

Contributions of National Institutes of Special Education to National-level Implementations of the UN Convention on the Rights of Persons with Disabilities —A Comparative Analysis Between Japan, South Korea, and Bangladesh—

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Abstract

There were two major opportunities to reform special education internationally: the Salamanca Statement in 1994 and the United Nations Convention on the Rights of Persons with Disabilities (CRPD) in 2006. The CRPD in particular altered trends in special needs education and promoted awareness of the human rights of persons with disabilities. Many national organizations have subsequently begun to work toward implementing the CRPD after its ratification in their respective countries. In doing so, these nations took on important roles in unique ways. This study compares the missions, histories, functions, organization, financial support, approaches, and staffing of three entities: the National Institute of Special needs Education (NISNE) in Japan, the Korea National Institute for Special Education (KNISE), and the National Foundation for Development of the Disabled Persons (NFDDP) in Bangladesh. Japan and Korea have independent organizations for special-needs education under the jurisdiction of their respective ministries of education. Bangladesh does not have an independent organization like the NISNE or KNISE, but a foundation managed by the Ministry of Social Welfare. Each organization, nevertheless, serves a similar purpose and function (i.e., the promotion of inclusive education). The NFDDP oversees a wide range of activities concerning the development of special-education systems, which includes the establishment of special schools and hostels. The NFDDP's primary focus is to raise awareness regarding disabilities and education, which is imperative to implementing the CRPD's guidelines. However, the NISNE has exerted great effort in refining human-rights policies, functions, and training. Moreover, the NISNE has not implemented a monitoring mechanism following its ratification of the CRPD. In contrast, the KNISE has adopted a systematic approach to providing education to students with disabilities, and by extension protecting their human rights. It is argued that both the NISNE and NFDDP can learn valuable lessons from the KNISE with respect to human rights for persons with disabilities.

Keywords: UN-CRPD, South Korea, Japan, Bangladesh, national institutes, human rights

I . Introduction

Numerous international documents have reiterated that disability is a human-rights issue; these documents include the World Programme of Action Concerning Disabled Persons ¹⁾, the Convention on the Rights of the Child ²⁾, and the Standard Rules on the Equalization of Opportunities for Persons with Disabilities ³⁾. Over 40 nations adopted disability discrimination legislation during the 1990s. The UN Convention on the Rights of Persons with Disabilities (CRPD) ⁴⁾—the most recent and most extensive recognition of the human rights of persons with disabilities—outlines the civil, cultural, political, social, and economic rights of persons with disabilities. Its purpose is to “promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.”

The principle of inclusive education was first endorsed and recognized internationally at the 1994 World Conference on Special Needs Education in Salamanca, Spain. The Salamanca Declaration encouraged governments to design education systems that respond to diverse needs to ensure that all students have access to regular schools based on a child-centered pedagogy ⁵⁾. Likewise, the CRPD established inclusive education as a mechanism to procure persons with

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disabilities the right to an education. In Article 24, the CRPD stresses the need for governments to ensure equal access to an “inclusive education system at all levels,” and provide reasonable accommodations and individual support services to persons with disabilities to facilitate their education ⁴⁾.

The CRPD underscores the rights enforced by other international laws related to Education for All, but focuses on disability and outlines how these obligations might be met by governments. The commitment to inclusive education became a legal obligation through Article 24 of the CRPD. Ratification of the CRPD means that countries are legally obliged to provide inclusive, quality, and free primary and secondary education to all children. Bangladesh signed and ratified the CRPD in May and November 2007, respectively; South Korea signed and ratified the CRPD in March 2007 and December 2008, respectively; and Japan signed and ratified the CRPD in September 2007 and January 2014, respectively ⁴⁾. Japan first adopted the CRPD’s laws and acts related to it domestically; hence, there was a five to six-year delay between signing and ratifying the CRPD when compared to the other countries.

