

INCLUSIVE EDUCATION AND UPBRINGING: CHALLENGES, MODELS, AND EFFECTS OF IMPLEMENTATION – A COMPARATIVE AND SYSTEMATIC REVIEW

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Abstract. Inclusive upbringing and education at all levels of the education system are key mechanisms for ensuring equal opportunities and the social inclusion of students with diverse educational needs. This paper provides a comparative and systemic analysis of the challenges, models, and effects of implementing inclusive education in preschool, primary, and the broader educational context, with particular reference to experiences and the educational systems of Serbia and Finland. The analysis indicates that successful inclusion depends on institutional support, teachers' professional development, and an individualized pedagogical approach, while major challenges include uneven access to resources and the need to strengthen systemic capacities. The comparative review suggests that the Finnish model is characterized by well-developed support mechanisms and a strong emphasis on individualization, whereas in Serbia several areas for improvement in the implementation of inclusive policies are identified. The paper contributes to a deeper understanding of inclusive education models and offers guidelines for improving educational policies and practices, with the aim of strengthening social inclusion and educational development of all students.

Keywords: inclusive education; preschool education; comparative analysis; curriculum implementation; educational policy

Introduction

Inclusive upbringing and education represent one of the key segments of modern educational systems, as they enable all children to develop social, emotional, and cognitive competencies within the same educational environment. The primary goal of inclusion is to create an environment that respects diversity and provides support to every child in order to help them develop their full potential. Contemporary research highlights that inclusive education contributes to social integration and

the development of empathy among children, as well as to strengthening the professional competencies of preschool teachers and educators in working with heterogeneous groups of learners (Ainscow, 2020). Furthermore, the inclusive approach is based on the principle of equal educational opportunities, which implies adapting teaching methods and strategies to the needs of each child.

Children with developmental difficulties are those who experience certain challenges in cognitive, linguistic, motor, or socioemotional development, which may affect their learning and everyday functioning. Developmental difficulties may vary in intensity and form, and contemporary approaches emphasize the importance of early identification and adequate support in order to enable children to participate equally in the educational process. An inclusive educational system involves adapting teaching methods and providing individualized support, thereby reducing barriers to learning and enabling the optimal development of a child's potential (Mitchell, 2010). Support for children with developmental difficulties does not relate only to the educational process, but also to social integration and the development of self-confidence. Children with developmental difficulties often face challenges that may limit their participation in educational activities and hinder the development of their abilities. Therefore, it is essential to create a pedagogical environment that respects individual needs and enables active participation of every child. Active participation in the educational process includes not only the acquisition of knowledge, but also the development of a sense of belonging, motivation, and self-confidence, which contributes to social integration and the overall development of the child. Contemporary educational policies emphasize inclusion as a strategic goal aimed at ensuring equal opportunities for learning and development for all students (UNESCO, 2017).

Educational plans and curricula and their implementation represent two closely interconnected concepts within the education system at all levels. Educational plans and curricula include the objectives, content, methods, and evaluation of the educational process, while implementation refers to their practical application in preschool, primary, secondary, and higher education. Research shows that teachers who apply strategies of emotional support and establish high-quality relationships with children contribute to creating an environment that better responds to students' needs and interests. This is particularly important in contemporary educational approaches that emphasize flexible planning and the adaptation of content to the individual characteristics of students (Siraj et al., 2023). In this regard, inclusive education can be understood as an educational service that provides children with developmental difficulties the opportunity to attend regular schools together with their peers (Darma & Rusyidi, 2015). Successful implementation requires continuous professional development of teachers, the development of appropriate didactic strategies, and cooperation between educational institutions, families, and the local community, which contributes to the quality and effectiveness of the educational process at all levels.

