Same Commitments, Different Architectures: A CRPD-Referenced Comparison of Inclusive Education Policy in Tanzania and Ethiopia

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ABSTRACT

This study compares how mainland Tanzania and Ethiopia define, mandate, and govern inclusive education in national policy, using Article 24 of the Convention on the Rights of Persons with Disabilities (CRPD) and General Comment No. 4 as a common benchmark. Through qualitative comparative document analysis, eleven national laws, policies, strategies, and plans were examined against eleven CRPD-derived criteria. The analysis also considered how governance responsibilities and support systems are organised, while distinguishing policy provisions from secondary evidence about implementation. Both countries recognise a right to inclusive education and address accessibility, yet neither sets a time-bound commitment to end segregated provision. Tanzania endorses "responsible inclusion," whereas Ethiopian policy states that inclusiveness "does not mean full integration." In both settings, more detailed CRPD-aligned commitments appear in sector strategies rather than in the principal education policies revised in 2023; neither of those policies explicitly refers to the Convention. Reasonable accommodation receives particularly weak treatment, and financing commitments lack clear allocation rules. The most significant difference concerns institutional architecture. Ethiopia has developed a cluster-based network of inclusive education resource centres supported by itinerant teachers, while Tanzania relies on a national assessment centre and support linked to special schools and units. Responsibility is also divided differently: between national institutions in Tanzania and across federal, regional, and woreda levels in Ethiopia. These findings suggest that the design of support and governance structures, rather than the strength of stated rights commitments alone, distinguishes the systems. The study offers a CRPD-referenced framework for evaluating inclusive education policies and highlights the need for clearer accountability, financing, and individual entitlements.

Keywords: inclusive education; CRPD Article 24; education policy; Tanzania; Ethiopia.

INTRODUCTION

Article 24 of the Convention on the Rights of Persons with Disabilities (CRPD) obliges states parties to ensure an inclusive education system at all levels (United Nations, 2006). The Committee on the Rights of Persons with Disabilities (CRPD Committee) has interpreted this obligation in General Comment No. 4, which distinguishes inclusion from exclusion, segregation and integration and sets out what an inclusive system requires, from reasonable accommodation to financing and data (CRPD Committee, 2016). These standards build on the Salamanca Statement, which first placed inclusion at the centre of international education policy (Ainscow et al., 2019), and are reinforced by the commitment in Sustainable Development Goal 4 to inclusive and equitable quality education (United Nations, 2015).

Ratification has not translated readily into inclusive systems, particularly in low- and lower-middle-income countries, where reviews of implementation repeatedly identify constraints of resources, support and capacity (Mendoza & Heymann, 2024; Nel, 2020). How national policy defines inclusion, assigns responsibility and organises support matters because these choices shape what schools are expected to provide and what learners can claim.

Tanzania and Ethiopia offer an instructive comparison. Both ratified the CRPD, Tanzania in 2009 and Ethiopia in 2010 (MoE, 2022; MoEST, 2021), both have issued successive inclusive education strategies, and both revised their principal education policies in 2023. Both also face well-documented barriers to implementation at school level (Abera et al., 2025; Samson et al., 2025). Yet the two countries have organised support for learners with disabilities in different ways, and their governance systems, devolved local government in mainland Tanzania and a federal structure in Ethiopia, distribute responsibility differently.

This article makes two contributions. First, it provides, to our knowledge, the first comparison of inclusive education policy in two Sub-Saharan African countries that uses Article 24 of the CRPD and General Comment No. 4 as an explicit benchmark, extending an earlier single-country review of Tanzanian policy (Kyambo et al., 2022). Second, it shows that the institutional architecture of support, rather than the strength of policy commitment, is what most distinguishes the two systems. The study addresses three questions:

1. How do the national policy documents of mainland Tanzania and Ethiopia define disability and inclusive education?

2. To what extent do these documents meet the criteria of Article 24 and General Comment No. 4?

3. How do the two countries' governance arrangements distribute responsibility for delivering inclusive education?

LITERATURE REVIEW

From Special Needs Education to Inclusion

Education for learners with disabilities has moved, in policy if not always in practice, from separate provision towards inclusion in regular schools. General Comment No. 4 gives this shift a precise vocabulary. Exclusion denies access to education; segregation educates learners with disabilities in separate environments; integration places them in mainstream institutions on condition that they adjust to existing requirements; and inclusion involves systemic reform of content, teaching methods, structures and strategies so that all learners can participate (CRPD Committee, 2016, para. 11). Evidence on the effects of inclusion is broadly positive but depends on how it is implemented (de Bruin, 2020), and the concept has widened from disability to equity for all learners (OECD, 2023).

Inclusive Education Policy in Low- and Middle-Income Countries

Reviews of inclusive education in low- and lower-middle-income countries find that interventions are often small, externally supported and constrained by limited resources and support systems (Mendoza & Heymann, 2024). In Africa, inclusive and special education policies have expanded since the 1990s, but systems often retain special schools alongside mainstream provision (Nel, 2020). Studies of rights-based approaches to education describe a persistent gap between policy and practice (Sahani, 2025). Much of this literature examines practice at school level; fewer studies analyse the design of national policy frameworks against the standard the CRPD sets.

Tanzania and Ethiopia

In Tanzania, research on inclusive education has examined the gaps between commitments to access, equity and inclusion and their realisation (Philip, 2024), government support for students with disabilities (Kambuga & Mgonja, 2023), and the barriers schools face in implementing inclusive policy and curricula (Nuru et al., 2025; Samson et al., 2025). The closest study to the present one is a review of seven Tanzanian policies, laws and guidelines, which found that they recognise education as a right of children with disabilities but give little attention to enforcement, budgetary allocation and monitoring (Kyambo et al., 2022). That review did not use the CRPD as a benchmark and did not compare Tanzania with another country.

