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REVIEW ARTICLE

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How is inclusion defined on the early childhood level in China, Germany and the UK: a systematic literature review

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ABSTRACT

In the international context, including children with diverse needs and backgrounds in early childhood settings is at the heart of education policy and planning. Nevertheless, a lack of a consistent and clear definition of inclusive education will leave the concept wide open for different interpretations and sometimes misinterpretations, which potentially leads to exclusionary practices in the name of inclusion. Our study examined how early childhood inclusion is defined in China, Germany and the UK. Peer-reviewed studies between 2000 and 2020 were systematically examined under the framework of the four dimensions of inclusion of 'access, acceptance, participation and achievement'. 15 studies were selected that showed various aspects of the definition. Discussions on the inconsistent and tokenism definition of inclusion from various stakeholders are presented. Implications for future research and practice are discussed.

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Inclusive education; definition; early childhood; systematic review

Introduction

Definition of inclusion – issues and confusion, in interpretations

The definition of inclusive education has been adopted and interpreted to mean different agendas, strategies, approaches and models of provision (Göransson and Nilholm 2014; Nilholm and Göransson 2017; Slee 2011). As Grosche (2015) stated, 'the terminological ambiguity and the resulting lack of adequate operationalization of inclusion are great challenges for empirical educational research on inclusion' (18). Meanwhile, although the ratification of the UNCRPD has been achieved in many countries, the unclear definition poses great challenges for consistent implementation of inclusive education since no common goals can be drawn in educational policy-making (Krischler, Powell, and Pit-Ten Cate 2019; Powell, Edelstein, and Blanck 2016). While there are continuous efforts to develop a universal definition of inclusion (Nilholm and Göransson 2017; Shyman 2015), the concept remains ambiguous, unclear and incomprehensive when examined in individual countries (Krischler, Powell, and Pit-Ten Cate 2019).

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Although the United Nations Salamanca Statement, UNESCO's 'Education for All', EU Commission and many other international organisations intend to adopt a broader approach that goes beyond 'special needs' to conceptualise inclusive education comprehensively, referring to equality, discrimination and social inclusion (Miles and Singal 2010; Thomas 2013; UNESCO 1994), predominant studies and reviews identify that 'inclusion' is typically synonymous with 'special needs', a narrow definition of inclusion that deals with children with disabilities or special educational needs (Hardy and Woodcock 2015; Haug 2014; Wolff et al. 2021).

In understanding a global phenomenon like inclusive education, one should consider the specific cultural and historical contexts in which inclusive education takes place (Artiles and Dyson 2005; Richardson and Powell 2011) so that potential scientific progress in identifying successful practices will more likely be generated (Krischler, Powell, and Pit-Ten Cate 2019). Thus, short descriptions of the social and historical backgrounds and the current status of the definition from the perspective of China, Germany and the UK are discussed first.

Definition in China

The conceptualisation of inclusive education in the Chinese policy framework is contested, inconsistent and confusing (Tan 2020). Until now, there is no consistent translation of the term 'inclusion': either as 'Ronghe' meaning 'fusion, mixture or merging' or 'Quanna' meaning 'all in', which were applied interchangeably to refer to inclusion in policies, research and practice despite their subtle differences (Tan et al. 2021). Children with visual, hearing/speech and intellectual disabilities 'learning in the regular classroom (LRC)' served as the main form of inclusion at all levels of schools for the past four decades since LRC was introduced (Yan and Deng 2019).

'The People's Republic of China on Protection of Disabled Persons Act' and 'Educational Guidelines for People with Disabilities' stated that children with disabilities have the right to attend public early childhood programmes, LRC on the early childhood level only started until the beginning of twenty-first century as Shanghai proposed the concept of 'Early Care and Inclusive Education' (Hu and Szente 2010) despite the government ratifying the UNCRPD in 2008. In 2021, early childhood inclusion was encouraged at the 13th National People's Congress (NPC). Nevertheless, all the national and regional legislations advocating for inclusive education have not addressed the definition. 'LRC' is more of a pragmatic strategy to cope with the limited educational opportunity for children with disabilities, thus differing from the international understanding of inclusion that is grounded in liberal democracy with individualism value and ensures every child's right to education (An, Hu, and Horn 2018). It fails to provide equitable and appropriate education for all children, showing a very limited response to the international advocacy towards inclusive education (Deng and Poon-McBrayer 2004).

