

## Legal Review of Inclusive Education Policy: A Systematic Literature Review 2015-2025

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Received: 2025-March-12

Rev. Req: 2025-April-13

Accepted: 2025-May-07



10.59683/ijls.v4i1.152

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How to cite this paper: Kartiko, A., Arif, M., Rokhman<sup>3</sup>, M., Ma'arif<sup>4</sup>, M.A. & Aprilianto, A. (2025). Legal Review of Inclusive Education Policy: A Systematic Literature Review 2015-2025. *International Journal of Law and Society (IJLS)*, 4(1), 22-46. <https://doi.org/10.59683/ijls.v4i1.152>

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**ABSTRACT:** *Inclusive quality education is essential for national development, aligning with Indonesia's goal to educate intelligent, responsible, and noble citizens without discrimination. Binding legal regulations become the basis for implementing inclusive education that is fair and without prejudice. As for these two research questions: how are the legal rules governing inclusive education in Indonesia and other countries? What are the challenges of implementing inclusive education in Indonesia? Using the systematic literature review research method, with keywords in Indonesian and English, "inclusive education policy" AND "law", and "inclusive education policy" AND "law" AND "Indonesia" in the 2015-2025 period. The researcher obtained the results of 68 articles that were appropriate and complete "full paper", with the final details; articles from Scopus 19 and Google Scholar 49 total of 68 articles. The results of the study show that in terms of legal regulations, inclusive education in Indonesia is much clearer and more binding than in Japan, Malaysia, Vietnam, and Myanmar, only losing to Finland, which is much better in terms of law and implementation. However, Indonesia still has several challenges in implementing inclusive education, such as limited human resources, the need to provide collaboration space for teachers, government and parents, minimal facilities and infrastructure and weak supervision and evaluation. Theoretical implications of clear and binding inclusive education legal regulations start from the definition, rights, obligations, monitoring systems, and sanctions if violations are found compared to other countries.*

Pendidikan inklusif yang bermutu sangat penting bagi pembangunan nasional, sejalan dengan tujuan Indonesia untuk mendidik warga negara yang cerdas, bertanggung jawab, dan berakhlak mulia tanpa diskriminasi. Peraturan perundang-undangan yang mengikat menjadi dasar penyelenggaraan pendidikan inklusif yang berkeadilan dan tanpa prasangka. Adapun kedua pertanyaan penelitian ini: bagaimana aturan hukum yang mengatur pendidikan inklusif di Indonesia dan negara lain? Apa saja tantangan penyelenggaraan pendidikan inklusif di Indonesia? Menggunakan metode penelitian telaah pustaka sistematis, dengan kata kunci dalam bahasa Indonesia dan bahasa Inggris, yaitu “kebijakan pendidikan inklusif” DAN “hukum”, dan “kebijakan pendidikan inklusif” DAN “hukum” DAN “Indonesia” pada periode 2015-2025. Peneliti memperoleh hasil sebanyak 68 artikel yang layak dan lengkap “full paper”, dengan rincian akhir; artikel dari Scopus 19 dan Google Scholar 49 sebanyak 68 artikel. Hasil penelitian menunjukkan bahwa dari segi peraturan perundang-undangan, pendidikan inklusif di Indonesia jauh lebih jelas dan mengikat dibandingkan dengan Jepang, Malaysia, Vietnam, dan Myanmar, hanya kalah dari Finlandia yang jauh lebih baik dari segi hukum dan penyelenggaraannya. Namun, Indonesia masih memiliki beberapa tantangan dalam melaksanakan pendidikan inklusif, seperti keterbatasan sumber daya manusia, perlunya menyediakan ruang kolaborasi bagi guru, pemerintah, dan orang tua, minimnya sarana dan prasarana, serta lemahnya pengawasan dan evaluasi. Implikasi teoritis dari peraturan perundang-undangan pendidikan inklusif yang jelas dan mengikat mulai dari definisi, hak, kewajiban, sistem pengawasan, dan sanksi jika ditemukan pelanggaran dibandingkan dengan negara lain.

**Keywords:** *Inclusive Education, Human Rights, Education Policy.*

## I. INTRODUCTION

The development of an ideal civilization in a country can be determined by how much attention it pays to its education system ([Saputra](#), 2018), a dimension that pays attention to easy and quality access to education ([Griffioen et al.](#), 2018), and evenly distributed so that it can be felt by all elements ([Hakim](#), 2016), without distinguishing (discriminating) background, economy. Culture and religion ([Rupiah et al.](#), 2024). [VanBalkom](#) (2010) notes that education is the most powerful force for world citizens because it calls for conveying universal truths and can be accepted by all elements. So that the birth of quality education will be able to have a significant positive impact on the development of the country, in line with the national goals of the Indonesian state, namely to educate the nation's life, intelligent, responsible and noble individuals ([Khunaifi & Matlani](#), 2019).