In Ethiopia, research has traced the inclusion of students with disabilities in the Education for All agenda (Franck & Joshi, 2017), the perspectives of system- and school-level stakeholders on the pathway to inclusive education (Yorke et al., 2022), and the conditions for implementation in mainstream primary schools (Genovesi et al., 2024; Taddese et al., 2025). The only comparative policy study involving Ethiopia that we identified compared it with Canada (Devall-Martin & McHolm, 2024).

The Gap Addressed

No study, to our knowledge, has systematically compared the policy frameworks of two Sub-Saharan African countries against Article 24 and General Comment No. 4. This gap matters because Tanzania and Ethiopia ratified the same Convention yet organise support for learners with disabilities through different institutional models, offering a natural comparison of how similar international commitments are translated into different national arrangements.

Theoretical Framework

The study draws on three complementary perspectives, each of which is used as an analytical tool rather than as background.

Social Model of Disability

The social model locates disability in the barriers that social and institutional arrangements create rather than in individual impairment (Oliver, 2013). In education, it directs attention away from the learner's deficits and towards the structures, curricula and attitudes that exclude (Masuku, 2021). In this study, it informs two analytical questions: whether policy documents frame disability in medical or social terms, and whether support is located in the regular school or in separate settings.

Human Rights-Based Approach

A human rights-based approach treats inclusive education as a legal entitlement that states must respect, protect and fulfil (United Nations, 2006). General Comment No. 4 specifies the content of that entitlement, including the prohibition of exclusion, reasonable accommodation, individualised support, accessibility, teacher education, financing, data and the participation of organisations of persons with disabilities (CRPD Committee, 2016). These provisions supply the coding criteria used in this study (see Table 3).

Inclusive Education as System Reform

A system perspective on inclusive education holds that inclusion depends on coherent conditions across the system, including clear responsibility, coordination between levels and the use of resources to support regular schools (Ainscow, 2020). This perspective informs the analysis of governance: how the two countries distribute responsibility for delivering inclusive education between national bodies and across levels of government.

METHOD

Research Design

This study is a qualitative comparative document analysis (Bowen, 2009; Dalglish et al., 2020). It examines policy texts, not classroom practice or learner outcomes, and therefore makes claims about how inclusion is framed, mandated and organised, not about how effectively it is implemented. Where the analysis refers to implementation, it draws on published reports, which are cited as secondary evidence and distinguished from the policy texts.

Case selection followed a most-similar-systems logic (Anckar, 2020), in which cases that share many background conditions are compared so that a difference of theoretical interest can be examined. Mainland

Tanzania and Ethiopia share several conditions that are relevant to inclusive education policy. Both are Sub-Saharan African states that ratified the CRPD within a year of each other, Tanzania in 2009 and Ethiopia in 2010 (MoE, 2022; MoEST, 2021); both have issued successive national strategies for inclusive or special needs education; both revised their principal education policies in 2023; and both report constraints of data, teacher preparation and resources in their own policy documents (MoE, 2021; MoEST, 2021, 2023). They differ in a respect that is central to the research questions: the institutional model through which support for learners with disabilities is organised, and the governance system through which it is delivered, with devolved local government in mainland Tanzania and a federal structure in Ethiopia.

The two countries are comparable rather than identical. They differ in income classification: in the World Bank's country classification, Tanzania was a low-income economy for most of the study period and has been classified as a lower-middle-income economy since July 2020, whereas Ethiopia was classified as a low-income economy throughout the period (World Bank, 2026). They also differ in population size, constitutional structure and the language of official documents. These differences limit the extent to which variation in policy design can be attributed to the organisation of support alone. The comparison is therefore used to identify and interpret patterns in policy design, not to establish causal effects.

Document Corpus

The corpus comprised national laws, policies, strategies, plans and implementation guidelines governing the education of learners with disabilities in mainland Tanzania and Ethiopia (Table 1). Documents were identified through the websites of the two ministries of education, the UNESCO IIEP Planipolis repository and the Policy Vault Africa database, supplemented by documents cited in recent reviews (Kyambo et al., 2022; Yorke et al., 2022). A document was included if it (a) was issued or adopted by a national government; (b) was issued between January 1994 and December 2023; (c) contained provisions on the education of learners with disabilities; and (d) was in force at the end of that period or, if superseded, was needed to trace change over time. Documents were excluded if they were issued by sub-national authorities, were drafts, were produced by development partners rather than governments, or were issued outside the publication window. Reports by development partners were used only as secondary sources (Table 2). Tanzania's fourth national inclusive education strategy, launched in October 2026 (Daily News, 2026), falls outside the window. Education in Zanzibar is administered separately and is outside the scope of the study.

Eleven documents met these criteria: four from Tanzania and seven from Ethiopia. The difference reflects mainly how each country has codified inclusive education. In Ethiopia, provisions are spread across several dedicated instruments: an apex education policy, two successive special needs/inclusive education strategies, a master plan, an implementation guideline for resource centres and an education sector development programme. Two of these, the 1994 policy (E0) and the 2012 strategy (E3), are superseded and were retained only to trace change over time. In mainland Tanzania, the relevant provisions are concentrated in a disability law, a disability policy, the apex education policy and a national inclusive education strategy.