Definition in the UK

In the UK, inclusion is a multi-faceted term and has a wide range of definitions. The concept evolved from special education, integration and inclusion (Francisco, Hartman, and Wang 2020; Williams-Brown and Hodkinson 2020). The concept of

integration was first coined and defined in the 'Warnock Report' (1979) that recommended children with disabilities and special needs to be placed in mainstream schools. Further in 1994, the 'Salamanca Statement' introduced the term inclusion extending the concept to more than children with SEND, acknowledging the unique needs of all children, their families and professionals. This emphasis on diversity and inclusion has been highlighted and is related to the policies and legislation, especially in the 'Equality Act (2010)'.

The UK consists of four countries – England, Wales, Scotland and Northern Ireland. The focus of the concept is on SEND and other aspects of diversity that vary in the countries although they are influenced by each other and their social, cultural and political contexts (Beaton and Black-Hawkins 2014). England focuses on SEND and a wide range of categories of diversity especially reflecting on the society in different parts of England; Wales emphasises cultural and linguistic diversity (especially Welsh language and culture); Northern Ireland highlights ethnic and religious diversity, and Scotland relates to narrative of community and equality for all.

Definition in Germany

Like many countries, the debate on inclusion strongly interrelates with the one on integration in Germany (Werning 2014), by ratification of the 'UNCRPD' in 2006. The translation of 'inclusion' used in the Salamanca Statement 1994 to 'Integration' reflects the high historical relevance of this term in the German context and the controversial relationship between the two terms (Albers 2011; Werning 2014). While inclusion first focused on the mainstreaming of children with special needs, the term integration referred to a joint education of children with and without special needs. Klein et al. stated that 'integrative processes' (Klein et al. 1987) are not static and do not refer to an integration of the single child within the setting, but take place on multiple levels: the individual level, the interactional, the institutional and societal level.

Concerning the current context of the early childhood sector, the terms integration and inclusion still are relevant a refer to different dimensions (Rothe et al. 2020). On an institutional level, it is an integrative system that focuses on children with 'Eingliederungshilfe' (Integration assistance),[1] and is provided by different forms of integration in regular settings. It refers to a more ideological dimension and is acknowledged in conceptualisations on different educational levels, the Federal states (early childhood curricula/'Bildungs – und Orientierungspläne, Education and orientation plans'), the different providers (Caritas, AWO), as well as the individual institution.

Why the three countries

China and Germany share a similar long-existing parallel structure of special and inclusive education and a tradition of a medical understanding of disability (Tan et al. 2021), while the UK is well-known for its strong advocacy for a broader understanding of inclusion. Meanwhile, Germany and the UK have similar inclusion development from disability to integration and to inclusion with the former still using the terms integration and inclusion interchangeably, while the discussion of inclusion focuses mainly on disability in China. Thus, it would be interesting to highlight the similarities and differences

in the historical and social contexts of these three countries and their influence on the definition of inclusion. Lastly, considering the authors' previous research on those countries and are most familiar with their inclusion process, it seems justified to select those three countries.

The guiding framework and research question

Together with Dyson, Howes, and Roberts (2002) and Göransson and Nilholm (2014), more studies that succeeded in establishing factors that increase levels of inclusion in schools and/or classrooms while defining inclusion are advocated. In response to this, we applied the four dimensions of 'access, acceptance, participation and achievement' by Ainscow, Booth, and Dyson (2006) and Artiles and Kozleski (2016) as the guiding framework while examining empirical studies from China, Germany and the UK from 2000 to 2020. This framework resonates with the diverse social, cultural and political contexts of different countries and relates to the children, their families and staff while defining inclusion. We formulated the research question: **How is inclusion in the early childhood context in China, Germany and the UK defined?** We want to examine how children and their families are experiencing inclusion through accessing, being accepted, participating and achieving in the settings. While acknowledging the countries' socio – political and cultural contexts, we aim to explore their impact on the definition of inclusion at different layers of policy and practice.

