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# Aiming for More Inclusive Societies Through Education: A Comparative Study Between Iran and Italy

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#### **Abstract**

This study provides an in-depth analysis of two education systems that, at first glance, differ widely both geographically and culturally. This initiative stems from the desire to share knowledge and practices between countries to respectively improve levels of inclusion in schools. In Italy, inclusive education has been a cultural and political priority within the education sector since the 1970s, aiming to ensure equal opportunities for development and access to education for all students, regardless of their individual characteristics such as gender, origin, religion, and ability. In Iran, on the other hand, although there has been more awareness regarding inclusive education in recent years, few measures have been taken. These have generally been initiatives from teachers, school principals, and other stakeholders to ensure all students' access to education. Both countries recognise the importance of a student-centered approach and consider collaboration among educational actors fundamental. Iran and Italy also face similar challenges, even if at different levels and perspectives, related to the need for further teacher education and broader awareness of diversity and the risks of exclusion. In line with the principles underpinning the inclusive paradigm, these differences and similarities between the two contexts represent a wealth of opportunities for those seeking reflections through comparison to address emerging needs in the respective countries. This paper highlights the benefits of intercultural education in promoting inclusive and equitable quality education for all in both countries.

**Keywords:** inclusive education, intercultural education, education systems, comparative study, diversity

# 1. Introduction

The fundamental objective of education systems is to prepare high-quality educational services. The study and analysis of successful education systems around the world can help improve the effectiveness of a system in other countries willing to implement actions for improvement (Aliyari et al., 2012). Additionally, comparing education systems in different countries can enhance the quality of educational programs and curricula (Ghorbani et al.,

2015). Comparative studies appraise the differences and similarities among education systems, examine the causes of success or failure, and use their experiences for the development of effective education systems (Sajadi et al., 2017). Comparative research is a necessary component of developing modern education systems within the academic field (Madandar & Abbasi, 2007). On the other hand, literature on comparing Italian education systems is more common. Nevertheless, to date, no research has been carried out to compare the Italian and Iranian education systems specifically on inclusive policies and practices for students with special needs in the two countries.

The choice of these two countries stems from the collaboration between two PhD students, authors of the article, studying at the University of Salerno. Although characterized by different historical evolutions and distinct cultures, the two countries share common values regarding inclusive education. This inspired them to compare these two systems to identify the respective strengths and propose feasible actions to promote inclusive practices. Additionally, this process was considered an opportunity to foster intercultural awareness, understood as a process to address the complexity of modern reality and allow more cultures to share and create relationships with each other. It was perceived as a process that may inspire daily teaching-learning processes so that education becomes a right for all (Giusti, 2020). Highlighting the complexity of the systems is important to make the diversity of approaches clear. In addition, it is necessary to learn and understand the differences. By paying attention to social and cultural changes, education systems can identify new training needs with a view to promoting active citizenship.

Based on these premises, this study intended to carry out a comparative analysis of education systems in Iran and Italy. Starting from the current education systems in Iran and Italy, this study analyses education policies and practices with a specific focus on special and inclusive education. Both systems will be first described separately, then similarities and differences will be outlined. Subsequently, intercultural relationships to improve both education systems will be highlighted. This article provides insight into the social and educational richness of both countries based on the principles of inclusion and intercultural competence.

## 1.1 Method

In comparative studies, researchers carefully analyse and contrast two or more phenomena to identify both their unique qualities and commonalities (Sajadi et al., 2017). Relying on this method, inclusive education policies and practices were analysed and compared. To collect the required information, an extensive search was carried out among articles published in English, Farsi, and Italian languages. The search was performed on Google Scholar and the Scientific Information Database (SID), using a combination of the following keywords in all three languages: Iran, Italy, education system, inclusive education, and special education. Additionally, for more updated and detailed information regarding the Iranian education system, the websites of the Iranian Ministry of Education and the Ministry of Special Education were accessed. As for the Italian context, the website of the Italian Ministry of Education was consulted. The data was then collected and compared.

# 2. Iran and its education system

Iran, a Muslim country in the Middle East, covering an area of 1,648,195 square kilometres in southwestern Asia, is the sixteenth largest country in the world. Iran is a diverse country with a population comprising many ethnic and linguistic groups (World Population Review, n.d). The population of Iran is approximately 83.6 million, with a literacy rate of 86% among those aged 15 and older (UNESCO, 2015).

