

Student diversity and student voice conceptualisations in five European countries: Implications for including all students in schools

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Abstract

This article analyses the ways in which notions of student diversity and student voice are defined in five European countries, two terms directly related to notions of inclusion. In so doing, it examines links between the two terms, noting that, often, they are used in international research without acknowledging the ways that they are defined within particular national contexts. Using literature and policy documents from five countries (i.e. Austria, Denmark, England, Portugal and Spain), the article highlights similarities as well as differences in the various contexts. Through the analysis of these texts, the paper concludes that diversity is conceptualised in five ways, although there is occasionally overlap of different conceptualisations in some of the countries. Meanwhile, the term 'student voice' is a term that is not used in some of the countries' policies. Instead, other terms that relate to student voice, such as 'participation', are used. The paper discusses the implications of these varied understandings for the promotion of the inclusion of all students in schools.

Keywords

Student diversity, student voice, inclusive education, schools, European countries

Introduction

The issue of inclusion in education has gained considerable attention over the last decades internationally, especially since the publication of the United Nations Educational, Scientific and Cultural Organisation 'Salamanca Statement and Framework for Action on Special Needs Education' in 1994 (United Nations Educational, Scientific and Cultural Organisation, 1994). More recently, in the Education 2030 Framework for Action, the need to address all forms of exclusion and marginalisation is highlighted (United Nations Educational, Scientific and Cultural Organisation, 2015), by focusing on all learners, particularly those who have been traditionally excluded from educational opportunities, such as students from the poorest households, ethnic and linguistic minorities, indigenous people, and persons with disabilities. Meanwhile, in Europe, research has highlighted how the participation of socially excluded groups in research studies can contribute to social transformation (Puigvert et al., 2012).

Inclusion has been described as an ongoing process to overcome barriers to participation and learning (Ainscow, 1999; United Nations Educational, Scientific and Cultural Organisation, 2017). At the same time, it has been described as a struggle (Vlachou, 1997) involving a set of interrelated complex issues. Ultimately, inclusion requires transformation of existing structures (Ainscow, 1999; Slee, 2011), with the goal being the development of democratic societies where all members are 'included equally in the decision-making process and have an equal opportunity to influence the outcome' (Young, 2002: 52). Inclusion has been linked to democracy by a number of authors (e.g. Nilholm, 2006; Young, 2002). Most recently, the European Commission (2020) has also reiterated its commitments to inclusion, the empowerment of individuals and the promotion of democratic societies, through priorities and lines of actions for the promotion and defence of human rights and democracy.

In addition, as proposed in the Paris Declaration (European Union, 2015) 'Promoting citizenship and the common values of freedom, tolerance and non-discrimination through education', one of the suggested priorities is actions to address diversity in education and training. It is clear, therefore, that the need to respond to student diversity in schools is an issue of concern worldwide.

At the same time, an emphasis on students' rights has gained prominence since the United Nations Convention on the Rights of the Child (UNCRC) (1989), particularly the idea of focusing on students' views, as explained in articles 12 and 13. This has led to an argument that the views of young people, particularly those from at-risk groups, can challenge policy-makers and practitioners to find more effective ways of ensuring that all children are included (Ainscow and Messiou, 2017; Messiou, 2006). More recently, the concerns with student diversity and the idea of engaging with students' voices in schools have also been linked to notions of inclusion (Messiou, 2012, 2019). Furthermore, the idea of students' voices and their links to democracy have already been made by others (Fielding and Moss, 2011). Or, as previously argued, listening to children's voices in education is a manifestation of being inclusive (Messiou, 2006).

The agenda

The specific agenda for this paper arose from our involvement in two interrelated studies, in secondary and primary schools, that explored ways in which an engagement with the views of students can assist teachers in engaging with learner diversity in order to make their lessons more inclusive (Messiou and Ainscow, 2015; Messiou et al., 2016). The findings of this research led to the development of a new approach, 'Inclusive Inquiry', that was trialled and evaluated within networks of primary schools in five European countries (Messiou and Ainscow, 2020).

Our monitoring of the developments in the various schools that took part in the first study drew attention to the way that local factors influenced what happened. The reasons for these differences between countries are, we assume complex, reflecting historical and cultural influences on the work of schools and teachers. However, through our discussions with practitioners in the different countries, it became clear that national policy formulations are an important factor in the way that these influences work.

These experiences led us to look more closely at national policy documents, at the start of the second study, in order to gain a better understanding of how key concepts, such as 'diversity' and 'student voice', are addressed. In making sense of these explanations, we were able to draw on the insider knowledge of members of our research team in each of the five countries. They, in turn, used their knowledge about relevant academic literature to throw light on the factors that have influenced policy formulations.

