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The special education profession in four Nordic countries in light of evolving policies on inclusion and special needs education

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ABSTRACT

The purpose of this study was to explore the role of special education professionals in Denmark, Finland, Norway, and Sweden in light of educational policies and reforms. The study places emphasis on (a) the policy context of inclusion and special needs education, (b) the formal qualifications required of special education professionals, and (c) the position of these professionals in compulsory education. Our approach involved a comparative analysis of how legislation and policies interact with the field of special education as a 'professional jurisdiction' in each of the four countries. We find that the major thrust of reforms has been aimed at reducing the number of students who receive special needs education and their placement in segregated settings. The introduction of early intervention, multi-tiered systems of support, and collaborative approaches are seen as means of reaching this goal. In addition, findings reveal that the special education profession is weaker in Denmark and Norway compared to Sweden and Finland. We argue that a lack of a consensus regarding the role and qualifications of special education professionals creates problems for schools and limits the availability of diverse forms of expertise which are necessary for inclusion.

KEYWORDS

Inclusion; special education profession; professional jurisdictions; Nordic education policy

Introduction

The field of special education emerged as an attempt to offer an alternative educational pathway to children with special educational needs (SEN), initially emphasising the identification of learning difficulties and specialised instruction, primarily in segregated settings. However, in recent years, there has been a notable shift towards more inclusive approaches (Cameron et al. 2018; Florian 2019; Sundqvist 2021). This shift has been driven by international agreements, such as the Salamanca Declaration

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(1994) and the Convention on the Rights of Persons with Disabilities (2006), which advocate for inclusive educational systems that provide equal opportunities for all students, regardless of their abilities. At the same time, globalisation, rapid technological and social changes, and increasing diversity among students have placed increasing pressure on teachers and schools (Kaczorowski et al. 2023). To address these issues, reforms have been undertaken in teacher education, national systems of assessment, privatisation of schools, and the introduction of multi-tiered systems of intervention (Ainscow 2020; OECD 2010). Logically, such reforms have also influenced the education of pupils with SEN, as well as those who are responsible for providing that support.

Several comparative studies have investigated aspects of special needs education and the role of special education professionals in the Nordic countries. Studies have highlighted differences and similarities with respect to the intensity of support provided (Sundqvist and Hannås 2020), resource allocation (Cameron and Lindqvist 2014), teacher and special educator preparation (Hausstätter and Takala 2008; Sundqvist and Hannås 2020), and the everyday work of special educators (Jortveit et al. 2020). For instance, Hausstätter and Takala (2008) analysed special education professionals' formal education in Finland and Norway, describing a highly structured system in Finland, contrasted with a patchwork of programmes in Norway. Noting the status special educators in Norway and Sweden often hold, Cameron and Lindqvist (2014) found that these professionals were highly influential over resource allocation compared to other stakeholders. While these studies illuminate the relevance and work of special education professionals, there is a dearth of comparative research that considers the occupation across multiple Nordic countries in relation to recent educational reforms.

Comparative research can provide insights into the consequences of such reforms and offer a better understanding of the circumstances and conditions in which we live (Phillips and Schweisfurth 2014). Moreover, through systematic cross-border analyses, comparative studies offer a means of increasing our understanding of how different approaches may impact the quality of educational systems. In the context of Nordic cooperation, this approach can also facilitate the establishment of connections that can lead to coordinated efforts to improve both practices and policies for students with SEN and their peers.

Given this background, the purpose of this study was to explore the role of special education professionals in Denmark, Finland, Norway, and Sweden in light of recent educational policies and reforms. The study places emphasis on the following three areas: (a) the policy context of inclusion and special needs education, (b) the formal qualifications required of special education professionals, and (c) the position of these professionals in compulsory education across the four countries.

Inclusion and the system of professions

As a point of departure, we look to Abbott's (1988) theory on the division of expert labour and Evetts' (Evetts 2011, 2013) description of the contextualisation of professionalism. Abbott (1988) argues against describing professions as exclusive occupational groups with special skills, which develop irrespective of other professions and outside pressures. Instead, professions are seen as interdependent alliances with common work. While some occupations have developed out of an expressed need, others are dependent on the

sanctions and approval of the state (Evetts 2013). Inclusion is a political goal that has arguably challenged 'traditional' approaches to special needs education and the state has played a role in both establishing and steering the professions that are responsible for delivering support to students with SEN and 'making inclusion happen'.

