COMPARATIVE STUDY OF EDUCATION FOR STUDENTS WITH SPECIAL NEEDS IN JAPAN AND POLAND

The purpose of this article is to present trends in educational policy and the problems of education for students with special needs through a comparative study of Japan and Poland. It presents a brief history of special education, regulations on the school system, groups of students with special needs and the features of the current system of education for students with special needs in both countries under comparison. The conclusion points to positive changes and those aspects of Polish and Japanese education and public policy toward people with special needs that should be altered.

Key words: special education, special needs education, students, Poland, Japan

World Report on Disability states that “1 billion people have a disability. Of these 110–190 million have very significant difficulties in functioning. In the 1970s, WHO estimated that 10% of the population were disabled. Now, through analysis of the World Health Survey, the Global Burden of Disease Study, and national surveys, we know that 15% is more accurate. Second, the World report tells us that the number of PWDS is increasing.” (Officer 2012, p. 27). The report also outlines barriers faced by PWD in many countries including stigma and discrimination; lack of adequate health care and rehabilitation services; problems with the way services are delivered; inaccessible transport, buildings and information and communication technologies; lack of participation in decisions that directly affect their lives; lack of adequate education (p. 28).

What is the situation of people with disabilities in two distant countries, Poland and Japan, countries that have developed in different socio-economic conditions? How has developed a system of education of students with special needs? What are the achievements and what problems are faced by the two countries? These are the main questions that responds this article.

Methods

It was used a complex variety of methods, complementing each other: analysis of the legislative documents, governmental documents, statistical data, instructional and teaching publications.
A brief history of the development of the system of education for people with disabilities in Japan

Since 1947, the compulsory education system has consisted of six-year primary school education for children aged 6 to 12 and three-year lower secondary school education for children aged 13 to 15. Three-year upper secondary school for children aged 16 to 18 is not included in compulsory education. Despite the fact that more than 90% of 16-year-olds enroll in upper secondary school every year, upper secondary school education in Japan is not compulsory education even nowadays. There are many families in economic poverty that give up the advance and take their children from upper secondary schools as they cannot afford the school fees. Therefore, the compulsory education system in Japan has an exceptional status among developed countries such as the OECD countries.

Table 1. History of education for people with special needs in Japan

<table>
<thead>
<tr>
<th>Year</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>1878</td>
<td>“Moain” school (training institute for the blind and the deaf) was established in Kyoto city</td>
</tr>
<tr>
<td>1886</td>
<td>“Kun-Moain” (training institute for the blind and the deaf) was set up in the General Affairs Bureau of the Monbusho (Ministry of Education)</td>
</tr>
<tr>
<td>1948</td>
<td>Compulsory Education for Children with Visual Impairments and Hearing Difficulties in Elementary Division started</td>
</tr>
<tr>
<td>1952</td>
<td>Office of Special Education was set up in the Elementary and Secondary Education Bureau of the Monbusho (Ministry of Education, Culture, Sports, Science and Technology – MEXT)</td>
</tr>
<tr>
<td>1963</td>
<td>Government Guidelines for teaching in Special Schools for Children with Intellectual Disabilities</td>
</tr>
<tr>
<td>1971</td>
<td>The National Institute of Special Education (NISE) was founded</td>
</tr>
<tr>
<td>1973</td>
<td>Teacher Training Course of Special Education was set up in each National University of Education</td>
</tr>
<tr>
<td>From the end the 1960s to beginning of the 1970s</td>
<td>Every year the social movement presented a petition to the government to allow the enrollment of all students with disabilities</td>
</tr>
<tr>
<td>1979</td>
<td>Compulsory Education for Children with Intellectual Disabilities, Physical Disabilities, and Health Impairments started</td>
</tr>
<tr>
<td>2001</td>
<td>The Advisory Committee on “National Agenda for Special Support Education” was launched</td>
</tr>
<tr>
<td>2007</td>
<td>The Reform of Special Education, “Special Support Education”/“Special Needs Education” started</td>
</tr>
<tr>
<td>2009</td>
<td>Government Guidelines for Teaching in Schools for Special Needs Education was launched</td>
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</table>


In 1947, the Basic Act on Education and the School Education Act established the aims and objectives of education, the educational standards and ways of edu-
cation, the types of schools. The School Education Act of 1948 provided the possibility of setting up special schools for the visually impaired and for the hearing impaired. However, until 1979, there were no national plans for building special schools for children with physical and/or intellectual disabilities. Many students with mild and severe disabilities could not go to any schools until 1979 because the government deprived them of their rights to education. On the other hand, some local governments built a few special schools for children with physical and/or intellectual disabilities in each city by using their own budgets, in addition to the central government budget for mainstream school construction.