Three steps were taken so that the unequal number and type of documents would not distort the comparison. First, comparisons were made between documents with equivalent functions: the two apex education policies (T3 and E1) and the two current inclusive education strategies (T4 and E2) form the core of the comparison, while laws, plans and guidelines were used to show how commitments are anchored or implemented. Second, the superseded documents (E0 and E3) were used only to trace change within Ethiopia and were not treated as evidence of current policy. Third, no country-level scores or counts of ratings were computed; findings are reported as patterns across documents of comparable status, and each finding identifies the documents on which it rests.

Table 1: *National Documents Analysed*

Code	Country	Document	Year	Issuing body
T1	Tanzania	Persons with Disabilities Act, No. 9 (Part VII)	2010	Parliament of the United Republic of Tanzania

T2	Tanzania	National Policy on Disability	2004	Ministry of Labour, Youth Development and Sports
T3	Tanzania	Education and Training Policy of 2014, 2023 Edition	2023	Ministry of Education, Science and Technology
T4	Tanzania	National Strategy for Inclusive Education 2021/22–2025/26	2021	Ministry of Education, Science and Technology
E1	Ethiopia	Education and Training Policy (Amharic)	2023	Ministry of Education
E2	Ethiopia	Special Needs/Inclusive Education Strategy 2022/23–2029/30	2022	Ministry of Education
E3	Ethiopia	Special Needs/Inclusive Education Strategy (superseded)	2012	Ministry of Education
E4	Ethiopia	Master Plan for Special Needs Education/Inclusive Education 2016–2025	2016	Ministry of Education
E5	Ethiopia	Guideline for Establishing and Managing Inclusive Education Resource/Support Centers	2015	Ministry of Education
E6	Ethiopia	Education Sector Development Programme VI 2020/21–2024/25	2021	Ministry of Education
E0	Ethiopia	Education and Training Policy (superseded)	1994	Federal Democratic Republic of Ethiopia

Note. In-text citations: T1 = URT (2010); T2 = URT (2004); T3 = MoEST (2023); T4 = MoEST (2021); E1 = MoE (2023); E2 = MoE (2022); E3 = MoE (2012); E4 = MoE (2016); E5 = MoE (2015); E6 = MoE (2021); E0 = FDRE (1994). URT = United Republic of Tanzania; MoE = Ministry of Education (Ethiopia); MoEST = Ministry of Education, Science and Technology (Tanzania); FDRE = Federal Democratic Republic of Ethiopia.

Evidence on implementation was drawn from reports by development partners and from a study of education sector reform as shown in Table 2. These sources were not coded; they were used only to describe the implementation context and are reported separately from the policy analysis.

Table 2: *Secondary Sources on Implementation*

Code	Country	Source	Use in the analysis
S1	Ethiopia	World Bank (2023), feature story on inclusive education resource centres	Centre numbers; personnel trained
S2	Ethiopia	UNICEF (2024), case study on disability inclusion in pre-primary education	Early identification; cluster centres
S3	Tanzania	World Bank (2024), report on disability inclusion	Assessment centres; budget share
S4	Tanzania	Opalo (2023), working paper on education sector reforms	Roles of national bodies

Coding Procedure

Each national document was coded deductively against 11 criteria derived from Article 24 of the CRPD and General Comment No. 4 (Table 3). Documents were also coded for medical-model and social-model framing of disability (Oliver, 2013), and governance arrangements were coded inductively. For each criterion, each document received one of four ratings, defined as follows.

Explicit (E). The document states the requirement of the criterion directly and in operative terms, as a right, duty, commitment or defined mechanism. For example, Tanzania's Persons with Disabilities Act gives persons with disabilities the same rights to education as other citizens, including in inclusive settings, and prohibits discrimination by learning institutions (URT, 2010, ss. 27–28); it was therefore rated E for C1.

Partial (P). The document addresses the criterion only in part, in general terms, as a goal or an acknowledged problem without an operative commitment, or in a form that departs from the CRPD standard. For example, Ethiopia's 2022 strategy commits to renovating schools "for reasonable accommodation purposes" (MoE, 2022, p. 16), which treats an individual duty as a matter of building accessibility; it was therefore rated P for C4.

Absent (A). No provision addressing the criterion was found after a full reading of the document's education and disability provisions and a keyword search for the criterion's terms. For example, Tanzania's 2023 Education and Training Policy contains no reference to reasonable accommodation; it was therefore rated A for C4.

Not applicable (—). The criterion falls outside the purpose of the document type, so the absence of a provision says nothing about the document's alignment with the CRPD. For example, the 2015 guideline on resource centres (E5) regulates how centres are established and managed and was not expected to define a right to inclusive education; it was therefore rated — for C1 to C5, C7 and C10.

A provision that bore on more than one criterion was rated under each criterion to which it applied. The decision rule for each rating under each criterion is given in Supplementary File S1. All four authors independently coded all 11 documents using the same criteria and rating definitions. Their ratings were then compared, and each discrepancy was discussed with reference to the original document and the decision rules until consensus was reached. Table 4 and Supplementary File S1 report the consensus ratings. Ethiopia's 2023 policy is available only in Amharic as a scanned document; its text was extracted using optical character recognition (OCR), and passages relevant to the analytical criteria were translated into English and checked by a native Amharic speaker to ensure accuracy and consistency with the original document. Quotations from that document are the authors' translations.