Some terms related to the provision and workforce vary in the three countries. To enhance the consistency of the understanding of those terminologies, it is important to clarify them. Firstly, while in the global context, early childhood refers to the period of children from birth to 8, we decided to focus on children from age 2 to 6, a synthesis reached considering the different age groups of the three countries' early childhood settings. Secondly, the term 'professionals' is used as a common term to refer to the practitioners working in early childhood settings.

Method

Literature search and eligibility criteria

The following electronic databases were used to find an initial set of relevant literature published between 2000 and 2020: EBSCO host Database, British Education Index; Education Source, ERIC, Pedocs, Proquest and Google Scholar. We also searched different journals: International Journal of Inclusive Education, European Early Childhood Education and Research Journal, specialist journals and books.

Our primary key search words are: 'inclusion', 'inclusive education' ('inclusive*'); 'children', 'Early childhood', 'early childhood settings*', 'kindergartens*', 'early childcare', 'childcare', 'diversity', 'diverse*', 'difference', 'access', 'acceptance', 'participation', 'achievement', 'China', 'Germany', 'UK'. We used Boolean search terms (AND, OR) and wildcards (such as the asterisk) to double-check results and made sure that combinations and alternative forms of the keywords were searched. Our searches were

conducted between February 2020 and June 2020, so the set of articles we found represent those referenced in databases before June 2020.

The initial search yielded the following articles: 106 articles in China, 247 articles in Germany and 1005 articles in the UK. We then carefully reviewed the titles and abstracts of all the searched articles and made sure that there were full texts available for each of the articles. We then selected the literature that met all the following five inclusion criteria:

1. Published between 2000 and 2020
2. Reported an empirical study (using quantitative, qualitative or mixed-method design)
3. Discussing the concept of inclusion
4. Focusing on the early childhood level
5. Focusing on China/Germany/the UK (any of the four countries)

After this first filtering, 100 articles remained: 26 articles from China, 40 articles from Germany and 34 articles from the UK. For the next round, we developed the following two exclusion criteria to narrow down our selection that addressed the definition of inclusion at the early childhood level in the three countries. Specifically, we excluded articles that

1. Were not published in peer-reviewed journals
2. Did not focus on or address perceptions or definitions (or the notions/concepts) of inclusion

For the final round, 85 articles (including 21 of the 26 articles from China, 36 of 40 articles from Germany and 28 of 34 articles from the UK) were excluded, leaving 15 articles. Specifically, 45 articles (10 from China, 24 from Germany and 11 from the UK) did not address the definitions (or notions/perceptions) of inclusion on the early childhood level. 38 articles (two from China, 19 from Germany and 17 from the UK) are not peer-reviewed. Apart from this, there are several other reasons for the exclusion of the articles in China: seven of them did not focus on mainland China (six on Hong Kong and one on Taiwan); two focused on the definition of inclusion both on the early childhood and the primary and secondary school levels. Lastly, we identified five articles from China, four articles from Germany and six from the UK.

Article coding procedure

Articles were reviewed starting with the most recent year (2020) and moving backwards. Specifically, guided by the framework of the 'access, acceptance, participation and achievement', the full text of the retained articles was independently coded by the three researchers to identify data relevant to the research questions: the definition of inclusive education in the early childhood level. Specifically, articles were coded for information related to Authors (year, country); aims of the study, methodology, key findings and dimensions of inclusion. We then sat together via six different Zoom sessions (each lasting around three hours) to review all codes to determine consistency between the descriptions provided by each coder. All codes were thoroughly discussed until all

researchers agreed that all pertinent information was included and consensus was established.

Results

15 studies (five from China, four from Germany and six from the UK) were identified to answer the research question (see Table 1). Eight of the 15 studies applied a qualitative approach, three used a mixed method and four applied a quantitative design. Research methods included interviews, questionnaires, observations, qualitative secondary analysis, video-cued ethnography and document analyses. The timeline of the selected studies showed that inclusive education at the early childhood level was discussed in the UK (2004–2020) several years earlier compared to China (2012–2017) and Germany (2012–2020).