The central government’s neglect of special education was based on a belief that educational potential was not observed in students with physical and/or intellectual disabilities. Every year, a national movement consisting of parents of children with disabilities, researchers and school teachers presented a petition to the government to allow the enrollment for them. Educational outcomes of students with disabilities proved that they are able to learn and give strong arguments for the national movement in those days.

Finally, since 1979, all students with disabilities have been using their right to education and have been receiving compulsory education in various learning places. The development of special education in Japan is the result of the national and international movements fighting for the rights of persons with disabilities in the 1970s.

Until 2006, three types of special schools were built: schools for the visually impaired, schools for the hearing impaired and schools for children with physical and/or intellectual disabilities. Since 2007, three types of special schools were integrated as Special Needs School beyond the type of disabilities. Those schools comprise four levels of departments, namely: kindergarten, elementary, lower secondary and upper secondary departments. Elementary schools and lower secondary schools are compulsory education. In schools for Special Needs Education, children follow a special curriculum which meets the needs of those children.

The features of Special Needs Education in Japan

Special Needs Education in Japan means education for all students with disabilities in consideration of their individual educational needs, aiming at a full development of their capabilities and at their independence and social participation. Japanese special educational policy takes into consideration the Convention on the Rights of Persons with Disabilities (CRPD).

Special Needs Education for children of school age is defined in the Basic Act on Education and School Education Act. The following types of disabilities are distinguished: visual and hearing impairment, intellectual disability, physical disability and emotional disturbance. The Act stipulates that special schools must offer, in principle, the same education as mainstream schools.

Special Needs Education is carried out in various forms, including resource rooms, special classes (both are in mainstream schools), and in special schools named “Schools for Special Needs Education.” The objective of each lesson and the curriculum at schools for intellectually disabled children are not bound by the government
guidelines for teaching. The curriculum can be organized in a flexible manner in accordance with the needs of the children.

Although inclusive education promotes the same place for learning together with all students including those with special educational needs, it offers various types of learning places adapting each special need, such as mainstream classes, regular classes with professional support, regular classes with professional staff, resource rooms, special classes, special needs schools, and hospital or home visiting instruction (see Figure 1).

Special schools were assigned a new function as a local educational special center. In addition, “a school cluster” composed of some regular schools, educational special centers in one district is created. All this serves to satisfy the educational needs of each student.

Figure 1. The cascade of SNE

Hospital or Home visiting instruction
Special needs school
Special class
Resource room
Mainstream class with professional staff
Mainstream class with professional support
Mainstream class

Sources: http://www.mext.go.jp/a_menu/shotou/tokubetu/material/1358539.htm

The Ratio and Number of Students in Compulsory School Ages receiving “Special Needs Education” as of May 1st, 2014 (http://www.mext.go.jp/a_menu/shotou/tokubetu/002/1329076.htm)
Special Schools:
For Visual Impairments, Hearing Difficulties, Intellectual Disabilities, Physical Disabilities, and Health Impairments – 0,67% (approximately 69 thousands students)
Note: the ratio of students of compulsory school ages are approximately 10190 thousands
Mainstream Primary and Lower Secondary Schools:
Special Classes
For Visual Impairments, Hearing Difficulties, Intellectual Disabilities, Physical Disabilities, Health Impairments, Speech and Language Disorder, and Autism and Emotional Disturbance – 1,84% (approximately 187 thousands students);
Resource Rooms:
For Visual Impairments, Hearing Difficulties, Physical Disabilities, Health Impairments, Speech and Language Disorder, Autism, Emotional Disturbance, LD and ADHD – 0,82% (approximately 84 thousands students)
Mainstream classes:
Students with LD, ADHD and High-Functioning Autism (diagnosis made by teachers) – 6,5%.

In 2009, government guidelines were issued for teaching in schools for special needs education. According to these guidelines, Individual Teaching Plans for each student were to be developed. Individual Teaching Plans state targets, contents and methods of teaching for each student.