The CRPD promotes legal disability reforms that directly involve persons with disabilities based on a human-rights framework. Its core message is that persons with disabilities should not be considered “objects” to be managed, but “subjects” deserving of equal respect and enjoyment of human rights. States that ratify the CRPD have a range of general obligations. Among other things, they commit to (1) adopting legislation and other appropriate administrative measures where needed; (2) modifying or repealing laws, customs, or practices that discriminate directly or indirectly against persons with disabilities; (3) addressing disability in all relevant policies and programs; (4) refraining from any acts or practices inconsistent with the CRPD; and (5) taking all appropriate measures to eliminate discrimination against persons with disabilities by any individual, organization, or private enterprise. States must also consult with persons with disabilities and their representative organizations when developing laws, policies, and programs to implement the CRPD.

In addition, the CRPD requires public and private bodies to make reasonable accommodations for persons with disabilities. Further, the CRPD is accompanied by an optional protocol that, if ratified, provides a mechanism for complaints and inquiries, which can be lodged with the committee monitoring the treaty ⁴⁾⁶⁾ Article 33 identifies three mechanisms for this purpose at the national level. First, states must identify one or more focal points relating to the CRPD’s implementation. Second, they must consider establishing a mechanism to facilitate action at different levels. Third, they must develop a framework with one or more independent mechanisms to promote, protect, and monitor the CRPD’s implementation ⁶⁾.

As mentioned previously, Bangladesh and South Korea ratified the CRPD five to six years before Japan. Thus, the monitoring of Bangladesh and South Korea by the committee and its subsequent recommendation and consideration of those countries occurred much earlier than in Japan, where the monitoring process still has not been initiated. Upon completing its monitoring of South Korea in 2014, the committee strongly worried that the country boosted placement in special schools and classrooms⁷⁾.

This research compares the contributions of national special-education institutions/foundations to national development in three different countries through direct interviews with staff members at various institutions/foundations and by reviewing academic papers and websites. In particular, this paper focuses on each entity’s mission, history, function, organization, financial support, staffing, and prioritization of human rights as related to the CRPD. It attempts to determine the causes of differences that emerge in the research to identify new dimensions, and to understand the structure and management of national institutions following the CRPD’s ratification.

II. Methodology

This is a comparative-qualitative study. Data were collected through secondary sources and one-to-one, semi-structured interviews. The official websites and publications of the National Institute of Special Needs Education

(NISNE) in Japan, Korea National Institute for Special Education (KNISE), and National Foundation for Development of the Disabled Persons (NFDDP) in Bangladesh were consulted. In addition, staff members at these organizations were interviewed to gain insight regarding each institution’s respective functions and future plans. After this information was collected, the findings were put into table form and compared. Similarities and dissimilarities with respect to functions and initiatives were identified, as well as future implications for human-rights issues.

III. Results

3.1. Comparison of the Missions of the NISNE, KNISE, and NFDDP

Table 1 shows the respective missions of the three aforementioned organizations. In general, their missions focus on special needs education policy, research, teacher training, and the dissemination of information. However, there are several important differences between them. Unlike the KNISE and NFDDP, the NISNE does not address the protection of human rights. The KNISE was unique in that it promoted enhanced quality of life and the development of curricula and textbooks for vocational and higher/lifelong education. Likewise, the NFDDP was unique in its focus on preventive measures and promoting public awareness.

Table 1. Comparison of the Missions of the NISNE, KNISE, and NFDDP

NISNE ⁸⁾	KNISE ⁹⁾	NFDDP ¹⁰⁾
To develop an inclusive education system that meets the unique needs of children with disabilities by operating in a flexible and prompt manner to address national-policy issues and those faced by educational institutions based on changes surrounding special-needs education, both in Japan and overseas. In doing so, the NISNE collaborates with both the national and local government.	The KNISE aims to establish special-education policies, conduct research, provide training opportunities, disseminate information, develop curricula and textbooks, protect the human rights of students with disabilities, and assist in vocational, higher, and lifelong education for people with disabilities. The KNISE strives to improve special-education services in Korea, and by extension, the quality of life for people with disabilities.	The NFDDP takes steps to preserve the rights and dignity of citizens with disabilities in Bangladesh. It strives to identify the causes of disabilities, and to conduct and publish research concerning preventive measures in order to increase public awareness. In addition, it aims to establish research and training institutes for people with disabilities, and to provide them with appropriate assistance. Further, the NFDDP works to identify people with disabilities and to devise realistic and effective treatments. It also provides necessary help and encouragement to institutions, organizations, and committees engaged in developmental works for people with disabilities.

