

Chapter 5

Inclusive Education and Diversity in South Africa and Germany – Concepts, Policies, and Historical-Political Paradoxes

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In this book chapter, the authors will focus on the historical development of inclusive teaching in both the German and South African socio-political contexts. The authors will first summarize the historical context of inclusive teaching with regard to education reform in South Africa and Germany. This study was conducted by scholars from the University of the Witwatersrand in Johannesburg, South Africa and the University of Tübingen in Tübingen, Germany. In this chapter, the authors draw on studies in South Africa and Germany to foreground how discussions on the complex cultural, social, political, and historical sediments have influenced the traction of inclusive education provision in both countries and shaped contemporary school contexts. The authors argue that politico-historical contexts are of critical importance to better understand how the ideas of inclusive education and teaching diversity are expressed and acted upon in unique contemporary school contexts. These findings call for researchers to consider the historical roots that have constrained or enabled inclusive education provision in their country.

<http://dx.doi.org/10.15496/publikation-76382>



Part I: The South African context

1 Introduction

Globally, classrooms are complex spaces in school systems that are guided by the organizational structures and national traditions of the country in which they are located. This is no different in South Africa, where school systems and pre-service teacher education providers are directly influenced by national policies, emerging from historically shaped contexts and traditional influences. These historical contexts that inform policy and directives can be attributed, in part, to political, geopolitical, traditional, and social influences. In this chapter, the authors describe and analyze the socio-political situation and policy formation processes regarding inclusive education and diversity in the South African context, outlining existing perspectives on learners and explaining former and existing structures, policy changes, and their effects. The authors consider the argument that there is a mismatch between policy aspiration for inclusive education in South Africa and deep-seated beliefs about diversity and difference that are difficult to shift, especially if teacher education is, in some higher learning institutions, pursuing an approach that reinforces a medicalized view of divergent learner behavior.

2 The historical context of education policy under Apartheid legislation

In 1948, the Afrikaner National Party came to power in South Africa (Chisholm, 2012). Between 1948 and 1990, the ruling National Party instituted policies of racial segregation under Apartheid laws. Historically, education policies and directives under the Apartheid State instituted the segregation of children according to their race and disabilities. For example, in 1953, the Apartheid government passed the Bantu Education Act into law. This act formalized unequal education for black South Africans, who were to be educated to the level of manual labor only (Kallaway, 1984). As for education, disabled school students were seen as different from the norm and thus also incapable of benefitting from mainstream education. Therefore, it was thought that they should instead be taught in special needs schools that accommodate their disabilities. There was a preoccupation with disability categories and a medicalized approach during the Apartheid years in South Africa. Historically, the medicalized approach relied on the use of classificatory systems for perceived learning limitations in children, “mainly based on medical or psychological categories—for example, ‘sensory impairments’ or ‘intellectual difficulties’” (Terzi, 2005, p. 446).

There were two chronological phases of segregating learners with diverse learning abilities. The first was to separate the ‘normal’ child from the handicapped child. The second was to distinguish among the handicaps. In the first phase, learners were distinguished according to whether they were ‘handicapped’ or ‘normal’. Handicapped children were considered as belonging to a different category of children. The Act of 1948 (Section 1) defines the “handicapped child” as one who deviates to such an extent from the majority of children in body, mind or behavior that (a) he cannot derive sufficient benefit from the instruction normally received in the ordinary course of education, (b) he requires special education to facilitate his adaptation to the community, or (c) he should not attend an ordinary class in an ordinary school, because such attendance may be harmful to himself or to the other pupils in the class.

Act 41 of 1967, which refers to white children only, defines a ‘handicapped child’ as one “belonging to a category of children” (RSA, 1967a, Section 1 (xiv)) described in a schedule of eight possible handicaps. The De Lange Report (1981) refers to 21 categories of ‘handicapped child’ and the Stander Report of 1987 lists 11 categories of “impairment”. Other classification categories had traction during the Apartheid era. The Murray Report of 1969 distinguished between (white) children who had slight difficulties and who could, with remedial assistance, function in the mainstream; children with moderate difficulties who would require temporary, but full-time remedial assistance; and children with severe disabilities who required special education (Partington, 1991). This three-fold categorization was further developed by the De Lange Report of 1981, which identified “scholastically impaired pupils” in mainstream education, “handicapped pupils” in special education, and “highly gifted pupils” (p. 29). Ten years later, du Toit (1991) found it necessary to subdivide children's problems into those relating to development, learning, and behavior. A further distinction was made between what were deemed “restraints” and “handicaps”. Restraints, du Toit maintained, “develop when certain factors or circumstances extrinsic to the child... cause him (sic) not to actualize his possibilities optimally” (p. 26). Handicaps, by contrast, referred to “an identifiable deficiency of the child's given potential” (p. 26) and were synonymous with disability. When considering the institutionalized categorization of people on racial lines under Apartheid, which subsequently informed educational policy directives for the teaching of children with special needs, the legislative ideas of inclusive education and diversity in the South African context acquire a special meaning. This special meaning is unique in South Africa's apartheid history, where every policy intervention in the aftermath of this dark period had to ensure that a human rights ethos prevailed. This was especially challenging as the education doctrine enforced by the Apartheid regime focused on control, which impacted pedago-

gical thinking, teaching practices in classrooms, and attitudes towards learners with diverse learning needs (Naicker, 2007).