The Iranian education system has been strongly inspired by the old French education system, and policymaking is controlled by the central government (Behbahani, 2010). In Iran, education is a social and cultural institution that plays a critical role in imparting, sharing, and preserving the country's culture. It aims to help students build essential foundations and develop the right values. The goals of education in Iran can be categorized into cultural and ethical, scientific and instructional, social, environmental, life, and economic goals. From kindergarten to Grade 12, the Ministry of Education oversees the education system. This ministry consists of several deputy ministries, organizations, and centres with specific administrative responsibilities. At the national level, these responsibilities include developing the curriculum, creating and publishing textbooks and educational materials, providing professional development for teachers, overseeing educational activities, and evaluating students' progress (Bakhshalizadeh & Karimi, 2019).

The existence of this centralized system results in delays and excessive bureaucracy in administrative policies. Despite the increase in power and responsibilities of affiliated departments in provincial centres and towns, decision-making remains centralized (Behbahani, 2010). The formal education system in Iran is 6 years of primary education and 6 years of secondary education. A high school diploma is required for university admission.

Table 1: The Education System in Iran for all students

Level of Schooling	Ages	Grades	Number of Years	Sessions per Week
Pre-primary	6		1	Varies by institute
Primary (two three-year periods)	7–9 10–12	1–3 4–6	6	25 (45 minutes each)
Lower Secondary	13-15	7-9	3	30 (50 minutes each)
Upper Secondary	15 –18	10-12	3	35 (50 minutes each)
Vocational	15 –18	10-12	3	40 (50 minutes each)

Source: Bakhshalizadeh, & Karimi, 2019

The optional pre-primary education stage prepares children for the compulsory primary education phase. The Organization for Educational Research and Planning and the Welfare Organization oversee and ensure the educational readiness of preschool centres. These preschools can be either public or private, and they may cater exclusively to boys, girls, or both.

The main objectives of pre-primary education include:

- supporting the physical, mental, emotional, and social development of children;
- enhancing socioemotional growth, self-confidence, environmental awareness, and appreciation of aesthetics;
- providing opportunities for children to enjoy and engage in group activities;
- reinforcing religious and ethical values and fostering a sense of national identity;
- promoting desired social and individual behaviours in children;
- encouraging the development of oral language and communication skills.

Primary education, the initial phase of formal schooling, spans six years, divided into two three-year segments, catering for children aged 7 to 12.

The primary goals of primary education are to:

- foster an environment conducive to moral development;
- cultivate literacy and numeracy skills;
- enhance social skills;
- educate students on personal hygiene;
- nurture students' talents, abilities, and physical strength.

Primary school subjects include the Holy Quran, Farsi (reading, writing, and dictation), mathematics, science, religious education, social studies (covering history and geography), art, and physical education. Additionally, in the sixth grade, students are introduced to Thinking and Inquiry, Technology, and Occupations.

As per Article 3 of the Constitution, the government is obliged to provide free education and to foster a spirit of inquiry and investigation in science, technology, culture, and Islamic studies up to the secondary school level. Religious minority groups, such as Christians, Jews, and Zoroastrians, are allowed to teach and practice their religions freely (Bakhshalizadeh, & Karimi 2019).

The lower secondary education stage spans three years (Grades 7 to 9) for students aged 13 to 15.

The primary objectives of lower secondary education are to:

- cultivate moral and intellectual capabilities;
- expand general knowledge;
- enhance proficiency in academic disciplines and foster scientific imagination;
- identify individual preferences and talents to guide students toward appropriate study programs.

At this stage, students explore various subjects in the physical and social sciences, humanities, and arts. Lower secondary students also learn a second language of their choice (English, French, or German), there is the opportunity to choose vocational education, and for boys, defence education is envisaged. Upper secondary education, catering for students aged 15 to 18, lasts three years (Grades 10 to 12). At this level, students choose from three study tracks: academic, technical, or vocational, based on their educational background and career aspirations. The technical, vocational, and Kar-Danesh (vocational) programs prepare students for the labour market, post-graduation, leading to either an associate's diploma or a skill certificate diploma. In Iran, schools at all levels, from elementary to university, can be either public or private. About 11.5 percent of students attend private schools, and roughly 35 percent are registered in vocational schools. Public education in Iran is free for all citizens (Bakhshalizadeh & Karimi, 2019).