This process of policy analysis proved to be helpful as we further examined the evidence we had accumulated about the work carried out in schools in the five countries, so much so that we concluded that it could be useful to a wider readership, particularly in relation to the implications that these might have on the inclusion of all students. With this in mind, in this paper we present our analysis of policy documents and relevant scholarly literature from the five countries in order to address the following questions:

- (a) How are the terms 'student diversity' and 'student voice' defined within national education policies in the five countries?
- (b) In what ways does the academic literature in each of the countries define these two terms?

First of all, however, we draw on the relevant theoretical literature that relates to our overall argument, which is: in order to respond to learner diversity, it is necessary to engage with students' views in meaningful ways, so as to ensure inclusion.

Defining diversity

Diversity is an ambiguous and complex notion, with numerous definitions. For example, it has been referred to as 'human variety in social sciences' (Zhang et al., 2016: 368), and, more specifically, as 'a range of characteristics differentiating communities, individuals, social practices and personal preferences' (MacPherson, 2017: 845).

Broadly stated, there are two overall approaches in defining diversity. Whilst the first approach focuses narrowly on specific groups protected by affirmative action, with a central concern on issues such as race, gender, ethnicity, age, nation origin, religion and disability, the second approach embraces 'a myriad of other personal, demographic, and organizational characteristics' (Herring and Henderson, 2011: 630). The conceptualisation of diversity based on the listing of group characteristics in the first approach, as Zhang et al. (2016) observe, has some limitations. They argue that since all group characteristics might not be listed in one definition, it is likely that those characteristics that are not listed will be ignored. The second approach to define diversity is also not without problems, since it 'masks inequalities of social groups and dilutes the efforts of diversity management' (Zhang et al., 2016: 369).

For some scholars, diversity in education is often associated with 'differences' (e.g. Ainscow et al., 2007; Shah, 2008). For example, Shah notes that a problem with the notion of diversity is 'how to accommodate difference with equality to liberate the students from experiencing marginalisation' (Shah, 2008: 525).

In addressing the issue of cultural and religious diversity in education, different countries rely on a variety of formulations. For example, Germany, Greece and Ireland use the terms intercultural education and interculturalism, whereas other countries, such as the UK, the Netherlands, Canada, and the USA, are more familiar with the idea of multiculturalism (Faas, 2008; Faas et al., 2014; Leeman, 2008). Indeed, in South Africa, since 1994, multiculturalism is seen as one of the new approaches to education, together with inclusive education and critical multiculturalism (Reygan and Steyn, 2017). However, except for critical multiculturalism, these approaches have been criticised for their ignorance of concepts such as power and privilege, for their assimilationist impulse, and for essentialising difference (Reygan and Steyn, 2017).

In suggesting a new approach to diversity, Reygan and Steyn (2017) propose the introduction of critical diversity literacy, which centres on other aspects of diversity, rather than only focusing on racial diversity. In this respect, sceptics of diversity, as Herring and Henderson observe, argue that too much attention has been put on race. These authors go on to advocate the idea that it is necessary to 'guard against the slippery notion of diversity' (Herring and Henderson, 2011: 636). Rather, they see it as a critical concept, creating a connection with other notions, such as equity, parity and opportunity, in order to avoid what they see as the hollow usage of the term. On the other hand, Mitchell argues that diversities must be considered from 'an ecological perspective by focusing on how children are influenced by complex interaction among their society, community, family, school and classroom context' (Mitchell, 2017: 299).

In discussing diversity in relation to migration, Vertovec argues that it is not enough to capture the complexity of diversity only in terms of ethnicity or country of origin. This may lead to 'a misleading, one-dimensional appreciation of contemporary diversity' (Vertovec, 2007: 1025). He therefore suggests using the notion of 'super-diversity' as an umbrella term, to mean the inclusion of a 'multiplication of significant variables that affect where, how and with whom people live' (Vertovec, 2007: 1025). These variables include 'differential immigration statuses and their concomitant entitlements and restrictions of rights, divergent labour market experiences, discrete gender and age profiles, patterns of spatial distribution, and mixed local area responses by service providers and residents' (Vertovec, 2007: 1025).

In an attempt to capture the complexity of the interplay of these factors, Vertovec (2007) goes on to draw on an example of the diversity of the population in London, using a range of data sources. However, according to Meissner, Vertovec's discussion seems to focus extensively on 'ethnicity-related' issues, surrounding country of origin, language use and religious differentiation, while briefly discussing 'the experiences and positionings of migrants with reference to rights and responsibilities granted, migratory pathways followed and transnational links maintained' (Meissner, 2015: 559). Meissner (2015) also points out three points of potential criticism in the development of the notion of 'super-diversity', that is, 'the lack of the definition of diversity, the mostly unbound ethos of the notion, and its immigration focus' (Meissner, 2015: 559).