In 2012, “The Report of Special Committee on the Way of Special Needs Education” by the Ministry of Education, Culture, Sports, Science and Technol-
ogy (MEXT) was prepared. It defines the reforming of the various conditions of school to promote the equalization of education, adjustment for the contents and methods of teaching for each student with disabilities, and providing the fundamental school environment to maintain the conditions of the support system and facilities for each school according to the Convention on the Rights of Persons with Disabilities.

Some problems of Japanese education

The special educational policy reform began in 2001, and the aim of the reform is the transformation from special education through Special Needs Education to inclusive education. Meanwhile, official government documents highlight only some categories of disabilities and disorders. ADHD, LD and High-Functioning Autism etc. are not mentioned in this document. Therefore, it is important to extend the list of students with special educational needs.

The transition to inclusive education encounters many difficulties, such as: educational methods, technical skills of mainstream teachers, and serious issues of educational condition. The worst problem is the size of the mainstream class at primary schools and lower secondary schools. There are almost over thirty five students per one mainstream teacher without special education skills, although the government sometimes announces it will take care of financial support for mainstream schools. And there is a simple and incorrect understanding of inclusive education that “children with disabilities should learn with children without disabilities in the same place.” Teachers in special classes and special schools also face many problems. The phenomenon of burnout increases was revealed. Evidence of this is the large number of teachers’ absences.

One should pay attention to the duality of educational policy in Japan. The right to education of all students with special needs together with non-disabled students is granted because of political correctness and, on the other hand, the state doesn’t provide sufficient resources to support teachers and students with special needs in schools. This problem increases in public primary schools, junior and upper secondary schools (see indicators for Japan in: Education at a Glance 2015: OECD Indicators, 2015, p. 233).

A brief history of the development of the system of education for people with disabilities in Poland – 20th and 21st centuries

The history of care for people with special needs in Poland dates back to the 11th century (Kulesza, 2013). This article presents the newest history relating to the development of special education in the 20th and 21st centuries. The beginning of the 20th century in Europe is marked by the birth of the ideas of humanism, saying that “there is no cripple, there is a person” (Maria Grzegorzewska, the founder of the Maria Grzegorzewska University in Warsaw). The 20th century is the age when special education was formed as an academic discipline (the Special Education Department at Warsaw University was established in 1958), a field of study called special education was created and a network of special settings was developed.
In Poland, the need for providing education to children with disabilities was voiced particularly loudly and efficiently by Maria Grzegorzewska, “the first lady of Polish special education.” It was she who was responsible for setting up centers for people with hearing impairments, visual impairments, intellectual disabilities, chronic conditions and socially maladjusted people as part of her work in the ministry of education in 1919.

When special education was developing, new legal acts were being introduced. The March Constitution of 1921 was the first most important document. It granted all Polish citizens the right to education. The Constitution of 1921 did not distinguish between nondisabled people and people with disabilities, and it can be said to be the first education act that did not discriminate people with disabilities as – regardless of its authors’ intentions – it conferred the right to education on everyone.

Paradoxically, as the education system developed, people with disabilities were excluded from mainstream education and a system of special education – education only for people with special needs – separated as a parallel system. This process continued for many years until 1993, when it was legally settled again that children with disabilities could study together with nondisabled children. Since then, a tendency to integrate the system of mainstream education with the system of special education has been seen (Table 2).

**Table 2. History of education law for people with special needs in Poland**

<table>
<thead>
<tr>
<th>Year</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1921</td>
<td>March Constitution of the Republic of Poland guarantees free and compulsory education for all children.</td>
</tr>
<tr>
<td>1932</td>
<td>Art. 8 of the Act on the Education System in Poland provides for exemption from compulsory education for “abnormal” children if there is no school for them near their place of residence.</td>
</tr>
<tr>
<td>1956</td>
<td>Decree on Compulsory Education – children considered unable to learn in regular schools receive compulsory education in special schools.</td>
</tr>
<tr>
<td>1961</td>
<td>Art. 20 of the Act on the Education System gives grounds for establishing special preschools as well as education and care centers.</td>
</tr>
<tr>
<td>1993</td>
<td>Order 29 issued by the Minister of National Education on October 4 (on principles of providing care for students with disabilities, their education in mainstream and integrated public preschools, schools and center, and on special education) provides for care and education for students with disabilities in mainstream and integrated centers; it permits different entities and private persons to run such facilities. Special education becomes an integral part of the education system.</td>
</tr>
</tbody>
</table>
The features of education for people with special needs in Poland at the beginning of the 21st century