The role of administration differs between the three organizations. Whereas the NISNE and KNISE are overseen by the Japanese and Korean ministries of education, respectively, the NFDDP is overseen by the Bangladesh Ministry of Social Welfare. Hence, the NFDDP’s mission is greatly influenced by this organizational structure. It is worth noting that the CRPD recommends a shift away from welfare and medical-based models toward social models.

3.2. Comparison of the Histories of the NISNE, KNISE, and NFDDP

Table 2 shows the respective histories of the NISNE, KNISE, and NFDDP. The NISNE was established in 1971, and hence earlier than the KNISE or NFDDP; however, it did not undergo any significant system changes during its first 20 years. The KNISE was established in 1994 by the General Affairs, Planning and Research, and Teacher Training divisions, and therefore was not merely an offshoot of special education for individuals with disabilities. Its formation might have been influenced by the introduction of the Salamanca Statement and the Revised Korean Special Education Promotion Law in 1994, which followed a paradigm shift to a systems approach.

The NISNE seems to be struggling to move away from a classic paradigm and into a new one. This is particularly true when examined in light of the KNISE’s initiatives, such as the establishment of distance special-education broadcasting.

Further, in 1996 the KNISE began sending lectures to local educational boards and special schools, in addition to providing assessment and advice to children with disabilities through feedback communication with staff members. Likewise, in 2004 the KNISE launched the Training Center for Distance Education. Moreover, through the curriculum and textbook team, the South Korean Ministry of Education is responsible for editing and publishing textbooks for elementary and secondary education. The KNISE also publishes three different levels of textbooks across all subjects for children with developmental disorders.

Table 2. Comparison of the Histories of the NISNE , KNISE , and NFDDP

NISNE ⁸⁾	KNISE ⁹⁾	NFDDP ¹⁰⁾
<p>1971: Establishment of the NISNE. A general-affairs division, seven departments of education for nine disability categories, and an educational-engineering division were also created. An educational clinic was attached, as well as a department of in-service training for special-education teachers and the dissemination of information.</p> <p>2001: Commencement of the National Institute of Special Education as an independent administrative agency.</p> <p>2004: Reorganized to establish the Department of Policy and Planning, Department of Educational Support Research, Department of Teacher Training and Information, and Clinical Center for Children with Special Needs.</p> <p>2006: The Clinical Center for Children with Special needs was integrated into the Department of Counseling and Consultation for Persons with Special needs.</p> <p>2007: Changed name to the National Institute of Special Needs Education.</p> <p>2008: The Department of Educational Support Research was renamed the Department of Educational Support. The Information Center for the Education of Persons with Developmental Disabilities was established and the research unit system introduced.</p> <p>2011: Reorganized to establish the Department of Policy and Planning, Department of Educational Support, Department of Counseling and Consultation for Persons with Special Needs, Department of Teacher Training and Collaborative Projects, and the Department of Educational Information.</p> <p>2012: Department of Counseling and Consultation for Persons with Special Needs was integrated into the Department of Educational Support.</p> <p>2016: Reorganized to establish the Department of Policy and Planning, Department of Teacher Training, Department of Information and Support, and Center for Promoting Inclusive Education.</p>	<p>1994: Establishment of the KNISE.</p> <p>1996: Creation of general affairs, planning and research, and training divisions.</p> <p>1997: Commencement of distance special-education broadcasting.</p> <p>1998: Commencement of the Education Welfare Information Center for People with Disabilities.</p> <p>2004: Establishment of the Training Center for Distance Education, which is affiliated with the KNISE.</p> <p>2010: Completion of the Asan office.</p> <p>2013: Under regulation no. 187, the KNISE was reorganized into the following teams: Curriculum and Textbook Team, Human Rights Protection Team, Career/vocational Education Team, Higher/lifelong Education Team.</p> <p>2014: A "happy space" was opened (i.e., a space for leisure and cultural experiences).</p> <p>2016: The General Affairs Support Team was created.</p>	<p>The NFDDP is arguably the most innovative service oriented and rights-based program for the development of the persons with disabilities. It was established August 19, 1999 under the Ministry of Social Welfare.</p>