A challenge, however, is that the concept of inclusion is complex and defined in different ways in both literature and policy (Kiuppis 2014). In addition, there are tensions in the relationship between students with SEN (i.e. students with difficulties calling for support), special needs education (i.e. support provided to students with difficulties) and inclusive education. Nonetheless, an element that recurs in most definitions of inclusion is the assumption that students with SEN should receive their education together with other students of the same age (Göransson and Nilholm 2014; Haug 2017; UNESCO 1994). Broader perspectives on inclusion, on the other hand, focus on ideological goals, such as acceptance of diversity, a sense of belonging and community, equality, in addition to the goal of improving social and academic outcomes for all students (Ainscow 2020; Hansen et al. 2020; Nilholm and Göransson 2017; Slee 2011). This broad definition of inclusion challenges the traditional position of special education professionals, who have tended to focus their work specifically on pupils with learning difficulties.

Depending on the author, special education can be seen as either a means to achieve greater inclusion (e.g. Florian 2019; Haug 2017) or as a detriment to it (e.g. Tomlinson 2012). This is also dependent on what is meant by special education as a scientific field or profession, versus special needs education, as a legal right or approach to education for an identified group. In the current study, we use the terms 'special education' (SE) and 'special needs education' interchangeably, to be consistent with the way these terms are used in the English language literature of the countries included in this study. While it is a difficult concept to define, there is broad agreement that the goal of special needs education is to ensure that students identified as having SEN, for a wide variety of reasons, receive additional support through adaptive pedagogical methods that allow them to participate in school and the wider community, while encouraging both academic and social progress (UOE 2016).

Methods

Our methodological approach drew on diverse traditions of inquiry, including concept mapping (e.g. De Ries et al. 2022), scoping review methods (Arksey and O'Malley 2005) and comparative research. We broadly followed the five-stage framework proposed by Arksey and O'Malley (2005): (1) identify the research questions; (2) identify relevant documents; (3) select documents; (4) chart the data; and (5) summarise and report the results. Analytically, the approach moved from conceptualisation to contextualisation (i.e. broad ideas to descriptions of local contexts), to isolation of differences via comparative analysis, and ultimately to explanation and hypothesis formation (Phillips and Schweisfurth 2014). The material that forms the basis of the study comprises laws, policies, and national statistics focusing on the legal definitions and rights of pupils with SEN in the four countries. For the purpose of clarity, we limited the review of policies to approximately the last two decades. In addition, we examined the qualification requirements for special education professionals in each country and relevant local research on this topic. Theisen and Adams (1990) suggest that comparative educational research can be

Table 1. Descriptions of special needs education in major education law within the four countries.

Denmark	'Students who need support for less than nine teaching hours per week must have support within general education. In teaching, differentiation, group formation, two-teacher arrangements and teaching assistants can be used, among other approaches, which can benefit both the individual student and the class as a whole' (2014).
Finland	'Special support consists of special needs education and other support provided under this Act. Special needs education is provided, allowing for the pupil's interests and the facilities for providing the education, in conjunction with other instruction or partly or totally in a special classroom or some other appropriate facility' (2010, §17).
Norway	'Pupils have the right to individually adapted education if it is necessary for them to obtain satisfactory outcomes from their education' (Education Act 2023, §11-6). Pupils have the right to personal assistance or technical aides and/or physical accommodations if they are needed 'to participate in education and achieve satisfactory outcomes' (Education Act 2023, §11-4 & §11-5).
Sweden	'If an assessment shows that a student is in need of special support, he or she must be given such support' (Education Act 2010, 800, §3-7). 'Special support may be provided instead of the regular education in which the pupil should have participated or as a complement to it. Special support should be given within the group where the pupil belongs unless otherwise provided by this Act or other statutes' (Education Act 2010, 800, §3-8).

categorised in relation to the aims of a given study (e.g. analysis, description, evaluation). The current study can be considered descriptive and analytical, rather than evaluative in nature. That is, we do not attempt to determine if one educational system is 'superior' to another. Rather, we describe the situation in each country and analyse the relationship between the special education profession and inclusive education through the lens of our theoretical perspectives, while considering cultural contexts and socio-political priorities shaping educational policy decisions. The major laws, databases, and policy documents that were central to our analysis are indicated with an asterisk (*) in the reference list.

