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Educational Justice and Disability: The Limits of Integration

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Integration as a requirement of social justice is generating much enthusiasm in political philosophy. In The Imperative of Integration (2010), Elizabeth Anderson defines integration as involving and furthering “the free interaction of citizens from all walks of life in terms of equality and mutual regard” (Anderson, 2010, p. 95). However, this idea of integration as a moral imperative is yet to be tested in the case of students with an intellectual or behavioural disability (I/BD), a small group with complex and diverse educational needs. While “inclusive” schools may be increasingly the norm in Western education systems, it is not self-evident that the imperative of integration ought to carry over into special education. Focusing on the unique concerns for integrating students with an I/BD into generalist classrooms, I aim to describe the moral constraints that ought to be imposed on the process of integration.

The concerns for integrating students with an I/BD will be framed as a question of the just distribution of costs associated with bringing about integration. It will be argued that, within the context of education, the imperative of integration is unjust if it unduly burdens students with an I/BD, perpetuates the harms it proposes to resolve, or results in a failure to provide the educational goods owed to students. As schools are specially tasked with the provision of educational goods in society, educational costs are more ethically significant in the given context than the costs of not integrating. Educational institutions should still play a role in achieving an integrated society through just means. This must be done by shifting the burdens of integration off students with an I/BD and onto the education system.

1. Educational Justice and Disability

As a secondary school teacher in Melbourne, Australia, I taught students with diverse cultural, language, race, class, and religious backgrounds. None of this diversity garnered more attention than did that of students with an intellectual or behavioural disability (I/BD).¹ These students were few in number, socially isolated, and were received with stress or frustration by a number of their teachers. For one student, Sam,² his occasional absences from the classroom would prompt audible sighs of relief from many of his teachers – even when they knew he was on school grounds. Rather than looking for him, now they could get down to the business of teaching uninterrupted.

The inclusion of students with an I/BD in generalist schools is often seen as an educational right for children with an I/BD. This rights-based language is grounded in the assumptions that mainstream education is superior to special education and that integrated conditions benefit marginalized groups (McMenamin, 2015). For many students like Sam, negative attitudes on the part of teachers and other school officials impede integrating processes, which in turn hinders their access to a just education. Schools, however, have a special moral duty to secure educational justice. This duty to secure educational justice ought to take priority over integration. This is true despite the significant capacities

¹ I use this term to capture those students *labelled* as having an intellectual or behavioural disability (I/BD) within their educational jurisdiction. While I use the term broadly, it must be noted that I/BD is applied to a small but highly diverse group of students. As a result, the claims made throughout this paper will be most apt for those with an I/BD that affect learning or behaviour, or are stereotyped as being difficult or time-consuming to teach.

² The student's name has been changed.

of schools to promote integrated societies. This is not to say that schools have no place in securing other features of justice. Rather, as schools, they have a special moral responsibility to secure an adequately educated population³ – it is this element of justice with which they are specially tasked. If securing integration means they will fail to secure an adequately educated population, integration should be pursued through other means. I will argue that this means two things: that integration cannot place unjust burdens on students with an I/BD – meaning they cannot be compelled to sacrifice a just education for the sake of integration – and that special moral duties fall on the education system to ensure that teachers are able to facilitate integration such that students need not opt out of integration to secure a just education.

Integration as a requirement of social justice is generating much enthusiasm in political philosophy. In *The Imperative of Integration* (2010), Elizabeth Anderson defines integration as involving and furthering “the free interaction of citizens from all walks of life in terms of equality and mutual regard” (Anderson, 2010, p. 95). Integration contrasts with segregation, which is both the process by which one group closes its network to another and the outcome of that process (ibid.). Group differences here obstruct or distort interaction, leading to and reinforcing segregation. This, in turn, creates antagonistic and hierarchical relations making segregation a self-reinforcing cause of group inequality (Anderson, 2007, pp. 595–622). Integration will also see some level of group difference preserved. However, these differences do not lay the foundations for inequality but are instead recognized on equal terms.

Anderson highlights the relationship between securing successfully integrated conditions and achieving both educational and social justice (see Anderson, 2007, p. 602). The connection between integration and justice can be seen when applied to racial or religious groups. The social and educational segregation of Black communities in the United States, for example, arose from and was reinforced by inequality and de jure discrimination. However, the idea of integration as a moral ideal is yet to be tested in the case of students with an I/BD, a small group with complex and diverse educational needs. While inclusive schools may be increasingly the norm in Western education systems, the underlying justifying theory of integration was founded on racial injustices. It is not self-evident that anti-segregationist theories can carry over to the case of disability. Given the importance of education, we ought to be more certain of the integrationist imperative in the context of students with an I/BD before we defend it or put it into practice (see Pugach & Johnson, 1988, p. 6). Focusing on the unique concerns for integrating students with an I/BD into generalist classrooms, I aim to describe the moral constraints that ought to be imposed on the process of integration.

The concerns for integrating students with an I/BD will be framed as a question of the just distribution of costs associated with bringing integration about. I will argue that, within the context of education, the imperative of educational integration is unjust if it unduly burdens students with an I/BD, perpetuates the harms it proposes to resolve, or results in a failure to provide the educational goods owed to students with an I/BD.⁴ As schools are specially tasked with the provision of educational goods in society, educational costs are more ethically significant in the given context than the costs of not integrating.