Equal education treatment still seems to be a major challenge for educational institutions worldwide, including Indonesia ([Haug](#), 2017). One of them is the position of individuals (children) with special needs who should receive the same inclusive education without exception ([Messiou](#), 2017), starting from learning opportunities in an equal environment to the quality of learning in schools ([Sari et al.](#), 2022), however, in written data about how the commitment of the Indonesian state is present with various policies regulated in regulations. *First*, Law 20 of 2003 discusses the education system without discrimination and inclusive education services for children with special needs ([Irawati & Susetyo](#), 2017;

[Khunaifi & Matlani](#), 2019). *Second*, Law 8 of 2016, which discusses the rights of people with disabilities to receive proper education (Ediyanto et al., 2017), and third, Education Regulation 70 of 2009 ([Mulyadi](#), 2017), which states that schools are obliged to accept children with special needs without discrimination.

The many findings of research results that examine various inclusive education policies and their implementation are an effort to achieve equal education without discrimination ([Panda et al.](#), 2023). In line with [Notopradyitno](#) (2019) who said that the Indonesian government has a clear mission in equalizing, respecting and fulfilling the rights of children with special needs (inclusive education) through laws, education regulations and implicitly, there can be regional regulations. This is in line with [Emilyana et al.](#) (2024), who revealed the existence of state regulations on inclusive education synchronized through regent regulation no. 40 of 2017 concerning the certainty of equal services for all students, without exception for children with special needs; thus, children will get justice, build self-confidence and make children develop more by adapting to differences ([Nisak](#), 2018). In line with [Dewantara & Kusumastuti](#) (2020) the government's policy on inclusive education is very noble because it can be implemented since early childhood so that it can minimize limitations in children's growth and development and provide space to participate in normal activities with other children, at least preventing the condition from getting worse ([Fasha & Widowati](#), 2017).

The importance of government policy as a basis for the implementation of inclusive education in schools has also been conveyed in several parts of the world, such as the enactment of special laws on inclusive education in Finland ([Saloviita](#), 2020), Ireland, Austria, Spain and the Czech Republic ([Smyth et al.](#), 2014), Sub-Saharan Africa ([Charema](#), 2010), and Latin America ([Her & Iles](#), 2005). In line with [Batista et al.](#) (2024), Brazil's commitment to inclusive education also emerged from government laws derived from policies and schools as organizing entities must ensure full compliance with policies. Similar practices also apply in Vietnam and Malaysia, which regulate inclusive education based on state laws as a result of international agreements. However, in practice, inclusive education in Vietnam is still separated at the preschool level, so inclusive education programs in Malaysia are much more running and developing in accordance with the law's mandate ([Linh & Azar](#), 2019). In addition, Myanmar also optimized inclusive education by updating the law in 2015 to improve the implementation of inclusive education with professional facilities and teachers from primary, secondary and higher education levels ([Oo & Kawai](#), 2021).

Based on the findings of various policies from the law on Inclusive Education that are enforced at the global level, there are multiple challenges and opportunities in the implementation process, so researchers find a space to conduct in-depth research to examine the legal aspects and policies of Inclusive Education in Indonesia and other countries through a systematic literature review approach, researchers have two research questions, namely: how are the legal regulations governing Inclusive Education in Indonesia and other countries? What are the challenges of implementing Inclusive Education in Indonesia? Through two questions, an in-depth study of implementation challenges and comparisons of Inclusive education in other countries will be obtained.

## II. METHOD

The research method uses a systematic literature review of articles that have been published in the last ten years (2015-2025) in the global publication database ([Yusop et al.](#), 2022). Namely Scopus, WOS and Google Scholar; in the data search process, the researcher uses keywords that are by three research questions, namely how are the legal regulations governing inclusive education in Indonesia and other countries? and What are the challenges of implementing inclusive education in Indonesia?. Keywords used in English and Indonesian are "inclusive education policy" AND "law", and "inclusive education policy" AND "law" AND "Indonesia" in the publish or perish application version 8. The researcher uses PRISMA analysis in data analysis, which includes three criteria: identification and validity and screening for in-depth review.

At this stage, the researcher applies inclusion and exclusion to avoid bias in searching and analyzing articles ([Donthu et al.](#), 2021). The criteria used include six stages. *First*, the search for articles is based on themes in accordance with the two research questions, so researchers do not include them. *Second*, the range of articles included has only been in the last ten years, 2015-2025, because the study's relevance to inclusive education legal regulations is very large. *Third*, at the search stage, the researcher will determine three global databases as options: Scopus, Wos, and Google Scholar. *Fourth*, the language of the articles is accepted in English and Indonesian, so other than that, it is not included in the scope of the study. *Fifth*, in the process of searching for articles, researchers utilize technology, namely the publish or perish application version 8 with keywords in Indonesian and English, "inclusive education policy" AND "law", and "inclusive education policy" AND "law" AND "Indonesia". *Sixth*, the data taken results from research in the form of "peer-reviewed" journal articles, so book chapters, proceedings and conferences will be automatically excluded from the analysis process. So, other than the five criteria above, it will be included in the research exclusion.