Findings

Although the study places emphasis on three main topics (i.e. policy, special educator qualifications, and the position of special education professionals), it is clear that the latter two are closely intertwined. Thus, we have chosen to divide the findings into two main parts. First, we present relevant policies, statistics, and legislation from each country. Second, we describe the 'special education profession' in each country, in regard to both the educational qualifications and the role of these professionals in compulsory education. Definitions of special needs education in the laws of each country are provided in Table 1, while the percentage of pupils receiving different types of support are shown in Table 2. The major work responsibilities and educational background of special education professionals is summarised in Table 3. Each section is followed by a brief synthesis and comparison of the countries. We then take up a broader discussion about the major trends across the countries with respect to inclusion and the special education profession.

Special education policies

Denmark: policy

Over the last two decades, changes in Danish policy have sought to reduce the number of students given a clinical diagnosis and placed in special schools or special classes (Hedegaard-Soerensen, Jensen, and Tofteng 2018). Major educational reforms and policy

Table 2. Key terms and percent of students receiving each type of support by country.

Country	% of All Compulsory School Students	Key Terms for Types of Support
Denmark	2.1% = special schools 3% = segregated classes 18.4% = part-time support	- full-time support in special schools - full-time support in special classes - part-time special education support in regular classes
Finland	13.9% = intensified support 9.7% = special support 23.5% = part-time special education ¹ 3.3% = full-time special education (special classes and schools)	- intensified support - special support - part-time special education - full-time special education
Norway	intensive instruction = no data 8.1% = special teaching ² 1% = special classes and schools	- intensive instruction in grades 1-4 - individually adapted education - personal assistance - physical accommodation & technical aids
Sweden	extra adaptations = no data 6.2% = special support 1.4% = special schools	- extra adaptations - special support

¹Part-time special education in Finland is a 'low-threshold' form of support parallel to the tiered-system. ²Special teaching is the term used in Norway prior to the 2023 Education Act. *Sources.* ISB 2023, Andreasen, Rangvid Schindler, and Høygaard Lindeberg (2022) Statistics Finland (2023), NDET (2023), Skolverket (2024).

papers place inclusion at the forefront in schools (Education Act 2024; BEK nr. 693) and try to solve this goal through different kinds of support and differentiation (see Table 1). While many municipalities offer a 'ladder of support' similar to multi-tiered systems of support (MTSS), these approaches vary greatly depending on the individual municipality (Molbæk 2023). To date, there are no national regulations or guidelines on the use of a MTSS in Denmark.

In 2013, the Danish government agreed with the National Association of Municipalities on a goal that 96% of students should attend regular schools. Municipalities have applied different means to achieve this target. Approximately half of Danish municipalities have chosen an 'inclusion-promoting steering model' where regular schools are required to pay 'segregation charges' for every student that they do not accommodate (Tegtmejer and Jørgensen 2022, 4). The model is intended to promote inclusion, but it also places school leaders in a dilemma. On one hand, leaders want to retain students and funding at their school, while on the other hand, they may not have the necessary competence to support students with SEN (Tegtmejer and Jørgensen 2022). The goal of reducing the percentage of students in segregated settings from 5.6% in 2010 to 4% by 2015, has yet to be achieved (see Table 2). In fact, more students today attend special schools and classes than before these reforms were introduced and today, we see a significant increase in the total share of students who receive support. We also see an increase in the proportion of students who are provided the highest number of hours of support per week (Andreasen, Rangvid Schindler, and Høygaard Lindeberg 2022).

Finland: policy

Although inclusion is mentioned in the Finnish curriculum (FNAE 2014), the concept is not defined, and segregated solutions are prevalent. As a result of increases in the number of students in special needs education and a desire to make schools more inclusive, the educational system underwent reforms in 2010. Since the reform, support has been organised according to a three-tiered model, comprising (a) general support (yleinen

tuki), (b) intensified support (tehostettu tuki), and (c) special support (erityinen tuki) (2010; FNAE 2014).