Adopting a political perspective, Vavrus (2012) examines diversity issues through three philosophical orientations: *social conservatism*; *liberal multiculturalism*; and *critical multiculturalism*. The first position, social conservatism, prioritises the private over the public, which leads to the view that symbolic and material discourse of cultural diversity is 'an antisocial nuisance' that prevents social development. The second position, liberal multiculturalism, in its attempt to 'celebrate diversity' of group identities, detaching diversity from the private sphere, while at the same time bringing it closer to the public, generally views group identities as fixed and diverse cultures that are 'relatively equal' (Vavrus, 2012: 669). Unlike the other two positions, critical multiculturalism considers diverse cultural practices and identities as fluid, incorporating power and privilege into the investigation of diversity issues of class, race, ethnicity and gender. Vertovec (2015: 2) also synthesises the notion of 'diversity' from a wide range of sources to conclude that the public understandings of diversity often relate to various categories of difference, and that 'diversity' and 'difference' can refer to 'practically anything'. Similarly, Minow highlights that difference is a comparative term. In particular, it seems to beg the question, 'different from whom?' (Minow, 1990: 22). Also, for some educational sociologists (e.g. Carbonell, 1995), 'difference' implies, many times, a kind of emotional negative evaluation of some human characteristics regarding what it seems for the majority as 'normal'.

It seems reasonable to argue, therefore, that, despite being used widely, the term diversity remains a complex one, with multiple meanings. In the analysis that follows, we bear this complexity in mind as we consider relevant literature and national policy documents in five European countries.

Student voice and diversity

Returning to Herring and Henderson's (2011) argument of the need to connect diversity with other notions, we suggest that another term that relates to diversity is that of student voice. In particular, we view the notion of student voice as relating to matters of equity, parity and opportunity.

As with diversity, the idea of student voice encompasses a range of meanings, from expression of views, either verbally or non-verbally, to active participation in decision-making. So, for example, Alexander suggests that the notion of voice is 'complex and can be used in various ways, reflecting different contexts, aims and beliefs' (Alexander, 2010: 144). Similarly, Fielding (2006) argues that the term includes a range of activities encouraging the involvement of young people. For Thomson, voice means: 'Having a say, as well as referring to language, emotional components as well as non-verbal means that are used to express opinions' (Thomson, 2008: 4).

In a later publication Thomson defines voices as:

... a political concept that brings together past and present, emotional and intellectual ways of knowing, public and private, various parts of social and cultural life, and truths and fictions. 'Voice' is inherently concerned with questions of power and knowledge, with how decisions are made, who is included and

excluded and who is advantaged and disadvantaged as a result. Weak forms of 'voice' generally support the status quo or aim for modest reforms. The strongly democratic use of 'voice' equates to a call for a public sphere in which there is dialogue, reciprocity, recognition and respect. Reaching that utopian state is understood as a struggle to be heard, listened to and taken seriously. (Thompson, 2011:21)

This issue of power is also discussed by Robinson and Taylor who argue that 'student voice work is also about students having the power to bring about changes which will improve their experiences in school' (Robinson and Taylor, 2012: 33). Relevant to this, Fielding suggests 'a fourfold model which distinguishes between students as sources of data, students as active respondents, students as co-researchers, and students as researchers' (Fielding, 2001: 135). This suggests that, acting as researchers, students have the potential to bring about change in schools through their suggestions and actions. This implies stronger forms of voice, which allow for differences of view to be taken into account and acted on. As Fielding (2004) argues, such efforts can foster student agency. Questions of power and knowledge construction, as well as notions of agency, do not only relate to the concept of student voice but also link to the concept of inclusion (e.g. Fielding, 2004; Nind, 2014).

Taking account of these debates, we argue here that, if diversity is associated with differences, as explained earlier, then this could apply to differences and multiplicity of views, as expressed through the student voice movement. In addition, as discussed above, student voice involves participation and opportunities, concepts that link to the notion of diversity.

We are therefore suggesting that, in order to respond to diversity, the voices of all students should be heard and acted on. Indeed, we go further in suggesting that, in order to value diversity in schools, the views of all students must be heard. Such a position, directly relates to notions of inclusion. In other words, listening to all students' views, signals valuing diversity, and we are therefore arguing that this is also demonstrating a principled commitment to inclusion.

In what follows, we examine the extent to which this thinking is evident in national policy documents and related literature in five European countries. At the time when this analysis took place, England was still a member state of the European Union, and therefore, subject to the same set of European laws about rights and discrimination.

Aims and methodology

The fluidity of the terms 'diversity' and 'student voice', is taken as our starting point, and due to the fact that we were embarking on a collaborative action research project involving five European countries (Austria, Denmark, England, Spain, and Portugal), we wanted to explore a number of interrelated issues. In particular, we saw this as an opportunity to explore and understand better the complexities of each national context in relation to policy and practice. In this way, the different meanings and debates we have summarised were to provide theoretical tools to aid our analysis as we set out to address the agenda set out above. We were also interested in examining the extent to which these two themes were linked within national discourses.