It is important for lectures in inclusive education to be text-dominant at the elementary and secondary levels. It is impossible for the NISNE to publish these textbooks, since Japan's Ministry of Education, Culture, Sports, Science, and Technology alone has the ability to approve textbooks published by private book companies. Meanwhile, the KNISE reorganized its human rights protection team in 2013, five years after the CRPD's ratification. Given that Japan ratified the CRPD in 2014, the NISNE ought to have a human rights protection team by 2019.

3.3. Comparison of Functions Between the NISNE, KNISE, and NFDDP

Table 3 shows the respective functions of the NISNE, KNISE, and NFDDP. Focusing on the structure of functions alone, it seems that the NISNE has the greatest burden with respect to developing inclusive education, as it lacks a mechanism to protect the human rights of students with disabilities. From a common sense standpoint, the

implementation of inclusive education is dependent on protecting the human rights of students with disabilities. To this end, the KNISE offers preparation for inclusive education through online in-service training courses. Unlike the other two organizations, the NFDDP provides a year-long B.S.Ed. course, special schools, a sports complex for persons with disabilities, and various cultural activities. However, the NISNE and KNISE have special neighbor schools for experimental initiatives. The NFDDP may need to take additional steps to develop a more well-rounded approach to special needs education when compared to other OECD members.

Table 3. Comparison of Functions Between the NISNE, KNISE, and NFDDP

NISNE ⁸⁾	KNISE ⁹⁾	NFDDP ¹⁰⁾
<p>1. Research activities To conduct studies that contribute to making and promoting national policies for special needs education and the dissemination of research results.</p> <p>2. Teacher training To provide teacher training to contribute to promoting the special needs education policies of each prefecture, in addition to the implementation of special needs education and support related to improving teachers' leadership and expertise.</p> <p>3. Collection and dissemination of information To promote a broad understanding among related parties and share information efficiently and effectively in cooperation with related organizations while enhancing information collection/ dissemination related to special needs education.</p> <p>4. Center for promoting an inclusive education system To establish a center that unifies inclusive education research resources at the NISNE in order to solve issues directly faced by prefectures and municipalities, as well as to pursue other efforts.</p>	<p>1. Research on special education according to social changes/needs and the development of curricula and textbooks This entails (a) a survey of special-education practices for special-education policymaking, (b) research concerning special education for the self-actualization of students with disabilities and social integration, (c) active research and its dissemination to enhance special education quality, (d) developing curricula and textbooks commensurate to the needs and abilities of students with disabilities, and (e) developing instructional techniques and teaching materials to improve the quality of instruction for students with disabilities.</p> <p>2. High quality in-service training in special education This encompasses (a) offering high-quality training programs that meet consumers' needs, (b) providing various special-education training opportunities, (c) offering training courses for inclusive education, and (d) providing online in-service training courses.</p> <p>3. Becoming an accessible special education information provider to reduce information gaps for people with disabilities This includes the establishment and management of information systems for education and research for people with disabilities, as well as the development of educational content and assistive devices based on disability type.</p> <p>4. Support for vocational training to expand employment opportunities for students with disabilities This entails (a) providing on-site training to improve the expertise of relevant personnel and to support educational practices; (b) research on course development and vocational training for people with disabilities, as well as data collection for policymaking; and (c) the development and commencement of vocational programs for students with disabilities based on cutting-edge technology.</p> <p>5. Educational welfare through lifelong education for adults with disabilities This encompasses (a) conducting research concerning the management of lifelong education institutions to promote independence and social integration, (b) developing lifelong education to reduce information gaps, (c) establishing networks and information-support systems, and (d) offering training programs and cooperating with relevant organizations.</p>	<p>1. Disability service center Under this program there are 113 centers covering all of Bangladesh's 64 districts (including an autism corner in each). Up to 20 million people with disabilities have received services from these centers free of cost.</p> <p>2. National Center for Special Education (NCSE) The NCSE aims to offer education to students with special needs and is under the NFDDP's supervision. It provides a training college for special-education teachers, hostel, and resource section.</p> <p>3. One-stop mobile therapy service The JPUF will use World Bank funds to procure 32 fully-equipped mobile vans in order to strengthen its disability outreach services.</p> <p>4. Training programs The NFDDP oversees the NCSE mentioned above, which offers a year-long B.S. Ed. course. In addition, the JPUF runs a special school for hearing-impaired children.</p> <p>5. Skill-improvement training</p> <p>6. Complex for people with disabilities To establish the rights of people with disabilities and ensure their inclusion in society, the government has devised a comprehensive plan to create a separate complex for individuals with disabilities at the NFDDP's campus in Mirpur, Dhaka.</p> <p>7. Sports complex for people with disabilities</p> <p>8. Cultural activities</p> <p>9. Hostel for both male and female individuals with disabilities who are employed</p> <p>10. The Proyash Special School has been allocated government funding through the NFDDP.</p>