While every student has the right to receive general support (tier 1) in everyday teaching, intensified support is given to students who need short-term, concentrated instruction. In the third tier (special support), pupils receive their education according to an individualised education plan (IEP), either in a special class/school or in a regular class. If the student is placed in a regular class, they are often provided special needs education outside the classroom; although other approaches, such as co-teaching, are sometimes used (Sundqvist, Björk-Åman, and Ströme 2019). In 2022, approximately one-third of pupils in grades 1–9 who received special support, were in full-time special classes (Statistics Finland 2023). The proportion of students receiving the second and third tier of support have increased since the start of the reform (Statistics Finland 2023). The percentage of students placed in different settings are shown in Table 2.

Norway: policy

In Norway, efforts towards inclusive education are tied to the concept of adapted education (tilpasset opplæring), which requires that schools adapt approaches and the learning environment to meet the needs of all students. In 2023, the Norwegian Education Act was revised, and the term ‘special teaching’ (spesialundervisning) was replaced with ‘individually adapted education’ (IAE) which is provided to students ‘when necessary to receive a satisfactory benefit of education’ (Education Act 2023, §11-6). As with the previous version of the law, this form of support comprises a legal, individual right based on a formal eligibility decision. As indicated in Table 2, approximately 8% of pupils received ‘special teaching’, a percentage that has remained relatively stable over the past decade (NDET 2023). In addition to IAE, the new law provides access to ‘physical accommodation and technical aids’, and ‘personal assistance’, which can be provided without an expert assessment.

Although it is not explicitly described as a tiered system, elements of this model are evident. First, adapted education remains an expectation for all students. Second, since 2018, schools have been required to provide intensive instruction to students in grades 1–4 who are deemed at risk of falling behind in reading, writing or arithmetic (Education Act 2023, §11-3). Intensive instruction may be given in small groups or individually for short periods. Adapted education and intensive instruction are conceptually similar to tier 1 and tier 2 in a three-tier model, while IAE can be said to represent the third tier. The Education Act only briefly refers to the concept of inclusion with respect to ensuring a safe learning environment, yet the concept is not defined.

Sweden: policy

In Sweden, students who are at risk of not reaching academic requirements or who are otherwise in need of support, are entitled to that support (SFS 2011, 800). The law allows for special education to be provided one-to-one or in groups, either within the regular classroom or in segregated settings. According to a recent report (Skolinspektionen 2023), 1.3% of primary school students were partly or entirely educated in special classes in the 2022–23 academic year. This percentage increases for each grade and is highest in grade 9 (3.1%). In addition, national statistics show that the percentage of primary school students who attend special schools has increased in the last five years from 1% to

about 1.4% (Skolverket 2024). Since 2014, two types of support are formulated in the Education Act: (a) extra adaptations (extra anpassningar), preferably provided by teachers (rather than assistants) to students in need of accommodation within regular settings, and (b) special support (särskilt stöd), provided by regular teachers or other staff to pupils with an IEP, either within or outside of regular settings. It is required that students first receive extra adaptations prior to receiving special support (SFS 2010:800, §3-7). Since the introduction of the new wording on extra adaptations in 2014, the percentage of pupils with IEPs has decreased from around 15% prior to 2014 to 6.2% in the 2023–24 academic year. Despite emphasis within the statutes that pupils should be taught in their regular classrooms, inclusion is not mentioned in the major educational policies.

Synthesis of special education policies

All four countries have seen reforms in the last two decades aimed at reducing special needs education and the segregation of pupils with SEN. However, there appears to be an absence of clear policies indicating how inclusion should be interpreted or operationalised other than with respect to location (e.g. special vs. regular school). While the terms used to describe special needs education are more concrete, they are still widely open for interpretation (see Tables 1 & 2). Although the Nordic countries share ambitions about inclusion, they also recognise a need for ‘extra’ resources or protections for students with SEN. In addition, all four countries have education laws that ensure the provision of special needs education based on support-need, as opposed to diagnosis of disability; and all four countries retain the use of segregated settings to some degree. This indicates a tension between the narrow perspectives on inclusion in the policy documents (Ainscow 2020; Haug 2017).

