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**Comparison of special education in the Czech Republic and in  
the United Kingdom**

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vedoucí práce: Mgr. Jana Kořínková, Ph.D.

## **Prohlášení**

Prohlašuji, že jsem bakalářskou práci zpracovala samostatně pod odborným vedením Mgr. Jany Kořínkové, Ph.D. a veškeré použité zdroje uvedla v seznamu bibliografických citací.

V Olomouci, dne

.....

Hana Maňková

## **Declaration**

I declare that I elaborated my bachelor thesis independently and under the supervision of Mgr. Jana Kořínková, Ph.D., using only sources listed in bibliography.

in Olomouc

.....  
Hana Maňková

## **Poděkování**

Chtěla bych poděkovat mé vedoucí bakalářské práce, Mgr. Janě Kořínkové, Ph.D., za její užitečné rady, ochotu a trpělivost při vedení mé závěrečné práce.

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## **Abstract**

This bachelor thesis focuses on special education in the Czech Republic and the United Kingdom.

The theoretical part introduces special education as a field of study, it also introduces its history from the beginning of humanity to the present day. It focuses on the history of special education in the Czech Republic and the United Kingdom. It introduces who is a pupil with special educational needs, special educator, it also presents concepts such as inclusion, integration.

In an ostensible second part, it examines the system of special education in the Czech Republic, then in the United Kingdom. In the end, it compares these systems together, defining their similarities as well as their differences.

## **Key words**

*special education, pupils and students with special educational needs, the Czech Republic, the United Kingdom, special educational needs, disability, impairment, support measures, educational system, special educators, history of special education, inclusion, special schools, mainstream schools*

## **List of abbreviations**

SEN – Special Educational Needs

PFL – People–first language

PPCC – Pedagogical-Psychological Counselling Centre

SEC – Special Education Centres

IEP – Individual Education Plan

EHC plan – Educational Health and Care plan

SENCo. – Special Educational Needs Coordinator

FEP – Framework Educational Programme

WHO – World Health Organisation

DDA – Disability Discrimination Act

## **Aims of the thesis**

The aims of my bachelor thesis are to theoretically review special education in the Czech Republic and in the United Kingdom and to compare both systems regarding the compulsory schooling in the Czech Republic and in the United Kingdom.

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# 1. Introduction

This bachelor thesis deals with the topic of special education, focusing specifically on two countries which are the Czech Republic and the United Kingdom. In the two countries, the system in which it operates in these countries will be discussed in detail, who is involved and under what circumstances and conditions, as well as how special education came into being as a separate field of study and what all led up to it. In the conclusion of the thesis, the systems of the two countries will then be compared and it will be possible to see what they have in common as well as what is different and in which areas.

Despite the fact that special education is a term or a field of study that nowadays everyone should know about, I still feel that not everybody is sure what this term and all it entails behind it means.

Special education is truly special in the way that special education teachers and workers work and get to know special pupils and people and that is something that may be attractive to someone who wants to study this. I realised it was the right choice for me in the first year of my studies at the university when I had worked in social services centre in my hometown, Olomouc. Working there showed me what this profession signifies. My time there assured me of my choice and in addition, it gave me the idea that I want to share and spread knowledge about special education and its thoughts and ideas to others. Although it is demanding, difficult and full of challenges, it is very fulfilling and sometimes considered a mission.

The connection between special education in the Czech Republic and special education in the United Kingdom came to my mind because I study special education in combination with English language at the university, and I was very curious about how special education may differ in other countries around the world. So, I decided to combine both of my study programmes and explore the systems in our country and in the United Kingdom.

## 2. DEFINING SPECIAL EDUCATION

This chapter serves as an introduction to the field of special education. It deals with the main terms and facts, it also introduces the special education in general, its history focusing on history of special education in the Czech Republic and in the United Kingdom. It also describes teachers and pupils in special education, their characteristics and main attributes.

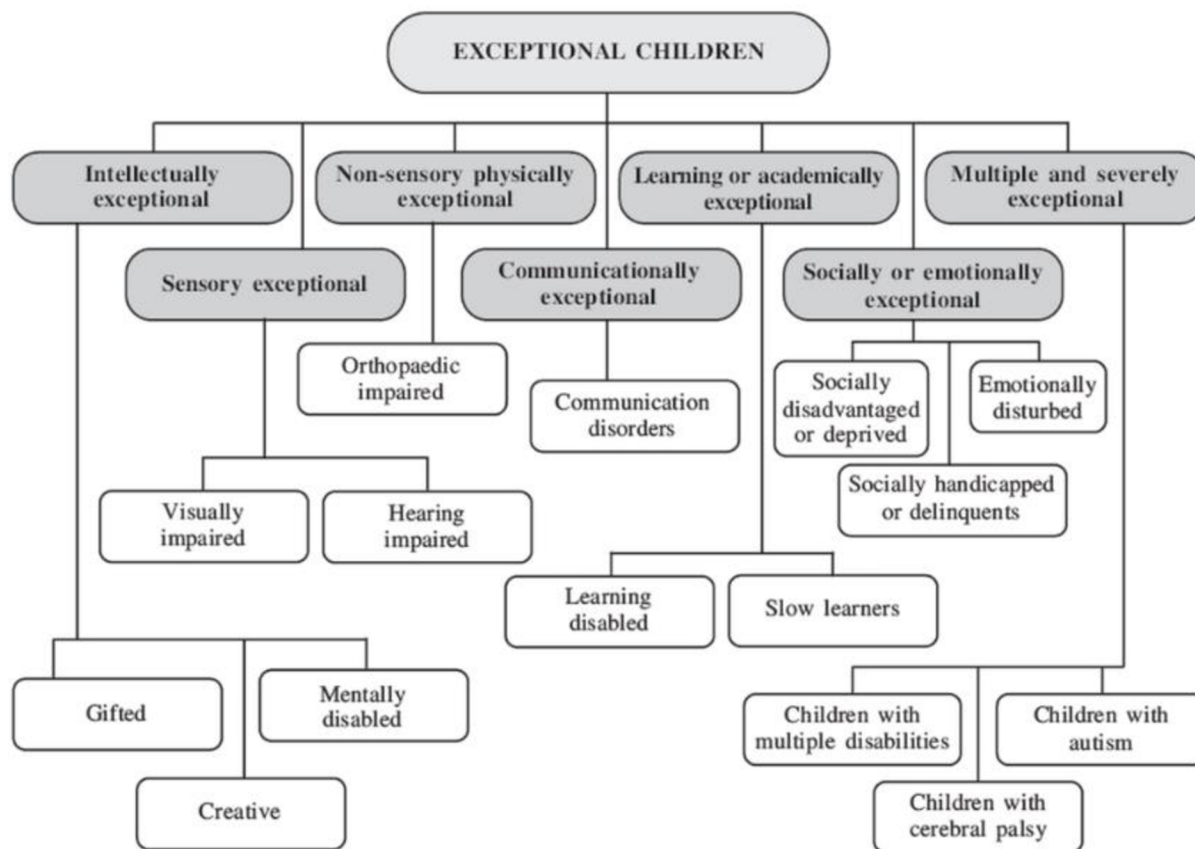
Special education is a very broad field of study which can be often defined or described differently by different authors. In a very simple way special education can be understood as Mangal (2007) stated “as a result, the term special education may refer to the distinctive type of education, specifically or specially designed for meeting the needs of exceptional or special children.” (Mangal, 2007, p. 29). Heward (2009) writes about people with disabilities in a general sense and describes them as “people with disabilities have a fundamental right to live and participate in the same settings and programs — in school, at home, in the workplace, and in the community — as do people without disabilities.” Heward (2009, p. 1).

People who are in any way disabled deserve as many opportunities for making their own choices in life as other people (Heward, 2009). People may often misinterpret special education and therefore they could get a completely false impression of it but overall, we can understand special education as a process where we try not to ignore pupils with disabilities but where we try to find appropriate ways of engaging knowledge in pupils with disabilities (Kauffman, et al., 2018). Special education can be defined as a science that deals with the problems of a person who experiences some defects or difficulties and due to those defects this person needs a special approach. These differences are of a kind that cannot be dealt with within the field of pedagogy in general (Monatová, 2013). When a person with any disability is not competent to deal with his or her disability on a daily basis, that is when he or she requires extra help, which is special education’s help. similar theory comes from Renotierová (2006) who offers two different ways of understanding special education. One is called broader sense and the other one is narrower sense. In a broader sense, special education is meant to be any discipline that focuses on different age categories. In a narrower sense, special education is already seen as a separate discipline whose main points of interest are the laws of special education,

as well as trying to prepare individuals for working and social life and full participation in it.