In the process of searching for researcher data through the publish or peris application on February 2, 2025, with details in the table below:

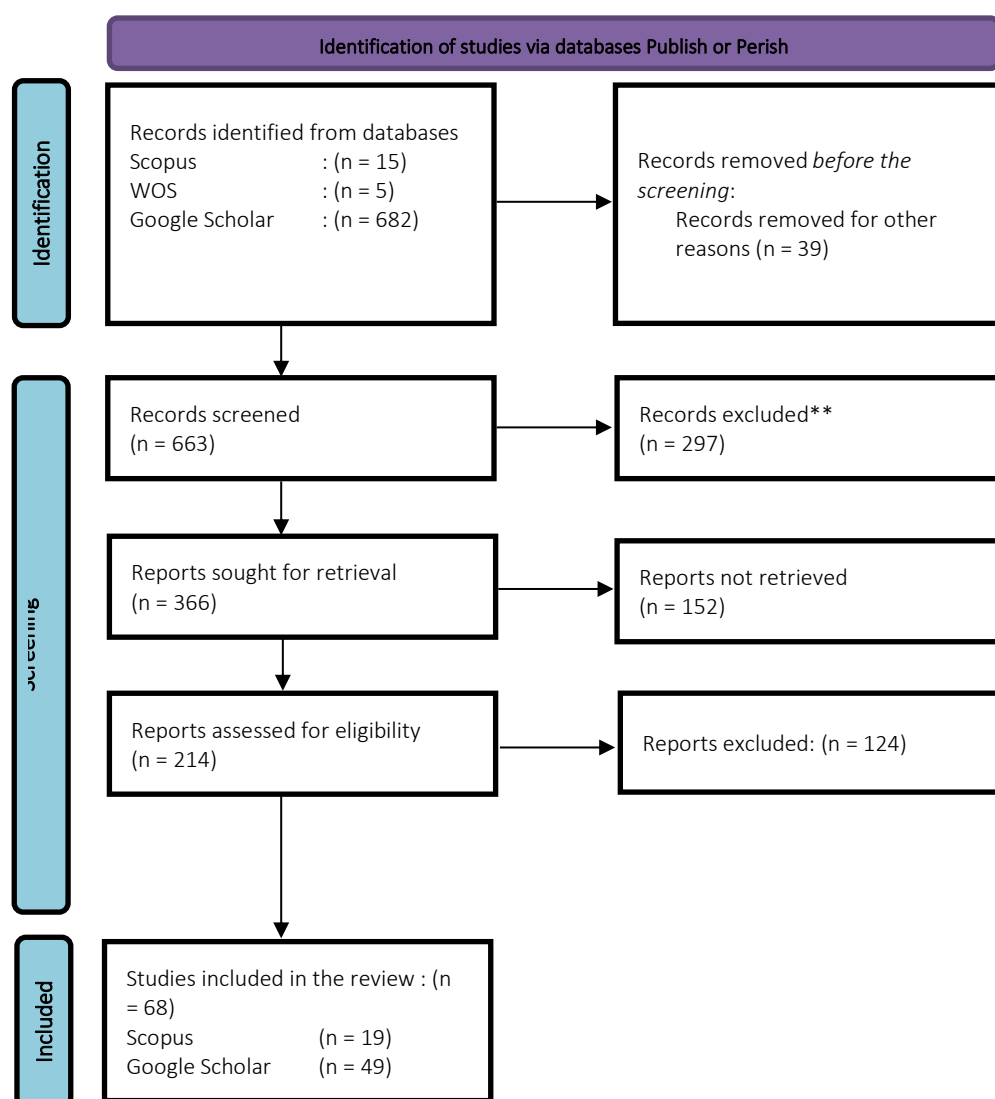
**Table 1. Results of obtaining research data through the Publish or Perish application**

No	Keywords	Year	Databased	Count
1	"inclusive education policy" AND "law"	2015-2025	Scopus	23
2	"inclusive education policy" AND "law"	2015-2025	WOS	5
3	"inclusive education policy" AND "law"	2015-2025	Google Scholar	401
4	"kebijakan pendidikan inklusif" DAN "hukum" DAN "Indonesia".	2015-2025	Goggle Scholar	281
Count				

In the table above, the total findings of the articles are 702. From 702 articles, the researcher will conduct a PRISMA analysis with three stages: identification, screening and

inclusion, from the included data and entered into the Zotero application. The data that has been sorted in the Zotero application will be exported in the form of RIS data. The results of the RIS data are re-validated and validation is done using the N-Vivo application, after which they are entered into the Vos viewers application to determine the distribution and relevance of themes to the research results and obtain results in the form of visualization according to the research keywords.

Analysis prism as an analysis process based on all data obtained in the publish or perish application (Sugiarto et al., 2022), in detail, can be seen in the flow chat below:



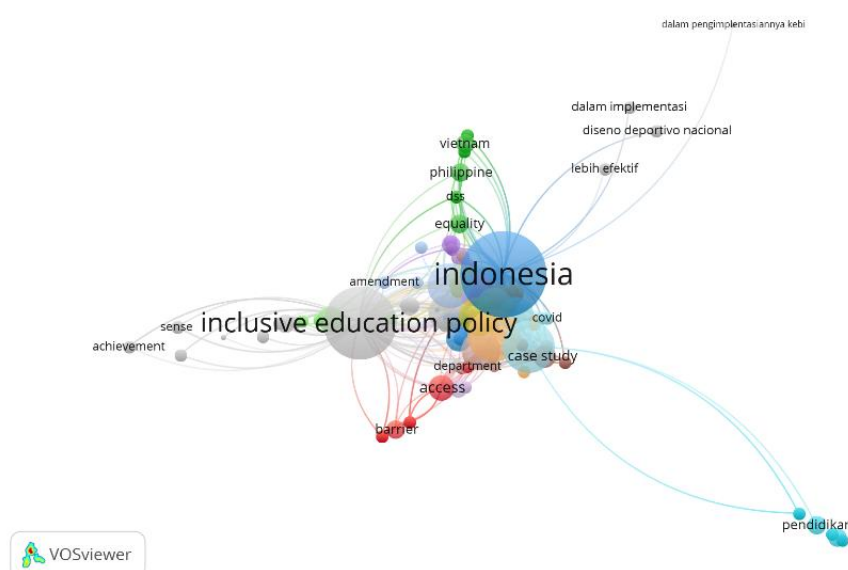
**Figure 1.** Prism analysis is obtained in the Publish or Perish application