Table 3: *CRPD-Derived Coding Criteria*

Code	Criterion	Source
C1	Right to inclusive education and prohibition of exclusion	Art. 24(1), 24(2)(a); GC4 para. 18
C2	Inclusion defined as distinct from integration and segregation	GC4 para. 11
C3	Commitment to transition from segregated provision, with a time frame	GC4 paras. 40, 63, 70
C4	Reasonable accommodation as an individual, immediately enforceable duty	Art. 24(2)(c); GC4 paras. 28–31
C5	Individualised support (e.g., individualised education plans)	Art. 24(2)(d)–(e); GC4 paras. 32–33
C6	Accessibility of environments, materials and communication (Braille, sign language)	Art. 24(3); GC4 paras. 22–23
C7	Pre-service and in-service teacher education for inclusion	Art. 24(4); GC4 para. 71
C8	Dedicated financing mechanism	GC4 paras. 69–70
C9	Disaggregated data and monitoring	Art. 31; GC4 para. 68
C10	Participation of organisations of persons with disabilities	Art. 4(3); GC4 para. 64
C11	Support and resource system, including early identification	GC4 paras. 67, 72

Note. GC4 = General Comment No. 4 (Committee on the Rights of Persons with Disabilities, 2016).

Trustworthiness

Credibility was supported by recording, for every rating, the section or page on which it rests, so that each judgement can be traced to the text. The complete coding matrix, giving the rating, supporting excerpt, page or section reference and justification for each of the 121 document–criterion pairs, is provided as Supplementary File S1. Superseded documents were coded using the same criteria to examine changes over time, and

secondary sources were kept separate from the coding process to ensure that statements about policy implementation were not confused with statements about policy provisions.

Ethical Considerations

The study analysed publicly available documents and involved no human participants, so formal ethical approval was not required. Documents were quoted accurately and in context, and translations are identified as such.

FINDINGS

The analysis covered 11 national documents: four from mainland Tanzania and seven from Ethiopia, including a superseded policy and a superseded strategy that were used to trace change over time as shown in Table 1. Each document was coded against 11 criteria derived from Article 24 of the CRPD and General Comment No. 4, as in Table 3. Table 4 summarises the results. Six findings emerged. They concern the persistence of parallel systems, a gap between sector strategies and apex education policies, the governance of delivery, the architecture of support, financing and data, and reasonable accommodation. Evidence on implementation from development partners is reported separately at the end of the section as indicated in Table 5.

Table 4: Coding of National Documents Against CRPD-Derived Criteria

Criterion	T1	T2	T3	T4	E1	E2	E3	E4	E5	E6	E0
C1 Right	E	P	E	E	P	E	E	E	—	P	P
C2 Definition	P	A	P	E*	A	P	P	P	—	A	A
C3 Transition	P	A	A	A	A	A	A	A	—	A	A
C4 Reasonable accommodation	P	A	A	P	A	P	A	A	—	A	A
C5 Individualised support	P	P	P	P	P	A	E	E	—	A	A
C6 Accessibility	P	P	P	E	P	E	E	E	P	P	A
C7 Teacher education	A	P	A	E	A	E	E	E	—	P	P
C8 Financing	A	A	A	P	P	P	P	E	P	P	A
C9 Data and monitoring	A	P	A	P	A	E	P	E	P	P	A
C10 Participation of OPDs	E	E	P	P	A	P	P	P	—	A	A
C11 Support system	A	P	P	P	A	E	E	E	E	P	A

Note. E = explicit; P = partial; A = absent; — = not applicable to the document type; T1 = Persons with Disabilities Act (2010); T2 = National Policy on Disability (2004); T3 = Education and Training Policy of 2014, 2023 Edition; T4 = National Strategy for Inclusive Education 2021/22–2025/26; E1 = Education and Training Policy (2023); E2 = Special Needs/Inclusive Education Strategy (2022); E3 = Special Needs/Inclusive Education Strategy (2012); E4 = Master Plan for Special Needs Education/Inclusive Education 2016–2025; E5 = Guideline for Establishing and Managing Inclusive Education Resource/Support Centers (2015); E6 = Education Sector Development Programme VI; E0 = Education and Training Policy (1994). OPDs = organisations of persons with disabilities. *T4 adopts the core features of General Comment No. 4 but also endorses "responsible inclusion" (MoEST, 2021, pp. 8, 40). Ratings are the consensus of four independent coders. The full coding matrix, with the supporting excerpt, location and justification for every rating, is provided in Supplementary File S1.

Shared Rights Commitments, Persistent Parallel Systems

Both countries have ratified the CRPD, and their current strategies adopt its rights language. Tanzania's strategy commits to the participation of all learners with special educational needs "without discrimination or exclusion" and states that it localises the core features of an inclusive education system set out in General

Comment No. 4 (MoEST, 2021, pp. 39–40). Ethiopia's 2022 strategy grounds the right to education in the Convention (MoE, 2022, p. 6). Tanzania's Persons with Disabilities Act provides the strongest legal anchor in the corpus: it gives persons with disabilities the same rights to education as other citizens, including in inclusive settings, and prohibits discrimination by learning institutions (URT, 2010, ss. 27–28).

Yet no document in either country commits to ending segregated provision within a stated time frame (criterion C3). Tanzania's strategy describes the country as "inclined to responsible inclusion," acknowledges that inclusive settings may be inappropriate for some learners, and records "three concurrent systems" of special, integrated and inclusive schools (MoEST, 2021, p. 8). Placement in a special setting is to follow the results of identification and assessment (MoEST, 2021, pp. 39–40). Ethiopia's documents make the same move. The 2012 strategy states that children with severe disabilities "must also be served in special schools and or special classes" (MoE, 2012, p. 5); the Master Plan holds that "inclusiveness does not mean full integration" (MoE, 2016, p. 5); and the 2022 strategy retains special schools and classes for learners with severe and multiple disabilities, defining special needs education to include "everything from special schools, through special classes to inclusive education"(MoE, 2022, pp. 3–4). The only provision that frames special schools as transitional is section 29 of Tanzania's Act, and it sets no time frame (URT, 2010).