A comparative analysis of models of inclusive upbringing and education enables a better understanding of different approaches to the implementation of inclusion and the identification of good practices that can contribute to improving pedagogical and institutional support. In different educational systems, there are variations in approaches to supporting students with developmental and educational needs, teachers' professional development, and cooperation with families and the community, which all influence the quality of inclusive practice. The analysis of these differences provides a basis for formulating recommendations that can contribute to the development of educational policies and the advancement of inclusive education at all levels. Inclusive education requires the adaptation of pedagogical and institutional practices in order to meet the diverse needs of students and enable their active participation in the learning process. As emphasized in the literature (Kinsella & Joyce, 2008), educational institutions and teachers must adjust their approaches to ensure an environment that respects individual differences and enables equal participation of all students. This includes flexible planning, differentiation of teaching content, and the provision of support that corresponds to the specific needs of each student, regardless of the level of education.

The aim of this paper is to analyze, through a theoretical and comparative approach, the challenges and models of inclusive upbringing and education, with particular emphasis on the factors that influence the successful implementation of inclusion. The study examines systemic, institutional, and pedagogical aspects of inclusive education, including curricular frameworks, teachers' professional competencies, and support mechanisms, in order to identify the key elements that contribute to the quality of inclusive practice. Based on the analysis of available literature and a comparative approach, the paper offers guidelines for improving educational policies and practices that promote equality and educational opportunities for all students.

1. Theoretical and Institutional Aspects of Inclusive Preschool Education

Theoretical and institutional aspects of inclusive upbringing and education are based on contemporary pedagogical approaches that view inclusion as a process of adapting the education system to the needs of children, rather than expecting children to conform to rigid institutional requirements. Inclusive pedagogy emphasizes that education should be flexible and focused on individual development, thereby enabling equal participation of all students and strengthening their social and cognitive competencies (Florian, 2015). This approach highlights that inclusion is not only about the physical presence of children in an educational institution, but also about providing adequate pedagogical support that enables successful learning and social integration. Contemporary theoretical approaches stress that inclusive education should respect diversity and promote collaboration and mutual learning, contributing to the development of tolerance and social cohesion (Loreman, 2017).

From an institutional perspective, inclusive upbringing and education require clear legal and strategic frameworks that define children's rights and the responsibilities of educational institutions. International standards emphasize the importance of systemic support for inclusion through the professional development of educators and teachers, curriculum and plan adaptations, and collaboration with families, ensuring that inclusive principles are integrated into everyday pedagogical practice (Bindhani, Gopinath, 2024). Without adequate institutional support, inclusion may remain merely a declarative principle, whereas successful implementation requires continuous improvement of educational policies and pedagogical strategies. Contemporary approaches highlight that educational institutions should develop inclusive policies that provide equal access to education and reduce learning barriers, thereby strengthening the principles of equal opportunities and social justice (Walton, 2025).

These theoretical and institutional frameworks demonstrate that inclusive upbringing and education represent a complex process requiring collaboration among educational institutions, families, and the broader community. Research indicates that inclusion contributes to the development of children's social and emotional skills, enhances their independence, and prepares them for future educational and social life. Therefore, successful implementation of inclusive principles requires systemic support and continuous improvement of pedagogical practice to ensure that every child has equal opportunities for development and learning. In other words, education for all should eliminate barriers for children with developmental difficulties in accessing quality education (Husna et al., 2019).

2. Inclusive Educational Programs: Strategic Approaches and Implementation Models

The inclusion program within educational systems represents an integral part of educational policies aimed at ensuring equal opportunities and social inclusion of students at all stages of education. Inclusion is increasingly recognized as a key driver of educational reforms and a central goal of the international political agenda, highlighting its strategic significance in contemporary education systems (Azorín & Ainscow, 2020). Within this paper, institutional and strategic mechanisms of inclusive education in the education systems of the Republic of Serbia and Finland are comparatively analyzed, with particular emphasis on legislative frameworks, program standards, and models of support for inclusion. The analysis covers the evaluation of implementation strategies, professional development of teaching staff, and availability of pedagogical support as key factors for the successful realization of inclusive policies. The comparative approach allows for the identification of structural differences and good practices that can contribute to the improvement of inclusive education systems and the strengthening of institutional capacities to support diversity in learning and development.