# 2.1 Special and Inclusive Education in Iran

All Iranian children undergo a mandatory national screening at six years of age to determine their readiness for primary school enrolment. This comprehensive program includes a dental checkup and assessments of vision, hearing, height, and weight, conducted by a general physician and another health professional. Additionally, an educational counsellor evaluates the child's communication skills and educational readiness using a specialised scale known as 'The First Step'. Each child is assessed individually by each professional. Children who do not pass the screening are referred for further professional evaluation (Samadi & McConkey, 2018). In cases where developmental problems are diagnosed, children are referred for specialist evaluation by psychologists, rehabilitation professionals, and specialist assessors employed by the Iranian Special Education Organization (ISEO, 2015-2016). This group includes children with developmental delays and intellectual disabilities, as well as those who are not yet ready for formal education. More than 90% of these children are enrolled in special schools (Samadi & McConkey, 2018).

From the perspective of education specialists, exceptional students differ significantly from their peers in cognitive, intellectual, physical (sensory or motor), emotional, or social aspects. This significant difference necessitates tailored educational adjustments, including changes in programs, content, methods, materials, and standard educational environments, along with the

provision of specialised educational and rehabilitation services. In Iran, the State Welfare Organisation is responsible for children with disorders from birth to age 5. Upon reaching age 5 and entering preschool, the responsibility shifts to the Iranian Special Education Organisation, which operates under the Ministry of Education, as mandated by Iranian law (Alikhani et al., 2021). Students with special needs primarily attend specialised schools overseen by the Iranian Special Education Organization (ISEO, 2015-2016). The 1988 Law on Goals and Duties of the Ministry of Education aimed to eliminate all types of prejudice in the education of Iranian children. Iran ratified the UN Convention on the Rights of Persons with Disabilities (CRPD) in 2009. In March 2018, the Parliament adopted the Law for the Protection of the Rights of Persons with behavioural Disabilities. The Circular No. 97000/2806/2 of 2008 shaped the rules of procedure for inclusive education of students with special needs. These rules aim to facilitate 'the attendance of visually challenged, deaf, physically disabled, borderline students and those with low to moderate disorders at ordinary schools.' In this regard, a three-year pilot project at 28 schools in 7 provinces was implemented in 2008–09. In 2008, the Ministry of Education was mandated to prepare another circular on 'Attaching priority to mainstreaming the children with special needs into regular schools' and a policy on inclusive education. This inclusive education policy is currently not accessible online, but the 2010-14 Fifth National Development Plan aimed to develop the education of students with special needs through inclusive education, but with different challenges have yet completely to be implemented (UNESCO, 2021).

In Iran, there is a prevailing belief that children with special needs cannot attend regular schools and integrate with their typically developing peers. However, education represents a pathway to citizenship and is a fundamental right for all children (Howe & Covell, 2005), regardless of their developmental course. Iranian children with disabilities invariably attend special schools and many may be excluded from education entirely (Samadi & McConkey, 2018). The definition of 'special needs education' varies between countries. In some, it refers exclusively to children with physical disabilities, whereas in others, it encompasses a wider spectrum of students, including those with learning difficulties or from socio-economically disadvantaged backgrounds (OECD, 2013). In Iran's education system, children with special needs and students are categorised into seven groups: intellectually disabled (mentally retarded), deaf (hearing impaired), blind (visually impaired), inclusive development disorders (the autistic group), physically disabled, multiple disabilities, and those with specific learning disorders. Students with specific learning disorders are not screened in the national screening programme but are diagnosed after enrolment in schools.