Polish law distinguishes 11 groups of people with special educational needs. These are:

1) people with disabilities (intellectual disabilities; visual impairments: blind and low vision people; hearing impairments: deaf and hard-of-hearing people; motor disabilities, including aphasia; multiple disabilities; autism, including Asperger syndrome),
2) socially maladjusted people,
3) people at risk of social maladjustment,
4) people with special gifts and talents,
5) people with specific learning difficulties,
6) people with language communication disorders,
7) people with chronic diseases,
8) people in crisis or traumatic situations,
9) people experiencing academic failures,
10) people experiencing environmental neglect connected with the living conditions, the way of spending free time or community interactions,
11) people experiencing adaptation difficulties related to cultural differences or to a change of educational setting, including previous education abroad experience (Journal of Laws of the Republic of Poland of April 30, 2013).

According to Article 15 of the Act on the Education System (of September 7, 1991, with later amendments), schooling is compulsory for all Polish citizens regardless of their disability until the age of 18 in Poland. Free education is available to people with disabilities until they turn 24 years of age.

Compulsory one-year preschool education will cover six-year-old children as of September 1, 2016, and compulsory schooling - all seven-year-old children (except children whose school entry is deferred).

In Poland, education is divided into four levels, starting with 1) one-year preschool education through 2) primary education (6 years until to 2016; 8 years since 2017) and 3) two-cycle secondary education (2-3 years – lower secondary school and up to 5 years – upper secondary school) to 4) three-cycle higher education (3 years – Bachelor’s programs, 2 years – Master’s programs, 4 years – doctoral programs).
It should be noted that free education is provided to all citizens at every educational stage in state settings, which is Poland’s great achievement (Valeeva, Kulesza, 2016).

School system up to upper secondary level

Children and youth can learn in three types of preschools, schools and centers in Poland:
1. Mainstream preschools and schools (1–2 children with special needs in a group/classroom, a maximum of 30 children – only one mainstream teacher during group activities/lessons; a team consisting of a mainstream teacher and other school specialists develops Individualized Education and Therapy Programs (IEPs); additional support is offered optionally by speech therapists, physical therapists and psychologists in resource rooms; support outside of the school – specialist activities in resource rooms in counseling centers;
2. Integrated preschools and schools (proportion: 1 child with special needs to 4 children without problems, a maximum of 20 children; support – a special educator during group activities/lessons; a team consisting of a special educator, a mainstream teacher and other school specialists develops IEPs; additional support is offered optionally by speech therapists, physical therapists and psychologists in resource rooms; and
3. Special preschools and schools, and education and rehabilitation centers (the number of children depends on disability; a team consisting of a special educator and other school specialists develops IEPs; obligatory support is offered by speech therapists, physical therapists, psychologists and other specialists as needed in resource rooms (Kulesza, 2013).

Students with SEN can receive compulsory education in educational settings and as one-to-one instruction (see Figure 2) provided at home or in other institutions; regardless of where they receive their compulsory education, they are always supported with Individualized Education and Therapy Programs (IETPs) or Plans of Supportive Actions (SAPs).

Figure 2. Meeting special educational needs of students in Poland

The steps of the development of Individualized Education and Therapy Programs (IETPs) for students with disabilities were developed and adapted to the changes introduced by the Ministry of Education in 2010 at all levels of educ...
The recommended teaching model has three levels (Figure 3). The first level is diagnostic level, the second – programming level, and the third – practical level (Trochimiak 2010, p. 6).