In the Republic of Serbia, inclusive education is normatively based on the Law on the Foundations of the Education System (ZOSOV) (Official Gazette of RS, No. 88/2017, 27/2018 – other law, 10/2019, 6/2020, and 129/2021). This law represents the overarching legal act regulating the principles, objectives, and organization of the education system at all levels. Article 3 stipulates that the education system must ensure equality and accessibility of education without discrimination on any grounds, including developmental difficulties and disabilities. This establishes inclusion as a systemic principle rather than an isolated pedagogical measure.

The law further stipulates the obligation to provide additional educational support to any child or student who requires it, which is realized through the development and implementation of an Individualized Education Plan (IEP) (Articles 76 – 79 of ZOSOV). An IEP involves the adaptation of content, teaching methods, class organization, and assessment procedures according to the individual characteristics of the child or student. In this way, the normative framework operationalizes inclusion through concrete pedagogical mechanisms.

In addition to ZOSOV, an important legal basis is provided by the Law on the Prohibition of Discrimination (Official Gazette of RS, Nos. 22/2009 and 52/2021), which prohibits discrimination in the field of education, as well as the Rulebook on Detailed Guidelines for Determining the Right to an Individualized Education Plan, Its Implementation, and Evaluation (Official Gazette of RS, No. 74/2018). These documents further elaborate the procedures for assessing needs, planning, and monitoring support, confirming that inclusive education in Serbia is a legally binding standard of educational practice.

In Finland, inclusion is not regulated by a specific law explicitly using the term “inclusive education”; rather, it is integrated into the entire education system. The main legal framework is the Basic Education Act (628/1998), which stipulates that instruction must be organized according to the age and abilities of students, with an obligation to provide support to any student who needs it (Sections 3 and 16). The Act emphasizes cooperation between schools and families, as well as the student’s right to adequate support in learning.

The normative framework is further operationalized through the National Core Curriculum for Basic Education (Finnish National Agency for Education, 2014; revised 2016), which treats inclusion as a fundamental value of the education system. The curriculum emphasizes differentiated instruction, flexible pedagogical approaches, and the organization of support within the regular educational environment. Student heterogeneity is considered a foundational premise for organizing teaching, with the goal of enabling each student to progress according to their individual potential.

A particularly significant component of the Finnish system is the three-tiered support model (general support, intensified support, special support), introduced through amendments to the law in 2010. This model allows for continuous and

timely support without necessarily removing students from the regular school setting. Support begins at the level of general classroom differentiation and, if needed, progresses to more formalized forms of planning and professional collaboration. In this way, inclusion is implemented as both a preventive and developmental principle of educational policy.

From a comparative perspective, the education systems of the Republic of Serbia and Finland share a common goal of providing inclusive education based on the principles of equality, developmental support, and adaptation of the educational process to students with developmental difficulties and additional learning needs. However, differences are observed in implementation models, the degree of institutional autonomy, and the organization of systemic support.

An overview of inclusion models shows that European and regional systems apply diverse approaches, ranging from full inclusion models, which dominate in Nordic systems, to partial inclusion and dual systems that combine regular and special education (European Agency for Special Needs and Inclusive Education, 2018). In Finland, the three-tiered support model enables the integration of pedagogical and specialized assistance within the regular educational environment, reducing the risk of social segregation and enhancing student participation (Thuneberg et al., 2013). In contrast, the system in the Republic of Serbia relies on Individualized Education Plans (IEPs) and multidisciplinary teams as mechanisms of institutional support, which normatively guarantee students' rights, but implementation challenges may lead to uneven effects in practice (OECD, 2020).

The characteristics and specificities of implementing inclusive policies depend on institutional and resource conditions. In Serbia, inclusion is legally regulated and based on the obligation of institutions to provide additional support, while the success of implementation depends on the availability of specialized staff and the organizational capacities of schools. In Finland, the inclusive model emphasizes a preventive approach and differentiated instruction as a standard pedagogical practice, enabling support to be provided within the regular education system. This approach enhances institutional flexibility and allows timely intervention, whereas the Serbian model emphasizes formal mechanisms for protecting students' rights and the individualization of support.