Each team of researchers in our partner universities produced a descriptive report summarising the policy documents and relevant literature in their country in relation to the two terms: diversity; and student voice. The reports in each country had to be produced with the following questions/criteria in mind:

- (a) What are the definitions of diversity in the literature in your country?
- (b) What are the definitions of student voice in the literature in your country?

- (c) Do policy documents focus on the issue of diversity in schools (especially focusing on primary schools)? If yes, how do they define diversity?
- (d) Do policy documents focus on student voices in schools (especially focusing on primary schools)? If yes, how?

These questions were set in order to explore and understand each context in more depth, as opposed to being used as a form of comparison. Through thematic analysis (Bryman, 2008) of the reports, carried out by the first author, it was highlighted that diversity was conceptualised in five ways across the different countries. These are: diversity as related to specific groups of students; diversity as related to all students; diversity as related to issues other than the learners; diversity as a problem; and diversity as an asset. We also found that the notion of student voice is hardly used as such in policy documents in most of the countries. Member checking processes with our university partners were followed to enhance the trustworthiness of the data analysis (Lincoln and Guba, 1985). In what follows we consider each of the two themes, diversity and student voice, in more detail.

Diversity in education

Diversity as related to specific groups of students

In all five countries diversity was seen to be related to specific groups of students. For example, in the Spanish literature there are references to different ‘forms of diversity’: cultural diversity (García and Moreno, 2014; Gil-Jaurena, 2012; Janer Armejach, 2013; Lalueza, 2012; Leiva, 2012, 2017; Mata and Ballesteros, 2012; Mateos, 2017); linguistic diversity (Jiménez, 2012; Rodríguez et al., 2013); religious diversity (Rodrigo and Meseguer, 2018); affective-sexual diversity (Díaz de Greñu Domingo and Parejo, 2013; Sánchez, 2011); special educational needs associated with disability (Verdugo and Shalock, 2013); diversity of learning styles, of interests, motivation (Coll, 1991); diversity in terms of gender (Rebollo et al., 2012). However, when educational policy measures of *attention to diversity* are analysed in different autonomous communities’ of Spain¹, there is a tendency to use ‘categories’, referring to the collectives that are commonly recipients of the same responses (Sánchez Palomino and Rodríguez González, 2016).

Similar approaches are found in the literature of other countries too. For example, ‘diversity’ is commonly related in Portuguese literature to a complex and vast number of *individual characteristics*: age, gender, nationality, etc.; and *social characteristics*: linguistic-, religious-, cultural-, ethnic-, social and family backgrounds or socioeconomic status, with different needs and expectations (Moreira and Madeira, 2016; Sanches and Teodoro, 2007).

As far as policy documents are concerned, a category that was mentioned in all of the countries’ policies in relation to diversity was that of disability. In Austria, this seems to be the main focus (besides linguistic diversity, as well as refugee status). For example, the ‘National Action Plan Disability 2012–2020’ (Federal Ministry of Labour, Social Affairs, Health and Consumer Protection, 2012), sets goals and actions at a national level in order to implement the UNCPRD in Austria. Also, at the level of federal states, similar documents aiming at offering a framework for a slow step-by-step implementation of the UNCPRD were developed. By the way of example, the federal state of Styria (the first federal state in Austria) developed a three-phase plan in 2012, which describes concrete measures to reach more participation and equality of persons with disabilities (Steirischer Aktionsplan, Land Steiermark, 2012). Examples such as this show how international policy documents have had an influence on the development of relevant policies in the various countries.

In Spain, disability and special educational needs are also the focus of policy documents in the 17 different autonomous communities. Though diversity is not clearly defined, it seems to be mainly related to those students defined as having specific educational support needs (e.g. article 17 in the Decree 89/2014). Whereas in Denmark, three groups are the focus of attention: those with disabilities; those with difficulties; and those with disadvantages (Hedegaard-Sørensen and Pentthin Grumloese, 2016). All three groups are seen as problems, as discussed in a later section.

In addition, other categories mentioned in the Austrian context are linguistic diversity and, closely related to this, refugees. Since 2015, refugee status of children has become a major concern in some documents provided by the Federal Ministry of Education (2017). Frequently, diversity dimensions linked to this status are of a linguistic nature, on the one hand, but also differences in culture, as well as experienced trauma, on the other hand. These themes are of concern in documents released to support teachers to handle the situation.