This historical education policy, formulated and enacted by the Apartheid state, raises some interesting questions, notably concerning whether newly promulgated policies in the post-Apartheid era were able to change education spaces from environments informed by the ideas of the medical model, racial segregation, and special needs thinking, into teaching and learning spaces accepting of learner diversity. It is worth noting that a defining characteristic of disability studies in both the United Kingdom and in the US “was the rejection of the medical model of disability and the advocacy of full inclusion of disabled people in all aspects of society” (Connor et al, 2008, p. 443). This rejection demonstrated a shared dissatisfaction with the institutional practices aligned with special needs education, informed by the medical model, which resulted in what the authors called “detrimental and indefensible instructional practices” that promoted the use “of damaging labels and deficit-driven, medicalized conceptualizations of disability that undeniably contradicted the views and life experiences of many disabled people” (p. 445). The history of the Apartheid legacy, with its policies of racial segregation and advocacy for special needs teaching, has ‘cast a long shadow’ over newer initiatives that advocate for basic human rights and education for all. These ‘historical sediments’ have slowed the traction of inclusive education over the course of the post-Apartheid years.

3 The South African context in the immediate post-Apartheid period

The policies that directed the segregation of children according to their disabilities changed after the end of legalized apartheid. This occurred during the transition period between the 4th of May 1990 and the 27th of April 1994, when the nation changed from a racist, authoritarian state into a democratic society. As a result of the political changes in the country, there was a discernible shift in thinking from the ideas associated with segregated education and division to the ideas of inclusive education. This was in line with a shift from a racially segregated society to an inclusive society based on the principles of human rights and dignity. This shift in thinking aligned with newly established constitutional laws set in place on the 4th of December 1996. These constitutional laws were introduced to govern and transform the education system. This transformation was supposed to occur in accordance with the idea of an inclusive education system that recognizes the right of all children to an equitable education. There is evidence that indicates a foregrounding of links between the newly promulgated national constitution, the principles of human rights, and inclusivity within

education policy development (Lomofsky & Lazarus, 2001). Because of this, a change in legislation and policy was necessary for shifting the values of society from one characterized by segregation and marginalization, towards one based on the values of inclusion and democracy. Engelbrecht (2006) outlines how educational change in the direction of inclusive education in the South African context was not just another teaching or operational strategy, but rather a change that aimed to contribute to a democratic society, and that this could only be achieved through fundamental reform. To achieve educational change, various educational policy documents and directives provided a roadmap for how inclusive education in South Africa was to be actualized. The most influential document in South Africa, created with this goal in mind, was the National White Paper 6: Special Needs Education; Building an Inclusive Education and Training System (Department of Education (DoE, now DBE), 2001) (WP6). This document outlined a national strategy that set out to achieve an inclusive education system, focusing on addressing and accommodating learners who experience various barriers to learning (Engelbrecht, Nel, Nel & Tlale, 2015). Two stated goals of the WP6 policy are, firstly, to systematically move away from using segregation according to categories of disabilities as an organizing principle for institutions, and secondly, to introduce strategies and interventions that will help educators cope with a diversity of learning and teaching needs to ensure that transitory learning difficulties are ameliorated (National White Paper 6, p. 10).

4 The impact of the Apartheid legacy on education reform in South Africa

It was envisaged that a process of policy reform would create a sense of hope for learners vulnerable to marginalization and exclusion (Muthukrishna et al., 2002). However, despite the attention given to policy reform, it became evident that these reforms had failed to gain the traction anticipated. Christie (2006, p. 373) explains that “by the mid-1990s, education theorists and researchers had begun to puzzle about what had happened to the envisaged policy shifts after the establishment of the new Government of National Unity (GNU) in 1994.”

4.1 Lack of traction of the ideas of inclusive education as a result of ingrained ideas of segregation

One reason for this lack of traction was that the ingrained way of thinking about the teaching of learners with different needs, under the education policies of the

Apartheid state, cast a long shadow on the implementation of inclusive education in South Africa. The ideas associated with the medical model and with racial segregation are ingrained in the thinking of many people who had and still have influence in education. Engelbrecht (2006, p. 261), who did research into inclusive education implementation in a South African school, showed that “enforcing control through policy change at a macro level cannot change human behavior, values, and attitudes.”