In Serbia, inclusion is strongly codified through the Law on the Foundations of the Education System (ZOSOV), which establishes inclusion as a fundamental principle of the education system at all levels, from preschool to secondary education. The implementation model can be described as normative-regulatory, as the realization of inclusion relies on clearly prescribed procedures, Individualized Education Plans (IEPs), the work of intersectoral commissions, and institutional collaboration with families and local communities. The system emphasizes democratic values, equal access, and the social responsibility of schools, while student support is formalized through legal mechanisms and administrative procedures. The main challenges

relate to insufficient horizontal coordination within the system, limited resources, and variations in the quality of implementation between educational institutions.

In contrast, the Finnish education system develops inclusion through an integrated and preventive approach, grounded in the Basic Education Act and operationalized through the National Core Curriculum for Basic Education. The Finnish model can be described as systemic-integrative, as student support is not treated as a separate measure but as an inherent part of regular classroom instruction. The three-tiered support system (general, intensified, and special support) enables flexible and timely interventions without stigmatizing students. Individualization, multidisciplinary collaboration, and teachers' professional autonomy are key drivers of implementation. Schools function as collaborative communities in which teachers, special educators, psychologists, and other specialists continuously plan and coordinate support for each student, reducing the need for formal separations or extensive administrative procedures.

Thus, while Serbia builds inclusion through normative clarity and institutional mechanisms that guarantee students' rights, Finland develops it through system flexibility, high professional trust, and early intervention. From a systemic perspective, both models aim at the same goal - ensuring equal educational opportunities - but differ in the degree of decentralization, professional autonomy, and the operationalization of support.

Within a systemic approach to inclusive upbringing and education, social inclusion, family collaboration, multidisciplinary work, progress monitoring, and the development of key skills represent interconnected domains with strong theoretical and empirical foundations (Johnson & Johnson, 2009). In the Republic of Serbia, inclusion is normatively regulated through the Law on the Foundations of the Education System (ZOSOV), which defines the obligation to provide equal access to education and additional support for students. This model emphasizes institutional responsibility and individualized support, thereby legally safeguarding students' rights. The advantage of a normative framework lies in its clearly defined support mechanisms, while empirical data indicate challenges in consistent implementation and resource availability, which may lead to uneven outcomes of inclusive policies (OECD, 2020). Formal regulation provides the foundation for institutional action, but the success of implementation depends on the capacity of institutions and the professional competencies of staff.

In contrast, the Finnish inclusive model is based on an integrative and preventive approach, in which student support is embedded in everyday pedagogical practice. The three-tiered support system – general, intensified, and specialized – enables flexible responses to educational needs and timely intervention (Thuneberg et al., 2013). The curricular framework emphasizes differentiated instruction and individualization as standard pedagogical practices, reducing the risk of social segregation and strengthening the inclusive potential of the system. The strength of

the Finnish model lies in the integration of support within the regular educational process, allowing continuous and preventive intervention without the need for separate procedures.

Social inclusion and the development of empathy in both systems are based on the principles of social learning and cooperative forms of work (Johnson & Johnson, 2009). In Serbia, inclusion is implemented through structured pedagogical strategies and multidisciplinary collaboration, whereas the Finnish model emphasizes cooperative activities and individualization without stigmatization. Group work and joint activities contribute to the development of social competencies and reduce social distance (Ruijs & Peetsma, 2009). In the Finnish system, diversity is treated as a resource, strengthening a positive school climate and social cohesion, while the Serbian model emphasizes formal support mechanisms and institutional responsibility. Both approaches contribute to social integration but differ in the operationalization of inclusive principles.

Collaboration with families is a key element of inclusive practice in both systems. In Serbia, the partnership between schools and parents is normatively defined, highlighting shared responsibility in educational support and ensuring continuity between family and school environments (Epstein, 2011). Regular communication and information exchange enable alignment of pedagogical strategies with the individual needs of the child. In the Finnish model, family collaboration is integrated into the broader framework of pedagogical autonomy and individualized support, contributing to flexibility and the adaptation of educational strategies to the specific needs of each student.