The KNISE features a function to protect the human rights of students with disabilities. Article 8 of the CRPD concerns efforts to raise awareness, which entails fostering an attitude of respect for the rights of persons with disabilities at all levels of education. To this end, the KNISE provides instructional materials such as picture books to help even infants and young children understand disability, an approach that the NISNE and NFDDP should likewise adopt. Moreover, the KNISE has taken steps to create learning materials for career/vocational and higher/lifelong education. This is in line with Article 27 of the CRPD, which stipulates that states must recognize the right for persons with disabilities to work; by extension, this includes providing them with appropriate and equal training that will enable them to achieve this goal.

3.4. Organizational Structures of the NISNE, KNISE, and NFDDP

With respect to the CRPD, the KNISE includes a human-rights protection team in its division of training. It is important for Asian people to have this division of training, since the notion of human rights in the CRPD seems to be generalized from a Western perspective. The Western conceptualization of human rights aims to provide inherent and inalienable rights to all, regardless of their culture or tradition. Nevertheless, Eastern cultures restrict the application of human rights when they infringe on the cultures and traditions of their own people. Whereas Western culture focuses on individualism, wherein every person must earn a livelihood for themselves, Eastern culture focuses more on collectivism, wherein there are large, supportive families. Thus, the human-rights movement in Eastern countries largely focuses on ensuring the availability of employment and services for persons with disabilities.

Table 4 compares the organizational structures of the NISNE, KNISE, and NFDDP. As the employment of people with disabilities is a common concern in Eastern nations, the KNISE features teams for higher/lifelong education and career/vocational education in its Division of Information Support. The NFDDP emphasizes collective efforts toward addressing human-rights issues and channels its various services through public-private-partnerships. This is evident in the NFDDP’s interactions with different NGOs, parents, representatives, and government officials.