By extracting outcome information about the different dimensions of defining inclusive education within each article, commonalities were identified based on key passages in the text and summarised in thematically overarching categories in relation to the four dimensions of the guiding framework. Those studies highlighted the different perspectives of professionals, parents and children on early inclusive education across the three countries.

The dimension of access

Studies (1, 3, 4 and 5) from China and studies (12, 13, 14 and 15) from the UK have a stronger focus on children and parents' access to early childhood settings while defining inclusion compared to the German study (8). Children's perspective was discussed in four categories: physical access; access to activity and programme design; access to curriculum and assessment and access to qualified professionals. Firstly, the lack of physical access addressed the inadequate infrastructural features of early childhood settings (e.g. lack of elevators; limited classroom size) (1, 4, 5 and 7). Secondly, although Tobin (2020) discussed how some UK professionals paid attention to constructing a culturally sensitive classroom environment (15), children's lack of access to activity and programme structure (e.g. lack of culturally relevant books) was widely identified from other settings in China (1 and 5) and the UK (15). Thirdly, children's lack of access to curriculum and assessment was addressed in China (4) and the UK (14). Lastly, Tobin (2020) highlighted the lack of children's access to qualified professionals, indicating professionals' lack of training in cultural knowledge and inclusive education.

The dimension of acceptance

The dimension of acceptance was widely discussed, showing that children with SEN and from im/migrant backgrounds and their parents were not fully accepted in early childhood settings. Firstly, inclusion is only applicable to certain groups. While German parents and professionals questioned the optimal support for children with speech developmental delay (6), UK professionals viewed children with learning difficulties should not be included since 'they could create an uncomfortable environment' (Clough and Nutbrown 2004, 311). Furthermore, children's inclusion depended on 'the degree of their condition', for example, 'a child with severe autism would be too disruptive and

Table 1. Selected studies.

Authors (year, country)	Research aim	Research methods	Key findings	Dimensions of inclusion
Hu et al. (2011, China) (1)	Factors supporting or hindering inclusion	Qualitative Observations, interviews, documents **Setting** One early childhood setting in Beijing	Inclusion as a new concept; Factors: - Medical model of inclusion service - Professionals' needs for training, resources and challenges working with parents - Unbalanced collaboration between special educators and professionals	**Participation:** - Varied participation of children with SEN in different classroom activities - Special educator's responsibilities to improve participation and social interactions **Access**: - Not wheelchair accessible; sparse furniture for play and learning; lacking variety in shapes and functions - Lack educational materials **Achievement** - pecial educators using charts, pictures and videos for children's performance: initial assessment with a curriculum-based measure; monitoring children's 'off-task behaviours' to implement SET-model-based intervention
Hu, Lim, and Boyd (2016, China) (2)	The engagement of children with disabilities across activities in inclusive settings	Quantitative Videotaped observations, direct observations **Setting** Five early childhood settings in Beijing	Inclusion means physically including children with disabilities; Different levels of engagement and interaction across activities and subjects	**Participations:** Teacher-centred, whole-group instruction, large class size explained low engagement and social interactions - Mostly engaged during mealtime and self-care activities; low engagement during free play - Very low frequent and mostly negative interactions initiated by children with disabilities: more with professionals and peers during free play **Achievement:** - Professionals or shadow teachers provided step-by-step prompting, preventing engagement and social interactions - Professionals lacked strategies to teach children to initiate interactions

(*Continued*)

Table 1. Continued.