From the results of the prism analysis, the researcher obtained 88 appropriate and complete "full paper" articles with the final details, articles from Scopus 19 and Google Scholar 19, totalling 68 articles. Furthermore, the researcher will reveal the details and depth in the sub-chapter of the research results.

### III. RESULT AND DISCUSSION

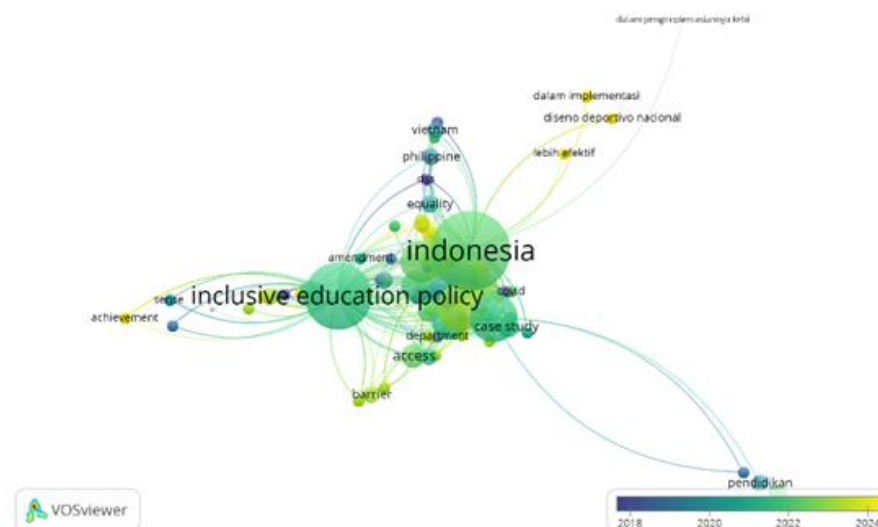
#### Literature Analysis and Thematic Visualization of Inclusive Education

The research results from the PRISMA analysis can be classified according to the research questions. What are the legal regulations governing Inclusive Education in Indonesia and other countries? What are the challenges of implementing Inclusive Education in Indonesia? From the research questions above, the researcher collected articles through the Zotero application and exported RIS data. Then from the RIS data collection, the researcher entered it into the Vos Viewers application to get a visualization of the relationship between 68 articles from the analysis results in the image below:



**Figure 2.** *Relevance of research themes from the results of Vosviewer visualization*

Figure 2 shows the relationship between the many research results examining inclusive education policies and amendments directly studied in Indonesia. In addition, there is a relationship with several other countries that focus on studying inclusive education policies, such as Vietnam, the Philippines, and Finland. Meanwhile, if seen from the distribution of research publications in Figure 3:



**Figure 3.** Distribution of research results based on year of publication

Figure 3 shows that the published research results are dominated by the 2022-2024 period regarding inclusive education policies in Indonesia. Hence, the urgency of the study in this study is very relevant amidst the important issue of the government paying attention to decent education, starting from the legal basis, policies and implementation processes that meet the standards of facilities and infrastructure and educators (teachers) who are by their expertise, the researcher explains in more detail in the three sub-studies below.

### Legal Regulation of Inclusive Education in Indonesia and Other Countries

Legal regulations governing inclusive education in Indonesia are based on the need to create an education pattern that can humanize humans (Arthur & Chen, 2023), namely fostering a spirit of mutual respect for diversity (Kaizu & Tamaki, 2024), and the shortcomings of other individuals (Notopravitno, 2019). The Indonesian government has issued several applicable laws and policies based on these conditions. Historically, Law No. 4 of 1997 concerning Persons with Disabilities was the first regulation discussing the rights of persons with disabilities in Indonesia. This law became the initial embryo that marked the state's attention to disability issues, including in education (Syarif, 2024). However, along with the development of the times and more complex needs, Law No. 4 of 1997 was later revoked and replaced by Law No. 8 of 2016 concerning Persons with Disabilities. This new law contains more comprehensive and detailed provisions, including special regulations regarding inclusive education. Therefore, in the study of inclusive education legal regulations, Law No. 8 of 2016 is more relevant and should be used as the main basis (Ristiyanti & Muqowim, 2023).