**Figure 3. Teaching model for students with disabilities in mainstream, integrated and special settings**

<table>
<thead>
<tr>
<th>STUDENT WITH DISABILITY</th>
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</thead>
<tbody>
<tr>
<td>statement of special educational needs by psychological and education center</td>
</tr>
</tbody>
</table>

**DIAGNOSTIC LEVEL: TEAM WORK OF TEACHERS AND SPECIALISTS**

<table>
<thead>
<tr>
<th>analysis of the statement of special educational needs</th>
<th>analysis of other statements/ opinions</th>
</tr>
</thead>
<tbody>
<tr>
<td>multidisciplinary assessment of the student’s functioning level</td>
<td>identification of the student’s individual needs</td>
</tr>
<tr>
<td>evaluation of the effectiveness of interventions</td>
<td></td>
</tr>
</tbody>
</table>

**PROGRAMMING AND PRACTICAL LEVELS: MEET THE SPECIAL EDUCATIONAL NEEDS**

| individualized education and therapy program (IETP) | record of the student’s individual needs |


**Legal basis of teacher training standards in Poland**

Maria Grzegorzewska did not only build the foundations of the special education system in Poland, but she also laid the foundations for the professional teacher education system to train teachers to work with students with special needs. First (from 1992), those were one-year courses for working teachers who had students with disabilities in their classrooms, organized in the State Institute of Special Education in Warsaw. Then the one-year courses turned into Master’s degree programs in 1973. Now teachers acquire qualifications in:

- three-year Bachelor’s degree programs,
- two-year Master’s degree programs, and also
- in qualifying courses and postgraduate programs (usually three semesters).

Teachers are prepared to work with students with special educational needs according to the following legal acts:

- The Regulation of the Minister of National Education and Sport of September 7, 2004, on teacher training standards introduces a clause on “designing educational activities in the context of special educational needs” in the area of psychology and a clause on “working with students with special educational needs” in the area of pedagogy (Journal of Laws of 2004, No. 207, Item 2110).
The amendment to the Higher Education Act of March 18, 2011, stipulates that it is essential that teacher training standards include teacher preparation for working with students with special educational needs (Journal of Laws of 2011, No. 84, Item 455, Art. 9c).

The Regulation of the Minister of Science and Higher Education of January 17, 2012, on teacher training standards increases the importance of teachers’ practical preparation for working with students, including students with special educational needs. The legislator lists the skills connected with independently designing and adapting a curriculum to the needs and abilities of students as well as the ability to individualize tasks and adapt methods and content; and emphasizes the importance of developing the future teachers’ awareness of the need to conduct individualized educational activities for students with special educational needs (after Kulesza, Gosk 2015).

On the one hand, it should be noted that Polish special educators are usually very well prepared for work with students with special needs. On the other hand, an all-Poland study conducted by D. Al-Khamisy (2013) revealed that mainstream teacher education programs lacked courses that would prepare teachers to work with students with SEN. Teachers often feel helpless before students with disabilities, their skills in designing IETPs are insufficient; at the same time, they are aware they need to improve their skills and gain new competencies. A particularly low level of preparation for integration is seen in teachers at higher stages of education. In this context, inclusion rates calculated by E.M. Kulesza based on the data compiled by the Polish Central Statistical Office (GUS) for the 2014/2015 school year look interesting. It is a good idea to have a closer look at them.

**Effectiveness of inclusion in Poland**

Inclusion rate and the number of students with SEN in compulsory education in the 2014/2015 school year:

1. **Primary education**
   - Special schools and special classes in mainstream schools – 24,434 students
   - Integrated and mainstream schools and classes – 38,596 students (inclusive settings)
   - The inclusion rate oscillates around 61.2%.

2. **Lower secondary education**
   - Special schools and special classes in mainstream schools – 25,804 students
   - Integrated and mainstream schools and classes – 21,400 students (inclusive settings)
   - The inclusion rate oscillates around 45.3%.

3. **Upper secondary education**
   - Special schools and special classes in mainstream schools – 26,500 students
   - Integrated and mainstream schools and classes – 8,900 students (inclusive settings)
   - The inclusion rate oscillates around 25.1%.

The inclusion/integration rate relating to students with special needs is highest in primary education (61.2%). The higher the stage of education, the lower the percentage of students with special needs in integrated and mainstream schools – it amounts to 25.1% only.

It is probable that the reasons for the low inclusion rate are numerous. However, it can be expected that it is related to the poor educational offer for students with disabilities in mainstream upper secondary schools, lack of specialist teacher training in vocational education, architectural barriers, and – frequently – mental barriers.