Authors (year, country)	Research aim	Research methods	Key findings	Dimensions of inclusion
Hu et al. (2017, China) (3)	Parents' understanding of the importance and feasibility of inclusion	Quantitative Questionnaire **Setting** Different settings in Hubei	Highly supporting inclusion but viewing it as ideal; Parents' educational level and children's specific disability influence inclusion beliefs	**Acceptance:** Parents with children with SEN support inclusion more compared to those with children without SEN **Access:** - Very low inclusion feasibility: policy and practice barriers - More support for parents and professionals **Participation:** - Professionals' use of 'a range of instructional approaches to promote children's participation in play and learning activities' **Achievement:** - Parents with typically developing children view 'free play' as important to facilitate children's learning than parents with children with SEN
Hu, Roberts (2011, China) (4)	Administrators' perspectives of innovative services for the inclusion of children with disabilities	Qualitative Interviews **Setting** 12 early childhood settings in Beijing	Supporting the philosophy of inclusion but with preconditions; Previous experience with children with SEN influence inclusion understanding	**Acceptance:** - Starting with the level of inclusion in spirit - Inconsistent understanding of inclusion: some think inclusion reflecting social equity and some as an opportunity and privilege **Access:** - Lack wheelchair access - Needing more psychological assessment, instructions and curriculum **Participation** - Not just learning games and routine activities, but also sharing same qualified teaching staff and environment

(*Continued*)

Table 1. Continued.

Authors (year, country)	Research aim	Research methods	Key findings	Dimensions of inclusion
Hu et al. (2017, China) (5)	Professionals' perspectives on the importance and feasibility of quality inclusion	Quantitative Questionnaire **Setting** Preservice professionals from two universities in Beijing and Shanghai; In-service professionals from four Beijing settings and four early rehabilitative centres	Inclusion in its infancy: not optimistic in perceived feasibility of inclusion	**Acceptance:** - Believing inclusion is important but difficult to implement - The widely existing social stigma towards disabilities **Access:** - A lack of infrastructural support like class size, programme models - More environmental modifications (adapt materials/toys) - More related services or pull-out settings - More support for parents and professionals **Participation:** - Instructional approaches for more engagement are needed - Professionals should consider parents' needs in IEP goals
Lohmann, Hensen, and Wiedebusch (2017, Germany) (6)	Attitudes and realisation of inclusion	Qualitative Single and group interviews **Setting** 12 early childhood settings	Inclusion is valued positively but preconditions are needed	**Acceptance:** Inclusion is valued and accepted positively, but - Special services are preferred for some children - Needs to be realised in the whole society first - Needs a clear definition
Treschner (2015, Germany) (7)	Realisation of inclusion with regard to the tensions it causes for the child's 'Subjektbildungs-Prozess (Subject formation process)'[a]	Qualitative Secondary analysis **Setting** One integrative early childhood setting	Children with disability are structurally discriminated	**Access:** Children's physical access to settings is limited: - Absence of elevators and other physical features **Participation:** Structurally discriminated by pedagogical practice and other features - Children's' strong dependency on professionals

(*Continued*)

Table 1. Continued.

Authors (year, country)	Research aim	Research methods	Key findings	Dimensions of inclusion
Tobin (2020, Germany)[b] (8)	Meeting the needs of children from newly arrived migrant families	Qualitative Video-cued interviewing approach **Setting** Five settings England, France, Germany, Italy and the United States	Settings are not inclusive enough to accommodate migrant parents' needs and expectations	**Access:** - Children's access depending on parents' limited information **Acceptance:** - Parents not fully accepted **Participation:** - Parents' limited chance to participate in programmes **Achievement:** - Parents' objectives and concerns on children's learning and academic achievement not met
Seele (2012, Germany) (9)	Children's perception of themselves and how they participate in the social construction of ethnic identity	Qualitative Observation and interviews **Setting** One early childhood setting in the Berlin	Children actively reproduce inequality while experimenting and doing ethnicity playfully	**Acceptance and Participation:** Children created their own reality that controls their possibilities to participate, depending on the acceptance of mother tongue, physical appearance and family origin
Nutbrown and Clough (2004, UK) (10)	Professionals' views on children with learning difficulties	Mixed method Questionnaire and interviews **Setting** A wide range of local authority and private settings	Majority believed the principle of inclusion with preconditions	**Participation** 'Hierarchies of tolerance': professionals' positive opinion on parents and children' involvement but effectively and selectively exclude some children in practice: - Claimed children be included, but with appropriate support and depending on their condition (e.g. excluding those with learning difficulties and interrupting the class) - Inconsistent parental involvement in children's learning and development

(*Continued*)

Table 1. Continued.