Table 2: The Education System in Iran for Special Needs Students

Level of Schooling	Ages	Grades	Number of Years	Sessions per Week
Pre-primary	6–8		2	Varies depending on children's abilities
Primary (two three-year	9–11	1–3	6	25 (40 minutes each)
periods)	11-13	4–6		
Lower Secondary	14-16	7-9	3	30 (45 minutes each)
Upper Secondary (Vocational)	17–19	10-12	3	35 (45 minutes each)

Source: Samadi & McConkey, 2018

A historical examination of special education reveals that in the past, globally, the prevailing approach within the education system was segregation (Castellví et al., 2021). Inclusiveness has been ignored in Iran and segregation, is the base of special needs education. Hence, the global movement towards increased inclusion of children in mainstream educational environments has not significantly influenced Iran. Most children attend special schools, and

those with more profound disabilities are often excluded from the educational system, sometimes attending centres overseen by the Iranian Social Welfare Organization. Currently, educational inclusion in Iran is restricted to specific categories of students and certain age groups (Samadi & McConkey, 2018). In these cases, students with special needs study alongside regular students.

# 3. The Italian education system

Italy is a parliamentary republic and a member state of the European Union. It is the third-largest state in the European Union with a population of approximately 59 million inhabitants. It is in southern and western Europe and borders France, Switzerland, Austria, and Slovenia to the north. The Italian peninsula extends into the Mediterranean Sea, bordered by the Ligurian, Tyrrhenian, Ionian, and Adriatic Seas, along with several islands. Italy has the highest number of UNESCO World Heritage sites, serving as a meeting point for many Mediterranean civilizations and one of the most flourishing cultural centres in the world. The Italian school system is a positive example of democracy and inclusive citizenship from both legal and cultural perspectives (Fiorucci, 2020).

The Italian education system, which is free and compulsory (Italian Costitution, article34), is overseen by the Ministry of Education and Merit (MIM). It provides a tiered structure of education and training with compulsory schooling from ages 6 to 16, according to Law n. 296 of 2006. The system is divided into several education cycles:

- from three months to six years of age, educational services for children are provided by local authorities but attendance is not compulsory. These services are administered directly or through agreements with other public entities or private individuals who cater for children aged between three months and six years old. From the age of 3 there also nursery schools, which can be operated by the State, local authorities, or through agreements with other public entities or private individuals;
- The first cycle of education is divided into two compulsory stages: primary school, spanning from ages 6 to 11, followed by lower secondary school from ages 11 to 14;
  - The second cycle, from ages 14 to 19, lasts for five years;
- Higher education encompasses universities, institutions for higher artistic, musical, and dance education, as well as higher technical institutes (Ministry of Education and Merit, MIM).

Every school year in Italy begins in the first half of September and ends by mid-June. This division applies to every school level, up to secondary school. However, for universities, the academic year begins on November 1st and ends on October 31st of the following calendar year, though the start dates are regulated by the universities themselves.

Età deali studenti Durata del programma ----.....

Fig. 1- Italian education and training system

Source: https://www.miur.gov.it/sistema-educativo-di-istruzione-e-formazione [15/04/2024]

Compulsory education in Italy spans 10 years, covering the ages of 6 to 16, which includes the eight years of the first education cycle and the initial two years of the second cycle (Official Gazette, DM139/2007). During this period, personality development is promoted, alongside the acquisition of basic knowledge and skills, and the provision of necessary tools for literacy and the enhancement of relational skills. By strengthening attitudes towards interaction, the aim is to progressively develop knowledge, skills and attitudes to make informed choices.

The subjects most studied are Italian, history and geography, mathematics and science, English and a second foreign language (French, German, or Spanish), technology, art, music, Catholic religion, and physical and sports sciences. The teaching of the Catholic religion is a subject guaranteed in schools of all levels and is subject to choice by the family or student. In upper secondary school, specific subjects are added for each high school or institute chosen, including subjects such as philosophy, biology, law, economics, and foreign languages.

After completing the first cycle of education, the final two compulsory years (ages 14 to 16) can be completed in state secondary schools (high schools, technical institutes, and professional institutes) or through private education and training courses. Every student has the right to education and training for 12 years or until they obtain a three-year professional qualification by the age of 18 (Law 28, March 2003, n. 53). In the second cycle of education, the aim is to develop students' autonomous study skills, strengthen their aptitude for social interaction, and organise their knowledge and skills. It contributes to educational, socio-emotional, cultural, and professional growth, fostering autonomy of judgment and the exercise of personal and social responsibility.