However, before the enactment of Law No. 8 of 2016. Legal regulations related to inclusive education were born from Law No. 20 of 2003 concerning the national education system, which contains instructions on organising education with equal rights towards quality education in Indonesia. Jannah & Hermanto (2022) stated that the presence of this law is proof that the government is directly present in the community



because the state must provide fair, decent and equitable education ([Saputra et al., 2025](#)). In line with [Syarif \(2024\)](#), who also provide the view that the mandate of Law No. 20 of 2003 is that the state must be present and act fairly for all Indonesian people in providing educational facilities without exception to children with special needs in the form of inclusive education from early childhood education, elementary, middle and high levels. Attention to the field of education is also a mandate of the 1945 Law, Article 28 C paragraph 1, namely that every citizen has the right to develop themselves and fulfil basic needs, such as education, technological knowledge, culture and art, to achieve quality in the welfare of life ([Rosari et al., 2023](#)).

Another legal guideline that is the basis for the optimal implementation of inclusive education is the existence of Law No. 8 of 2016, which explains specifically about people with disabilities, as expressed by [Achmad \(2023\)](#) that the purpose of the birth of Law No. 8 of 2016 is that the state wants to create an inclusive environment for people with disabilities so that they can participate fully in life, education, social, economic and political in Indonesia ([Khoiriyah et al., 2024](#)). [Notoprayitno \(2019\)](#) provide the view that the birth of the above law is a basis for establishing special schools (*Sekolah Luar Biasa/SLB*) and inclusive schools, which in the regulation of the Minister of Public Works and Public Housing No. 14 / PRT / M / 2017 accessibility of children with special needs is infrastructure, starting from buildings, stair lifts, escalators, sinks and toilets for children.

Furthermore, the legally binding law is derived from the policy made by the Minister of National Education, Permendiknas No. 70 of 2009, which regulates inclusive education for all students disabilities, special talents/above average intelligence by ensuring facilities, curriculum and teachers that are by needs ([Agustina & Rahaju, 2021](#); [Ferizaldi & Fazlina, 2020](#)), in the regulations it is stated that each district/city must appoint at least one inclusive school along with its supporting facilities. [Gustaman et al. \(2025\)](#) reinforce that the birth of Permendiknas No. 70 of 2009 is the basis that education is born for all because the progress of a nation can be seen from the laws and policies implemented in the implementation of education. So that the next policy is issued in the gubernatorial regulation, such as the example in the East Java Governor's Regulation No. 30 of 2018 concerning the implementation of inclusive education that respects diversity and is non-discriminatory for students in elementary, junior high and secondary schools ([Syarif, 2024](#)), the regulation will be followed up in each district/city, such as in the Decree of the Mayor of Surabaya Number 188.45/79/436.1.2/2019, Regional Regulation Number 3 of 2015 of Padang City ([Sabrina & Erianjoni, 2019](#)), Jombang Regency ([Saputra et al., 2025](#)), Situbondo ([Yuliyanto & Sedarmayanti, 2023](#)), which reveals the policy of implementing inclusive education ([Sari & Soeskandi, 2021, 2022](#)), and the provision of alternative services for children who have not been able to attend formal education through open schools.

Legal regulations in implementing inclusive education also apply in other countries ([Kusters et al., 2021](#)), such as Japan, which maintains the human rights of its citizens to pursue proper education without discrimination ([Yoshitoshi et al., 2024](#)). According to the law, Japan still enforces special schools for disabilities better known as Special Needs Schools/SNS) as per the law in the Fundamental Law of Education (1947, revised 2006) and the School Education Law (1947, revised 2007), which regulates equitable education.



However, after the 2014 conference on the rights of persons with disabilities ([Yoshitoshi & Takahashi](#), 2023), Japan has undergone renewal by strengthening its commitment to space for persons with disabilities to pursue education in formal education (inclusive education) by considering the expertise of accompanying teachers and curriculum modifications ([Kaizu & Tamaki](#), 2024; [Moberg et al.](#), 2020).

Legal regulations in inclusive education also apply in Malaysia through the Education Act 1996 and the Persons with Disabilities Act 2008, in addition to government support prohibiting schools from rejecting children with special needs with the Zero Reject Policy concept, which is evidence of a concrete solution in eliminating inequality in education. Meanwhile, in Vietnam, through the Education Law 2005 and the Law on Persons with Disabilities 2010 and Myanmar regulations ([Tonegawa](#), 2022), both have a clear legal framework for implementing inclusive education ([Linh & Azar](#), 2019). Although not as good as Finland, which legally has the best inclusive education system in the world through the Basic Education Act 1998 and the Non-Discrimination Act 2014, all schools accept students with special needs without discrimination because they receive special support from the government generally to specific such as ([Lempinen](#), 2017), special training for inclusive education teachers ([Grynova & Kalinichenko](#), 2018; [Smyth et al.](#), 2014), flexible curriculum ([Chaudhary & Syal](#), 2022), and learning methods that adapt to students' needs ([Pesonen et al.](#), 2014).