Authors (year, country)	Research aim	Research methods	Key findings	Dimensions of inclusion
Clough and Nutbrown (2004, UK) (11)	Professionals' perspectives on children with learning difficulties in specialist and 'mainstream' settings.	Mixed method Questionnaire; interviews **Setting** A wide range of local authority and private settings	Supporting inclusion with reservations	**Participations:** - Three responses: all children be included; children should be included 'in principle'; children with learning difficulties should be excluded - All parents must be involved but some parents will not due to their difficulties **Achievement:** - Curriculum policies largely support and promote inclusion to varying degrees - Age differences for assessing children's academic progress
Flewitt and Nind (2007, UK) (12)	Parents' perspectives on combining special and mainstream services for their children	Mixed method Questionnaire and interviews **Setting** 134 early childhood settings in 3 South East England authorities	Reported no or limited choice and conflicting advice	**Access**: - Children lacking flexibility in access to services their parents prefer **Participation:** - Difficult decision making, feeling powerless, passive and deskilled dealing with bureaucratic processes **Achievement:** - Different or even contradictory perspectives on the best provision for children's developmental and learning needs

(*Continued*)

Table 1. Continued.

Authors (year, country)	Research aim	Research methods	Key findings	Dimensions of inclusion
Owen (2019, UK) (13)	Parents and professionals' perspectives on the value of difference	Qualitative Interviews **Setting** Five community-based parent and toddler groups in north-west England	Professionals and parents articulated different understanding of 'diversity gain', majority parents being less able to articulate desire for inclusion	**Acceptance:** - Some thought inclusion reflecting social equity and some as opportunity and privilege for certain groups **Access:** - Professionals believed being accessible to the local community is important - Professionals lacked resources to support practice **Participation** - Parental involvement as crucial to authentic inclusive practice
Magennis and Richardson (2020, UK) (14)	Professionals' attitudes about inclusion and diversity	Mixed method Questionnaire and interviews **Setting** 30 early childhood settings	Inclusion and diversity are promoted: over 90% defined inclusion 'including or involving everyone'	**Acceptance:** - Importance of peace-building on religious diversity, cultural and ethnic awareness - Children learning differences in national identity, race, religion and culture early on **Access:** - Professionals provided access to children to participate, differentiated curriculum and multicultural resources **Achievement:** - Professionals are vital pieces in the jigsaw-puzzle to promote and sustain peace in Northern Ireland

(*Continued*)

Table 1. Continued.

Authors (year, country)	Research aim	Research methods	Key findings	Dimensions of inclusion
Tobin (2020, UK) (15)	Needs of children of im/migration and refugee families	Qualitative See study 8 **Setting** See study 8	Parents being pragmatic and strategic in setting preferences; Professionals caught between being culturally responsive and following their pedagogical beliefs and principles	**Access**: - Parents' incomplete information about settings - Most settings appeared culturally sensitive and responsive: culturally relevant books and holidays, using children's home languages **Participation:** - "Bicultural staff as crucial but under-appreciated - Parents' voices not fully heard - Professionals under-prepared **Achievement:** - Difficulty to catch up with peers - Professional and parents' conflicts of values: professionals unwilling to accommodate parents' wishes for a more academic approach

[a]'Subjektbildungs-Prozess': process of becoming in the tension of dependency and autonomy.
[b]Tobin (2020) addressed both German and UK contexts (study 15).

affect the learning process for the rest of the children' (Clough and Nutbrown 2004, 311). Secondly, different stakeholders, such as parents of children without SEN in China, are less accepting of children with SEN compared to parents of children with SEN (Hu et al. 2017). Thirdly, while only the acceptance of children with SEN was discussed in China, some German and UK studies showed that children from im/migrant families were not accepted by their peers due to their different physical appearance and mother tongues (13 and 15) and Tobin (2020) further criticised that professionals tend not to meet their parents' needs.