For students who have just arrived in Austria and who are not (as yet) able to speak or understand the language of instruction, there is the opportunity to participate in the lessons as '*außerordentliche Schüler/innen*' (extraordinary students). This status enables the teacher for one year (in special cases for an additional year, hence, two years: § 4 Abs. 3 SchUG, 1986) to not assign a grade to the student (Federal Ministry of Education and Women, 2014). Another recently developed measure provides special instruction in separate classes for all those children who are not able to speak or understand German at a certain level (Federal Ministry of Education, Science and Research, 2018). This idea was the reason for many controversial discussions but, nevertheless, the government implemented its decision.

Portugal (Direção-Geral ad Educação, 2017) has developed a broader approach, focusing on Citizenship Education (*Educação para a Cidadania*), a national strategy for all schools. This privileges and values interculturality (cultural and religious diversity), respect for human rights and democratic citizenship.

The longest list of categories comes from the English context. In 'The Common Inspection Framework: Education, Skills and Early Years', published by the Office for Standards in Education, Children's Services and Skills (Ofsted) (2015), it is stated that schools and providers will be evaluated on how well they respond to individual needs through their effort to help 'all children and learners to make progress and fulfil their potential' (Office for Standards in Education, Children's Services and Skills, 2015: 6). The outcomes of different groups of students are taken into account when making judgements. These groups are: disabled children and learners and those who have special educational needs; children and learners in specialist provision; boys/men; girls/women; the highest and lowest attaining children and learners; children and learners for whom English is an additional language; children and learners from minority ethnic groups; Gypsy, Roma and Traveller children and learners; lesbian, gay and bisexual children and learners; transgender children and learners; young carers; children and learners attending alternative provision; children and learners with medical conditions; disadvantaged² children and learners; children looked after and care leavers; older learners; children and learners of different religions and beliefs; ex-offenders; teenage mothers; and other vulnerable groups (Office for Standards in Education, Children's Services and Skills, 2015: 6–7).

Diversity is therefore conceptualised in England in relation to this extensive list of categories, especially in relation to the collection of statistical evidence for the annual School Census and National Pupil Database. In particular, there is a focus on 'age, gender, ethnicity, language status, free school meal eligibility, special educational needs type and provision, disability status and level of national curriculum attainment' (Lawson et al., 2013: 108).

Interestingly, the new Inspection Framework in England, introduced in September 2019, is intended to be a force for the improvement for all learners (Office for Standards in Education,

Children's Services and Skills, 2019). At the same time, there is reference to the Single Equality Act (2010) and how schools comply with the rules as set out in the legislation. This refers to protected characteristics, such as disability, gender and age, and therefore, the focus on categories will remain in future inspections.

Diversity as related to all

In addition to relating diversity to specific groups of students, four of the countries seem to relate the notion of diversity to all students in their educational policies. Specifically, in Austria, Spain and Portugal diversity is discussed through the use of the term 'heterogeneity'; whilst in England, as mentioned above, though certain categories are mentioned, at the same time reference to all learners is made.

The most striking example, however, is that of Portugal, with the recent publication of the new Law Decree (DL 54-2018) where, it is stated, 'there is a moving away from the rationale that it is necessary to categorize to intervene' (*Diário da República* (2018)). Rather, the focus of the law is on all children. However, as Alves highlights, there is 'ambiguity present in wanting to "push away the need to categorise to intervene" while at the same time creating a "new category": special health needs (NSE), which encompasses students with physical and mental health problems that impact on attendance and learning progress' (Alves, 2019: 871).

Diversity as related to issues other than the learners

In all the countries the issue of diversity is somehow linked to the notion of inclusion. For example, in the National Action Plan in Austria, there is one section that refers to education. Within this section, one sub-chapter, which refers to schools, claims that the aim is to keep on working towards an inclusive school system. Additionally, accessibility in school contexts is addressed. Goals and measures are specified for these topics (such as, accessible materials for instruction, intensifying teacher training towards inclusion, etc.) (Federal Ministry of Labour, Social Affairs, Health and Consumer Protection, 2012). Therefore, though the issue of inclusion is highlighted, it is related to a specific group of learners, those with disabilities.

In England, the idea of inclusion was a strong focus of previous governments and was highlighted in policy and guidance documents (e.g. Booth and Ainscow, 2002; Department for Education, 2013). However, the Conservative Party that led the coalition government formed in 2010, said in its manifesto: 'We will end the bias towards inclusion.' More recently, the revised Special Educational Needs and Disabilities (SEND) Code of Practice (Department for Education, 2015), which is the statutory guidance for all schools, has a section focusing on inclusive practice and removing barriers to learning.