For those students, the key goal of their whole life and educational process of special education is to prevent, eliminate, and overcome the barriers that can impair a child with disabilities from learning and from participating fully and actively in both school and society. Preventive, remedial, and compensatory interventions are the three fundamental types offered in special education (Heward, 2009). Pipeková (2006) writes that the main goal of special education is to maximize the development of the personality of the person with a disability and to achieve the maximum level of socialization. Slowík (2007) adds that an aim of special education is to achieve maximum integration in both social and professional life.

According to the Education Act 1996 of the United Kingdom (Education Act 1996 s.312(2), 1996) children who have some learning difficulties and thus require special educational support or help have “special educational needs”. Delaney (2016) views students with special educational needs as students who demand some adjustments in education due to those needs which can be classified into a few categories such as problems in certain areas including problems with speaking, mental or somatic problems, behavioural problems or some problems which affect their learning. The figure below provides an overview of the areas of special education according to Mangal (2007). The author there describes all children with any kind of disability as “exceptional” children. The word “exceptional” is there by the author described as: “Exceptionality, in this sense, stands for a generic term pointing out towards the existence of wide individual differences among the children in one or the other aspects of their personality. The term has a quite broader meaning and concept. However, in its practical application in the field of education, psychology and sociology, the term carries a somewhat limited and specific meaning. Here, we confine ourselves to its use in relation to the concept of normal and normality, i. e. the things or attributes of one’s personality which are quite far away from the normal are often taken as one’s exceptionality in that attribute. In this way, the concept of exceptionality is very much associated with the concept of normal and normality. It is therefore imperative to us for being acquainted first with the use of these terms.” (Mangal, 2007, p. 1-2).



**Figure 1:** Classification and Labelling of Exceptional Children (Mangal, 2007, p. 20)

Special educational child can be seen as someone who troubles much more than the rest of peers in the same age or peer group. Delaney (2016) also mentions that some interpretations of special education needs (SEN) tend to involve gifted and talented students who require extra support because they are significantly more capable than their peers. Heward (2009) adds the term exceptional children covers more than the term students with disabilities, which is limiting because it does exclude children who are more talented or gifted than other children.

With regard to the teaching and learning process Delaney (2016) mentions that there virtually do not exist any specific universal techniques or practices how to teach children with special educational needs. The teachers essentially just apply techniques and practices which are used applied in regular education and adjust them to special education students a little bit.

When addressing or speaking about children, students or even adults, one of the most important term or rule is a phrase People-first language (PFL) (Snow, 2007). It is not the disability or the handicap that defines certain person. First of all these people are human beings who have the right to be always seen as an individual with his or her own characteristic. “When we see the diagnosis as the most important characteristic of a person, we devalue her as an individual.” (Snow, 2007, p. 1). According to Blaska (1993), the choice of words people use to describe a person with some kind of handicap or disability is influenced by their prejudice and they often convey feelings of pity.

Among the most important yet commonly mistaken terms that are essential for understanding special education are the terms disability, impairment and handicap. Despite the fact that the terms disability, impairment and handicap are often used as words with the same meaning they are not synonyms. The definitions of these words are defined in the classification by World Health Organization (WHO) as: “Impairment: any loss or abnormality of psychological, physiological, or anatomical structure or function.” (WHO, 1980). All of the terms are similarly perceived and described by Heward (2009), who writes that impairment means that a body part or organ is missing or is not functioning as it should. If the impairment affects a person in his or her everyday life it is called disability. In one setting, a disability might be problematic, but not in another. Disability according to the World Health Organization (WHO): “any restriction or lack (resulting from an impairment) of ability to perform an activity in the manner or within the range considered normal for a human being. Handicap: a disadvantage for a given individual, resulting from an impairment or a disability, that limits or prevents the fulfilment of a role that is normal (depending on age, sex, and social and cultural factors) for that individual.” (WHO, 1980). For instance, Heward (2009) gives an example that “the child with a prosthetic limb may be handicapped (i. e., disadvantaged) when competing against nondisabled peers on the basketball court but experience no disadvantage in the classroom.” (Heward, 2009, p. 7).

## **2.1 History of special education**

As Slowik (2016) states, when looking at special education as an approach to helping people and not yet as a discipline, we have to go back in history to prehistoric times when people already had a tendency to help, heal and care for individuals with

disabilities. So, one could say that special education in this respect is as old as disability or as old as humanity itself. The development of special education in this sense can be traced along with the development of medicine. In areas where medicine could no longer help these individuals, efforts were made to ensure that the disability at least did not worsen. It should be noted, however, that these people were not always accepted by the wider society, and it often happened that people rejected them and formed prejudices against them that were not based on facts or experience.

During the age of the oldest civilisations, strong repressive measures were implemented against the affected individuals, with the reality being their destruction, mistreatment, or enslavement. What is known is the ancient Spartan tradition of killing weak children who could not sustain a hard upbringing shortly after birth. Even so, archaeological evidence demonstrated that even in the past, some seriously crippled people survived, requiring a high level of care and help (Titzl, 2000). But as Florian (2013) mentioned, this was also influenced by the fact that people were very religious and therefore perceived disability as something that was decided only by higher powers, hence these people were not able to achieve the same standard of living as people without disabilities, or that they could not fulfil to the maximum their religious or social role in life.

On one side, people have tried to help these individuals to achieve the highest possible standard of living (Slowik, 2016), on the other hand, they were often the target of ridicule, insults, abusive treatment or even looked down upon (Winzer, 1993). Overall, these people, no matter what their disability was, have been separated from the rest of society repeatedly throughout the history of humanity and the development of special education (Mangal, 2007). It got to the point where people were deprived of their rights to live, unable to make decisions for themselves freely. And this deprivation of human rights was not only on the part of other people, it was also done legally. They were despised by the church, and as far as the psychological aspect was concerned, they were often declared incompetent or incapable. Yet the worst thing was the fact that these people were unable or incapable of defending themselves in any way (Winzer, 1993). But in any case, their lives have often been greatly shortened because of their disability (Slowik, 2016).

In the period around the 16<sup>th</sup> century, the first references about special education begin to appear in the sense of the first efforts to actually teach and educate people with disabilities. Among the first mentions is the Spanish monk and also the first teacher of the deaf, Pedro Ponce de León, who is also the founder of a school for the deaf, and today schools for the deaf in Europe and America are named after him (Hrubý, 1999). Other pioneers of special education include Juan Pablo Bonet, who is credited with writing the first book on special education called “Reduccio´n de las letras y arte para enseñar a hablar a los mudos” (Bonet, 1620), he had also a great impact on the development of other special educational institutions throughout Europe, for instance in Paris, where Abbé Charles-Michel de l’Épée worked and established a school for deaf children (Fernández-Viader, Fuentes, 2004). As Florian (2013) suggested, it is noticeable that at this time there is a great shift in the field of special education and care for people with disabilities, with many educational institutions being established.

Special education experienced its greatest growth during the Enlightenment, when it flourished especially in England and France (Winzer, 1993). It is said that the Enlightenment was such an early beginning of special education as a discipline and even to this day, the thoughts, ideas and concepts from the Enlightenment shape and influence special education. These ideas also preceded, for instance, the implementation of compulsory schooling (Richardson, Powell, 2011). Therefore, the Enlightenment made a great contribution to special education, and by the end of the 18<sup>th</sup> century, special education was already regarded as one of the fields of education. It had already been proven that even pupils and people with disabilities could be educated like other people (Winzer, 1993).

In any case, the concepts of the history of special education and the history of exceptional children or pupils cannot be confused because, as Mangal (2007) mentions, they do not mean exactly the same thing. The author sees the main difference in the name itself, the history of special education goes back to the 18<sup>th</sup> century and deals with education, so the discipline as such is examined here, whereas the history of exceptional children or pupils focuses directly on those children and pupils that she wrote have been in society since time immemorial. In any case, it must be said that the two fields that the author separated are complementary and one would not have come into being or function without the other (Mangal, 2007).