Segregation and integration, the two arrangements that General Comment No. 4 distinguishes from inclusion, therefore remain sanctioned options in both systems, although the Committee holds that sustaining a mainstream and a special or segregated system is incompatible with progressive realisation (CRPD Committee, 2016, paras. 11, 40). An independent assessment of Tanzania reaches the same conclusion, noting the parallel existence of "integration" and "inclusive" practices that contradict the Convention (World Bank, 2024).

A Vertical Gap Between Strategies and Apex Policies

In both countries, CRPD-aligned commitments are concentrated in sector strategies rather than in the apex education policies that govern them. Both countries revised their principal education policies in 2023, and neither gives inclusive education more than brief attention. Tanzania's Education and Training Policy contains two policy statements on inclusive education, concerning the identification of special needs and "conducive environments" (MoEST, 2023, pp. 43–44). It describes an inclusive system as one in which all students "learn together according to their age in schools within their communities" but, in the next sentence, refers to "integrating students with special needs" (MoEST, 2023, p. 43). Ethiopia's policy lists "equitable, inclusive and accessible education and training" as a key result area and commits to a curriculum that accommodates learners with disabilities (MoE, 2023, pp. 9, 15) [authors' translation]. Neither policy refers to the CRPD: Tanzania's lists the Sustainable Development Goals, the Universal Declaration of Human Rights, Agenda 2063 and regional protocols (MoEST, 2023, p. 4), while a review of the original Amharic version of Ethiopia's policy identified no explicit reference to the Convention.

The sequence of adoption reinforces the gap. Both current strategies were adopted before the apex policies they are meant to implement, and Ethiopia's September 2022 strategy still cites the 1994 policy. Commitments to inclusion therefore rest on instruments with weaker legal standing than the policies that frame the education system as a whole.

The language used to describe disability has nonetheless shifted across the corpus. Ethiopia's 1994 policy aimed "to enable both the handicapped and the gifted learn in accordance with their potential" and promised "special education and training" for people with special needs (FDRE, 1994, Sections 2.2.3, 3.2.8.4). Tanzania's 2004 disability policy framed early identification as a route to "eliminating onset of disability" (URT, 2004, Section 3.4). Tanzania's 2021 strategy, by contrast, defines and rejects the medical approach (MoEST, 2021, p. 71), whereas Ethiopia's 2022 strategy continues to define its target groups by impairment category (MoE, 2022, pp. 3–4).

Divided Responsibility for Delivery

In mainland Tanzania, responsibility for education is formally divided. The ministry responsible for education prepares policy, while the President's Office-Regional Administration and Local Government (PO-RALG)

oversees devolution, supervises the Teachers' Service Commission and runs primary and secondary schools. The 2023 policy itself acknowledges "an overlap in the execution of some responsibilities" between the two bodies, which "has led to ongoing operational challenges (MoEST, 2023, pp. 20–21). This divided arrangement extends to inclusive education: the inclusive education strategy was prepared jointly by the two institutions (MoEST, 2021, p. ix), yet the apex policy's two statements on inclusive education assign no responsibility for delivering support to learners with disabilities (MoEST, 2023, pp. 43–44).

In Ethiopia's federal system, the documents distribute responsibility across tiers. The resource centre guideline assigns planning and budgeting to the federal ministry and requires regional education bureaus to secure budgets for establishing and running centres (MoE, 2015, pp. 24–25). The 2022 strategy nonetheless identifies "the absence of a consistent organizational structure to manage and implement inclusive education from the Ministry of Education to the woreda education office" as a weakness of the previous strategy (MoE, 2022, p. 9) and proposes structures and accountability from the federal to the woreda level (MoE, 2022, p. 14). The

Master Plan argues for a decentralised funding model in which budgets are delegated to regions, woredas and school clusters (MoE, 2016, p. 70). Both systems thus distribute responsibility across levels, but in Tanzania the apex policy names an unresolved overlap between two national bodies, whereas in Ethiopia the strategy names a missing chain of responsibility from the centre to the woreda.

Different Architectures of Support

The two countries diverge most clearly in how support for learners with disabilities is organised. Ethiopia has institutionalised a decentralised, cluster-based model. Its 2015 guideline defines resource centres as hubs that serve neighbouring satellite schools through itinerant teachers (MoE, 2015), the Master Plan and the 2012 strategy build on this model (MoE, 2012, 2016), and the 2022 strategy directs regional and woreda authorities to convert existing cluster schools into inclusive education resource centres and to establish identification and screening centres at federal and regional levels (MoE, 2022, p. 20). This model is the closest in the corpus to the support system General Comment No. 4 describes, which includes partnerships between neighbouring educational institutions (CRPD Committee, 2016, para. 72).

Tanzania's strategy, by contrast, reports a single national assessment centre and notes that verified national data on types of learning difficulty remain hard to obtain (MoEST, 2021, p. 16). It plans to provide support and assessment services "in existing special vocational center[s], schools, and units" (MoEST, 2021, p. 51). Support in Tanzania is therefore anchored in special provision, whereas in Ethiopia it is located, at least in policy, within the mainstream school cluster. Both countries address teacher preparation: Tanzania reports a revised pre-service curriculum and plans in-service training for teachers and lecturers (MoEST, 2021, pp. 25, 52), while Ethiopia's strategy commits to equipping special needs education teachers with sign language and Braille skills (MoE, 2022, pp. 15–16) and to pre-service and in-service training (MoE, 2022, p. 17).