On the other, hand, in Denmark aspects of diversity relate to the notion of differentiated instruction. This emphasis was introduced in 1993 through a school reform (Danish Ministry of Education; see: www.uvm.dk). Current political definitions of diversity and differentiated teaching state that: 'Differentiated teaching builds on the vision of creating a school for all. Therefore, differentiated teaching is closely connected to communities and differentiated teaching is a principle concerning whole class teaching. Furthermore, differentiated teaching takes the point of departure in student diversity leading to a practice of teaching that secures engagement and participation for all. The aim is that every child reaches its full potential. Notice that differentiated teaching does not mean differentiating children by grouping them according to attainment levels' (see: <https://www.uvm.dk/aktuelt/nyheder/uvm/2018/aug/180822-faa-viden-og-inspiration-til-at-lykkes-med-differentieret-undervisning>www.uvm.dk).

The Danish discussion about diversity and differentiated teaching is influenced by several evaluation reviews from the Danish Institute of Evaluation (2011, 2013, 2014). It is stated in these reports that Danish teachers are not conversant with teaching to diversity in their practices. It is also noted that teachers find it difficult to differentiate between professional attention toward whole class teaching, and attention toward children's community and diverse strategies for participation. Furthermore, it is stated in the reports that teachers perceive differentiated teaching as differentiation of pupils (individuated teaching) and not as differentiated teaching and environment. This seems to imply that children are expected to adapt to the whole class teaching approach and to the culture of the learning environment.

Diversity as a problem

Evidence within the policy documents of each country, apart from Portugal, suggests that diversity is seen as a problem that needs to be handled. For example, in Spain, diversity is not seen as something positive, or as a pedagogical asset, but as something that needs to be addressed. Specifically, in the Act on the Improvement of the Quality of Education (Ley Orgánica Para la Mejora de la Calidad Educativa, 2013), four types of specific educational support needs that need to be addressed are mentioned:

- (a) Students with special educational needs.
- (b) High-ability students.
- (c) Late entries into the Spanish education system.
- (d) Specific learning difficulties.

Similarly, in Denmark three groups are the areas of focus:

- (a) Disabilities: Students with disabilities or impairments, viewed in medical terms as organic disorders attributable to organic pathologies.
- (b) Difficulties: Students with behavioural or emotional disorders, or specific difficulties in learning. The educational need is considered to arise primarily from problems in the interaction between the student and the educational context.
- (c) Disadvantages: Students with disadvantages arising primarily from socio-economic, cultural, and/or linguistic factors (Robson, 2004).

Here, the language used is interesting, in that it appears to signal that diversity is a problem. At the same time, the idea of differentiation, as presented above, rests on ideas of difference as something that needs to be addressed through the introduction of different levels, for example.

In England, through the SEND Code of Practice (Department for Education, 2015), as well as earlier documents, such as the 'UK 2008 Report – Growing Diversity of Needs Within the School', a focus on 'needs' is emphasised. In the SEND Code of Practice (Department for Education, 2015) four areas of need are highlighted:

- (a) Communication and interaction.
- (b) Cognition and learning.
- (c) Social, emotional and mental health.

(d) Sensory and/or physical needs.

This emphasis on ‘needs’ appears to signal perceptions of diversity as something that needs to be addressed, rather than an asset.

In addition, English schools are required to keep data about specific types of disabilities for the statutory School Census, which allows the Government to predict levels of future resource requirement. These categories of special educational needs include: specific learning difficulties; moderate learning difficulty; severe learning difficulty; profound and multiple learning difficulty; speech, language and communication needs; social, emotional and mental health; autistic spectrum disorder; visual impairment; hearing impairment; multisensory impairment; physical disability; and ‘special educational needs support’ but no specialist assessment of type of need. Similarly, the focus on resources suggests that diversity is seen as something that will need additional support, as opposed to be seen as an additional asset.

In Austria, the term “*Heterogenität*” (meaning heterogeneity) is used in a slightly different way than the term diversity, which is more recent. Referring to the German-speaking countries, Sliwka (2010, 2014) differentiates these two terms by the way the variety of characteristics in students is perceived. When talking about heterogeneity, differences between students are perceived as a challenge that needs to be managed. Typically, adjustments are made to deal with these challenges stemming from the learners’ differences. Heterogeneity is often used when describing the variety of academic achievement in a classroom in the sense of interindividual comparisons. The empirical foundation to this topic, however, is rather sparse (Decristan et al., 2014). Teachers tend to overestimate heterogeneity in their classrooms (Decristan et al., 2014).

Diversity as an asset

The idea of diversity as an asset is discussed in academic literature in all of the countries to varying degrees (e.g. Ainscow et al., 2016; Jamal, 2013; Moliner and Moliner, 2010; Sliwka, 2010, 2014; Tetler and Baltzer, 2011). However, looking at the policy documents, it is striking that few examples of policy make explicit reference to diversity as an asset. A specific example comes from Portugal, where, in the Law Decree (DL 54-2018) in the 5th Article ‘Lines of action for inclusion’, it is stated that:

Schools shall include in their guidance documents the lines of action for the creation of a school culture where everyone will find opportunities to learn and the conditions for full realization of this right, responding to the needs of each pupil, **valuing diversity** and promoting equity and non-discrimination in accessing the curriculum and the progression in the educational system. (*Diário da República*, 2018)

However, as Alves (2019) points out, other statements in the Law suggest that student differences are challenges for teachers. Therefore, we have contradicting messages within the same policy.