On the other hand, not all authors describe the history and development of special education along with the development of society. Some, such as Mangal (2007), divide the developmental eras of special education into the following categories:

- “1. The era of exclusion – extermination and abandonment
2. The era of acceptance as a subject of amusement and use
3. The era of legal discrimination and witchcraft
4. The era of sympathy and asylum – institutionalization
5. The era of isolated settings – special schools
6. The era of segregated settings – special classes
7. The era of inclusive settings – regular classes.”

(Mangal, 2007, p. 55)

To understand, in the era of exclusion, which existed mainly in earlier times and the early days of humanity, there was essentially a removal of persons with disabilities from mainstream society. This was often done in ways that today could be described as inhumane or illegal. Such practices were common in ancient Greece, Athens, and Sparta, for instance. In the second era, the era of acceptance as an object of amusement and use, people with disabilities were treated as slaves or used for amusement and mockery. For instance, society essentially made clowns, midgets, and circus entertainment out of them. The third era is characterized by the fact that (as mentioned at the beginning of the chapter) the church and the state began to create laws that directly labelled people with disabilities as incapable and prohibited them from many activities, including some basic human rights. The era of sympathy and asylums can be described as a period in which people with disabilities were locked up in various institutions. The institutionalization was mainly because of the pity that society showed towards these individuals. However, in those institutions, they were not given education, they were there for treatment and also simply to get rid of them by the society. The era of the isolated setting coincides with the Enlightenment, where the ideas that people with disabilities were educable and could learn emerged and therefore schools were created specifically for these individuals (isolated). This era is followed by another era where the schools that were created further separated individuals from society. The main reason for that was supposed to prevent the

intact society from meeting those with disabilities. Later on, special classes began to open up in mainstream schools as a result of humanism. The last era, the era of inclusive settings, could be summarized as Mangal (2007, p. 65) mentioned: “The era of inclusive settings, i. e. educating all types of children whether exceptional or normal together in the regular classes of the mainstream schools, represents the modern era and latest development in the history of special/disability education. The beginning of this era may be traced as back as the 1970s ...” (Kumatonto et al., 2021; Mangal, 2007).

One of the best known and most pivotal case that is remembered by many is the work of Jean Marc Gaspard Itard, a French physician, who is known for teaching and helping Victor, a boy who was called the Wild Boy (Cook, Schirmer, 2003). His work then served as the basis for other authors who followed him and further tried to spread special education to Europe and then America (Rotatori et al., 2011). As Richardson and Powell (2011) wrote, at the end of the 18<sup>th</sup> century, many organisations for people with various types of disabilities were already built.

Many authors (Winzer, 1993; Mangal, 2007) agree that perhaps the greatest contribution and influence on the emergence of special education as a field of study was made by Denis Diderot. In fact, he summarized (with a help of Jean Le Rond’ d’Alembert) virtually all the information known up to that time in one work, which bears the title *Encyclopédie*. Moreover, it was arranged alphabetically in the work, making it easier to understand (Winzer, 1993).

Thus, as far as special education as a discipline is concerned, according to Titzl (2000) and Renotierová (2006) it does not have quite as long a history as other fields and disciplines do, but its history has always been influenced by the particular country in which it has developed. It consists of a variety of entangled and complicated arguments and challenges that have influenced and complemented each other (Florian, 2013). Overall, it could be said that it has been part of humanity since the very beginning (Titzl, 2000; Renotierová, 2006).

### 2.1.1 History of special education in the Czech Republic

Special education has been developing slightly differently in the Czech Republic and in the United Kingdom. This different development and its major milestones will be discussed and described below. Special education as a field of education or a study (as written above in the previous chapter) is quite young, and it has undergone many changes throughout its development (Slowik, 2016).

In the history of the development of special education in the Czech Republic, the field has often been inconsistent, mainly because the field has repeatedly been renamed. The field of special education has had different names by different authors or in different periods, and its ideas and goals have changed (Hornák et al., 2002). Jan Ámos Komenský made a significant contribution to the development of special education with his work *Didactica Magna*, from which special pedagogy borrowed its basic principles. Some authors (Edelsberger et al., 1964) have noticed that general and special education developed separately, and only later (around the end of the 18<sup>th</sup> century) did special education start to take over from general education things that general education had already worked out long ago, only it started to adapt them to its needs.

According to several authors, for instance, Titzl (2002) or Renotierová (2006), the overall development of special education is divided into four developmental periods. These periods will be discussed in more detail below. At the outset, it should be noted that one of the main problems why special education as a separate and distinct field of study did not move forward in terms of theory, according to Titzl (2000), is the fact that only the individual fields of special education, the so-called “pedias”, have been studied in detail from a practical and theoretical point of view. According to Renotierová (2006), an important work that influenced the first stage of development is “*Pädagogische Pathologie*” (Pedagogical Pathology) by Adolf Strümpel (1812-1899). The first and second stages of the development of special pedagogy overlapped somewhat, both taking place roughly in the 19<sup>th</sup> century (Titzl, 2000; Renotiérová, 2006). The main centre where special education was developing and moving forward was Prague (Titzl, 2000). The first textbooks for pupils with disabilities were created, and theories began to take shape on how to teach pupils with different types of disabilities (Titzl, 2000; Hornák et al. 2002). A great influence on the development of special pedagogy had Ellen Key, a Swedish fighter for women’s and children’s rights, and her work “*Barnetsarhundrade*” (Century

of the Child), in which she accused schools and society of treating children in a way that did not respect a child as a personality different from an adult (Cipro in Bůžek, 2011). Another helpful contribution to the development of special education was the so-called “Čádovy sjezdy” held in 1990 and 1913 (Titzl, 2000), which aimed to spread their idea further to Moravia and Silesia (Vojtko, 2010) and at the same time to further explore the field of special education from the theoretical point of view. Their goal was in fact fulfilled, they contributed to the opening of more schools in Bohemia and Moravia. Around this time, a new branch of science, pedology, was also emerging, which can be defined as “the science of the child, consisting of the biology of the child (pedobiology), the psychology of the child (pedopsychology) and the sociology of the child (pedosociology). It grew out of the recognition that the child is not an adult ‘in the small’” (Edelsberger et al., 1978, p. 271). On the other side of it came “nápravná pedagogika”, whose founder was Jan Mauer (1878-1937). “By corrective pedagogy (nápravná pedagogika) we understand the means and methods by which we modify the education and teaching of deviant children so that their defects are eliminated or at least mitigated. The deviant child is to be educated as his disposition permits and is to be brought up in such a way that in practical life he will not be a nuisance, but will be self-sufficient and useful.” (Zeman in Vojtko, 2010, p. 63). Černá et al. (2008) note that it was Jan Mauer and his colleagues who tried to link “nápravná pedagogika” (corrective pedagogy) with medical disciplines, which is why the name “léčebná pedagogika” (remedial pedagogy) began to be used in the world, while in our country Mauer’s “nápravná pedagogika” (corrective pedagogy) persists.

In the next stage (around the middle of the 20<sup>th</sup> century) the question of establishing a so-called unified school was addressed (Titzl, 2000), as special education and national education were not linked together. Thus, in 1948, thanks to the adoption of the unified school act, special education became part of the national school system (Váňová, 2007). At this time, we can observe the first efforts to divide special education into 4 disciplines, the so-called pedias (Černá et al., 2008). These disciplines so far, according to Renotierová (2006), have been: psychopediatry, orthopaedics, speech therapy and oculopedics.

Around 1948, the final and fourth stage of the development of special education begins (Renotierová, 2006). In this period, special education undergoes the biggest changes in the name of the field. The term defectology began to be used; according to

Titzl (2000), the term was first introduced by Otokar Chlup (1875-1965), but Renotierová (2006) mentions Miloš Sovák (1905-1989) as the first. However, the term did not gain much acceptance and therefore the term special education came into use. According to Slowík (2016), it was first used by Bohumír Popelář (1914-1969) in 1954, but according to Renotierová (2006) it was not used until 1957. His legacy was followed by Miloš Sovák, who also started to use this term (Slowík, 2016). Nevertheless, after a lot of thinking about names, the name special education was established (Titzl, 2000). Miloš Sovák had a great influence on the development of special education, pushing it further in terms of theory and practice. For instance, he initiated the provision of free hearing aids to people with hearing impairments, or he supported pupils with marked left-handedness to be able to write with their left hand (Slowík, 2016). In addition, thanks to Miloš Sovák, special education is divided into categories based on the type of disability of the person. Special education can be further divided according to age, to special education of pre-school age, school age, adult (special andragogy) and seniors (special gerontology). New category to study is exceptionally gifted students, this field of special education is starting to get more and more attention in the last years (Slowík, 2016). But more about the current state of special education is discussed in the chapter Special education in the Czech Republic. After this huge shift, however, the development of special education was again stopped for a while.