Financing Named but Not Allocated

Both countries recognise financing as a condition of inclusion, but neither has adopted rules for allocating it. Ethiopia's Master Plan contains a dedicated costing and financing pillar and reports a 2% top-up to school grants for special needs education from 2016/17, with reporting duties for regions (MoE, 2016, pp. 68–69). It also notes that costing models and budget estimates have yet to be developed (MoE, 2016, p. 70). The 2022 strategy records that the previous strategy had "no budget allocation guidelines and a consistent budget allocation system" (MoE, 2022, p. 8) and commits to allocating funds from the federal to the school level, with a guideline still to be prepared (MoE, 2022, pp. 21–22). Tanzania's strategy names "proper human and material resources allocation" as a strategic challenge (MoEST, 2021, p. 43) but contains no costing, and the apex policy addresses funding only for education in general (MoEST, 2023, p. 71). A development partner reports that the ministry sets aside 2% of its education budget for children with disabilities (World Bank, 2024), but no document in the corpus specifies this allocation. Neither country links funding to a transfer of resources from segregated to inclusive settings, as General Comment No. 4 urges (CRPD Committee, 2016, para. 70), although Ethiopia's Master Plan warns that resources channelled to special schools tend to increase their use (MoE, 2016, p. 69).

The same pattern holds for data. Ethiopia's 2022 strategy commits to integrating special needs data into the Education Management Information System (MoE, 2022, p. 21), but the sector programme acknowledges that data on children with disabilities are hard to obtain and that valid identification instruments are lacking (MoE, 2021, pp. 21–22). In Tanzania, the 2004 disability policy notes a "serious lack of data" (URT, 2004, Section 3.21), and the 2021 strategy reports that verified national data remain difficult to obtain (MoEST, 2021, p. 16). These findings extend to Ethiopia the conclusion of an earlier review of Tanzanian policies, which found weak attention to budgetary allocation and to monitoring and information systems (Kyambo et al., 2022).

Reasonable Accommodation as the Weakest Criterion

Reasonable accommodation is the criterion least addressed in both countries. Tanzania's Act is the only document in the corpus that treats the denial of reasonable accommodation as discrimination (URT, 2010, s. 3). The 2021 strategy mentions reasonable accommodation once, within a description of a "whole person app-

roach" (MoEST, 2021, p. 41), and the apex policy does not mention it. Ethiopia's 2022 strategy commits to renovating schools on the principles of universal design "for reasonable accommodation purposes" (MoE, 2022, p. 16), merging an individual duty with the general duty of accessibility, which General Comment No. 4 treats as distinct (CRPD Committee, 2016, para. 29). No document in either country establishes reasonable accommodation as an immediately enforceable duty or provides a mechanism for redress (CRPD Committee, 2016, para. 31).

Provision for individualised support has also weakened over time in Ethiopia. The 2012 strategy required teachers to design individualised educational programmes and planned a federal guideline (MoE, 2012), and the Master Plan retained them (MoE, 2016), but the 2022 strategy contains no reference to individualised education plans. Tanzania's strategy calls for "a personalised educational response" and a "continuum of support" (MoEST, 2021, pp. 39, 41) without specifying a planning instrument. Accessibility of materials and communication is, by contrast, the most consistently addressed criterion: both countries commit to Braille, sign language and accessible materials (MoE, 2022, pp. 15–16; MoEST, 2021, p. 25; MoEST, 2023, p. 33).

Implementation Context

Table 5 presents indicators drawn from the policy documents and from development partners' reports. Because they come from different sources, years and units, they illustrate the implementation context rather than measure the two systems on a common scale. They are consistent with the documentary findings. Ethiopia's resource centre network expanded from 113 centres in 2017 to 1,017 in 2023 (World Bank, 2023), whereas Tanzania had a single national assessment centre as of 2021 (World Bank, 2024). Ethiopia's sector programme reports a gross enrolment ratio of 11% for learners with special needs in Grades 1–8 in 2018/19, against a target of 61% (MoE, 2021, pp. 21–22), which shows that the cluster model has not yet closed the participation gap.

Table 5: Selected Indicators of Inclusive Education Provision

Indicator	Tanzania (Mainland)	Ethiopia
Current inclusive education strategy	NSIE 2021/22–2025/26 (MoEST, 2021); a fourth strategy (2026/27–2030/31) was launched in October 2026, after the analysis window (Daily News, 2026)	SNE/IE Strategy 2022/23–2029/30 (MoE, 2022)
Treatment of inclusion in the 2023 apex policy	Two policy statements (MoEST, 2023, pp. 43–44)	One key result area and one curriculum statement (MoE, 2023, pp. 9, 15)
Assessment and resource centres	One national ESRAC, as of 2021 (World Bank, 2024)	1,017 IERCs in 2023, up from 113 in 2017 (World Bank, 2023)
Dedicated financing	Ministry sets aside 2% of its education budget for children with disabilities (World Bank, 2024)	2% top-up to school grants for special needs education from

		2016/17 (MoE, 2016, p. 69)
Enrolment of learners with special needs	66,372 in primary in 2022, up from 37,034 in 2016 (MoEST, 2023, p. 16)	353,739 in primary and secondary in 2018/19 (MoE, 2021, p. 21)
Gap against national targets	Not reported	GER Grades 1–8: 11% in 2018/19 against a target of 61% (MoE, 2021, pp. 21–22)
Personnel trained	Not reported in the corpus	More than 9,000 IERC directors, itinerant teachers and experts (World Bank, 2023)
Early identification	No national figure	41,808 children identified through a screening tool and enrolled in pre-primary (UNICEF, 2024)

Note. Indicators come from different sources, years and units and are illustrative rather than strictly comparable. The Tanzanian budget figure is a share of the ministry's education budget, whereas the Ethiopian figure is a top-up to school grants. UNICEF (2024) reports 700 cluster centres supporting 3,500 satellite schools under a specific programme; the World Bank (2023) figure is a national total. ESRAC = Education Support and Resource Assessment Centre; IERC = Inclusive Education Resource Centre; GER = gross enrolment ratio.