### Challenges of Implementing Inclusive Education in Indonesia

Although the state has issued various measurable regulations and the government has issued several policies related to inclusive education, this has not been fully proportional to the optimal implementation of inclusive education in different educational units in Indonesia ([Little et al.](#), 2022; [Yuliyanto & Sedarmayanti](#), 2023; [Zain et al.](#), 2022). [Sabrina & Erianjoni](#) (2019) revealed how solid the existence of laws (statutes) in Indonesia is, which is the basis for inclusive education and its derivatives ([Faragher et al.](#), 2021; [Lahesti et al.](#), 2023; [Sabrina & Erianjoni](#), 2019). However, if intensive monitoring and assistance are not carried out accompanied by periodic evaluations, the implementation process will be less than optimal. Several findings on the implementation of inclusive education at the elementary school level ([Fasha & Widowati](#), 2017; [Munajah et al.](#), 2021; [Nugroho & Mareza](#), 2016; [Romadhon et al.](#), 2021), special schools ([Perdana et al.](#), 2024), and secondary ([Syarif](#), 2024), and higher education ([Huda & Syihabuddin](#), 2024), still leave various homework to be completed ([Jannata et al.](#), 2024; [Lestari et al.](#), 2024; [Moberg et al.](#), 2020). Several real challenges must be the attention of the state and government in optimizing inclusive education, as follows:

*First*, limited human resources, namely the lack of assistant teachers who have the qualifications according to the needs of schools ([Munajah et al.](#), 2021; [Rosari et al.](#), 2023; [Rosyidi](#), 2023), [Indah](#) (2022) noted that the availability of teachers with appropriate competency backgrounds is very minimal ([Khaerunisa & Rasmitadila](#), 2023), thus hampering the inclusive education process, such as initial assessment ([Lahesti et al.](#), 2023), not yet making plans ([Melinda et al.](#), 2025), implementation and evaluation of inclusive learning ([Emilyana et al.](#), 2024; [Gustaman et al.](#), 2025). In line with [Ferizaldi & Fazlina](#) (2020) which states that because the qualifications they have do not match the

needs, the results of the teachers tend to be less than optimal ([Perdana et al.](#), 2024), and still use simple methods and do not use special tools in learning for children with disabilities ([Jannata et al.](#), 2024). The above conditions indicate that the government must provide appropriate and fast solutions, such as providing special education for teachers who are beyond qualifications ([Chaudhary & Syal](#), 2022; [Dewantara & Kusumastuti](#), 2020; [Faragher et al.](#), 2021; [Lestari et al.](#), 2024), and providing training for teachers ([Lempinen](#), 2017; [Moberg et al.](#), 2020; [Nasir et al.](#), 2025). Because with good qualifications and expertise in human resources, inclusive education will run optimally ([Yoshitoshi et al.](#), 2024).

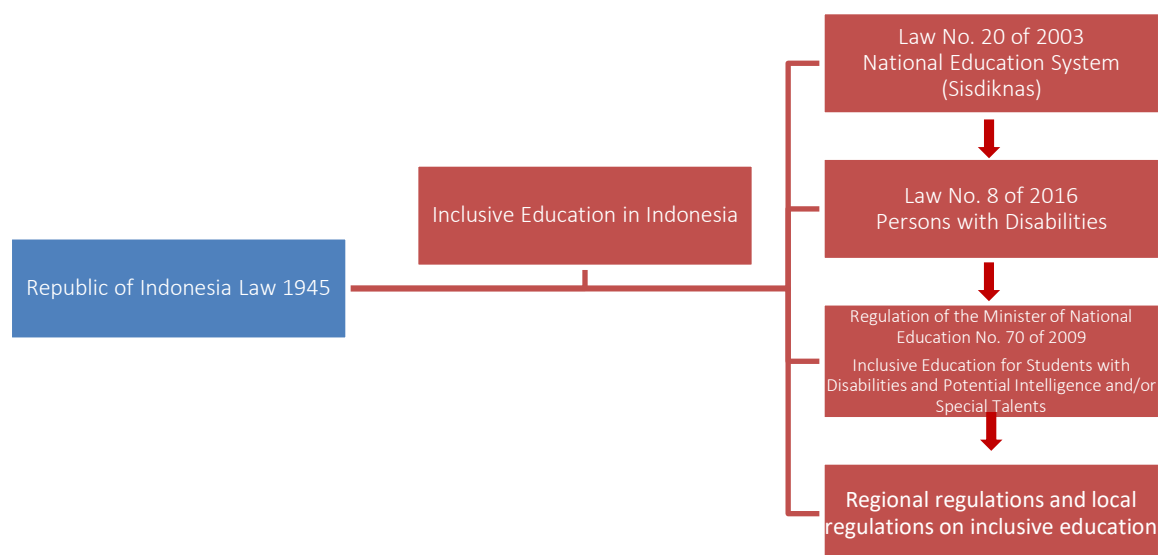
*Second* is the need to provide collaboration space for teachers, the government and parents ([Panda et al.](#), 2023; [Saloviita](#), 2020; [Zain et al.](#), 2022). Without good collaboration, implementing inclusive education is just an impossible dream to realize. Third, the challenge of implementing inclusive education is that many schools still lack facilities and infrastructure that are to the needs of students with special needs, [Yuwono & Supratiwi](#) (2024) so funding is needed in the development of facilities and infrastructure ([Agustina & Rahaju](#), 2021; [Jannah & Hermanto](#), 2022; [Ristiyaniti & Muqowim](#), 2023; [Somad et al.](#), 2024). In line with [Arias et al.](#) (2023) that infrastructure is an urgent challenge for schools after the lack of human resources (teachers), such as the availability of accessibility and special learning devices for people with disabilities ([Dewantara & Kusumastuti](#), 2020; [Emilyana et al.](#), 2024; [Ferizaldi & Fazlina](#), 2020; [Fionita & Nurjannah](#), 2024; [Gustaman et al.](#), 2025; [Munajah et al.](#), 2021). So coordination is needed with various parties, starting from policy-implementing institutions and government policymakers ([Maulida et al.](#), 2023; [Melinda et al.](#), 2025; [Sabrina & Erianjoni](#), 2019; [Syarif](#), 2024).