Conceptualizing the challenges associated with implementing inclusive education strategies in South African schools requires the history of the radicalized ideas of special education that informed policy and action during the apartheid years to be understood. These include a history of inequality and injustice for the majority of the population and the “theoretical frameworks within which ‘special needs education’ and ‘inclusive education’ have been located” (Engelbrecht, 2006, p. 254). Furthermore, South Africa continues to be a country characterized by significant wealth disparity. A minority of schools are well-resourced and progressive, while the majority of schools, particularly in rural areas, exist in poverty and are therefore severely under-resourced. Engelbrecht (2006, p. 255) explains how “huge disparities still exist between former advantaged schools for white children and formerly disadvantaged schools, especially those in rural areas where poverty, in all its manifestations, can be singled out as the most important characteristic of the communities in which these schools are situated”.

4.2 Political compromises as a constraint to the traction of inclusive education policies

State policies for education in the post-Apartheid era were characterized by contradictions. One reason for this was that the democratic and non-racial state had to make compromises with members of the old order, leading to a re-racialization of the state (Soudien & Sayed, 2004). These compromises to policy change were a result of the post-Apartheid state being bound up with the various political negotiations and compromises between the National Party that governed Apartheid South Africa and Nelson Mandela's African National Congress, which together formed, initially, a coalition government. What transpired was that education became a “prime site through which the rearticulated racial state could be observed” (Soudien & Sayed, 2004, p. 101). These compromises came at a time when trying to build social cohesion was a national priority. It is argued that perhaps policymakers were too accommodating of divergent interests in an attempt to forge a future in which everyone could feel inves-

ted. The result, however, is that in South Africa, there exist contradictory policies, with unintended consequences.

Within the new policies created by this hybrid state, there were hidden legal provisions and formulations that promoted subsequent racial practices, which came into existence as a direct result of the ambiguity of various policies' texts. For example, the general direction of the education policy embodied in the South African Schools Act of 1996 (SASA), which aimed to provide a free, compulsory, and equal education for all learners, contained exclusionary possibilities. Central to this was the policy decision in the SASA (1996), which allowed for decentralization of authority in school administration and governance away from the state and the devolution of this authority to the management organs of schools, which included the schools' governing bodies. Although this policy decision on the provision of schooling can be seen as inclusionary, and legal provisions had the best intentions of deepening democracy by promoting freedom of choice and participation, this decision lent itself to exclusionary actions (Soudien & Sayed, 2004). The manner in which the policy decision to decentralize education authority came into effect gave little cognizance to racially and economically defined communities that could be excluded based on physical geography. This is relevant to the post-Apartheid landscape in South Africa where, although the racist laws of segregation were abolished, people still lived in communities that were physically separated along economic and racial lines. Because of this, the policies of decentralization only served to preserve the privilege of schools that sought to control which children to include and which to exclude. In practice, schools could determine their access and admission policies, which perpetuated continued segregation and discrimination of learners from accessing equitable education opportunities in their communities. Schools in South Africa continue to manipulate these policy directives to decide which children should or should not be allowed entry to a given school.

Decentralized structures led to disadvantages for speakers with native languages other than English, reflecting some school boards' monolingual tendencies and disregarding even the South African constitution (Soudien & Sayed, 2004). This flaw led to discriminatory practices, such as the decision of some school boards to teach in English only. At the schools in question, a majority of learners were not native English speakers. Little effort was made to incorporate the children's native languages in an affirming way. To give this context, the South African constitution of 1996 recognizes eleven national languages, with no individual language having superiority or privilege over another. However, these policy-driven actions, which enabled the decentralization of educational authority, were applied to create non-inclusive educational structures.

4.3 Conceptualizations of diversity and inclusive education in the South African context

From a policy perspective, inclusive education in South Africa is seen as a systematic response to those learners who have been disadvantaged, or who are still disadvantaged, in terms of educational provision (RSA, 2015). The concept of diversity has a very specific meaning in South Africa as a direct result of Apartheid. Recognizing the “notion of diversity” indicates recognizing different races and cultures (Carrim, 2018, p. 154). With regards to the conceptualization of learner diversity in the South African context, from a legislative perspective, the White Paper 6 (Department of Education, 2001) acknowledges and respects learner diversity in the form of ethnicity, language, class, gender, disability, or HIV status.

However, the conceptualizations of diversity and inclusive education in the South African context cannot be separated. Sapon-Shevin (2013, p. 58) explains that children differ in many ways “and that to think about education that is inclusive and responsive to one set of differences (called disabilities) and to ignore differences of race, ethnicity, gender, sexuality, language, religion, and class doesn't create an educational system that is truly inclusive of all.” Policies attest that inclusive education is about including a range of identities vulnerable to exclusion and not just issues related to learning differences. In the Global Education Monitoring Report (GEMR report 2020, p. 4), it is explained how “inclusive education has taken on a broader meaning, encompassing all learners and focusing on policies that make some groups vulnerable to exclusion from education.” It is further explained in the GEMR Report that regardless of group, the mechanisms of exclusion are common, and that there needs to be a focus on covering all mechanisms that expose children, youth, and adults to exclusion risks, while maintaining a special focus on people with disabilities. In the South African context, one cannot consider the idea of diversity in isolation from that of identity, where “dealing with the issue of diversity is always closely linked to individuals experiencing their own identity as ‘being different or not’ in a particular context” (Holck, Muhr & Villeseche, 2016, p. 2).