Categories of special education	Type of disability
Orthopaedic Impairment	physical disability, chronic illness
Visual Impairment	visual/optic disability
Hearing Impairment	hearing/auditory disability
Intellectual Disability	mental disability (possibly psychological disorders, including pervasive ones)
Speech or Language Impairment	impaired communication ability
Emotional and behavioural disorders	behavioural disorders and social deviance

Partial deficiencies (attention deficit hyperactivity disorders)	specific learning disabilities, mild brain dysfunction (including ADD = attention deficit disorder, ADHD = attention deficit hyperactivity disorder syndromes), etc.
Multiple handicap and multiple disabilities	combination of two and more types of disabilities

*Figure 2.: Division of special education disciplines (categories) according to the types of client disabilities. (Slowik, 2016, p. 18)*

### 2.1.2 History of special education in the United Kingdom

The history of special education in the United Kingdom dates back to the 18<sup>th</sup> century. As for the beginnings of special education, there are a few theories, for instance, some sources including Kryszewska (2017) mention opening schools for disabled children already in 1760.

These schools are best known for their founder, Thomas Braidwood, who established a school for the hearing impaired in Edinburgh. Spain and its schools were also a great help in the development of schools in England. Another contributor in England was John Bulwer, a physician who was involved in sign language and improving the speech and spoken language of people with disabilities, trying to teach individuals to speak through sign language (Hrubý, 1999). But as Winzer (1993) opposed there had been efforts to educate people with disabilities for some time before them, mostly involving people with hearing impairments. John Wallis (1616-1703) along with William Holder (1616-1698) tried to use finger alphabets or sign systems to teach people with some hearing impairment. In addition, John Wallis can be proud of his 1653 textbook of English grammar, which makes an important mention of educating the hearing impaired at the beginning, plus he went on to analyse the individual syllables in the book, which was beneficial for the hearing impaired to learn the language more easily. For instance, the methods founded by Georg Dalgarno (1626-1687) are still used today; he was also the

first initiator of the idea that language intervention should start as early as possible, preferably at an early age.

As for the very establishment of the first schools and institutions for the education of these pupils: “It was not until the end of the nineteenth century that state provision for disabled children was introduced with the opening of a special class for deaf children by the London School Board in 1874, followed by the 1893 Elementary Education (Blind and Deaf Children) Act. This opened the way for a period of a massive expansion of the special education system with the accompanying proliferation of categories of handicap, specialists and schools and institutions to accommodate them.” (Armstrong, 2002, p. 444). This greatly contributed to the growth of the opening of schools for people with disabilities in England and many institutions had already been established by the end of the 19<sup>th</sup> century, but often institutions separated people with disabilities from society. They were not primarily aimed at educating these people, but rather at helping them and easing their problems (Armstrong, 2002).

Getting into the 19<sup>th</sup> century, segregation still continues, but according to Pritchard (1963) or even Armstrong (2002), the number of people who became disabled increased after the Second World War. Moreover: “... possibly that ‘disability’ had become more ‘normal’ as a result of war-inflicted maiming and impairment, as well as the apparent national wish for some levelling out of differences between people as part of national reconstruction, may all be factors which contributed to the drawing up of recommendations that special schools should be brought into the wider education framework.” (Armstrong, 2002, p. 446).

## **2.2 Teachers in special education**

People respect the work of a special education teacher, as this job requires a lot of devotion. Back in history, the first teachers were usually neither specially trained nor had any professional education. They also often lacked practical experience (Winzer, 1998). Besides having a special educational training, a teacher also should have some general theoretical knowledge about various people and their individual needs (Lavian, 2015). The professional demands placed on special education teachers are considered by Hallahan and Kaufman (1981) to be a complex and difficult issue, and a similar view is held by Lavian (2015), who suggests that the work of special education teachers is more

demanding than that of general education teachers. Hallahan and Kaufman (1981) added that the professional preparation of the special education teacher is a major contributor to the success of these students and these teachers often need to be more profoundly educated in this area (Fuchs, Fuchs, 1995).

The bond between special education teachers and their students is considered to be incredibly challenging due to the level of self-sacrifice, students' sensitivity, and determination. Landsman (1978) added another important remark about special education teachers and their relationship with the child's parents. This relationship or partnership is more sophisticated than in teacher–parent partnerships in other regular schools.

When it comes to classroom management, the teacher should always be prepared for unexpected situations and be very flexible. The teacher's role is more complex, it is not only his/her job to pass on information and knowledge to the students, but he/she should also make sure that he/she teaches them the appropriate strategies and methods that will suit those particular students to learn the content. Last but not least, the teacher should motivate the pupils because the main thing is that the teacher should pass on these methods and strategies to the pupils, not the content itself. In such schools, according to Laslettová (2020), organisational forms other than the frontal form are very often used, often working in small groups, which are more beneficial in the learning process for both the teacher and the pupils.

### **2.3 Pupils in special education**

“Based on the assumption that every child, every human being is different, it could generally be said that all students are students with special educational needs.” (Laslettová, 2020, p. 22). As stated in Act No. 561/2004 Sb., Section 16, part (6) pupils should have the right to receive an education that agrees with their needs and abilities in terms with the curriculum, format, and methods ... the form of impairment or deficit of students and pupils with special educational needs must be taken into consideration while examining and rating them. (Act No. 561/2004 Sb., the Education Act) Every child thinks differently and has his or her own tactic and speed learning. But regardless of all of this, the methods and forms of teaching that teachers usually use in regular schools have to be adjusted in special education schools to certain students' needs (Laslettová, 2022). For instance, as stated in Act No. 561/2004 Sb., education should be free of charge for those



students. They ought to be allowed to use other methods of communication in the classroom, such as the use of Braille, or be able to communicate non-verbally (through sign language) when it is not possible to do so verbally (Act No. 561/2004 Sb., the Education Act).

Probably the biggest obstacle for pupils by Pijl and Pijl (1998) are usually their own parents or the whole family, because parents prefer not to have their child in a special school, whether it is because their siblings or friends go to a mainstream school, or also because they want their child to get a 'normal' education amongst other pupils.

## **2.4 Integration and inclusion**

We can observe many opinions of various authors on the topic of integration and inclusion. Some authors view the terms integration and inclusion as synonyms but in fact the terms have many more layers and meanings. As Slowík (2016) mentioned, inclusion is a term that everyone now should be aware of yet very hard to understand in terms of content.

The so-called three-dimensional concept of understanding inclusive education occurs nowadays in the Czech Republic and abroad. As Horňáková (2006) stated in her work, inclusion can be understood in three different ways. It could be identified with the term integration, or it could be seen as a kind of improvement of integration or as a new approach to disabled children which differs from integration – as unconditionally accepting the special educational needs of all children.

Inclusion is more as a procedure, which is continuous and still evolving (Tannenbergerová, 2014). “Inclusion means educating students with disabilities in general education classrooms ... To some, inclusion means full-time placement of all students with disabilities in general education classrooms; to others, the term refers to any degree of integration into the mainstream.” (Heward, 2009, p. 71-73).

Integration, on the other hand, is a term which is used more often and moreover, it is set out in the School Act 561/2004 Sb. (Lechta, 2010). The main goal of integrated teaching is for students with different types and stages of disabilities to meet with their intact peers (Průcha, Walterová, Mareš, 2001).

On the other hand, Slowík (2022) points out that there may be confusion of terms, because special education is itself a discipline that actually separates pupils with disabilities from intact pupils, and therefore inclusion in special education may be a slightly misleading and confusing term. Despite all this, students must be respected by all terms (Průcha, Walterová and Mareš, 2013).