All students, whether Italian or foreign, from the early years up to the age of 19, have the right to free education, as the Ministry is responsible for guaranteeing equal education opportunities for all. The Ministry ensures the right to education throughout the national territory (paragraph 181 of Law 107 of 2015) (Law 13 July 2015, n. 107) <sup>1</sup> and defines the essential levels of services, i.e. both personal services and functional services.

<sup>&</sup>lt;sup>1</sup> Law 13 July 2015, n. 107. Reform of the national education and training system and delegation for the reorganisation of current legislative provisions. To affirm the central role of the school in the knowledge society and raise the levels of education and skills of students, respecting their learning times and styles, to combat sociocultural and territorial inequalities, to prevent and recover the school abandonment and dropout, in coherence with the educational, cultural and professional profile of the different levels of education, to create an open school, as a permanent laboratory of research, experimentation and didactic innovation, participation and education for active citizenship, for guarantee the right to study, equal opportunities for educational success and lifelong learning of citizens, this law fully implements the autonomy of educational institutions referred to in article 21 of law 15 March 1997, n. 59, and subsequent amendments, also in relation to the financial allocation. https://www.gazzettaufficiale.it/eli/id/2015/07/15/15G00122/sg

Regardless of their ability or level of disability, all students have the same right to attend mainstream classes. To ensure greater empowerment, special measures are implemented to achieve learning objectives according to national standards and guidelines. The school plays a crucial role in laying the foundation for the educational journey of children and adolescents, recognising that this journey will continue throughout their lives. Schools equip students with the skills to learn how to learn, to construct and adapt knowledge frameworks, and to keep them aligned with the rapid and often unpredictable evolution of knowledge and its subjects. This involves developing the necessary knowledge tools to understand the natural, social, cultural, and anthropological contexts in which students will live and operate (Decree of the President of the Republic 20 March 2009, n. 89).<sup>2</sup>

### 3.1 The Italian school: towards full inclusion

The Italian school system, to date, appears to be one of the most inclusive in the European Union, having navigated through significant uncertainty and dissonance. A historical overview is necessary to understand the challenging journey from integration to inclusion.

Legislatively, it is important to highlight Law 118/1971, which aimed at the protection and assistance of people with disabilities, followed by Law 517 of 1977, which abolished special classes for disadvantaged students. From that point on, students with certified disabilities began attending regular schools without distinction. This was a significant step for the Italian education system, prioritising the value of diversity, which was further addressed by ministerial programs in 1985. This marked the beginning of a broader understanding of education that goes beyond mere integration.

The Italian model known for its inclusive principles, guarantees tailor-made teaching, with Law No. 53/2003, which introduced the personalisation of education. The Ministerial Directive dated December 27, 2012, defines minors with special educational needs as "those pupils who experience a particular temporary or permanent situation that hinders their learning and development" and categorises them into three groups:

- students with certified disabilities according to Law no. 104/1992;
- students with developmental disorders who, in turn, are divided into specific learning disorders, according to Law no. 170/2010, and other developmental disorders;
- students with socio-economic, cultural, and linguistic disadvantage, behavioural or relational difficulties or who have high intellectual potential.

Students with disabilities have the right to personalised teaching in accordance with the Guidelines on the educational integration of pupils with disabilities, and to an Individualised Educational Plan (IEP) managed by the school community. Similarly, for students with specific learning disorders and other developmental disorders, a Personalised Teaching Plan is provided.

Since 1992, regulatory acts have been oriented towards a perspective of pedagogical and social care, starting with the Framework Law for assistance, social integration, and the rights of disabled people (Law 104/1992). This law represents "a further stage in the evolution of legislation regarding the right to study for students with disabilities" (Cottini, 2017). The Italian school system thus marks a transition to inclusion with the aim of enhancing each student's

<sup>&</sup>lt;sup>2</sup> Decree 16 November 2012, n. 254. Regulation containing national indications for the curriculum of nursery school and the first cycle of education, pursuant to article 1, paragraph 4, of the decree of the President of the Republic of 20 March 2009, n. 89. (13G00034) (GU Serie Generale n.30 del 05-02-2013) <a href="https://www.gazzettaufficiale.it/eli/id/2013/02/05/13G00034/sg">https://www.gazzettaufficiale.it/eli/id/2013/02/05/13G00034/sg</a>

potential. The school's role becomes that of supporting, encouraging, and aiding each student in achieving educational success. In this context, "the focus is not on independence, but on interdependence, mutuality, flexibility, and sometimes chaos, as diversity and complexity are valued over 'normalcy'" (Parmenter, 2014, p. 418).