In light of South Africa's history of institutionalized racism, segregation, and the medical model of learner difference, one argument in support of inclusive education aligned with the broader concept of diversity was that society deemed any exclusionary practices in schools to be morally and constitutionally unacceptable (Winter & O'Raw, 2010, p. 10). It is argued that exclusion, in any form, may have damaging effects on individuals and groups within society. Because of this, education provision in the South African context must endeavor to ensure that no group of people is favo-

red by teaching and learning in schools (Andrews, Walton & Osman, 2019). An inclusive school in South Africa needs to consider a diverse range of learning needs in the classroom environment. It must also account for the diverse socio-economic circumstances affecting different learners and how this might impact their ability to participate on an equal footing with others in the classroom and school environment. To achieve this goal, some policies and directives explain the expected role and function of teachers in inclusive classrooms. These directives aim to operationalize the practice of inclusive teaching, informed by the need to accommodate greater diversity. The South African Policy on Screening, Identification, Assessment, and Support (SIAS) (2014) outlines the role of teachers in schools. The SIAS policy is the first in South Africa since the ratification by the Cabinet of the Convention on the Rights of Persons with Disability (2007) to provide direction on how students are to be included in schools, rather than rejected because of a disability. The organizing principle behind SIAS is that every learner has the right to receive a high-quality basic education, support within his or her local community and accommodation in an inclusive classroom. These reflections show the interconnectedness between the concept of diversity, identity, and the ideas of inclusive education within a South African context. This is specifically in relation to past histories under Apartheid, which enforced racial discrimination and categorization of learners according to a medicalized model. This resulted in the segregation of children into categories that defined them as 'normal' or 'with deficit', which subsequently led to separate education provision of mainstream schools and special needs schools. Carrim (2003, p. 20) argues that inclusion is not about the integration or the "assimilation or accommodation" of people with disability "within existing socio-economic conditions or relations," or about making disabled people feel as normal as possible, but rather about the transformation of society regarding its values, which were aimed at eradicating exclusion and racial discrimination. To address extreme inequality and oppression, the alienation of many vulnerable learners from receiving an equitable education in South Africa has to be understood through the intersectionality of the concept of diversity and that of inclusive education.

4.4 Pre-service teacher education for inclusive teaching in South African universities

Education in South Africa under Apartheid governance reflected society's political philosophy. Its educational policies were based on categorical segregation. This segregation of people, applied to race, had also been applied to the educational categories found in the field of special education. Under special education provision, children in

all racial groups were classified according to their handicaps (Skuy & Partington, 1990). The radicalized nature of special education was not only reflected in the segregation of children in *general* or *special* schools according to racial groupings and educational categories, but also in the way pre-service teachers were educated at university. Amongst South Africa's twenty teacher training providers, which at the time consisted of universities and teacher training colleges, fourteen of them offered specialized diplomas and degrees that addressed special education. In these degree and diploma courses, teachers were trained to teach at special schools, where they would address, amongst others, categorized learning disabilities, mental retardation, and visual handicaps (Skuy & Partington, 1990). The radicalized nature of special education not only impacted children, who were categorized either as 'normal' or as different and thus 'handicapped', but also how teachers were trained to respond to learner difference during the Apartheid era. This way of thinking has been difficult to overcome even after it.

Despite the policy directives of the WP6, calling for inclusive teaching to be practiced in South African schools, South African universities continued to be influenced by medical model schools of thought in the development of their pre-service teacher education courses. Nel, Tlale, Engelbrecht and Nel (2016) found that pre-service teacher education at universities leaned towards a medical/individual model, and Donohue and Bornman (2014; 2015) describe how teachers in South Africa were trained to teach either general education or special education, with the result that teacher training institutions qualified many teachers who lack the skills to teach learners with disabilities. What these scholars highlight is how the non-alignment of teacher education programs for inclusive education at South African universities has constrained the traction of inclusive teaching.

Furthermore, there are issues with the way inclusive education is conceptualized and taught at individual universities. There is a need to interrogate the theoretical and conceptual underpinnings of what constitutes inclusive education curricula at South African universities. Within universities in South Africa, presentations of information in pre-service teacher education continue to conflict with each other. For example, there is a conflict between whether inclusive education should be integrated into the teacher training curriculum or whether it should be a stand-alone course. There is also disagreement among pre-service teacher education providers as to whether inclusive education should be informed by teachers' needs, knowledge based on policy, or knowledge based on authority in the field. These competing differences reflect the various theoretical and ideological views on teacher education of the many teacher education providers in the country (Walton & Rusznyak, 2017).

