHC-plan system by investing in earlier and school-led graduated support. SENCo membership of senior leadership teams should be mandated so that inclusion becomes part of whole-school decision-making rather than a specialist responsibility located at the margins. Inclusion indicators should also be embedded within the Ofsted inspection framework and compliance with the statutory 20-week EHC-plan timeframe should be restored as a high-priority accountability measure.

For Pakistan, the policy priority is more foundational. First, the promised 5% education-budget allocation for inclusion should be ring-fenced particularly because current education spending remains structurally incompatible with the inclusion commitments of the National Education Policy 2017 (MFEPT, 2017). Second, a national disability data registry should be developed to address the invisibility that currently prevents needs-based planning and resource allocation (Malik et al., 2022). Third, provincial codes of practice should be developed drawing selectively on the English SEND Code of Practice while adapting it to Pakistan's administrative, cultural and fiscal context. Fourth, disability-inclusive school inspection standards should be introduced at the provincial level to create clearer accountability for implementation.

### 6.2 Research Implications

The review identifies a need for more longitudinal, mixed-methods research tracking secondary pupils with EHC plans across the 11-25 age range particularly during post-16

transitions. In Pakistan, there is also a lack of large-scale controlled research comparing inclusive and segregated educational provision. Future studies should include student voice more systematically and adopt participatory or co-produced research designs. Cross-national comparative studies using consistent disability classification systems would also strengthen evidence-based advocacy for inclusive education funding and reform.

### 6.3 Clinical Implications

The social model of disability shifts professional practice away from individual diagnostic gatekeeping and towards consultative, school-embedded support for clinical & educational psychologists, speech & language therapists, CAMHS professionals and other allied practitioners (Murza & Buckley, 2023). In Pakistan, multidisciplinary teams supporting inclusive classrooms remain scarce. Expanding clinical and allied professional training in inclusive education and embedding these professionals within district education teams rather than limiting them to standalone clinical settings would improve access and strengthen school-based support systems.

### 6.4 Practical Implications

At school level, all teachers, not only SENCos, should receive training in UDL principles and the graduated "assess, plan, do, review" cycle. Teaching Assistants should be redeployed from one-to-one "velcro support" towards structured, targeted intervention groups and must be consistent with the evidence from Webster and Blatchford. Schools should also audit timetables, examination arrangements and physical environments using disability-accessibility checklists adapted to local contexts. Provision should be co-designed with pupils and parents using the Local Offer model as a possible template. In Pakistan, whole-school inclusion demonstrator projects should be piloted in selected secondary schools and evaluated rigorously before wider scale-up. School-based SENCo-equivalent roles should also be established in Pakistani secondary schools with protected time, defined responsibilities and access to continuing professional development.

### 7. Limitations

This review has several limitations. First, it is restricted to English-language, peer-reviewed sources, which excludes Urdu and minority-language scholarship as well as most grey literature. This is both a methodological and epistemological limitation because it may under-represent indigenous Pakistani knowledge production. Second, the review protocol was not pre-registered on PROSPERO which limits transparency in relation to prospective review planning. Third, 3 of the 4 databases used in the search particularly ResearchGate and Google Scholar function more as content indexes than curated citation databases. This creates some risk of quality variation although this was partly mitigated through full-text appraisal using the MMAT framework. Fourth, the distinction between attitudinal and systemic barriers is analytically porous, as many studies addressed multiple overlapping domains. Finally, the inclusion of studies from jurisdictions beyond the UK and Pakistan helped with cross-validation but it also introduced contextual variation that limits direct transferability.

### 8. Conclusion

A decade after the implementation of the SEND Code of Practice 2015, inclusive secondary education in England remains limited by attitudinal, physical, systemic, resource-related, teacher-training and curriculum barriers. These challenges show the continuing tension between a rights-based vision of inclusion and the performative, marketized structures of post-2010 schooling. Falling EHC-plan timeliness and rising tribunal appeals indicate that legal reform alone has not achieved inclusive transformation. Pakistan is at a different stage in its inclusion journey. Although the National Education Policy 2017 formally commits the country to inclusive education but Pakistan still faces more foundational barriers including cultural stigma, weak data systems, physical inaccessibility and macro-level under-investment. These issues must be addressed before a graduated support system can be meaningfully implemented.

Across both contexts, embedding the social model of disability and Universal Design for Learning into teacher education, school leadership and curriculum design offers a

promising route for reform. The comparative framework developed in this review helps explain how barriers operate differently across contexts and how reforms should be adapted accordingly. Ethical commitments to decolonial methodology, participatory research with disabled learners and transparent quality appraisal are central to credible inclusive education research and reform.

### Conflict of Interest

The author declares no conflict of interest.

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