Table 4. Comparison of the Organizational Structures of the NISNE, KNISE, and NFDDP

NISNE ⁸⁾	KNISE ⁹⁾	NFDDP ¹⁰⁾
<p><u>Department of Policy and Planning</u> General planning and coordination Evaluation</p> <p><u>Department of Teacher Training</u> In-service teacher training Support for enhancing the qualifications of teachers</p> <p><u>Department of Information and Support</u> Information strategy Educational support and cooperation with schools</p> <p><u>Information Center for the Education of Persons with Developmental Disabilities</u> Information regarding the education of individuals with developmental disabilities</p> <p><u>Center for Promoting an Inclusive Education System</u> Collaborative research concerning practices in local communities Surveys, international research, and cooperation Providing information and support for counseling/consultation</p> <p><u>Department of Administration</u></p>	<p><u>Division of General Affairs</u> General Affairs Support Team</p> <p><u>Division of Planning and Research</u> Curriculum and Textbook Development Team</p> <p><u>Division of Training</u> Human Rights Protection Team</p> <p><u>Division of Information Support</u> Higher/lifelong Education Team Career/vocational Education Team</p>	<p><u>Social Welfare Minister</u></p> <p><u>Social Welfare Secretary</u></p> <p><u>Managing Director</u> Director of Administration and Finance Director of Planning and Development</p> <p>(In addition, there is a management team comprising 15 members, which mostly includes different NGOs, parents, representatives, and government officials).</p>

The structure of these three institutions is largely dictated by the national budgets in their respective countries. As a central theme in the CRPD is human rights, the KNISE has established a protection team for human rights under its division of training. The KNISE has also produced educational materials for human rights that target students from their earliest stages of development. For example, it published a picture book that addresses the human rights of persons with disabilities that teaches students about discrimination and how to prevent and guard against harassment. In contrast, in Japan the Cabinet Office, the Ministry of Health, Labor, and Welfare take on this role rather than the NISNE. Nevertheless, it is very easy for Japanese teachers to procure educational materials in this area. In general, the KNISE's organizational structure is superior to the NFDDP or NISNE's.

IV. Discussion

It should be stated that the aforementioned laws and acts are so-called pilot laws in South Korea, which assume the presence of ideal and predicable conditions; as such, they are not always compulsory. To understand why there is a difference between Japan and South Korea with respect to the CRPD's implementation, one must examine the history of special education in South Korea. The Special Education Promotion Law (SEPL) amended in 1977¹²⁾ prohibited students with disabilities from being discriminated against in school activities, which by extension includes entry to schools and participation in school entrance examinations. In 1994, the law was completely revised to emphasize the rights of parents and guardians, education for children with learning disabilities, establish a mechanism for appeals, and to promote integration, as well as vocational training and assistance in the school enrollment process¹¹⁾. In addition, criteria for assessment and the notification of parents were set. The school enrollment process is as follows. First, a parent will attempt to enroll his or her child in an ordinary classroom at the nearest regular school; if this is not ideal, the child will be enrolled in a special classroom at a regular school. If neither of these options proves optimal, the student will be enrolled in a special school.

The CRPD had some ramifications with respect to the SEPL. Whereas the SEPL focused on primary and secondary education, the CRPD included provisions for infants and adults. In addition, the SEPL did not address the responsibilities of local governments, and was therefore ineffective in practice. Moreover, even in classrooms, the implementation of physical integration, and by extension appropriate educational adjustment (i.e., functional integration), was rare.

The National Solidarity League for the Educational Rights of Students with Disabilities was organized in 2003¹³⁾ which aimed to repeal the SEPL in order to address the aforementioned issues. The league lobbied, prepared a draft law, and picketed in front of the parliament. Following these efforts, the Special Education Law for Persons with Disabilities and Those with Special needs was adopted in 2007¹⁴⁾¹⁵⁾. In March of that same year, the Prohibition of Discrimination and Human Rights Relief for Persons with Disabilities was adopted, which appointed the National Committee of Human Rights to monitor its enforcement. It used the term "justifiable accord" as "reasonable accommodation" in the CRPD. When compared to the NISNE or NFDDP, the KNISE differs most significantly in its approach to the human rights of persons with disabilities owing to its human rights protection team, which develops systematic teaching strategies for students with disabilities to ensure their rights, and conducts research to increase awareness among teachers and the general public.