Each country has also introduced elements of MTSS within the last 2 decades, albeit with varying degrees of formalisation. At tier 1, national policies emphasise accommodations in general education (e.g. adapted education in Norway and Denmark), forms of tier 2 interventions are also evident (e.g. intensified support in Finland; extra adaptations in Sweden; two teacher arrangements and teaching assistants in Denmark), and more comprehensive forms of special education continue to be widely used (tier 3). Finland was the first of the Nordic countries to adopt this approach in 2010, where it is now well established. While Norway legally mandated a form of early intervention for grades 1–4 in 2018, the Danish ‘ladder of support’ is neither widespread nor anchored in legislation.

Special education professions

Denmark: professions

There is no clear, formal education for preparing professionals to work specifically with SEN students in Denmark, although an elective course in special education (35 ECTS) is offered in teacher education. In early childhood and social education, it is possible to specialise in either (a) social and special pedagogy or (b) school and leisure education. In addition, further education is possible through a master’s degree in special and social pedagogy (60 ECTS). Hence, there are two main groups who work with special needs education: teachers and social educators (pædagoger); either in special schools and classes, or in general education classrooms. Special education professionals’ qualifications and work responsibilities are summarised in Table 3.

Table 3. Overview of the primary school-based ‘special education professions’ found in the four countries, their major work responsibilities, and educational background.

Country & terms	Workplace & responsibilities	Protected title ¹	Educational background	Educational guidelines or curricular requirements for the professional preparation
<i>Denmark</i>				
Special educators ²	Work with SEN or advise others in ordinary and special schools.	No	Teacher education or social education	No standard curricula or guidelines. Teacher education or social education is required to teach/co-teach in schools. However, exceptions are sometimes made.
<i>Finland</i>				
Special teachers	Work with SEN within part-time special education mainly in ordinary schools (across 3 tiers)	Yes	Master of special education or related master's with min. 60 ECTS in special education	Goals of the profession are described in the Core Curriculum for Basic Education (2014). Universities decide the content of studies (300 ECTS), yet this is highly regulated by the Decree on Qualifications Required for Teaching Staff (1998). For special class teachers a qualification as class teacher is required.
Special class teachers	Work with SEN in ordinary and special schools. Required education to teach students in special classes/schools.	Yes	Teacher education. Master's degree and 60 ECTS in special education	
<i>Norway</i>				
Special education coordinators	Responsible for coordinating and providing special education in schools and advising teachers/assistants.	No	No formal requirements. Often master's degree and teacher education. Specialization in 5-year teacher education (new).	No standard curricula or guidelines. Regulations for teacher education dictate the number of credits in special education students must take for specialisation (90 ECTS), but do not address content.
Special educators	Work in schools, special schools/classes, preschools, or other settings. Provide special support or advise others (e.g. assistants).	No	No formal requirements. May have bachelor's or master's degrees in pedagogy or teacher education.	No standard curricula or guidelines. To teach in schools, one is required to have completed teacher education, however, exceptions are sometimes made.
<i>Sweden</i>				
Special educational needs coordinator (SENCOs)	Work with SEN and organising, coordinating services, teacher & parent consultation, and documentation. All levels of schooling, including preschool.	Yes	Teacher education and 3 years of work experience. 90 credits advanced level.	The education is regulated by the degree ordinance SFS (2017):1111 About 10 universities have the right to educate SENCOs with permission from the Swedish Higher Education Authority.

(Continued)

Table 3. (Continued).

Country & terms	Workplace & responsibilities	Protected title ¹	Educational background	Educational guidelines or curricular requirements for the professional preparation
Special education teachers	Largely the same as SENCOs, but with greater focus on teaching and school subjects (primarily Swedish or maths). Close cooperation with teachers.	Yes	Teacher education and 3 years of work experience. 90 credits advanced level.	Same as SENCOs.

¹*Protected title* refers to whether there is a formal education requirement to hold the position. In Norway and Denmark, a large number of graduates of special education programs work as counsellors in the Educational-psychological services, which are not included here. ²‘Special educator’ is one of many terms used for the occupation in Denmark.

Social educators, whose primary task is to collaborate with regular teachers to develop inclusive environments, also work with teachers and students in special schools. In addition, some teachers and social educators have specific responsibilities regarding developing inclusive environments within regular schools (Hansen, Jensen, and Molbæk 2022). Traditionally, collaboration between teachers in general education and teachers in special schools has been limited. However, municipalities have recently introduced more flexible organisational approaches, called ‘intermediary forms’ (mellemformer) consisting of special education within regular classrooms, as an approach to inclusion (Tegtmejer, Schoop, and Andreasen 2024). There are also increasing examples of municipalities using programmes, such as adapted instruction (undervisningsdifferentiering), co-teaching, and reduced class size (Tegtmejer, Schoop, and Andreasen 2024).