In fact, "in the word inclusion, there is the concept of welcome; the idea of a school as a community that welcomes differences within itself and makes these a resource for the development of everyone" (Goussout, 2015, p. 308, authors' translation). By ensuring adequate identification and support for individuals, Law 170/2010 allows reflection on the methodologies needed to harness each student's potential, granting the right to benefit from specific dispensatory and compensatory measures that aid in promoting flexibility in teachinglearning processes throughout all the education and training cycles, including university studies (Ministerial Directive, December 27, 2012). Unlike Law 104/1992, Law 170/2010 stimulates a different discussion by emphasising individual intervention and considering the entire educational path. Together with the Ministerial Directive of December 27, 2012, Law 170/2010 represents a significant shift towards the full implementation of the inclusion paradigm in Italy, introducing the term Special Educational Needs, which goes beyond the concept of disability (Pace et al., 2015). Subsequently, Law 107/2015 fully implements school autonomy, affirming "the central role of the school in the knowledge society and raising the levels of education and skills of students, respecting their learning times and styles, to combat socio-cultural and territorial inequalities, prevent and address school abandonment and dropout, and align with the educational, cultural, and professional profile of the various education levels, to create an open school [...]" (Official Gazette, Law 107/2015, art.1).

From this moment on, inclusive challenges represent an opportunity to transform the Italian school system into a more welcoming and equitable environment, with a greater focus on teacher education and the promotion of an inclusive culture. First, teacher education is one of the cornerstones of the entire Italian school system, leveraging the skills of curricular and support teachers, which are essential for effective action. In this regard,

"a coexistence of synchronous and diachronic actions appeared necessary: [...] an overall redefinition of the training paths intended for future teachers, guaranteeing everyone adequate didactic-pedagogical training to address educational needs [...]; a reticular training dissemination plan, capable of accompanying the transition process deriving from the application of new rules and consequent ministerial guidelines to promote inclusion" (Pace et al., 2015, p. 291, authors' translation).

This introduces a new conception of the teaching profession, aimed at ensuring inclusiveness within an already well-structured school system through developing specific skills. These skills "aim to equip teachers with transversal capabilities that can help them to manage current school scenarios effectively" (Aiello et al., 2021, p. 10, authors' translation).

As Cottini claims, the role of the teacher, [...] is a broad-spectrum job, characterised by clearly defined dimensions of knowledge (cultural and didactic skills), values (educational responsibilities), and a reflexivity on one's work (professional awareness) that cannot be overlooked (Cottini, 2017). Each teacher's training encompasses a broad range of knowledge and specialised methodological-didactic skills (Cottini, 2017), which are fundamental to their role. The importance of teacher training in each classroom, along with the use of tools, methods, and approaches developed in the field of special education, has enabled the school system to adopt a comprehensive vision of inclusion. The presence of pupils with disabilities or specific learning disorders in classes at all levels represents a significant value for Italy, forming the basis for a school understood as "a space of culture for the person, that is, a subject

with a role in the world, and more importantly, capable of acting upon it" [...]" (Margiotta, 2007, p. 269).

Based on the principles of subsidiarity and autonomy, the Italian system relies on educational processes that embrace a 'special normality' (Ianes, 2006), ensuring an inclusive school as "a path towards the unlimited growth of learning and participation for all pupils" (Booth & Ainscow, 2002, p. 110). Although the Italian school system has laid the foundations for what can be defined as a truly inclusive system, it must progress on this path to ensure that educational interventions remain functional and improve quality.

# 4. A comparison of the education systems and inclusive practices in the two countries

The following tables provide a comparison of the two education systems.