Summary of Findings

The two countries do not differ mainly in the strength of their commitments. Both endorse the right to inclusive education and address accessibility, and both are weak on transition from segregated provision, reasonable accommodation and rules for allocating finance. They differ in the architecture through which support is organised, a cluster-based network of resource centres in Ethiopia and a single national centre with support anchored in special provision in Tanzania, and in where responsibility for delivery is located. In both, the most CRPD-aligned commitments sit in strategies rather than in the apex policies that frame the education system.

DISCUSSION

This study asked how mainland Tanzania and Ethiopia define inclusive education, how far their policy frameworks meet the standard of Article 24 and General Comment No. 4, and how they distribute responsibility for delivery. The answer to the first two questions is similar for both countries: rights are recognised, accessibility is addressed, and segregated provision is retained. The answer to the third distinguishes them. The discussion below interprets these findings through the study's three theoretical lenses and considers what they mean for other systems.

Between Salamanca and the CRPD

From a human rights-based perspective, the central finding is that both countries accept the right to inclusive education while preserving the arrangements that the CRPD Committee regards as incompatible with it. Sustaining a mainstream and a special system side by side is, in the Committee's interpretation, inconsistent with progressive realisation (CRPD Committee, 2016, para. 40). Tanzania's "responsible inclusion" and Ethiopia's statement that inclusiveness "does not mean full integration" do the opposite: they make the continuum of placements part of the definition of inclusion.

One explanation is that the documents draw on two normative sources at once. Tanzania's strategy grounds its principles in Articles 6 to 8 of the Salamanca Statement while describing its features as a localisation of General Comment No. 4 (MoEST, 2021, pp. 39–40). The Salamanca Framework for Action accepted placement in special schools in exceptional cases (UNESCO, 1994, Framework for Action, para. 8), whereas General Comment No. 4 treats segregation as a form of exclusion from the general education system (CRPD

Committee, 2016, para. 11). Graham et al. (2023) compared the uptake of the two instruments in inclusive and special education research and called for stronger knowledge of the CRPD and General Comment No. 4 in education. The present findings suggest that the same layering exists in national policy: the older framework supplies the permission for parallel provision, and the newer one supplies the vocabulary.

Resource Centres and the Social Model of Disability

The contrast in support architecture invites a reading through the social model of disability, which locates disability in the barriers that systems create rather than in individual impairment (Oliver, 2013). Ethiopia's cluster-based resource centres place specialist support inside the mainstream system: itinerant teachers serve satellite schools, and the centres support regular teachers and families rather than removing children from their communities (MoE, 2015). In this respect the model resembles the support and resource system that General Comment No. 4 recommends, including partnerships between neighbouring institutions (CRPD Committee, 2016, para. 72). Tanzania's plan to deliver support and assessment services through existing special schools and units ties support to segregated settings, so that obtaining support and attending a special setting remain closely linked (MoEST, 2021, p. 51).

The Ethiopian model should not, however, be read simply as an application of the social model. Its resource centres also identify and assess children by impairment category, the strategy that expands them retains special schools and classes for learners with severe and multiple disabilities, and its definitions remain organised around types of impairment (MoE, 2022, pp. 3–4, 20). A resource centre can become either a bridge into the regular classroom or a specialist unit within a mainstream compound. Which it becomes depends on whether support follows the child into the regular class, a question that policy documents cannot answer and that implementation research must address. The difference between the two countries is therefore one of degree: Ethiopia has moved the location of support towards the mainstream, while neither has abandoned a placement logic.

Why Strategies Carry the Commitments

General Comment No. 4 calls for "a comprehensive and coordinated legislative and policy framework" with a clear time frame for implementation, supported by an education sector plan developed with organisations of persons with disabilities (CRPD Committee, 2016, paras. 63–64). In both countries the most detailed commitments sit instead in time-bound strategies. Both strategies were also developed or financed with substantial external support. Tanzania's strategy acknowledges logistical, financial and technical support from the United Kingdom's Foreign, Commonwealth and Development Office and its education programme (MoEST, 2021, p. ix), and Ethiopia's expansion of resource centres has been financed through a programme co-funded by the UNICEF, the Global Partnership for Education and World Bank (World Bank, 2023). Strategies of this kind can introduce rights-based language quickly, but they expire with programme cycles and carry less weight than the apex policies and laws that frame the education system. The silence of both 2023 apex policies on the Convention means that the commitments made in the strategies have not yet been absorbed into the core of either system.

Governance: Divided Responsibility in Two Forms

Inclusive education theory holds that inclusion depends on coherent system-level conditions, including clear responsibility and coordination across levels, as much as on classroom practice (Ainscow, 2020). Both countries fall short of this condition, but in different ways. In Tanzania, the difficulty is horizontal: policy is made by one national body and schools are run by another, and the apex policy itself acknowledges an overlap in their responsibilities (MoEST, 2023, pp. 20–21). Inclusive education, which the policy treats in two brief statements, has no assigned owner within this arrangement. In Ethiopia, the difficulty is vertical: the federal system distributes responsibility across federal, regional, zonal and woreda tiers, and the 2022 strategy names the absence of a consistent structure linking them as a weakness of its predecessor (MoE, 2022, p. 9). Ethiopia's cluster model may itself be a product of this arrangement, since resource centres give regional and woreda authorities a concrete unit to plan, staff and fund (MoE, 2015, pp. 24–25). Tanzania's single national centre, by contrast, sits outside the local government structure through which schools are run.