### **3. SYSTEM OF SPECIAL EDUCATION IN THE CZECH REPUBLIC**

This chapter deals with the system of special education in the Czech Republic. It covers the topic of legislation and provides an explanation of how special education is set out in the legislation of the Czech Republic. It provides an overview of the possibilities of education for pupils with so-called special needs. It will also discuss the topics of training special educators, pupils with special educational needs, and the related issue of providing support measures or individual education plan

In the Czech Republic, the educational process is governed by the Ministry of Education, Youth and Sports of the Czech Republic. The main law for primary and secondary education is Act No. 561/2004 Sb. on Pre-school, Basic, Secondary, Tertiary Professional and Other Education (Education Act) (Laslettová, 2020), while higher education is provided by another law, which is Act No. 111/1998 Sb., the Higher Education Act (Špičková, 2019). Špičková (2019) further adds that the education of children under the age of three is not currently included in the Education Act.

#### **3.1 Legislative background**

Legislation on the education of pupils with SEN is anchored in the already mentioned Education Act of the Czech Republic (Act No. 561/2004 Coll., on Pre-school, Basic, Secondary, Tertiary Professional and Other Education), which focuses on primary, kindergarten and secondary schools. Both variants of education – special and inclusive –

are covered by the Education Act (Špičková, 2019). This law is complemented by other decrees, such as Decree No. 27/2016 Sb. on the education of pupils with special educational needs and gifted pupils or even Decree No. 72/2005 Sb. on the provision of counselling services in schools and school counselling facilities. For inclusive education, section 16, part 9 of the Education Act of the Czech Republic is particularly important.

All of these previously mentioned laws and decrees will be discussed and described in more detail in the following subchapters.

### **3.2 Special educational schools**

There are special schools in the Czech Republic for any kind of disability or disadvantage, which a pupil or student has the right to attend, but he/she can also attend a regular school, where he/she can go to the same class as intact pupils. This trend is called inclusive education and has been growing in popularity over the last few years (Špičková, 2019). However, each disability has its own specificities and therefore requires a different approach in education and training (Chlupová, 2012) and, moreover, it is always crucial to take into account the individual needs of each pupil or student. The idea of educating pupils with special educational needs always takes place in special schools designed for this specific purpose (Špičková, 2019). In the Czech Republic, individual disabilities are divided according to the system of Sovák (1975) into: “psychopedia (special pedagogy for people with mental disabilities), somatopedia (special pedagogy for people with physical disabilities and chronic illnesses), speech therapy (special pedagogy for people with impaired communication skills), surdopedia (special pedagogy for people with hearing impairments), ophthalmopedia (special pedagogy for people with visual impairments), etopedia (special pedagogy for people with behavioural disorders)” (Chlupová, 2012, p. 9). Nowadays, the following two fields are added: “education of individuals with multiple disabilities (combined disabilities), specific learning or behavioural disorders (partial disabilities)” (Chlupová, 2012, p. 10). Another possibility for pupils with special educational needs to be educated is in mainstream schools, where a special class is opened only for these pupils. This class is set up under the Education Act, Section 16, Part 9 and is normally part of the school but is attended only by pupils with SEN (Špičková, 2019). They are set up primarily for pupils in the mild mental disability category (Bazalová, 2014). Bazalová (2014) and also

Bartoňová (2005) agree that these classes differ from a regular class at school in the number of students that is reduced, and also the teachers, who are special education teachers, work with different aids and resources. The emphasis is on an individual approach to each pupil, taking into account the individual's physical and psychological conditions. The focus here is mainly on the practical skills of the individual.

Considering both regular schools and special schools, it must always be ensured that students are given the same and fair conditions to make education effective, especially for the students (Kumar, 2017). For each pupil, it is necessary to focus on their individual strengths and needs. According to Chlupová (2012), the goal and concern of special education today is no longer just the process of education and the end result but seeks to extend into the whole life (lifelong learning) and to involve the individual in society as much as possible and thus lead a fulfilled life. Kumar (2017) has a similar view on this issue and additionally mentions social inclusion and cooperation as the main goal. If a child with special educational needs is placed in a mainstream school, he or she is educated like other pupils in a mainstream school according to the Framework Educational Programme for Primary Education (FEP), but his or her education is adjusted according to individual needs and requirements (European agency, 2014).

### **3.3 Special educators**

As already mentioned in the previous chapter, the education of pupils with special educational needs in the Czech Republic can take place in two different forms, either in mainstream schools through inclusive education or in special schools.

In mainstream schools, in order for inclusion to take place, it was necessary to prepare teachers who had not previously experienced inclusive education to work with pupils with special educational needs. The preparation was provided by special education teachers who were specially trained to do so (Macková, 2010). In order for the integration process to be successful on the part of the school and especially on the part of the educational team, Chlupová (2012) adds that these teachers need to have a high level of professional competencies and also to continue their education and training after finishing their studies.

Among other issues, a school special education teacher may (but does not have to) be part of a so-called school counselling centre. According to Pipeková et al. (2019), the duties of a school special educator are as follows: “The school special educator carries out special education diagnostic activities and coordinates special education counselling in the school. He/she participates in the development of individual education plans ... He/she participates in the creation of conditions for the inclusion ... in cooperation with other specialists ... His/her responsibilities also include suggestions and assistance with the implementation of support measures, methodological guidance of teaching assistants ... Coordination of cooperation with the special education centre and other specialised departments, provision of advisory and consultative assistance to parents of pupils or their legal representatives, and compliance with the code of ethics of the advisory worker should not be overlooked. The profile of a school special educator’s activities varies depending on the school where he or she works.” (Pipeková et al., 2019, p. 5).

In addition to the school’s special education teacher, the school may also have a school psychologist who is there to support the pupils, but also the parents of these pupils. They help teachers and educational team with the process of integration of pupils into classes (Bartoňová, 2005).

The educational requirements for a special educator can be found in Act 563/2004 Sb., on pedagogical workers, which states that a special educator must have a master’s-level professional education in special education for teachers (Act 563/2004 Sb., Section 6-8). A special educator can work across ministries. In the education sector, he/she can be employed, for instance, as a (already mentioned) school special educator, but also as a classical teacher in special schools, he/she can work in Pedagogical-Psychological Counselling Centres (PPCC), Special Education Centres (SEC), educational care centres and many others (Pešová, Šamalík, 2006). He/she can also work in the social sector, for instance as a social worker, in the performance of institutional and protective care, but the requirements for his/her education are no longer regulated by Act 563/2004 Sb. on pedagogical workers. Valenta (2014) adds that a special educator could pursue the profession of a criminal investigator. It can be said, therefore, that a qualified special educator is able to work in many different areas of the social and educational system of the Czech Republic (Šimová, 2017). However, this profession must always follow a code of ethics (Michalík, 2011).

### **3.4 Pupils with special educational needs**

According to Špičková (2019), pupils used to be distinguished into two different categories – either disabled or socially disadvantaged. Nowadays, however, the term pupils with special educational needs is more commonly used. In simple terms, these pupils could be characterised as pupils who need some type of help or support in their education. However, the most accurate definition of a child with special educational needs is provided by the Education Act of the Czech Republic. In this law, a child with special educational needs is defined as: “(1) A child, pupil or student having special educational needs shall be a disabled person, or a person disadvantaged in terms of health condition or social position. (6) Children, pupils or students with special educational needs shall be entitled to an education the content, form and methods of which correspond to their educational needs and possibilities, on the creation of necessary conditions enabling such education and on the advisory assistance of the school and the school advisory facility.” (Act No. 561/2004 Sb., Education Act, section 16, parts 1 and 6).

Under Decree 27/2016 Sb., pupils and students with special educational needs include gifted pupils and students. The decree defines gifted pupils and students as those who are at a higher level compared to their peers, either in the cognitive, motor, practical, artistic, and social areas or in a combination of several of the mentioned areas (Decree No. 27/2016 Sb., section 27, parts 1 and 2).