Multidisciplinary work and progress evaluation are common elements in both systems but differ in their implementation. In Serbia, multidisciplinary teams and Individualized Education Plans (IEPs) enable coordinated support, yet the capacity of institutions for systemic evaluation is not always uniform. Progress evaluation plays a key role in adapting educational goals and strategies (Black & Wiliam, 2009). In the Finnish system, multidisciplinary collaboration and formative assessment are integrated into the pedagogical process, allowing flexible monitoring of student development and continuous adjustment of support. This approach enhances the effectiveness of inclusive strategies and reduces the need for corrective interventions.

Teachers' professional competencies and institutional culture represent an additional comparative aspect, as professional development and inclusive teaching arrangements contribute to strengthening teachers' skills and their sense of efficacy in working with students with diverse needs (Malinen et al., 2013). An institutional culture that fosters professional growth and collaboration within schools further supports the implementation of inclusive pedagogical strategies, increasing teacher confidence and the sustainability of inclusive practices. In Serbia, teacher professional development is legally regulated, but research indicates a need for

greater practical application of acquired competencies in everyday practice (OECD, 2018). In Finland, professional development is based on high academic standards and continuous training, supporting professional autonomy and the quality of pedagogical work. Inclusive school culture in both systems is a prerequisite for successful implementation, but the Finnish model emphasizes the integration of inclusive values into daily practice.

At the systemic level, both models emphasize the importance of resource support and strategic planning. A lack of specialized staff, assistive technologies, and adequate material conditions can limit the effectiveness of inclusive policies (OECD, 2020). In Serbia, it is necessary to strengthen institutional capacities and coordinate resources to ensure consistent implementation of inclusive principles. In the Finnish system, the focus is on a preventive approach and the integration of support into the regular educational process, contributing to the long-term sustainability of inclusive strategies. The success of inclusion in both systems depends on the synergy between normative frameworks, professional competencies, and resource support.

In Serbia, multidisciplinary work is formally recognized as an important mechanism for supporting students with developmental and educational difficulties, but its implementation depends on institutional capacities and the availability of specialized teams. Teachers, psychologists, speech therapists, and special educators participate in planning and implementing Individualized Education Plans (IEPs), ensuring coordinated support for the student (Florian & Black-Hawkins, 2011). However, empirical data indicate that the availability of multidisciplinary teams is uneven, which can affect the quality and continuity of support. Fragmentation of interventions presents a challenge, making the strengthening of institutional collaboration and resource support essential for the consistent implementation of inclusive principles.

Continuous monitoring and evaluation of student progress are carried out through Individualized Education Plans (IEPs) and formative assessment, allowing for the adaptation of pedagogical strategies (Black & Wiliam, 2009). Progress evaluation is not only focused on measuring achievement but also on identifying potential and areas for further development. The normative framework provides for documenting progress and periodically reviewing educational goals, ensuring individualized support. However, research indicates that the capacity of institutions for systematic evaluation varies, which can affect the quality of implementing a formative approach.

Inclusion is not just a set of methods but also part of institutional culture and school climate. Ainscow et al. (2006) emphasize that developing an inclusive school requires a change in values and attitudes within the educational community, so that diversity is perceived as a resource rather than a barrier. A positive school climate, based on mutual respect and participation, contributes to reducing stigmatization

and strengthening social cohesion. Empirical research shows that formal support mechanisms have limited effect if they are not accompanied by an inclusive organizational culture (Ainscow et al., 2006).

Early intervention and a preventive approach are additional strategic elements of an inclusive system. Timely identification of developmental difficulties and the provision of support before they become lasting educational barriers are associated with better long-term outcomes in learning and social adaptation (Heckman, 2011). The preventive model, present in contemporary education systems, enables continuous monitoring and adjustment of interventions, thereby increasing the effectiveness of educational support and reducing the need for later corrective measures.

At the systemic level, the effectiveness of inclusive policies also depends on the availability of resources and financial sustainability. The OECD (2020) notes that a lack of specialized staff, assistive technologies, and adequate material conditions can limit the outcomes of well-defined normative policies. Therefore, inclusion cannot be seen solely as a pedagogical concept but must also be understood as a matter of educational policy and resource planning, requiring coordination across multiple institutional levels.