Table 3. School levels compared according to the number of school years

		IRAN	ITALY
Pre-primary		1	3
Primary (two three-year periods)		6	5
Lower Secondary		3	3
Up	per Secondary	3	5
University	Bachelor	4	3
	Master	2	2
	Doctoral	4	3

Table 4. Differences and similarities between Iranian and Italian education systems

3,500 00 - 3,500 000 000	IRAN	ITALY
Age - Compulsory education	From 6 to 12 years (primary education)	From 6 to 16 years (up to the first two years of higher secondary education)
Attendance of students with certified Special Needs	The vast majority attend special schools	The vast majority attend mainstream schools
Screening	6 years - Compulsory	Requested by parents
Type of school	Special schools	Mainstream schools
Cost of education in both mainstream and special schools	Free	Free
Type of support	Special Educational material; support in special schools	Personalised/individualised programs; learning support teacher in classrooms where a statemented student is present; personalised support material
Teacher education and training	Special teacher training at university  1, Bachlor degree (Education and training of exceptional children)  2.Master's degree (psychology and education of exceptional children)  3.Phd (psychology and education of exceptional children)	Special training for teachers to support pupils with disabilities at postgraduate level
Division by gender	Co-education (pre-school) Separate classes (primary, lower, and high secondary school) There are also some universities for females only	Co-education at all levels

	IRAN	ITALY
The categories of children with	Intellectually disabled (mentally	Intellectual disabilities; physical
special needs	retarded); deaf (hearing	disabilities:
	impaired); blind (visually	sensory impairment;
	impaired); development disorders	Specific learning disorders
	(including autism spectrum	(dyslexia, dysgraphia,
	disorder); physical disability,	dysorthography, dyscalculia) mild
	multiple disabilities; and those	Attention Deficit Hyperactivity
	with specific learning disorders	Disorder and other developmental
	(SLD) to combine all three	disorders;
	learning disorders (reading,	learning disadvantage linked to
	mathematics, and written	socioeconomic, linguistic, and
	expression)	cultural factors

#### 5. Discussion

Having analysed the different policies and practices related to general and special education in the two countries and provided a comparative overview of the two systems, the following reflection will take into account some cultural considerations that may explain further the differences outlined above. Through this study, it became clear that both countries apply a student-centred approach and consider collaboration among educational actors fundamental. Iran and Italy also face similar challenges with regards to the need for more specialised teacher education for the acquisition of competencies, and broader awareness of diversity and the risks of exclusion. Yet, it is clear that these requirements are at different levels and are viewed from very different perspectives, which may be mainly linked to cultural aspects. The descriptions and summaries of the two systems provide evidence of the different beliefs and perceptions regarding disability in the two countries. In addition, conversations among the authors regarding their experience in the two countries brought to light further aspects that should not go unnoticed.

When compared to Italy, special needs students in Iran seem to face greater challenges in accessing social amenities, education, employment, equal opportunities, economic resources, and other social services. Attention from officials and policymakers is still low. Unlike Italy, compared to other groups and minorities, students with certified disability encounter more restrictions and are less represented in the policymaking process. As a result, their issues are not adequately identified or addressed (Sadeghi & Fatemi, 2015). From anger to acceptance, from utter disappointment to the hope for a better tomorrow - these are contrasting emotions (Ingstad, 2001). These reactions, described as "problem" and "hope," encompass a wide range of feelings.

Common societal responses to disability, such as marginalisation, ignorance, stereotyping, misidentification, and discomfort, seem to be more prevalent in Iranian society as well. Special needs students in Iran often suffer from being ignored, undermined, misunderstood, marginalised, and pitied. Family narratives in developing societies like Iran frequently highlight that moral, medical, and religious perspectives on disability are deeply entrenched. Moral models, in particular, view disability as a source of shame for both the individuals affected and their families (Goodley, 2011). Traditional perceptions of disability in Iranian society, particularly among families in smaller towns, often lead to hiding disabled family members at home to avoid embarrassment. Additionally, the medical model is widely accepted in Iran, as opposed to a bio-psycho-social model in Italy, viewing disability as an issue inherent to the individual's body or mind that needs to be corrected (Goodley, 2011). Strengthening the culture of acceptance for people with disabilities in society is one of its basic duties. In Iran, the idea of abolishing special schools remains a distant dream. Despite this significant

difference in the system, stakeholders have varying and sometimes opposing perspectives on the issue.