The fourth challenge in the implementation of inclusive education is the still weak supervision and evaluation because school findings are still minimal in implementing character education optimally ([Alfikri et al.](#), 2022; [Dewantara & Kusumastuti](#), 2020), so the existence of supervision from both the government and the private sector is a necessity in order to achieve good inclusive education. [Fionita & Nurjannah](#) (2024) revealed that the existence of consistent supervision and evaluation is the key to the success of inclusive education; one of the main reasons is that if obstacles are found, corrective actions can be taken quickly and appropriately ([Gustaman et al.](#), 2025). in line with [Khoiriyah et al.](#) (2024) the task of supervision and evaluation must also be borne by the government as the maker of laws and policies in order to improve systems that are not running optimally ([Lestari et al.](#), 2024; [Maulida et al.](#), 2023). The existence of four challenges to implementing inclusive education is a space for all parties to find the best solution so that inclusive education can be implemented per the mandate of applicable laws and policies.

## Legal Review of Inclusive Education Policy

Legal regulations for inclusive education in Indonesia basically have a clear constitutional basis in accordance with the law in Indonesia ([Panjaitan](#), 2021; [Patra](#), 2018; [Rafii et al.](#), 2021). Several pieces of evidence show that legally inclusive education in Indonesia is quite effective and positively impacted because it pays attention to several components.

*First*, human rights ([Mariyono](#), 2024), equal rights between normal and special needs students (without discrimination) ([Buchner et al.](#), 2021; [Graham et al.](#), 2023). *Second*, in line with the International Convention (UN) on the rights of persons with disabilities ([Pérez-Macías et al.](#), 2022), Sustainable Development Goals (SDGs) ([Opoku et al.](#), 2019; [Tebbutt et al.](#), 2016), and the 1994 Salamanca Declaration on Joint Commitment to Overseeing Equitable Inclusive Education. *Third*, the regulation of inclusive education in Indonesia is clear ([Rofiah & Suhendri](#), 2023; [Sujarwanto](#), 2023), and binding starting from the definition, rights, obligations ([Adriany](#), 2024), monitoring system and sanctions if violations are found. *Fourth*, support from various parties and adequate facilities and infrastructure should be ensured so that inclusive education can run optimally ([Elvira et al.](#), 2024; [Mansur et al.](#), 2023). Through the four components above, the government's hopes of implementing equitable, inclusive education can be carried out properly. Details can be seen in the Figure below:



**Figure 4.** Legal overview of inclusive education in Indonesia

As for several legal stages that are running in Indonesia regarding inclusive education, starting from *First* Law No. 20 of 2003 concerning a fair national education system and recognizing that education is a right for all Indonesian people, [Kawuryan et al.](#) (2021) noted that education in Indonesia as stated in Law No. 20 of 2003 guarantees equality of education with equal access without exception in urban or rural schools ([Supianto et al.](#), 2024). *Second*, Law No. 8 of 2016 regulations for people with disabilities. [Nurdin](#) (2022) also stated that the birth of this law is proof of legal justice for people with disabilities regarding their rights so that they do not receive discriminatory treatment, especially in obtaining an education ([Qamariyanti et al.](#), 2024). In terms of policy, it already exists in the Minister of National Education Regulation No. 70 of 2009 regulates Inclusive Education for all children; this condition is relevant to the existence of children with special needs with an increasing trend every year ([Efendi](#), 2018; [Efendi et al.](#), 2022), so that in the Minister of National Education Regulation No. 70 of 2009 it further

strengthens the implementation of Inclusive Education starting from the objectives of Education ([Qorib](#), 2024), curriculum ([Arif et al.](#), 2024; [Dewi et al.](#), 2018; [Mukminin et al.](#), 2019), materials ([Fajarwati](#), 2017), and skills that are by children's needs. In addition, more specifically, regional and local governments also provide regulations on Inclusive Education with the main objective that the implementation process can run optimally ([Agus et al.](#), 2023), respect each other and avoid discrimination and stigma ([Rasmitadila, Humaira, et al.](#), 2021), so that educational opportunities are shared in a diverse space.

Indonesia's legal and policy structures are more established than those of other countries by UNESCO ([Warman](#), 2021). Only the Finnish system is superior as the best country in inclusive education, as Finnish data legally inclusive education has been in effect since 1998 written in the Basic Education Act 1998 and the Non-Discrimination Act 2014, which in terms of implementation Finland is much more consistent than other countries that produced inclusive education laws earlier. [Wolff et al.](#) (2021) stated that Finland's success is not only based on binding laws and policies. However, Finland, in practice, is supported by the culture of the wider community and complete facilities and infrastructure for children with special needs. Without exception, early childhood education ([Pihlaja](#), 2022), in Finland has eliminated special schools because all students study in regular (inclusive) schools.