The dimension of participation

The dimension of participation was frequently discussed from children, their parents and other stakeholders' perspectives. Firstly, from the Chinese and German literature, the lack of children's participation in different curricula, such as classroom activities, instructions and games, was addressed (1, 4, 5, 7 and 8). Moreover, while Chinese children's social interactions with peers and professionals and their engagement in different activities were intensively discussed (1 and 2), Seele (2012) showed how German children with im/migration background actively negotiated their social position and peer interactions. Secondly, although parents' involvement was perceived as important (5, 8, 10 and 13), there was a lack of such involvement in pedagogical decisions and children's social lives (5, 8, 12 and 15), with one exception that UK parents being involved with specific conditions (10). While German and UK parents faced challenges participating in their children's learning process and deciding suitable settings (8, 12, 13 and 15), Chinese parents complained about their low participation in deciding their children's IEP (individual educational plans) (5). Thirdly, Tobin (2020) highlighted though being under-valued that the bicultural teaching staff's participation served as key cultural and linguistic mediators for the inclusion of children from im/migration families.

The dimension of achievement

Children's achievement was more frequently discussed in the Chinese (1, 2, 3 and 4) and UK (11, 12, 14 and 15) studies compared to the German ones (8), indicating different focuses while defining inclusion. Children's academic achievement is much more mentioned than their social and emotional achievement (e.g. social interactions), especially in the UK where three types of academic achievement were addressed. Firstly, Clough and Nutbrown (2004) discussed how age differs when children's academic progress is assessed in the four UK countries: at the end of the foundation stage at 5 years in England and 7 years in Wales. Tobin (2020) further discussed how play could improve language acquisition among children from im/migration and refugee backgrounds. Moreover, Magennis and Richardson (2020) highlighted another type of achievement of enabling children to understand peace in Northern Ireland.

Discussions

This systematic literature review examines how inclusion is defined at the early childhood level in China, Germany and the UK, part of the international effort to develop

a clear definition of inclusion (Göransson and Nilholm 2014; Haug 2017). Although the studies showed different stakeholders' perspectives on inclusive education, only three studies examined children's perspectives, which should be criticised considering children are the receivers of inclusive practices daily (Lindner and Schwab 2020). Future research should consider children more as the focus. We applied the four dimensions of 'access, acceptance, participation and achievement' to scan the literature systematically and the majority revealed that children and their parents experience a lack of one or more of the four dimensions. Our research further emphasises the importance of including different stakeholders especially parents and valuing children's social achievement while defining inclusion using this framework. We further identified two themes regarding the definition: (1) inconsistent definition and (2) tokenistic inclusion.

Inconsistent definition

There is an inconsistency in the definition of inclusion while comparing the three countries. The references to categories of children included in the definitions varied. Agreeing with previous studies (Opertti, Walker, and Zhang 2014; Yan and Deng 2019), the selected studies focused predominantly on the narrow definition of inclusion that deals with children with special needs/integrative status (Arduin 2015), especially those identified in China focusing on children with three types of disabilities (hearing, visual and intellectual disabilities). This narrow definition has been substantially criticised since it potentially draws attention to the deficiencies of individuals and creates barriers to individuals' participation, rather than addressing wider contextual factors, social inequalities and structures (Ainscow, Booth, and Dyson 2006; Messiou 2017). Meanwhile, the inclusion of children with (im)migration backgrounds was included in some German and UK studies, indicating a shift of the definition from a predominantly disability-oriented one to addressing broader dimensions of the diversity of children (Equality Act 2010; Werning 2019). Nevertheless, though Germany and the UK expressed an intention to realise inclusion following the broader definition, those studies indicated a lack of children and their families' access, acceptance and active participation and achievement in the early childhood settings.

The inconsistent definition can also be seen within each country among different stakeholders (Owen 2019), agreeing with Roberts and Simpson (2016). Administrators, parents of children with and without SEN, professionals as well as children showed inconsistent understanding of inclusive education: inclusion is perceived either as social equity or opportunity and privilege for certain groups.