Walton and Rusznyak (2017) state that “initial teacher education for diverse students and inclusive classrooms would be strengthened by a more critical appraisal of the construction of courses in inclusive education.” It is suggested that such an appraisal of the course materials “has the potential to promote a rigorous and conceptually coherent approach to student diversity and inclusive teaching in initial teacher education” (Walton & Rusznyak, 2017, p. 238).

Finally, teacher education in South Africa needs to consider the intersectionality of diversity issues, which include gender, race, learning differences, language, and class. To achieve this objective, teacher education needs to take a “nuanced and sophisticated approach to power, privilege, difference, and oppression that engages multiple, imbricated axes of oppression and the way these play out in school contexts” (Reygan, Walton & Osman, 2018, p. 17). Very few pre-service teacher education programs in South Africa prepare teachers for a deeper engagement with issues of oppression and how it manifests within the classroom and broader society. Scholars note that “the interplay of multiple axes of oppression in terms of material, psychological and developmental consequences constitute complex terrain which requires sophisticated analysis” (Reygan, Walton & Osman, 2018, p. 10). What this tells us is that teacher education for inclusive education remains a critical focal point for the traction of inclusive teaching in South Africa.

5 Discussion

That inclusive education in South Africa is inexplicitly linked to the country's unique politico- historical context becomes clear in this discussion. The findings show how the lack of traction for the ideas of inclusive teaching in South Africa can be directly attributed to a catalog of factors. One of these is the deep-seated ideas of a medical-model way of thinking about disability and diversity, which promote ideas of segregation, both along racial lines and according to perceptions of what distinguishes a ‘normal’ learner from a ‘handicapped’ learner. Secondly, early policies for education provision in the post-Apartheid era were inextricably linked to political compromises that allowed for the ideas of racial segregation and the medical model to continue having an influence on teaching and learning. Thirdly, historically originating economical inequalities and segregated geographical distributions of people resulted in an uneven distribution of resources to schools, notably to those schools in rural areas. This was exasperated by policies that decentralized education authority. Finally, a lack of alignment between and within education providers for pre-service teachers resulted

in many institutions of higher learning continuing to advocate for the ideas of the medical model to categorize learner deficits. This is because of teacher educator program developers failing to conduct a critical appraisal of their course materials to address the severe socioeconomic disparities and learning differences that newly qualified teachers will face in the workplace.

Considering the 'sediments' of South Africa's unique politico-historical past and the complexity of the circumstances in contemporary school contexts, it is important to reflect on how the dark legacy of Apartheid could influence inclusive teaching practices in the future. There are no clear answers, and critical conversations need to continue in K-12 schools and institutions of higher education to challenge entrenched biases. In particular, the way we think about the way teachers respond to inclusive practices when teaching diverse learners must be challenged. Furthermore, there needs to be a continual engagement with African knowledge, as adopting the ideas of inclusive education hardly recognizes the history of colonialism and underdevelopment in countries like South Africa (Abdulrahman, et al., 2021).

Part two: The German context

6 Introduction

In this section, we analyze the concepts of diversity and inclusive education within the unique historical context of the German schooling system. In a similar way to the South African study, we reveal how the organizationally differentiated structure of schools in Germany generate a pattern of disparities and disadvantages primarily affecting students from poor and/or migrant families, as well as students classified as having special educational needs (SEN). As was seen in the South African study, recent policies implemented by the German state also aimed to implement inclusive education programs. We examine how this was put into effect against the backdrop of the German historical and political environment. We also explore whether these policies were able to change the education systems structure or vice versa, whether the German 'grammar of schooling' changed and changes the purposes and genuine concept of inclusive education.

The federal structure of the German welfare state in general, and in particular the political autonomy of the sixteen German states in school governance, can easily be identified as major causes for the variety of inclusive schooling concepts and policies. Moreover, these factors still have an impact on the curricula of pre-service teacher

education as the last link in the educational policy chain: the single states design the curricula to meet the requirements of their (more or less) differentiated school system. In Germany, ideas of diversity and inclusion meet an organizationally hierarchical and highly socially selective school system. These ideas appear as answers given to the education system from outside; it still seeks the appropriate questions from within. To what extent these concepts are capable of building a basis for reforming the German school system will be discussed in this part.

7 The historical context: nation-building, school organization and educational inequality

During the 19th century, the implementation of public schooling was a crucial part of nation-building in Europe. One main purpose was the cultural homogenization of an ‘imagined’ national community (Anderson, 1983) that was, especially in Germany, ‘diverse’ in terms of religion, language and cultural heritage (Wenning, 1996). Organizing a compulsory education system that includes every inhabitant of a defined age constituted a solution for two structural problems: enabling cultural nation-building and qualifying the working class in order to meet the requirements of industrialization.