Finland: professions

In Finland, the special education profession is divided into two groups: (a) special class teachers, who teach students in full-time special education and (b) special education teachers who primarily provide part-time special education to students in general education in relation to specific subjects (Sundqvist, Björk-Åman, and Ströme 2019). Both groups of professionals must obtain a master’s degree, either through attending a master’s programme in special education or by first becoming a class or subject teacher, after which a one-year (60 ECTS) postgraduate programme in special education is required. The core of special education teacher education focuses on learning difficulties, behavioural and emotional difficulties, and other disabling conditions. However, over the last decade, focus on collaboration and inclusive teaching methods has expanded (Takala et al. 2020).

Special education teachers in Finnish schools play a central role in identifying pupils in need of different tiers of support, and in planning and carrying out the education of these students. They are expected to advise and collaborate with general education teachers (Paloniemi et al. 2021) and hold considerable autonomy in delivering part-time special education (Björn et al. 2016). According to the core curriculum for basic education (FNAE 2014), part-time special education can be delivered via co-teaching, small-group, or one-to-one instruction. Although the use of co-teaching is on the rise in Finland, most special

education teachers spend most of their teaching time working directly with students with SEN (Takala et al. 2020).

Norway: professions

In Norway, the special education profession is loosely defined, and little has been done on the political front to clarify this role. Prior to the 1990s, there existed a formal special teacher qualification, which grew out of the need for teachers in special schools and 'helping classes'. The qualification was eliminated in the 1990s, and shortly thereafter the first bachelor's and master's programmes in special education emerged. Thus, teacher education was no longer required to obtain a degree in special education. However, the result of this development was that many graduates with degrees from these non-professional programmes are not qualified to work as teachers in schools. While special education is available as an elective course (30 ECTS) in Norwegian teacher education, graduating teachers report that they are not sufficiently prepared to support students with SEN (Antonsen et al. 2020). In response, special education (75–90 ECTS) was introduced in the new five-year teacher education programme as one of a handful of emphasis areas in 2018.

Special needs education in Norway has been criticised because students with SEN are often taught by assistants without training (Kolnes, Øverland, and Midthassel 2020). To address this issue, the new Education Act (2023, §11-9) states that school staff who are responsible for IAE must be qualified teachers and have relevant (i.e. formal) competence in the subject being taught. Exceptions can be made to this rule if support from other professionals can provide a 'better education' (§11-9). Such exceptions can only be made for persons with at least a bachelor's degree, who are particularly suited to meet the needs of the student. This may mean that graduates of non-professional, discipline programmes in special education will be more involved in providing IAE in the future.

Sweden: professions

According to the Swedish Education Act (SFS 2011, 800), general education teachers are responsible for educating all pupils, and segregated solutions should be avoided. In addition to general education teachers, there are two occupational groups in Sweden that work with SEN, (a) special educational needs coordinators (SENCOs) and (b) special education teachers (SETs). In many respects, the work and education of SENCOs and SETs are similar. Degree ordinances (SFS 2011: 688, SFS 2017, 1111) state that the education of SENCOs and SETs should lead towards skills to work with students in need of special support and development work with the goal of meeting the needs of all students (e.g. assisting teachers, documentation, and designing/evaluating interventions). While SETs are educated to work in compulsory schools and individual-oriented learning goals are highlighted in their education, the education of SENCOs focuses on both preschools and compulsory schools and emphasises the learning environment. Both SENCOs and SETs often take on leadership roles and support teachers at regular schools (Göransson, Lindqvist, and Nilholm 2015).

Between 1962 and 1989, special teachers were educated to work mostly with pupils outside the classroom (Bladini 1990). However, in the early 1990s, education for special teachers was discontinued and the SENCO route was introduced. Since that time, a degree

in teacher education and three years of experience have been required to enter these programmes at universities (90 ECTS). In 2008, the Swedish government reintroduced educational programmes for SETs. It should be noted, however, that there are some differences between the work tasks of previous special teachers and SETs educated after 2008 (SFS 2011, 688; SFS 2017, 1111).