Tokenism inclusion

The selected studies demonstrated a tokenism in inclusion definition on the early childhood level by showing that inclusion is only valid with certain preconditions and only applicable to certain groups.

Firstly, tokenism in inclusion is revealed through how different stakeholders emphasised the importance of certain preconditions to be realised before inclusion takes place. Though viewing inclusion positively, some professionals perceived it as being divorced from the realities of Chinese society (Hu et al. 2017) or claimed it to be realised in the

society before in the classroom (Lohmann, Hensen, and Wiedebusch 2017). Meanwhile, some claim that the support for parents and professionals should be first guaranteed before inclusion happens (Hu et al. 2017; Owen 2019).

Secondly, tokenism is also demonstrated when some professionals and administrators view inclusion as only valid for certain groups of children. Chinese general settings are only available for children with three types of disabilities, excluding children with other types of disabilities (e.g. children with ADHD or ASD) (Tan et al. 2021; Yan and Deng 2019). UK professionals viewed some children's inclusion as dependent on the degree of their 'conditions' (Nutbrown and Clough 2004). Meanwhile, German professionals perceived that special educational services should be preferred for some children with an integrative status,[2] especially those with delayed speech development, compared to the general settings (Lohmann, Hensen, and Wiedebusch 2017).

Limitations

One of the inclusion criteria examined peer-reviewed articles, leaving out a large chunk of literature especially those conducted in the German context since significant empirical inclusion studies are published in practitioner-oriented journals, monographs, edited books and other publication organs (Heimlich 2019). Moreover, the peer-review process and standards in China differ from those in the international context, so we only selected those that followed the international peer-review process.

Conclusions

Our study explores how early childhood inclusion is defined in China, Germany and the UK by examining literature from 2000 to 2020, the first systematic literature review applying an international comparison to examine the definition. It increases the awareness of the similarities and differences in the diverse cultural contexts in different countries and the relevance and importance of the concept of inclusion.

It can be concluded that early childhood inclusion is rarely defined as 'a principled approach' that focuses on increasing opportunities for all children to access settings, to be accepted by everyone, to participate in a wide range of activities as well as to achieve their best potential (Ainscow, Booth, and Dyson 2006; Mittler 2005), but rather a narrow conceptualisation that focuses on disability or special education (Wolff et al. 2021). Not including all dimensions while understanding inclusive education bears the risk of having a restricted perspective on inclusion and its realisation in research and practice. We thus advocate future researchers, policy-makers and practitioners to adopt inclusion as a 'principled approach' that cherishes inclusive values, such as equity, participation, community and respect for diversity in guiding overall policies and practice (Ainscow, Booth, and Dyson 2006; Messiou 2017) and accept the process of realising inclusion in its complexity and being persistent on the journey. We state that the four dimensions of inclusion – access, acceptance, participation and achievement – provide multileveled lenses to approach this reality in its complexity, which should serve as the basis of future inclusion research and practice.

Meanwhile, due to the three countries' specific cultural and historical contexts, the focus of the definition differs from disability-oriented to examining broader dimensions

of children from im/migrated families though the latter is noticeably rare by comparison. It can be thus concluded that inclusion is a continuous process taking place on different levels, resulting in transient situational snapshots and can be experienced by the diverse recipients and stakeholders in a cumulation of inclusive and non-inclusive moments that even occur simultaneously. This knowledge of realising inclusion as an on-going process is valuable for practitioners to remember while experiencing frustrations or doubts in daily practice. Moreover, inclusive processes are embedded in particular socio-historical contexts that have context-specific consequences for the definition, understanding and meaning of inclusion (Rothe et al. 2016; Haug 2017). Inclusion in this regard needs locally embedded definitions and approaches. This understanding is fundamental for researchers and practitioners exploring intercultural understanding of inclusion and seeking for culturally sensitive and sustainable realisation of inclusive practice.

Notes

1. A form of assistance, corresponding with the institutionally approved special educational needs on school level.
2. Children with an integrative status are diagnosed as having a disability or are at risk of being disable if not supported intensively in their learning development.

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