At present, career counseling for adults with disabilities is developing intensively. Universities, e.g. The Maria Grzegorzewska University, are establishing training programs for specialists – career counselors for people with disabilities. Financial support offered by the State Fund for the Rehabilitation of People with Disabilities (PFRON) plays an important part here. The institution has substantial state funding at its disposal, received from entrepreneurs that do not fulfill mandatory requirements concerning the employment of people with disabilities.

Law also creates favorable conditions for employers to hire people with disabilities in the open labor market: for example, they are reimbursed for the cost of adapting the workplace to the needs of a person with disability, and health insurance expenses are covered from the state budget for a certain period of time when a person with disability is employed there.

The ratification of the UN Convention on the Rights of Persons with Disabilities on September 6, 2012, was an important step. Thanks to the ratification, law relating to people with disabilities will be improved and better implemented, which will definitely help the situation of people with disabilities.

Discussion

Over the 20th and 21st centuries, Polish system of education for persons with special needs has gradually evolved from shared education (March Constitution of 1921) through segregated education (only special settings) to multi-variant education (mainstream, integrated and special education). It seems that the choice of one of three ways of education is a very good solution on a European scale, and perhaps even in the world. It seems that a unique solution is inclusive education, when in the class is a maximum of 20 students, including up to 5 students with special needs and 2 teachers, one mainstream teacher, the other – a special education teacher.

Positive changes that have taken place recently unarguably include the regulations which: a) make education mandatory for all students aged 6 to 18 or 24 if reasonable, regardless of disability severity; b) give grounds for organizing special education in mainstream, integrated and special settings; c) distinguish groups of students with special educational needs (11 groups) in a clear-cut way; d) determine students for whom separate special settings can be established; e) require teachers to provide support to students with special needs (irrespective of the type of the setting they attend) by designing Individualized Education and Therapy Programs; (f) describe the types of specialist classes and activities, etc.
Educational law also elaborates on the qualifications of teachers working with students with special needs (special teachers/educators, educator therapists, specialist teachers, etc.) and specifies the types of settings they can work in, the types of students they can work with and the types of positions they can hold. The legal changes have resulted in direct changes in educational practice and the inclusion rate has increased, particularly at the primary education level (61.2%).

However, there are still many issues related to education that need to be improved. As all-Poland research reveals, professional development programs for secondary education teachers are necessary in the following areas: a) assessing educational needs, b) designing individualized programs for students with special needs, and c) methodology for working with mixed-ability classes. Also, there is no coherent system of vocational education for adults with disabilities (especially those with profound and multiple disabilities) or a system of social support for adult students completing compulsory education. These are only some of the important problems Poland needs to solve.

Conclusion

The presentation of the Polish and Japanese education systems shows the intricacies of the development of both systems, the difficult road to building education for all, and terminological incompatibilities, especially the use of a different term for segregated education for students with disabilities. However, the approach to special needs education and solutions are similar in both countries to a certain extent.

Both Japan and Poland make education mandatory for all students regardless of their disability, ratified the Convention on the Rights of Persons with Disabilities, enabled students with special needs to receive education in the mainstream system (integrated classes, and special classes in mainstream schools), and emphasize the need or duty to design individualized programs. The comparison also shows that Poland has taken a giant step toward inclusive education in recent years, and Japan will hopefully take this step very soon.

References (Japanese part)


References (Polish part)


**KSZTAŁCENIE UCZNIÓW ZE SPECJALNYMI POTRZEBAMI W JAPONII I POLSCE – BADANIA PORÓWNAWCZE**

**Streszczenie**

Artykuł ma na celu przedstawić tendencje w polityce oświatowej oraz problemy dotyczące edukacji uczniów ze specjalnymi potrzebami poprzez badania porównawcze koncentrujące się na sytuacji Japonii oraz Polski. Omówione zostają: historia kształcenia specjalnego, regulacje prawne dotyczące szkolnictwa, grupy uczniów ze specjalnymi potrzebami oraz cechy obecnie funkcjonującego systemu oświaty obejmującego uczniów ze specjalnymi potrzebami w obydwóch porównywanych krajach. W zakończeniu zwrócono uwagę na pozytywne zmiany, a także te aspekty polskiej i japońskiej edukacji oraz polityki publicznej dotyczącej osób ze specjalnymi potrzebami, które powinny zostać zmienione.

**Słowa kluczowe:** kształcenie specjalne, edukacja osób ze specjalnymi potrzebami, uczniowie, Polska, Japonia