### **3.5 Support measures for pupils with special educational needs**

Support measures are those measures that are provided to pupils who need them in their education. These measures are divided into five levels according to organisational, pedagogical and financial requirements (Michalík, Baslerová, Felcmanová, 2015), and can also be combined (Ostrezi, 2021). Legally, they are anchored in the Czech Republic in the Education Act No. 561/2004 Sb. on pre-school, primary, secondary, higher vocational and other education. The support measures are provided free of charge and Laslettová (2020) further adds that: “Each support level is precisely defined and aimed to create the appropriate learning environment for any SEN students within the education system.” (Laslettová, 2020, p. 26).

According to the Education Act (No. 561/2004 Sb. ), support measures consist of “counselling assistance, adjustment of the organisation, content, assessment, forms and methods of education ..., adjustment of the conditions of admission to education and termination of education, use of compensatory aids, ... special teaching aids, use of communication ... or alternative communication systems, adjustment of expected outcomes ..., education according to an individual education plan, the use of a teaching assistant, the use of another teaching assistant, ...” (Act No. 561/2004 Sb., Section 16 (2)).

Part of the third level of the support measures is the teaching assistant, who works according to Decree No. 27/2016 Sb. on the education of pupils with special educational needs and gifted pupils, in which he/she is more fully addressed in section 5. This section states that the teaching assistant cooperates with the teacher, assists him/her in the education of pupils with SEN, and provides support and self-support to the pupils. Teaching assistants can be seen both in special schools and in inclusive education (Špičková, 2019).

Another widely used support measure is the Individual Education Plan (IEP), which is legislatively anchored in the Education Act (Act No. 561/2004 Sb., Section 18) and also in Decree 27/2016 Sb., section 3 and 4. The IEP is developed in accordance with the school curriculum and in cooperation with the Pedagogical-Psychological Counselling Centre (PPCC) or Special Education Centre (SEC). IEP should be continuously updated throughout the school year and should be modified according to the pupil’s progress and needs (Bartoňová, Vítková, 2013 as cited in Laslettová, 2020).

“If there are no changes for the better and the student is still unable to achieve better results and understanding of the curriculum, this reflects the inadequacy of the educational approaches used. The school will exhaust all its possibilities, and only then the teacher is to contact parents and the school counsellor and propose an expert examination by Pedagogical-Psychological Counselling Centre (PPCC) or Special Education Centre (SEC).” (Laslettová, 2020, p. 27).

## **4. SYSTEM OF SPECIAL EDUCATION IN THE UNITED KINGDOM**

In the United Kingdom, since the 20<sup>th</sup> century, there have been efforts to enforce the prohibition of discrimination in education, mainly because it leads to inequalities in society and at the same time because it is unethical (Fuchs, Fuchs, 1995). In the United Kingdom, there are four countries – England, Scotland, Wales and Northern Ireland – independent of each other, but in fact, they work together (Rotatori et al., 2014). Moreover, Bazalová (2006) stated that the educational system in every country in the United Kingdom is carried out very diversely. Nevertheless, Rotatori et al. (2014) suggest that all four countries share certain common features in education, with Northern Ireland and Scotland tending to vary the most from the shared characteristics of them all. The special education system is governed by the Education Act 1996 of the United Kingdom. This law mainly seeks to ensure that pupils with special educational needs are educated in the same schools as pupils who do not have any special educational needs (Záhořáková, Kala, 2016).

In contrast to other countries, the United Kingdom does not classify individual disabilities and does not categorise pupils by disability type. Florian (2013) suggests that the classification is not used mainly because they try to categorize the child's needs from the “educational perspective” (Florian, 2013, p. 93). The categorisation system used to be applied before, but now they use a so-called non-categorical system (Organisation for Economic Co-operation and Development [OECD], 2000). But it does not seem to appeal to some people, especially to parents of the children with SEN, as Rotatori et al. (2014) point out, there are people in the UK, who object and are against the non-categorical system.

Because of that, the government of the United Kingdom has started to gather information from schools in order to at least sort out the different categories of SEN. There are currently 11 and they are as follows: “Specific Learning Disability (SpLD), Moderate Learning Difficulty (MLD), Severe Learning Difficulty (SLD), Profound and Multiple Learning Difficulty (PMLD) Emotional and Behavioural Difficulty (EBD), Speech, Language and Communication Needs (SLCN), Hearing Impairment (HI), Visual Impairment (VI), Multi-Sensory Impairment (MSI), Physical Difficulty (PD), Autism



Spectrum Disorder (ASD) and other (OTH).” (Rotatori et al., 2014) Florian has practically the same opinion as Rotatori and specifies that “what characterizes this classification is that SEN is not defined in terms of provision but child difficulty categories ...” (Florian, 2013, p. 86).

#### **4.1 Legislative background**

One of the initial efforts towards inclusion was the passing of the Disability Discrimination Act (DDA, 1995), which was later complemented by the Special Educational Needs Act (2001), which aims to uphold the rights of people with disabilities. The Act is followed and appended by two decrees, the Equality Act (2006) and the Equality Bill (2009). Another tool that helped in the path to inclusion was the so-called Index of Inclusion. This Index of Inclusion can be seen as a manual on how schools should promote inclusion. In this case, it could lead to pupils with special educational needs being educated together with intact pupils in mainstream schools in the United Kingdom (Vítková, Bartoňová, 2019). Pupils with SEN are also addressed in the Children and Families Act (2014), the main idea of which is to educate pupils with SEN in mainstream schools on the condition that the child is able to manage it and that the child and their parents both choose to do so (Záhořáková, Kala, 2016). On the other hand, the authors add that there are also special schools. These schools educate pupils who, because of their special educational needs, might not be able to manage education in mainstream schools (Záhořáková, Kala, 2016). However, parents have the main and final word in the choice of school. All will be furthermore explained below in accordance with the Education Act 1996.

The Education Act 1996 of the United Kingdom, Part 4 is dedicated to the issue of special educational needs. Section 316 “Duty to educate children with special educational needs in mainstream schools” (Education Act, 1996, section 316) describes in paragraphs 1 – 3 in detail the procedure for placing pupils with SEN in schools: “(1) This section applies to a child with special educational needs who should be educated in a school. (2) If no statement is maintained under section 324 for the child, he must be educated in a mainstream school. (3) If a statement is maintained under section 324 for the child, he must be educated in a mainstream school unless that is incompatible with—

(a)the wishes of his parent, or (b)the provision of efficient education for other children.” (Education Act 1996, section 316, section 324).

To add, section 324 talks about “Statement of special educational needs” (Education Act, 1996, section 324). The section explains the statement in paragraph 3 as “(3) In particular, the statement shall— (a)give details of the authority’s assessment of the child’s special educational needs, and (b)specify the special educational provision to be made for the purpose of meeting those needs ...” (Education Act 1996, section 324 (3)).

Another important document is the Special educational needs and disability code of practice: 0 to 25 years, published in 2014, which already deals more with the practical side of education.

#### **4.2 Special educational schools**

As already mentioned, in the United Kingdom the education of pupils with SEN can take place in two possible forms. The assessment is always based on whether the pupil’s SEN is so severe that he or she cannot be included in mainstream schools and should therefore attend a special school, or whether the pupil’s SEN is to such an extent that he or she is able to be educated together with intact pupils. The second factor in the decision-making process is the parents and their statements on whether they want to place their child in a special school or whether their child is prepared and capable to be educated in a mainstream school (Záhořáková, Kala, 2016). “In other words, children and young people were welcome in mainstream schooling as long as they could be accommodated with additional resources and without having to make too many changes to the regular curriculum” (Rotatori et al., 2014, p. 120). Bazalová (2006) notes that the vast majority of pupils with SEN are educated in mainstream schools and only 1% of all pupils are educated separately in special schools. Reid et al. (2016) also agreed with this statement, but they wrote that the percentage refers only to the Scottish and English populations. If a pupil with SEN is educated in a school other than a mainstream school, it is still the duty of these schools to work in partnership with mainstream schools and, in addition, to arrange the transfer of pupils from special to regular schools if the pupil is able to do this successfully (Záhořáková, Kala, 2016).