Common Weaknesses: Accommodation, Allocation and Data

Three weaknesses are shared. Reasonable accommodation, which the Committee treats as an immediately applicable duty whose denial constitutes discrimination (CRPD Committee, 2016, para. 31), is either absent or merged with accessibility in every education document in the corpus. Financing is named but not governed by allocation rules, and neither country links funding to a transfer of resources from segregated to inclusive settings (CRPD Committee, 2016, para. 70). Data on learners with disabilities remain, by the documents' own account, difficult to obtain. These gaps confirm, for both countries, what an earlier review found for Tanzania (Kyambo et al., 2022), and they are consistent with reviews of inclusive education in low- and lower-middle-income countries that identify resources and support systems as recurring constraints (Mendoza & Heymann, 2024). They matter because each is a mechanism through which a stated right becomes enforceable for an individual learner.

Lessons Beyond the Two Countries

For readers in other systems, two lessons follow. First, the architecture of support deserves as much attention in policy analysis as the language of commitment. Two countries with similar rights commitments, similar resource constraints and similar retention of special provision have built very different routes by which support reaches a learner. Second, auditing policy against General Comment No. 4, criterion by criterion, reveals gaps that a general reading of policy intentions conceals, notably on transition, reasonable accommodation and allocation rules. The coding framework used here in Table 3 can be applied to other national systems, including high-income systems in which the same layering of Salamanca-era and CRPD-era commitments may be present (Devall-Martin & McHolm, 2024).

Policy Implications

The findings point to six implications, each linked to a criterion on which both countries fall short.

Anchor the right in apex instruments (C1 and C2). The next revisions of both Education and Training Policies, and their implementing laws and guidelines, should refer to Article 24 of the CRPD and define inclusive education in line with General Comment No. 4, so that commitments do not depend on time-bound strategies.

Adopt time-bound transition plans (C3). Both countries should set out how and by when special schools and units will be converted into resource and support centres for the mainstream system, rather than maintaining parallel placement as a permanent option.

Legislate reasonable accommodation (C4). Education law in both countries should establish reasonable accommodation as an individual, enforceable duty with an accessible complaints mechanism, as distinct from the general duty of accessibility.

Publish allocation rules (C8). Ethiopia should issue the budget guideline its 2022 strategy promises, and Tanzania should state its dedicated allocation in its policy documents. In both, funding rules should favour support in regular schools over placement in special settings.

Move support to where learners are (C11). Tanzania could extend assessment and support services through school clusters within the local government structure, drawing on Ethiopia's experience. Ethiopia should monitor whether its resource centres support learners in regular classrooms or become specialist units.

Clarify responsibility and data (C9). Tanzania should assign responsibility for inclusive education between its two national bodies explicitly, and Ethiopia should complete the structure from federal to woreda level that its strategy proposes. Both should collect disaggregated data on learners with disabilities through their education management information systems.

LIMITATIONS

This study has several limitations. To begin with, it analyses policy texts and therefore cannot establish how

policies are implemented in schools; statements about implementation rely on reports by development partners whose quality and coverage vary. Furthermore, Ethiopia's 2023 Education and Training Policy is available only in Amharic as a scanned document; its text was extracted using optical character recognition (OCR), and the translated quotations were checked by a native Amharic speaker. In addition, the corpus ends in December 2023 and excludes Tanzania's fourth inclusive education strategy, launched in October 2026, whose full text was not available at the time of analysis. Moreover, the indicators presented in Table 5 are drawn from different sources and years and are therefore not strictly comparable. The corpus is also unequal in size, with four Tanzanian and seven Ethiopian documents. This was managed by comparing documents with equivalent functions and by not aggregating ratings by country, but provisions in Tanzanian instruments outside the corpus may not have been captured. In addition, the two countries are comparable rather than identical: they have differed in income classification since 2020 and differ in population and constitutional structure, so differences in policy design cannot be attributed to the organisation of support alone. Finally, the analysis is limited to mainland Tanzania, as education in Zanzibar is administered separately.

CONCLUSION

This study compared the inclusive education policy frameworks of mainland Tanzania and Ethiopia against the standard set by Article 24 of the CRPD and General Comment No. 4. Both countries recognise the right to inclusive education and commit to accessible materials and communication. Both also retain segregated provision as a permanent option, leave reasonable accommodation largely unaddressed, and name financing without rules for its allocation. In both, the most rights-aligned commitments sit in sector strategies rather than in the apex education policies revised in 2023.

The two systems differ less in what they promise than in how they organise delivery. Ethiopia has built a cluster-based network of resource centres that places specialist support within reach of regular schools, while Tanzania relies on a single national assessment centre and on special schools and units. Responsibility for delivery is divided in both, horizontally in Tanzania and vertically in Ethiopia.

Three directions for further research follow. School-level studies are needed to establish whether Ethiopia's resource centres support learners in regular classrooms or function as specialist units. Tanzania's fourth inclusive education strategy should be examined to see whether it addresses the gaps identified here. Finally, the CRPD-referenced framework used in this study could be applied to other countries in the region to test whether the patterns observed in Tanzania and Ethiopia are more widely shared.

CONFLICT OF INTEREST

The authors declare that they have no known financial, personal, professional, or institutional conflicts of interest that could have influenced the research, analysis, interpretation, or reporting of the findings presented in this manuscript.

DATA AVAILABILITY

The complete coding matrix, with the supporting documentary evidence for every rating, is provided as Supplementary File S1. The policy documents analysed are publicly available and are identified in Table 1 and the reference list.

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