In Austria, the National Action Plan Disability goals stress that the diversity approach is to be acknowledged, which means that people with disability add to diversity in society and that this diversity involves chances and benefits to everybody (Federal Ministry of Labour, Social Affairs, Health and Consumer Protection, 2012: 6). In other words, this idea of viewing diversity as an asset is communicated here.

Students' voices

The students' voices movement has gained considerable attention over the last two decades across the world, especially after the UNCRPD (1989), which ratified children's right to be heard through Articles 12 and 13. Governments that have ratified the UNCRPD are required to demonstrate how they implement the UNCRPD's principles.

All five countries have ratified the UNCRPD. Despite this, the use of the term 'students' voices' in policy documents was absent in four of the five countries. The only country that seems to have direct references to the term in policy documents is England. However, related terms, such as children's rights and student participation, were found in the other countries' policy documents.

In England, student voice was reflected in some earlier policy documents (Department for Education and Skills, 2001, 2003). In 2008, the then Department for Children, Schools and document 'Working Together: Listening to the Voices of Children and Young People' (Department for Children, Schools and Families, 2008), highlighted the importance of taking account of children's and young people's views as well as working with them, especially in terms of benefits for increasing their engagement in learning. More recently, the Department for Education (2014), published the statutory guidance document, 'Listening To and Involving Children and Young People', highlighting two main reasons for involving children and young people: encouraging them to become active participants in a democratic society; and contributing to their achievement and attainment. It should also be mentioned that in England there is a Children's Commissioner (as of August 2020 Anne Longfield) whose role is to promote and protect the rights of children, focusing especially on those who are seen as the most vulnerable, and standing up for their views and interests (see: www.childrenscommissioner.gov.uk).

In addition, this commitment to the child's voice is highlighted in the SEND Code of Practice (Department for Education, 2015), which is concerned with those students defined as having special educational needs and disabilities. This is a new addition to the previous SEND Code of Practice in 2001. Similarly, though student voice is not explicitly used in 'The Common Inspection Framework: Education, Skills and Early Years' published by the Office for Standards in Education, Children's Services and Skills (2015), one of the focuses of inspection is that of 'personal development, behaviour and welfare'. Specifically, the inspectors make judgements by evaluating the extent to which a school is successfully promoting and supporting these three areas. In addition, every year Ofsted uses online questionnaires to gather a range of views about schools, including those of children and young people. The responses are submitted to Ofsted directly and analysed to be used before the inspections (see: <https://www.gov.uk/guidance/social-care-common-inspection-framework-sccif-independent-fostering-agencies/11-preparing-for-an-inspection>). It seems therefore, that the importance of students' voices is communicated to schools through official policy documents.

This was not the case for the other countries. However, even though student voice is not used in official documents, there are other terms that are associated with taking account of students' views, such as children's rights and participation. For example, in Austria, the idea of students' voices is associated with students' rights in schools (e.g. School Education Act and School Organization Act). Whereas in Portugal participation is one of the fundamental principles in national legislation. The Portuguese Education Act (Assembleia da República, 2005) emphasizes the importance of the participation of all. In addition, Section 4 of the Profile of Students Exiting Compulsory Schooling (Assembleia da República, 2017) presents the *values* that all children and young people should be encouraged to develop and put into practice in school activities. One of these values is related to citizenship and participation.

Spain has a similar approach. Participation is considered a main principle in current national legislation (LOMCE, 2013: Art. 119), and this applies to all educational stages and for all members in the school community; teachers, students and families, although particularly regarding the school management:

3. It corresponds to the educational Administrations to favour the participation of the students in the management of the schools, through their group delegates and course, as well as its representatives on the School Board.
4. Parents and students may also participate in the management of the centers through their associations. The educational administrations will favour the information and training addressed to them.

Finally, in Denmark, although the term student voice is not used in official documents, in the latest school reform (see: <https://retsinformation.dk/lov/1640>) a concern with students' well-being is a part of the legislation, alongside the focus on reducing the negative influence of social background and the focus of reaching for pupils' full potential. The Danish Ministry of Education is monitoring children's well-being through a questionnaire to the children on their attitudes towards and experiences of their school life. This is both a way of controlling the schools (monitoring the quality) and it is a tool for the schools to develop the quality of the school – working toward children's well-being.