### **4.3 Special educators**

As already mentioned, the educational process is carried out slightly differently in each part of the United Kingdom, but in spite of that, the requirements for teachers are more or less the same. The emphasis is always on having at least the basics of special education and having certain predispositions to be able to work with pupils with SEN even in mainstream schools (Bazalová, 2006) because the responsibility for the education of a particular pupil with SEN lies with the class teacher each time (Brabcová, 2012). This teacher is allocated a so-called “Support Teacher” or an assistant. Assistants are available to the school if the school has at least one pupil with SEN. In addition, every school should have a Special Educational Needs Coordinator (SENCo.) (Bartoňová, 2005; Brabcová, 2012) who is normally a member of the teaching staff and works according to The Special Educational Needs Code of Practices. Bartoňová (2005) mentions the main responsibilities of the SENCo. worker include working with the pupil’s parents, supporting teachers in the school, monitoring the progress and achievement of pupils with SEN, the supervision of the pupil’s learning.

### **4.4 Pupils with special educational needs**

In terms of terminology in referring to “pupils with special educational needs”, the abbreviation SEN is used. The abbreviation SEND is also used to refer to “children with special educational needs and disabilities” (Martin-Denham, 2015 in Lehká, 2020). The Education Act 1996 of the United Kingdom provides a definition of a child who has special educational needs. “(1)A child or young person has special educational needs if he or she has a learning difficulty or disability which calls for special educational provision to be made for him or her” (Education Act, 1996, section 312). The same definition can be found in another very important law about special education called Children and Families Act 2014. A child who has some kind of learning difficulty is then according to both of these Acts understood as a pupil who has “(a) he has a significantly greater difficulty in learning than the majority of children of his age, (b) he has a disability which either prevents or hinders him from making use of educational facilities of a kind generally provided for children of his age in schools within the area of the local education authority, or (c) he is under the age of five and is, or would be if special educational provision were not made for him, likely to fall within paragraph (a) or (b) when of or over

that age” (Children and Families Act, 2014, section 20). However, according to the School Act 1996, pupils from other socio-cultural backgrounds and with a first language different from the language of education are not classified as pupils with SEN (Brabcová, 2012).

Concerning the terms gifted and talented, they are not considered to be a synonym. Gifted students are seen as those students who achieve high academic results in subjects such as science, history, mathematics, etc. On the other hand, talented students excel in the areas of practical skills, i. e. in school it can be seen for instance in music education, sports, dance, art, and so on (Koshy et al. 2018). Attfield (2009) also coincides with the distinction and additionally states that many disagree with it. On the other hand, again, differences can be seen from country to country in the United Kingdom as the terminology is not the same in all of them. For instance, in England, the terms used are “gifted” and “talented” students whereas in Wales they lean towards the terms ‘more able’ and ‘talented’, in Scotland, like in Wales, the term ‘able’ is used (Boettger, Reid, 2015).

#### **4.5 Support measures for pupils with special educational needs**

Special educational provision are made in the United Kingdom for pupils with SEN. These are explained in the Children and Families Act 2014 as: “(1)“Special educational provision”, for a child aged two or more or a young person, means educational or training provision that is additional to, or different from, that made generally for others of the same age...” (Children and Families 2014, section 21 (1)). According to Rotatori et al. (2014), it is fundamental that Special Educational Provisions should be always designed and implemented for students with the consent of their parents and the individual student, while taking into account their opinions and inputs. The United Kingdom uses the so-called multi-track-approach. This approach can be understood as a system where different strategies are used in education (mainly in regular schools where inclusion is used). Whether a pupil with SEN is educated in a regular or special school, he/she always has the opportunity to use support services (Vítková, Bartoňová, 2019). As has already been written here, the SENCo. should be in every school attended by a pupil with SEN (Bartoňová, 2005; Brabcová, 2012) and his/her job is to supervise and provide the pupils in need with special educational provisions, which include, for instance, different teaching methods, assistance from another teacher, use of special aids,

etc. (Záhořáková, Kala, 2016). In any case, it is always essential, as Vítková and Bartoňová (2019) point out, to take into account the needs of each pupil individually. Schools should also follow the document Special educational needs and disability code of practice: 0 to 25 years, which contains direct practices, principles and instructions on how to work with pupils with SEN (Záhořáková, Kala, 2016).

If the interventions already provided have not been effective, either an Individual Education Plan (IEP) or an Educational Health and Care plan (EHC) plan is developed. The IEP is developed by the school, specifically the class teacher or SENCo, tailored to the individual pupil's educational needs. An EHC plan is a plan that addresses the educational, health and social needs of an individual and describes how to proceed in order for the pupil to achieve fulfilment in the areas mentioned (Lehká, 2020).

## 5. COMPARISON OF SPECIAL EDUCATION IN THE CZECH REPUBLIC AND IN THE UNITED KINGDOM

The figure below provides an overview of the main points of special education in the Czech Republic and in the United Kingdom. These main points will be discussed in more detail dealing with similarities but also differences in both countries.

	<b>the Czech Republic</b>	<b>the United Kingdom</b>
<b>legislation</b>	<ul style="list-style-type: none"> <li>• Education Act 561/2004 Sb.</li> <li>• Decrees 27/2016 Sb. 73/2005 Sb.</li> <li>• education for all</li> <li>• categorial system of disabilities (“pedias”)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Act 1996</li> <li>• Disability Discrimination Act, Special Educational Needs Act, Equality Act/Bill, Index of Inclusion</li> <li>• Children and Families Act 2014</li> <li>• education for all</li> <li>• different system in each country of the UK, but common features</li> <li>• non-categorical system – difficulty categories</li> </ul>
<b>schools</b>	<ul style="list-style-type: none"> <li>• mainstream schools (inclusion)</li> <li>• special schools</li> <li>• focus on lifelong learning not just education</li> </ul>	<ul style="list-style-type: none"> <li>• mainstream schools – preferred if it is possible</li> <li>• special schools</li> <li>• cooperation of schools</li> </ul>
<b>special educators</b>	<ul style="list-style-type: none"> <li>• special teachers – studies, professional competences</li> <li>• teaching assistant</li> <li>• school special education teacher (school counselling centre)</li> <li>• school psychologist</li> <li>• PPCC, SEC</li> </ul>	<ul style="list-style-type: none"> <li>• special teacher – studies, predispositions</li> <li>• support teacher and SENCo.</li> <li>• teaching assistant</li> <li>• Special educational needs and disability code of practice: 0 to 25 years</li> </ul>
<b>pupils with SEN</b>	<ul style="list-style-type: none"> <li>• SEN terminology</li> <li>• terminology set in Education Act and in Decree</li> <li>• gifted pupils and students</li> </ul>	<ul style="list-style-type: none"> <li>• SEN/SEND terminology</li> <li>• terminology set in Education Act, Children and Families Act 2014</li> <li>• gifted and talented students – difference in meaning and in terminology in each country</li> </ul>
<b>support measures</b>	<ul style="list-style-type: none"> <li>• 5 levels of support measures</li> <li>• set in Education Act</li> <li>• teaching assistant, IEP</li> <li>• cooperation with PPCC, SEC</li> <li>• individuality</li> </ul>	<ul style="list-style-type: none"> <li>• special educational provisions</li> <li>• set in Children and Families Act 2014</li> <li>• SENCo., assistant</li> <li>• cooperation between schools</li> <li>• IEP, EHC</li> <li>• individuality</li> </ul>

*Figure 3: Comparison of special education in the Czech Republic and in the United Kingdom (Own production based on information from previous chapters)*

Regarding the legislative anchoring of special education, in both countries it can be seen that special education is anchored in the Education Acts and various other documents complement it. Both countries aim to make education accessible to all pupils (without discrimination). The only difference is in the approach to the categorisation of disabilities. In the Czech Republic, the type of disability is taken into account when choosing an appropriate school for education, whereas in the United Kingdom, they use a non-categorical system and focus more on the area in which the pupil has difficulties in education.

What the Czech Republic and the United Kingdom have in common in terms of schools is the promotion of inclusion, i. e. the education of pupils with SEN in mainstream schools. However, this is always taken with the individual pupil and their needs in mind. Similarly to the Czech Republic, in the United Kingdom, there is a strong emphasis on cooperation between the school and the pupil's family, and also on cooperation with other schools (mainstream and special schools cooperate with each other) and other specialists. However, it can be observed that cooperation between schools is much greater in the United Kingdom than in the Czech Republic. In the Czech Republic inclusion is more and more practised, however, it is still not quite common nowadays and pupils are more often placed in special schools. By contrast, in the United Kingdom, it is more typical to put pupils straight into mainstream schools wherever possible. In both cases, however, it is possible to transfer a pupil (if possible or necessary) either from a mainstream school to a special school or vice versa.