Since school systems function as ‘historical machines’ guided by organizational routines and national traditions, attempts to structurally reform these systems were less likely to be successful, but rather reproductions of institutionalized organizational forms, cultural norms, and routinized professional practices. In Germany, the school system is characterized by an organizational differentiation of school types. This structure generates a typical pattern of disparities and disadvantages, primarily affecting pupils from poor and/or migrant families (Autorengruppe, 2018). After a four-year primary school, the system allocates the cohort to a secondary school system consisting of two to five (depending on the state) separated school types. The organizationally differentiated tracks through compulsory education finally lead to unequal exit exams, which in turn provide unequal transition opportunities. Parallel to this regular (compulsory) system, the German welfare state installed a separated school system and a specialized profession for Special Educational Needs in the early 20th century (Kastl, 2017), both of which still exist. To understand Germany’s ‘special path’ in policymaking and the paradoxes of inclusive education structures, knowledge of this historical and institutional background is required.

8 Reflecting or reproducing constructions of difference?

'Diversity' as educational concept

Referring to the concept of diversity is a rather recent phenomenon in German educational science and policymaking. The idea that schools encounter a 'diverse' pupil body now competes with former leading concepts such as 'cultural difference' or 'heterogeneity' (Lutz & Wenning, 2001). Like these alternatives, the concept of diversity has the function of constructing social reality for educational purposes (Emmerich & Hormel, 2013). In contrast to the former approaches, however, the term 'diversity' denotes a normative perspective that demands equity, full participation and anti-discrimination (Hormel & Scherr, 2004). An early example of a diversity education concept, Prenzel's (1993/2006) 'Pedagogy of Diversity' (orig. "Pädagogik der Vielfalt"), was influenced by women's-, anti-racism- and disability-movements. Prenzel sought to integrate the corresponding 'political pedagogies' that emerged in the 1980s (feminist, inter-cultural and integrative education). By conceptualizing 'diversity' as a generalized educational approach, Prenzel programmatically aimed to realize full social participation through education.

However, regarding the German educational discourse, cultural aspects of the diversity concept are emphasized, while societal inequalities indicated by categories such as class remain systematically neglected. Due to criticism of 'intercultural pedagogy', an approach that has been dominant and curricularly implemented in Germany since the mid-1980s, this culturalistic interpretation of diversity is historically plausible. As an educational program, interculturality is based on the political concept of multiculturalism and the idea that society itself is constituted by different ethnic groups. But multiculturalism does not match the traditional self-description of German society as being culturally homogeneous. Moreover, the term 'ethnicity' has never been used in Germany as a reference for national self-description, and still is not; rather, the term 'ethnic' indicates the affiliation of individuals with a non-German culture. Hence, intercultural pedagogy paradoxically performs an ethnic boundary-making unintentionally taking place in classrooms (Radtke, 1991). Due to this understanding of intercultural pedagogy as part of an institutionalized discrimination of migrant pupils (Gomolla & Radtke, 2002), a rejection of the established concept can be observed in the scholarly discussion of the last decade. Thus, the term 'diversity' offers a new semantical option for describing social differences while avoiding the racializing connotations of the older discourse (Hormel & Scherr, 2004).

Diversity-concepts usually provide lists of group-categories (race, class, gender, religion, nationality, language etc.) which can be ascribed to individuals in order to cons-

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tract a social reality relevant for educators. As the differentiation of individuals for educational purposes is the practical target, a broad variety of social categories seems to support the corresponding pedagogical practices applied within the school system. Taking the institutionalized separation of regular and special-needs schools into account, diversity appears to be a concept primarily received with a focus on the regular classroom. From this point of view, inclusion appears as a generalized target group concept aimed at achieving general educational equity. But diversity-knowledge paradoxically supports the pedagogical classification of pupils and thus plausibilizes compensatory grouping practices. Hence, while the diversity concept semantically emphasizes participation and equity as basic principles, it ultimately serves the academic legitimization of educational differentiation (Emmerich & Hormel, 2013). Furthermore, a naturalistic notion of diversity dominates the scientific literature and policy programs in Germany. As a consequence, diversity concepts tend to reify the social categories that are educationally in use.