Synthesis of the countries' professions

While Sweden and Finland have clear qualification requirements for special education professionals working in schools, Norway and Denmark have no such standards. In Norway, special education is often seen as a body of knowledge, which should be made accessible to teachers and others (Cameron et al. 2018). This is similar to the Danish picture, where elective courses in special education are available in teacher education, however, many teachers and assistants who provide this type of support have little or no preparation in the field (Antonsen et al. 2020). These differences appear to reflect the different approaches the countries have taken towards achieving inclusion, while not relinquishing access to special needs education.

Overall, the special education professions have seen several changes across these countries in recent decades. Compared to Denmark and Norway, the position of the special education profession in Finland and Sweden has remained relatively strong. That being said, the re-emergence of special teachers in Sweden in 2008 foreshadows the recent 'reintroduction' of special education as an emphasis area in teacher education in Norway.

There have also been changes in what types of knowledge and skills are deemed necessary for special education professionals. In Finland, growing emphasis on inclusion has led to increased efforts towards collaboration between special teachers and general educators, which has led to new ways of working, such as consultation and co-teaching (Sundqvist 2021). The same movement can be seen in Denmark, where co-teaching is often organised between teachers and social educators (Hansen et al. 2020). Nevertheless, the responsibility of developing inclusive environments is still largely seen as the primary task of special education professionals in all four countries. This independence creates clear challenges, as professional work requires a high degree of interdependence and affiliation with other professionals when goals (e.g. inclusive education) traverse professional boundaries (Abbott 1988; Evetts 2011, 2013).

Discussion

The purpose of this study was to explore the role of special education professionals in Denmark, Finland, Norway, and Sweden in light of recent educational policies and reforms. We have reviewed central policies with respect to special needs education and inclusion, the formal qualifications required of special education professionals, and the position of these professionals in compulsory education. It is clear, that all four countries hold high aspirations for inclusion, at least at the policy level, yet apply different approaches towards this goal. Moreover, with respect to legislation, there remains a lack of clarity as to how the concept of inclusion is interpreted in each country, if it is mentioned at all, beyond the placement of students in general education classrooms.

Our findings indicate that the major thrust of policy changes over the last two decades has been aimed at reducing the number of students with SEN and their placement in segregated settings. The introduction of MTSS is seen as a means of achieving this objective. Denmark is somewhat unique in this regard, where MTSS has yet to be legislatively instituted. Also in Norway, it is not as clearly defined or formalised as it is in Finland and Sweden. Despite these differences, all four countries share a tendency towards policies aimed at inclusion through government regulation and goal-steering.

Arguably, the adoption of MTSS could be expected in the Nordic countries, given that they have long emphasised educational equity and ensuring that all students have access to quality education (Blossing, Imsen, and Moos 2014). MTSS is aimed at addressing disparities by providing early, targeted, evidence-based support to students according to their individual needs (Björn et al. 2016; Paloniemi et al. 2021). Thus, its 'journey' from country to country may be justified. However, one cannot discount the risks of this apparent 'policy borrowing', including misalignment with local cultural, economic strains, ineffective implementation, and other unintended negative consequences (Phillips and Schweisfurth 2014). In this context, it is worth noting that the percentage of students in special schools has increased in Sweden and Denmark in recent years (ISB (2023); Skolverket 2024), the same is true of the percentage of SEN students in Norway that have their 'primary affiliation' in special classes (NDET 2023). Similarly, Finland has seen a rise in the percentage of pupils receiving special support since the three-tiered system was introduced (Statistics Finland 2023). Yet, it is far from clear whether the cause of these changes is tied to the introduction of MTSS or other reform initiatives.

Abbott (1988) points out that professions evolve over time and across cultures and contexts. Naturally, the relevance and standing of the special education profession varies between different countries, embodying political, social, and historical dimensions. Even so, researchers around the world have noted that the legitimacy of special education has been challenged by educational policies and reforms emphasising inclusion (e.g. Slee 2011; Tomlinson 2012). Findings from this study indicate that the 'jurisdictional claims' (Abbott 1988, 59) of special education professionals are weaker in Denmark and Norway compared to Finland and Sweden. We posit that this can be attributed to a long-standing reasoning among policy makers in Norway and Denmark that the use of special needs education and the professionalisation of special education is counterproductive to inclusion. In part, this is reflected in efforts to dismantle special needs education on a policy level, for example, by mandating that schools 'include' (i.e. use integrated placements) students in Denmark, or by advocating for adapted education as an alternative to special needs education in Norway.