In addition to the special educator, it is important to have other support staff in the school, whether it is a teaching assistant, which can be seen in both countries, or, for instance, in the Czech Republic, the so-called school special educator, who is called Special Educational Needs Coordinator (SENCo.) in the United Kingdom. They differ in name, yet they have essentially the same function. Furthermore, in the United Kingdom, the special teacher can be assisted by a support teacher or an assistant. These two workers do the same job, but in the Czech Republic, there is only an assistant with the same job responsibilities as those two workers.

The education of special educators/teachers is emphasized in both countries, they must have education in special education (university education) and in addition, they must be professionally prepared (able to work with different pupils and different special needs).

In addition, in the Czech Republic, there may also be a school psychologist who is at the school for the pupils as well as for the parents of these pupils and other teachers.

Although there is a slight difference in the terminology used to refer to pupils with special educational needs, the difference in meaning is minimal. However, there are major differences in the interpretation of the words gifted and talented pupils and students. In the Czech Republic, they are rather synonymous, looking more at the level of the pupil's giftedness and talents, whereas in the United Kingdom gifted and talented do not mean exactly the same thing and there is a perceived difference between them. In addition, the terminology differs in each country of the United Kingdom, but the meaning remains more or less the same.

Support measures and special educational provision are slightly different terms, but in any case, it can be concluded from the way they are explained in the previous chapters that they mean the same thing. They are provided to pupils according to their needs, and in both countries, there is an individual education plan, which is understood very similarly; in the Czech Republic, it is created within the framework of the support measures only when the previous measures have no longer worked. Moreover, in the United Kingdom one can find an Educational Health and Care Plan (EHC), in the Czech Republic there is no such specific plan, only documents that regulate education and do not focus on health or social needs like the EHC plan.

**Comparison of data for the school year 2012/2013**

	<b>Number of special schools</b>	<b>Number of pupils in total</b>	<b>Number of pupils with SEN</b>	<b>Proportion of pupils with SEN (%)</b>	<b>Proportion of pupils with SEN in mainstream schools (%)</b>
<b>the Czech Republic</b>	409	807 950	72 110	8,9	56,7
<b>the United Kingdom</b>	1 032	8 178 200	1 618 340	19,8	88,6

*Figure 4: Comparison of data for the school year 2012/2013 (Adapted from: Záhorská, Kala, 2016, p. 17)*



## Conclusion

The main aim of the bachelor thesis is to theoretically review special education in the Czech Republic and in the United Kingdom and then compare these systems of special education in two countries. This bachelor thesis begins with the chapter “Defining special education”, which serves as an introduction to special education. It describes what special education actually means, and how it is understood differently or similarly according to different authors. It also deals with the concept of pupils in special education, terms such as disability, impairment or handicap. It mentions how people with any kind of disability, handicap or impairment should be properly addressed (people-first language). There is an overview of how special education is divided into categories or disciplines. It also goes into detail about the history of special education, from its origins, through the Middle Ages, and the Enlightenment, to the time when special education became a separate field of study and the present. Then, it looks separately at the history of special education in the Czech Republic and in the United Kingdom. It introduces and provides an introduction to the two main actors in special education and these are the pupil and the special educator. This is followed by a chapter which discusses the topic of the placement of pupils in mainstream schools, known as inclusion.

The next chapter focuses only on the Czech Republic. The chapter deals with the system of special education in the Czech Republic, inclusion, education of pupils with special educational needs in mainstream schools and special schools. It explains how pupils with special educational needs are viewed or approached in the Czech Republic. It also discusses the issue of the special educator with regard to his/her education, requirements, competencies, etc. It also mentions other participants in the education of pupils with special educational needs. This is followed by an overview and explanation of the so-called support measures that are a fundamental part of the education of pupils with special educational needs.

The following chapter has the same structure as the previous chapter on the Czech Republic but focuses only on the system of special education in the United Kingdom.

The last chapter compares the two countries with their special education system. The chapter is introduced with a figure highlighting the key and main points from each country in all the areas discussed above. Subsequently, the points are discussed in more

detail. These main points are compared together in the two countries, some commonalities are found, which are prevalent, but there is also a number of differences.

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**Figure 1:** *Classification and Labelling of Exceptional Children* (Source: MANGAL, Shashi K. Educating exceptional children: An introduction to special education. PHI Learning Pvt. Ltd., 2007.)

**Figure 2:** *Division of special education disciplines (categories) according to the types of client disabilities* (Source: SLOWÍK, J. *Speciální pedagogika. 2., aktualizované a doplněné vydání.* Praha: Grada, 2016. Pedagogika (Grada). ISBN 978-80-271-0095-8.)

**Figure 3:** *Comparison of special education in the Czech Republic and in the United Kingdom* (Source: own production based on information from previous chapters)

**Figure 4:** *Comparison of data for the school year 2012/2013* (Adapted from: ZAHOŘÁKOVÁ, Renáta a Petr KALA. 2016. *Inkluzivní vzdělávání ve vybraných evropských státech.* (Srovnávací studie 5.366). Parlamentní institut [online]. Praha. [cit. 2023-03-03]. Online from: <https://www.psp.cz/sqw/ppi.sqw?d=1&t=47>)

## **Résumé**

Tato bakalářská práce se zabývá speciálním školstvím v České republice a ve Spojeném království Velké Británie a Severního Irsku.

Teoretická část představuje speciální pedagogiku jako vědní obor, seznamuje i s její historií už od počátku lidstva až po současnost. Zaměřuje se na historii zvláště v České republice a ve Spojeném království. Představuje, kdo je to žák se speciálními vzdělávacími potřebami, speciální pedagog, seznamuje s pojmy jako je inkluze, integrace.

V pomyslné druhé části zkoumá systém speciálního školství v České republice, poté ve Spojeném království. Na závěr tyto systémy společně srovnává, vymezuje jejich shodné rysy, ale také rozdíly.

## Annotation

Jméno a příjmení	Hana Maňková
Katedra nebo ústav	Ústav cizích jazyků
Vedoucí práce	Mgr. Jana Kořínková, PhD.
Rok obhajoby	2023

Název práce	Srovnání speciálního školství v České republice a ve Spojeném Království
Název v angličtině	Comparison of special education in the Czech Republic and in the United Kingdom
Anotace práce	<p>Tato bakalářská práce se zabývá speciálním školstvím v České republice a ve Spojeném království.</p> <p>Teoretická část představuje speciální pedagogiku jako vědní obor, seznamuje i s její historií už od počátku lidstva až po současnost. Zaměřuje se na historii zvláště v České republice a ve Spojeném království. Představuje, kdo je to žák se speciálními vzdělávacími potřebami, speciální pedagog, seznamuje s pojmy jako je inkluze, integrace.</p> <p>V pomyslné druhé části zkoumá systém speciálního školství v České republice, poté ve Spojeném království. Na závěr tyto systémy společně srovnává, vymezuje jejich shodné rysy, ale také rozdíly.</p>
Klíčová slova	<i>speciální pedagogika, žáci a studenti se speciálními vzdělávacími potřebami, Česká republika, Spojené království, speciální vzdělávací potřeby, postižení, znevýhodnění, podpůrná opatření, vzdělávací systém, speciální pedagogové, historie speciální pedagogiky, inkluze, speciální školy, běžné školy</i>
Anotace v angličtině	This bachelor thesis focuses on special education in the Czech Republic and the United Kingdom.

	<p>The theoretical part introduces special education as a field of study, it also introduces its history from the beginning of humanity to the present day. It focuses on the history of special education in the Czech Republic and the United Kingdom. It introduces who is a pupil with special educational needs, special educator, it also presents concepts such as inclusion, integration.</p> <p>In an ostensible second part, it examines the system of special education in the Czech Republic, then in the United Kingdom. In the end, it compares these systems together, defining their similarities as well as their differences.</p>
Klíčová slova v angličtině	<i>special education, pupils and students with special educational needs, the Czech Republic, the United Kingdom, special educational needs, disability, impairment, support measures, educational system, special educators, history of special education, inclusion, special schools, mainstream schools</i>
Přílohy vázané k práci	-
Rozsah práce	53 stran
Jazyk práce	Anglický jazyk