Meanwhile, in Japan, which regulates inclusive education in the Fundamental Law of Education 1947 (revised 2006), the School Education Law 1947 (revised 2007) is still transitioning towards inclusive education and reducing special schools. [Dyliaeva et al.](#) (2024) revealed that inclusive education still experiences many contradictions in the implementation process because before the regulations were revised, Japan separated children with special needs from normal children. So that service providers and facilities still need improvement. Meanwhile, in Malaysia, legal regulations were born in 1996, the Education Act 1996 and the Persons with Disabilities Act 2008, through the Zero Reject Policy concept, which was initiated in 2019 ([Chin](#), 2023; [Ensima et al.](#), 2022), namely a program prohibiting schools from rejecting students with special needs. So, public schools in Malaysia are required to accept students without discrimination ([Loganathan et al.](#), 2022). Meanwhile, Vietnam only enacted the Inclusive Education law in 2005, through the Education Law 2005 and the Law on Persons with Disabilities 2010 regulations. However, regarding implementation, Vietnam still experiences segregation, especially in resources ([Mulyani et al.](#), 2021; [Rasmitadila, Widyasari et al.](#), 2021), and facilities ([Pham et al.](#), 2020). This is different from Myanmar, which was only born in 2014 through the Education Law 2014 and the Child Rights Law 2019, so in terms of space, it is very limited, and there are still many special schools. [Tonegawa](#) (2022) stated that Myanmar only enforces inclusive education for children with special needs at an early stage ([Kartiko et al.](#), 2024), such as visual impairments ([Waite](#), 2015).

In the implementation stage of inclusive education in Indonesia, several challenges must be resolved immediately, even though they are legally final and binding. For such human resources, especially teacher positions, many are still found to have no qualifications (special needs); in addition, teachers lack support in accessing and having inclusive training. [Kurniawati](#) (2021) explained that the implementation of inclusive education in Indonesia still has complex challenges, namely, human resources (teachers) still need

professional development in the best strategies for inclusive education ([Kurniawati, 2021](#); [Sheehy et al., 2017](#); [Siron & Mulyono, 2017](#)). In the future, prospective inclusive education teachers must be by the qualifications and provide inclusive education training in order to foster creativity in the teaching and learning process ([Soeharto et al., 2024](#)), so that the role of government, schools and parents is key to the success of building a good inclusive education culture ([Andriana & Evans, 2020](#)).

Another challenge is the existence of infrastructure, which is still a pending note that needs to be fulfilled immediately. [Rofiah et al. \(2021\)](#) stated that infrastructure is an important supporting force in the learning process, especially for children with special needs in remote/rural schools because, in general, accessibility is very different from regular students ([Prasetyo et al., 2021](#)). So, the presence of the government as a policy maker is highly expected to be a solution in fulfilling inclusive education infrastructure ([Fatimah et al., 2024](#)), so that students feel comfortable and safe. Furthermore, supervision and evaluation are needed to ensure that the implementation process of inclusive education can run optimally. Because there is no national evaluation standard ([Mudjito et al., 2017](#)), schools in remote areas have not been touched ([Apologia et al., 2024](#); [AR et al., 2018](#); [Hakiman et al., 2022](#)), and data has not been well integrated into the national education system ([Solihat, 2018](#)).

#### IV. CONCLUSION

Indonesia's legal regulation of inclusive education is quite effective. It has a positive impact because it considers several components, including human rights, in line with the UN international convention, Sustainable Development Goals (SDGs), and the 1994 Salamanca Declaration on Joint Commitment in overseeing equitable, inclusive education. In addition, clear and binding legal regulations range from definitions, rights, obligations, monitoring systems and sanctions if violations are found, and ensuring the fulfilment of school facilities and infrastructure. It is proven that all of them are stated in Law No. 20 of 2003 concerning a fair national education system and recognizing that education is a right for all Indonesian people, Law No. 8 of 2016 regulations for people with disabilities and Permendiknas No. 70 of 2009, further strengthen the implementation of inclusive education starting from the objectives of education, curriculum, skills and materials that are by children's needs so that the legal regulations of the Indonesian state are superior. Based on the study findings, Indonesia's legal regulations on inclusive education are considered more advanced than those of Japan, Malaysia, Vietnam, and Myanmar though still below Finland, which is widely recognized as a global benchmark for best practices in inclusive education. Some challenges in implementing inclusive education include limited human resources, the need to provide collaboration space for teachers, government and parents, minimal facilities and infrastructure and weak supervision and evaluation. Based on the study's conclusions above show the findings of theoretical implications regarding clear and binding legal regulations for inclusive education, starting from the definition, rights, obligations, monitoring systems and sanctions if violations are found compared to other countries. In addition, it is based on the right structure of the results of the UN international

convention, the Sustainable Development Goals (SDGs) and the 1994 Salamanca Declaration on Joint Commitments in Overseeing Equitable Inclusive Education. However, this study has limitations because it is based on the results of a systematic literature review analysis with a specific theme in the 2015-2025 period. So that future research can be conducted on the Legal Strength of Inclusive Education Regulations in Indonesia: A Critical Study of the Implementation of Law No. 8 of 2016 concerning Persons with Disabilities.

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