9 Diversity and students' differentiation strategies in teacher education

The concept of heterogeneity has become a common pivot point for diversity-oriented strategies in pre-service teacher education in the German states (KMK, 2015). The idea of a given diversity of individual learning dispositions, such as motivation, knowledge, interest, effort and ability, legitimizes the development as well as the application of *differentiating* ('adaptive') didactical concepts in particular. Moreover, common heterogeneity concepts (Bohl et al., 2017) also include social categorizations such as gender, migration background, and language skills. The idea of diversity seems to provide a conceptual blueprint for the integration of the aforementioned social categories and their use for purposes of student classroom differentiation. Diversity concepts designed for teacher education appear to focus mostly on the former field of 'intercultural education', which they re-actualize with new semantics of difference and normative educational purposes, such as the recognition of being divers. But only few academic publications deal with the question of how the cultural diversity perspective can be developed and implemented systematically (Barsch, Glutsch & Massumi, 2017). Hence, one obstacle generated in the field of educational research itself seems to be the categorical single-axis orientation of educational scientists who concentrate on one target group, e.g., pupils with a so-called 'migration background' (Allemann-Ghionda, 2017). As with all constructions of diversity, the tendency to essentialize and naturalize societally and institutionally generated 'differences' continually leads

to the reification of socially constructed categories and thus makes it difficult to develop a convincing diversity concept in education science. However, beyond the epistemic problems, single-category concepts of diversity seem to meet the target group logic of compensatory educational policies and measures such as early language support or SEN support.

10 Designing inclusion: educational concepts for a highly selective school system

In 2009, Germany ratified the UN-CRPD (Convention on the Rights of Persons with Disabilities), thereby agreeing to “ensure an inclusive education system at all levels” (UN-CRPD, 2006, p. 16). As a result, a nationwide implementation process was initialized by the sixteen German states, aiming to install inclusive education structures, that is, to develop organizational and professional requirements for realizing the ‘inclusive classroom’.

A decade after the ratification of the UN-CRPD and the gradual inclusion-based school reforms, the conceptual and organizational realization of an inclusive education system in Germany is still highly controversial. This applies to debates within the scholarly discourse and in practice, as well as to debates on a policy level. Observing these academic debates and national as well as federal policies, it is possible to identify a diverse spectrum of pedagogical concepts and implementation strategies, which we will attempt to outline in this section. We will do so by tracing the evolution and recent developments of two educational approaches. These approaches shape the current discourse and can thus be seen as representatives for the discussion about inclusion and its implementation in Germany, namely inclusive pedagogy (Inklusionspädagogik) and special education (Sonderpädagogik).

Inclusive pedagogy as a discipline and as a professional practice in the German context emerged at the turn of the 20th century. It resulted from a critical evaluation and overcoming of integrative pedagogy with its “two-group-theory” (Hinz, 2012, p. 33), which is based on the conceptual separation of persons with disabilities from persons without disabilities. Furthermore, inclusive pedagogy criticizes a narrow understanding of inclusion, which targets individual pupils with special educational needs (SEN) and is oriented to supportive pedagogies (Emmerich & Hormel, 2013). Inclusive pedagogy thus pleads for a broad understanding of inclusion that embraces all categories of heterogeneity and diversity (Budde & Hummrich, 2015). Since diverse definitions of inclusion appear in this area of tension, and since there is no generally

accepted understanding of and strategy for the implementation of inclusion, scholars note a deficiency of definition (Hinz, 2013; Moser & Lütje-Klose, 2016). When attempting to define inclusion *ex negativo* as the “reduction of all barriers that hinder formal and factual participation in high-quality educational programs in the regular school system” (Emmerich & Moser, 2020, p. 14), the entanglements with Germany's stratified and highly differentiated educational system come to the fore. Embedded in a tradition of “institutionalization of self-referential systems of segregated special schooling” (Pfahl & Powell, 2014, para. 19) the German educational system is still mainly characterized by “interschool segregation” (Powell, 2016, p. 219). Although the federally organized German school system has gradually been getting into motion since the ratification of the UN-CRPD, measures to implement inclusion are still crucially shaped by the professional logic of special education (Biermann, Pfahl & Powell, 2020). For instance, special education pedagogies that focus on individual support are also maintained in the context of existing mutual schooling, as the practice of ‘team teaching’ shows (Böhm, Felbermayr & Biewer, 2018). Furthermore, as Powell (2010) indicates, the institutionalization of special education classification systems induced a growing number of children to be diagnosed as ‘disabled’.

11 Inclusion and the paradox of professionalization

After implementing the UN-CRPD, several German states aimed to abolish separated SEN-schools, while other states perpetuated the segregated SEN-school structure but added new organizational elements, such as ‘external’ SEN-classes that temporarily took place in regular schools, as is the case in Baden-Württemberg. Nevertheless, the implementation of inclusive structures raises questions regarding the adequacy of professionalization strategies. These can be discussed from three perspectives.

Firstly, since special education as a profession that focuses on children with special educational needs is already established in Germany, some scholars and policymakers advocate for its maintenance (Ahrbeck, 2014). This applies to the special education schools as well as to the professionalization of special education teachers, which takes place separately from general teacher training. The contents of the special education teacher training are above all supportive pedagogies (Förderpädagogiken) (Heimlich & Kiel, 2020).