The implementation of inclusive education faces significant systemic challenges that affect the quality and sustainability of inclusive policies. Insufficient support is a key problem, as many schools lack enough specialized personnel and resource support to work effectively with students with diverse developmental needs (UNESCO, 2017). Empirical research shows that the absence of multidisciplinary teams and assistive technologies can reduce the potential for individualized support and limit the effectiveness of inclusive strategies (EASNIE, 2019).

Resources and institutional capacity represent additional challenges, particularly regarding schools' financial and staffing capabilities. In systems with limited budgets, the implementation of inclusive policies often relies on the initiative and dedication of individual teachers or local initiatives, resulting in uneven outcomes (World Bank, 2018). Beyond material resources, school institutional culture has a significant impact on the success of inclusion. A positive school climate, supportive teacher attitudes, and collaboration with parents are prerequisites for the effective implementation of inclusive strategies (Slee, 2011).

Legislative and policy frameworks form the foundation of an inclusive education system, but their effectiveness depends on operationalization in pedagogical practice. In many education systems, a gap exists between normative provisions and the actual implementation of inclusive principles, which can result in formal but not substantive inclusion (UNICEF, 2016). Normative frameworks need to be accompanied by clear implementation guidelines and evaluation mechanisms that allow for monitoring outcomes and improving inclusion policies.

Pedagogical challenges in inclusive education involve adapting the teaching process to students' individual needs. Individualized approaches are a core principle of inclusive pedagogy, but their implementation requires additional planning and differentiation of instructional strategies (Tomlinson, 2014). Teachers must simultaneously address diverse educational needs, which demands methodological flexibility and the use of varied pedagogical approaches.

Adapting activities and instructional materials is critical for successful inclusion but requires additional resources and professional support. Differentiated instruction allows students to progress according to their individual abilities, yet the lack of adequate pedagogical resources can limit its effectiveness (Hattie, 2009). In an inclusive environment, the teaching process must be organized to enable active participation of all students, with methods and forms of work adapted to their individual characteristics.

Evaluation of student progress represents another significant pedagogical challenge. Traditional assessment models, which focus solely on academic achievement, do not always adequately reflect the individual development and progress of students with special educational needs (Guskey, 2010). Formative assessment, involving continuous monitoring of progress and adaptation of pedagogical strategies, offers a more effective model for inclusive education. This approach enables the identification of students' potential and the provision of targeted interventions that support their overall development.

Conclusions

Inclusive education represents a key direction of contemporary educational policies, grounded in the principles of equality, social justice, and respect for diversity in learning and development. A comparative analysis of the educational systems of Serbia and Finland shows that both systems share the common goal of developing inclusive education, but they differ in implementation methods and institutional support mechanisms. While the Serbian system is normatively established through legal frameworks that guarantee student rights and the possibility of individualized support, the Finnish model is characterized by a preventive and integrative approach, where support is embedded in everyday pedagogical practice through a three-tiered support system and flexible classroom organization.

The results of the comparative analysis indicate that successful inclusion requires alignment of normative frameworks, teacher professional competencies, and an institutional culture that promotes inclusive values. Limited resources, insufficient professional support, and uneven implementation of pedagogical strategies can pose challenges that affect the effectiveness of inclusive policies. Conversely, individualized learning approaches, differentiated instruction, and formative monitoring of student progress contribute to a higher-quality educational experience and strengthen social inclusion.

The comparative review demonstrates that no educational model is universally applicable; the success of inclusion depends on adapting strategies to the specific characteristics of national educational systems and their institutional contexts. Experiences from both systems can inform the development of inclusive practices through strengthening institutional support, continuous teacher professional development, and improvement of pedagogical strategies targeted to each student's needs.

In conclusion, inclusive education is a continuous process that requires ongoing enhancement of educational policies, professional development of teachers, and systemic evaluation of outcomes. As a global educational imperative, inclusion has the potential to contribute to the creation of more equitable and high-quality educational systems that ensure equal access to learning and development for every student.

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