In the related literature, the term student voice has been used widely in England (e.g. Fielding, 2006; Messiou, 2006, 2012; Robinson and Taylor, 2012; Rudduck and McIntyre, 2007; Thomson, 2008) and more recently in Spain (e.g. Escobedo et al., 2017; Sandoval, 2011; Susinos and Ceballos, 2012) and in Portugal (e.g. Bento and Reynolds, 2014; Marchão and Henriques, 2014; Torres, 2017). The term has also been used to some extent in Denmark (e.g. Tetler and Baltzer 2011; Ulvseth et al., 2017), whereas in Austria the notion of participation is the one that has been used most of the times (e.g. Griebler and Griebler, 2012).

What are the implications of these understandings?

As we have seen, the various conceptualisations of diversity overlapped many times in each of the countries. What emerges, though, is that there are tensions between diversity as a notion that focuses on all students and that of diversity as being about specific categories of students. Even in Portugal, with the most recent welcome focus on all students, there are still references to disability and even the creation of new categories. At the same time, it is interesting to note that deficit ways of students belonging in categories are reflected in most of the policy documents and, therefore, diversity is often seen as a problem, rather than as an asset. Such approaches of course, reflect the views of some authors that there is a need to focus on some groups of learners, such as disabled students and those defined as having special educational needs, alongside a recognition of difference, in order for provision to be made available to address barriers in education (Norwich, 1993; Terzi, 2005).

At the same time, contrary to the focus in much of the literature, where issues of power and privilege are associated with diversity by some authors (Reygan and Steyn 2017), it seems that in policy documents the notion of diversity is primarily associated with difference and most of the times associated with certain categories of students. This might have implications for the ways that teachers think about difference, since this is the way that it is communicated to them through official documents. In other words, deficit ways of viewing students are encouraged through official documents, whereas, issues of contextual barriers, such as power and privilege, which are associated with the definitions of diversity in academic literature, might be overlooked.

Even though the term student voice is not used explicitly in all five countries, ideas that are associated with student views are evident, which is encouraging to see. The extent to which approaches to facilitate genuine student participation, including giving students the chance to be heard, are indeed in place in practice, cannot be explored here, since this would require empirical data to do so. This is certainly an area that we will be exploring further during the course of our collaborative work. However, the fact that the analysis suggests that such terms appear on policy documents signals the importance assigned to such ideas in the various countries.

Differences amongst the five countries were expected to some extent. However, this analysis brings to light the details in each context and signals how some of the approaches that will be used in our collaborative research project might take different forms in the schools that are involved. At the same time, identifying that the term students' voices is not explicitly used in most of the countries, makes it an interesting angle to explore in relation to how the concept and the practicalities associated with this might be accepted by teachers who operate within policy frameworks that do not refer to such approaches directly.

Of course, the analysis presented here involved certain limitations: in particular, the fact that not all documents were read by the lead author who carried out the analysis, due to the different languages involved. Instead the analysis relied on reports produced by the teams of researchers in each country. There are therefore, nuances in meanings that might have got lost in preparing the researchers' report in a different language (English) to the one that the documents were written. The way that this was addressed was through member checking, as mentioned above; however, some nuances in meaning might still have got lost unintentionally.

Final thoughts

Since inclusion and the issue of how to respond to student diversity, as well as notions of student voice and student participation, are of international interest, these findings have implications that are of relevance to colleagues in other countries. In particular, they point to the need for those of us involved in collaborative projects that cut across national borders to be sensitive to the way that concepts have different meanings in other contexts. Whilst these differences make comparisons difficult, they can also make the familiar unfamiliar in ways that act as a challenge to our taken-for-granted assumptions. In this way they can stimulate reflection and new thinking.

Returning to the definition of inclusion as an ongoing process that focuses on identifying and removing barriers to learning and participation, we have seen how policy documents in the various countries still focus on certain students' characteristics, which are seen most of the times as ongoing challenges. The focus is therefore on learner differences, rather than analysing contextual barriers and how to address these in order to enable all students to be included. Such a focus on contextual barriers to enable all students to participate is a pressing issue these days, not least due to the increasingly diverse environments in every society, and the need to develop a more inclusive world. Given the growing demands in education worldwide, with migration being on the rise and the ongoing need for including all students, it becomes imperative to explore in future studies how articulations of these concepts, both in the literature as well as in policy documents, might have a bearing on teachers' thinking and schools' practices.

We conclude by arguing that the ongoing contradictions within policy documents that we have identified – particularly in relation to student diversity – are not likely enablers for the creation of inclusive learning environments. In particular, the ongoing emphasis on differences as problems to be fixed, cannot facilitate responses to diversity that require restructuring the environment to include all. A much more inclusive language is required, one that conveys messages of valuing all

students, whatever their characteristics or circumstances. As we have seen, for the time being, the messages are contradictory.

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Notes

1. Regional political organisations, similar to “*Länders*” in Germany.
2. In schools, ‘disadvantaged children and learners’ specifically refers to those for whom additional resources are provided through the pupil premium or early years pupil premium.

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