In Italy, despite the long history and evolution of inclusive education, the debate is still heated regarding whether integrating all students into ordinary schools is a positive choice. Teachers often feel they are not sufficiently trained to handle heterogeneous classes, with a high rate of foreign students and with different functioning in the cognitive, linguistic, socio-affective, psychological, relational spheres (Folci, in Pinnelli et al., 2024, p.35). For each pupil with a disability, a specialist support teacher is present in the classroom, a role introduced in 1977 to support and accompany students throughout their education, since the Italian school system is designed to address the needs of all students (Goussout, 2015). The support teacher plays a crucial role in encouraging the active participation of all pupils and ensuring quality education (Pace & Aiello, 2018). However, it is essential to continue investing in teacher training to co-design and collaborate on an inclusive system based on social rights. This system should value all children equally, regardless of ability, gender, language, ethnic, or cultural origin.

Inclusion can thus be defined not as the assimilation and adaptation of the student to a fixed or predefined model, but as an encounter with others. This encounter involves a dialogue between educators and students, as well as among the students themselves. Based on the comparison and structural evidence of the two educational systems, Italy's progress towards full inclusion is more successful, as the right to education is the same for all students, including those with special educational needs. Considering the now widespread idea of inclusion and historical processes, it is feasible in a concrete way to conceive and implement inclusive processes, seeing them as the result and evident continuation of the interaction processes that international reality has long regarded as exemplary (Mura, 2016).

In Iran, as in Italy, education is free for all students up to secondary school, which is crucial for ensuring the acquisition of literacy and numeracy skills, the right to education, and quality education. Thus, comparing these systems becomes fundamental in an increasingly globalised society. It is no coincidence that the Maastricht Declaration describes intercultural education as "an education that opens citizens' eyes to the realities of the world and commits them to participate in the creation of a more just and equitable world, a world of human rights for all" (Guidelines for intercultural education, 2008, p.10). Similarly, the Paris Declaration (1995), which concerns education for peace, human rights, and democracy, defines intercultural education as "the ability to appreciate the value of freedom and the skills needed to respond to the challenges that arise from it. This implies the necessity to prepare citizens to manage difficult and uncertain situations and to equip them with the aptitude for autonomy and individual responsibility" (UNESCO, 1995).

# 6. Conclusions

Inclusiveness has been largely overlooked in Iran, where segregation remains the basis of special needs education. Although Iran has made strides toward inclusive education, with policies aimed at integrating students with special needs into mainstream schools, several challenges persist. Limited funding, inadequate training, and insufficient infrastructure can hinder the effective implementation of inclusive practices. Despite progress, barriers such as limited resources and negative social stigma continue to impede the full realisation of inclusive education. Designing and delivering a curriculum that caters to diverse learning needs can be challenging for some schools. Additionally, inadequate teacher training and support can restrict the ability to implement inclusive practices effectively.

By learning from the experiences of countries like Italy, Iran can take effective steps to improve inclusive education for children with special needs. In contrast, Italy views inclusion as "a process, a philosophy of acceptance, and the ability to provide a framework within which students - regardless of ability, gender, language, ethnicity, or cultural origin - can be equally valued, treated with respect, and provided with equal opportunities at school" (Booth & Ainscow, 2002). Recognising the importance of the cultural differences, besides the policy and practice dimensions, this study has underscored the richness of the comparison. Further exploration is needed to compare the cultural beliefs and values of the different stakeholders involved. This could be achieved through semi-structured interviews and additional literature reviews to gain a deeper understanding of the systems and identify ways to enhance both.

The purpose of this study was to compare the education systems of Iran and Italy, with a particular focus on inclusive education practices. Additionally, it aimed to foster a deeper appreciation of each other's cultures through this comparison. Intercultural awareness "requires from those who teach and those who educate an authentic desire to understand and a real willingness to adapt to the new" (Giusti, 2020, point 1, authors' translation). Through this comparative study, the authors now have a broader perspective on the advantages and disadvantages of these diverse systems. It is no coincidence that Gadamer writes, "the diversity of the other is concretely close, and however great the diversity may be, it creates a connection" (Gadamer, 1990, p. 84, authors' translation).

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