Secondly, with the rise of Disability Studies (DS) in Germany, the conceptualization of SEN and the SEN-profession is increasingly challenged by DS scholars who aim at “eliminating the divide between special and general education” and emphasize “inclu-

sive education for all.” (Pfahl & Powell, 2014, para. 9). DS bases its understanding of inclusion on a social, human rights-oriented and cultural model of disability that demands structural change to allow the full participation of persons with disabilities (Brehme, Fuchs, Köbsell & Wesselmann, 2020). Thus, DS supports implementing a broad understanding of inclusion in general teacher training, which puts the predominance of the special education profession at risk.

Within inclusive pedagogy, there is widespread agreement that the initiated restructuring of the school system has made it necessary to incorporate inclusive teaching curricula into general teacher training as well. Nonetheless, questions arise when defining to what extent this should take place. This is also indicated by educational scientists, as the development of concrete didactics that embrace a broad inclusive understanding is not yet complete (Pech, Schomaker & Simon, 2017). Thirdly, from the perspective of DS and inclusive pedagogy, inclusion raises questions regarding the reorganization of regular teacher training, as well as regarding concrete competencies that have yet to be conceptualized and implemented in teacher training programs (Emmerich & Moser, 2020).

1.2 Diversity and inclusion in Germany: a social question

The historical view of the German school system raises the following question: will recent policies aimed at implementing inclusive education programs change the structure of the system or will the established “grammar of school education” (Tyak & Tobin, 1993) ultimately change the concept and goals of inclusive education? What we can empirically observe is a convergence of both, the concept and the structures, leading to a reform that changes the idea rather than the system.

A retrospective view on Germany's inclusion policies in the last decade sheds light on a process characterized by heterogeneous policy strategies, diverging organizational forms, and ambiguous results regarding educational inequality and social participation opportunities (Klemm, 2018). SEN schools were and continue to be schools for ‘poor people’, a statistical overrepresentation of disadvantaged social classes being well-documented. Boys with a so-called ‘migration background’, for instance, are currently the most overrepresented group (Powell & Wagner, 2014). Inclusion in Germany is therefore a social question, but this question results from the school system's internal structures and practices. Paradoxically, inclusive schooling strategies are mostly designed to be compensatory programs guided by the implicit logic of social prevention

13 Conclusion: what to learn from a South Africa—Germany comparison?

What ‘inclusion’ means, what it can do, and what it is good for depends on the established ‘grammar of schooling’ that characterizes each national education system. Interpretations of the idea of educational inclusion seem to vary with organizational school structures, institutionalized educational cultures, and the power of educational professions (Tomlinson, 2017). Since the concepts of educational inclusion, seen as solutions, differ from one country to another, a corresponding variety of specific problems can be expected for each country.

What applies to inclusion also seems to apply to the construction of diversity: adopted by scholars and policymakers, educational concepts of diversity implicitly describe the relationship between the education system and society. However, they do so from the system's perspective, guided by the system's purposes and by the contradictions and paradoxes produced by the systems. They make sense of the concept by matching the idea of diversity to the system's structures and routinized practices. Thus, the way diversity is pedagogically constructed says more about the constructor than about the constructed.

What both studies show is how ideas of diversity, the concept of inclusive education, and its legacies of attainment and traction are socially constructed by complex local conditions. On the one hand, the South African situation articulates complex interdependencies between education policies and the political project of building a post-Apartheid welfare state that not only provides equal access to education for all societal groups, but also empowers these groups to broadly participate in the national education system. On the other hand, the German situation is contoured by a strategy which matches the ideas of diversity and inclusion to the established national ‘grammar of schooling’, maintaining the existing organizational structures and professional practices for differentiating students. While ‘inclusion’ policies may have the potential to change South African schooling, the German system seems to change the conception of inclusion.

Besides the apparent differences, we can also see common problems guiding the implementation of diversity and inclusion programs: in both cases, first and foremost, inclusion is an answer given to persistent social questions, be it the literacy of a population, political and economic participation, the integration of refugees, or the abolishment of an ‘irregular’ SEN-school system separating students from regular school.

Secondly, to successfully implement inclusive structures, both national education systems need to reform the internal structures that produce inequality through schooling. Thirdly, the crucial task and challenge of educational studies is to critically reflect and systematically support this transformation process by developing advanced concepts of diversity and inclusion. These are to enable policy makers, school administrators, school leaders and teachers to avoid expected dead-end strategies, such as compensatory measures and target group education.

What both studies highlight is how discussions on the complex cultural, social, political and historical forces that are present in individual countries and contexts are critical in understanding how the ideas of inclusive education and diversity are expressed and acted upon in various different countries. They show that inclusive education is a constantly evolving process inextricably tied to individual countries and their unique contexts, and in direct relation to their evolving needs. Comparative studies like these have the advantage of providing us with a valuable opportunity to learn from each other's lived realities.

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