With respect to human-rights arrangement, which only the KNISE is familiar with, we provide the following suggested outline based on the CRPD.

- * Initiatives for the human rights of students with disabilities
 - A) Research and content development
 1. Conduct research concerning ways to create climates in schools that are human-rights friendly
 2. Develop multimedia content that encourages self-protection capabilities among students with disabilities that can be easily understood (e.g., picture books)

- * On-site support
 - A) Workshops for human-rights violation monitoring team managers
 - B) Training for human-rights violation monitoring team counselors

- C) Assuring the performance of human-rights violation monitoring teams
- D) Collecting and analyzing data through field research by the human-rights violation monitoring teams
- E) Supporting revisions to the human-rights violation monitoring teams' operations manuals
- F) Monitoring the progress of protecting students with disabilities from human-rights violations
- G) Developing a project to raise awareness of disability and promote inclusive education

* Initiatives for creating curricula and textbooks for students with disabilities

- A) Preliminary research concerning special-education curricula and textbooks
 1. Lexical and discourse analysis of issued special-education textbooks
 2. Development of alternative assessment plans in all subjects based on a given student's disability
 3. Research to determine which available materials best meet the learning needs of students with disabilities
- B) Development of teaching and learning materials
 1. Develop government-issued textbooks for students with disabilities based on the new special-education curriculum
 2. Develop supplemental textbooks for students with hearing impairments
 3. Develop supplemental textbooks for students with severe and multiple disabilities
 4. Develop teaching and learning materials for inclusive education

Owing to political differences between South Korea and Japan, the KNISE has its own curriculum and textbook development team. This team focuses on (a) implementing a national-level special-education curriculum, and (b) enhancing the quality of special education and access to general education curricula through research concerning the development, implementation, and application of curricula. In addition, the team aims to ensure equal access to education for students with disabilities, and to promote inclusive education by developing materials for this purpose.

The Japanese Ministry of Education, Culture, Sports, Science, and Technology only provides Japanese language, mathematics, and music textbooks to students with intellectual disabilities. In textbook-dominant lectures, modified textbooks are needed that address the same content as ordinary textbooks, thereby providing reasonable accommodations to students with intellectual disabilities. The NISNE disseminates research results by publishing leaflets and guidebooks; however, it does not directly commit to developing or issuing textbooks, as this is overseen by the Ministry of Education, Culture, Sports, Science, and Technology or private companies.

Moreover, the NISNE pays seemingly less attention to higher and lifelong education. In contrast, the KNISE includes a team dedicated to this purpose, which conducts research to increase employment rates and educational opportunities for students with disabilities. As its name implies, the higher and lifelong education team supervises research concerning lifelong education among adults with disabilities, provides effective programs and support for them, and encourages cooperation between relevant organizations.

V. Conclusion

With respect to implementing missions, policies, and practices following the CRPD's ratification, we identified two different approaches to management. These approaches were compared between Bangladesh, Japan, and South Korea. Unlike Japan and South Korea, Bangladesh does not have a specific entity dedicated to special needs education, but an original approach based on the country's unique cultural and educational characteristics.

落合俊郎¹⁶⁾ examined international trends in special-needs education and identified three paradigm shifts. Among those three shifts was a movement away from a remedial educational approach to a special-needs educational approach and systems approach. It appears that the NISNE is retaining a special-needs educational approach, whereas the KNISE is adopting a systems approach following the CRPD's ratification. It can be argued that the NISNE should likewise adopt a systems approach. Indeed, if Japan is sincere about implementing the CRPD's suggested policies and practices it must adopt the KNISE's approach. The 1994 Korea Special Education Promotion Law had clear provisions for the development of special-needs education in South Korea that were mentioned in the CRPD (e.g., promoting anti-discriminatory attitudes, parents' rights, integration, rights to appeal). Thus, we must recognize that such provisions facilitate rather than obstruct the development of special-needs education.

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