Governmental interventions can mould professions to align with state agendas both by mandating their work and defining their authority (Evetts 2011). One way this is done is through regulating and funding the educational qualifications that professionals are required to obtain (Abbott 1988). In contrast to Finland and Sweden, Denmark and Norway have no formal requirements or standards for holding the position of 'special educator' (Table 3). Although teachers in these countries can take courses and even degrees in special education, by and large they have no clear legal mandate to work in schools and provide special needs education. In contrast, despite political efforts to promote inclusion, Finland and Sweden have retained, and even expanded, formal qualifications for special education professionals.

Tensions between professional interests and power structures often manifest in the creation of new professions (Abbott 1988; Evetts 2011). These tensions may explain a degree of 're-professionalising' in the field over the years. Indications of this can be seen in Sweden, with the re-introduction of special education teachers in 2008, as well as the recent teacher education reform in Norway. In the case of Norway, although limited in scope and depth, teacher education students have, for the first time in decades, been offered the possibility of a government-sanctioned master's degree specialisation in the area of special education.

We argue that the absence of formally authorised special education professionals in schools is problematic as it raises questions about the possibilities for students with SEN to obtain adequate support. Indeed, expectations and requirements regarding the competence of those involved in supporting pupils with SEN can be considered a question of equity. Evetts (2013) notes that professionals are tasked with accessing and managing risk, which allows the people they support to deal with uncertainty, and that this is made possible through the use of expert knowledge and experience. Nordic research also suggests that the absence of qualified special education professionals in schools tends to lead to students with SEN being supported by staff without formal education or training (Jortveit et al. 2020; Sundqvist and Hannås 2020). Moreover, the uncertainty of special educators' duties also risks leading to a weak profession since, according to Abbott (1988), the strength of a profession lies in its control over its competency, work tasks, and clients. The lack of a consensus regarding what the competency of special educators entails creates problems for schools, parents, and students, as it is not possible to know what kind of skills and knowledge those responsible for meeting the needs of students with SEN possess (Hausstätter and Takala 2008).

The policies explored in this study reflect an added complexity to the idea of a Nordic model of education, as well as the roles and responsibilities of special education professionals within that model. Special education professionals and teachers play an important part in navigating and implementing educational reforms and in determining if they are successful. Political aspirations for inclusion remain strong among the governments of the four Nordic countries in this study, and there are signs of a continued process of reform to strengthen these efforts and address the many challenges faced by schools. It is clear that these processes will take different forms in different countries, including a potential movement away from complex and overlapping types of support in Finland and a possible strengthening of a framework for MTSS in Denmark and Norway.

In addition, this study illustrates how both the qualifications and competency required of special educators and the work that they do are tied to educational policies and reforms in schools. According to Abbott (1988), professional claims over an area of expertise are key to ensuring the quality and integrity of services and maintaining the knowledge base and practices within that domain. A related role of professions is the establishment and maintenance of moral obligations (e.g. codes of ethics) that limit destructive competition and promote cooperation, while also fostering pride and satisfaction in the work that professionals do (Evetts 2013).

Today's schools are under pressures from multiple directions, including teacher shortages, economic instability, increased global competition, and expanding diversity among students. Given the skillset that future generations of students are required to master for life in a complex and rapidly changing world, the conditions are right for

expanding and improving the types and qualifications of professionals active in educational institutions in the Nordic countries. Inclusion requires new ways of organising students and staff, expert knowledge and skills to make adaptations and provide high-quality teaching, as well as the willingness and competence to collaborate across professional boundaries (Ainscow 2020; Hansen, Jensen, and Molbæk 2022; Sundqvist 2021). In short, inclusion in today's schools demands 'highly differentiated and specialised' personnel (Haug 2017, 214). As a field, special education must ensure that this diversity of expertise is relevant, up-to-date, and available to benefit the students that it is intended to serve.

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