Throughout this paper, I adopt “flourishing” as the goal of a just education, as I find it best includes students with an I/BD. Accepting flourishing as the goal of education, I then take some relevant educational goods and outcomes to be self-respect; autonomy; treating others as, and being

³ Where so doing does not undermine the protection of more pressing foundational goods, such as the protection of life. The suspension of face-to-face teaching during the global COVID-19 pandemic provides an example in which the protection of a *more foundational good* (life and public safety) was justly protected at the (potential) expense of the adequate provision of educational goods. Note, however, that it is not *schools* that are tasked with the protection or promotion of a non-educational good in this case. Rather, schools remained tasked with securing educational goods for the school-aged population, but state priorities limited in their capacity to do so.

⁴ This is not to say that integration that unduly burdens students without an I/BD could not itself be unjust, but instead that it will not be the focus of this paper. This is for two reasons. The first is that empirical evidence suggests that, while integration generates some burdens for students without an I/BD, they primarily benefit from current integration practices. Thus, there is a less pressing need to analyse the risks of educational integration for students without an I/BD. Additionally, I take a priority view of distributive justice, in that more vulnerable groups ought to be given some priority in the sharing of benefits and burdens. One need not accept this second claim to recognize the greater interest in the impact of integrationist policies for students with an I/BD.

recognized as, an equal; and feeling safe, secure, and respected.⁵ The just distribution of educational goods such as these will be governed by the distributive values of adequacy and benefitting the less advantaged. A just and adequate education will provide a level of educational goods that are sufficient for flourishing over the course of one's life.⁶

Following Debra Satz (2007), I adopt an egalitarian conception of adequacy throughout this paper. The nature and content of educational adequacy for Satz can be derived from the requirements of full membership and inclusion in a democratic society of equal citizens.⁷ Educational experiences and outcomes do not have to be equal for adequacy to be met; instead, civic equality is what matters. Satz, however, like Anderson, argues that integrated schools are needed to meet this egalitarian conception of educational adequacy. Satz claims that "segregated schools, by sharply dividing the advantaged from the disadvantaged, tend to freeze a student's economic and social position at the level of his or her parents, prevent understanding across social groups, and undercut the democratic idea that we are all civic equals" (ibid., p. 626). Not all of the risks of segregation, so described, apply to all students with an I/BD. Further, under certain circumstances, segregation can be better placed to meet educational adequacy thresholds for students with an I/BD. More advantaged students may be harmed by decreased school diversity, where diversity enhances civic equality and, in turn, flourishing for the advantaged. When balancing conflicting claims to educational goods, I take it that priority ought to go to those who have the lowest chance at flourishing. In particular, priority ought to go to the least well off to prevent them from falling below an adequacy threshold.

I will begin by providing a brief outline of Anderson's *Imperative of Integration*. In section 3, I demonstrate that a range of desirable integrationist and educational goods, often viewed as constitutive to integration, are analytically and empirically independent of the processes by which integration is facilitated. My point is that, insofar as educational justice is fundamentally oriented to these educational goods, we should favour the kinds of educational settings that best promote them, even if these settings turn out not to be non-integrated.⁸ In section 4, I will highlight the distinctiveness of the case of integrating students with an I/BD into mainstream schools. A central aim of this paper is to disentangle questions about educational aims that are valid concerns of educational justice from questions about the processes by which these aims are promoted. On this basis, I argue that compulsory integration in educational settings is unwarranted on the grounds of justice. The argument is not that integration is unjust, simply that *poor* integration is unjust.

In section 5, I argue that while a right to voluntary separation is retained in cases in which integration would lead to an unjust education, a moral duty falls on the education sector to ensure that this choice need not ever arise. This duty is particularly strong in the case of I/BDs, as the choice to integrate can directly affect group formation. An integrated student is less likely to interact with other people with disabilities (not just in the classroom, but generally speaking). As a result, their identification with other people with disabilities and their bonding via shared experiences and understanding may be reduced. Where all students with an I/BD are integrated, the very existence of "I/BD" as a possible group identity could cease or be severely hampered. This may have lasting consequences for self-respect and self-advocacy. Further, the choice to integrate or segregate is most often made by a member from outside the group (a parent, a guardian, the school board). This means voluntary self-separation, in the strictest sense of the term, is not always possible. If integration is indeed a moral imperative, the imperative falls on the state to ensure that integrationist initiatives do not unduly harm the very groups they seek to support. Just integration must be secured by redistributing the burdens of integration so that they are not too heavily placed on the shoulders of students with an I/BD. This can and ought to be done by supporting and retraining teachers to be better facilitators of integration.

⁵ For a more detailed defence of flourishing as an inclusive educational goal, see Ahlberg, 2014.

⁶ For a detailed account of educational adequacy goals and thresholds, see Satz, 2007.

⁷ While Satz takes civic equality to be the outcome or aim of a just education, I take it as internal to the goal of providing future adults with opportunities to flourish within a democratic society. Whether civic equality is an end or component of a just education need not affect the preceding arguments, so I will set the distinction aside.

⁸ Of course, integration *can* further educational justice – I do not argue that it cannot do this or that integration is not an important part of a just education. In certain circumstances, however, trade-offs must be made between securing integration and securing essential educational goods. Within the context of the classroom, integration must not come at the expense of securing an adequate provision of educational goods for students with an I/BD.

2. The Imperative of Integration

Integration has been heralded as an imperative of justice. Anderson argues that the segregation of social groups “is a principal cause of group inequality” (2007, p. 2). Segregating processes are practices that result in the closing of a group’s social network to groups that are outside of that network (*ibid.*, pp. 9–10). Segregation is not inherently unjust. Rather, segregation is deemed unjust where it embodies, results in, or arises from unjust group inequalities or hierarchies. Once unjust group inequalities or hierarchies are established, segregation may be all that is needed to maintain their existence. The segregation of social groups is then self-reinforcing, creating and sustaining stigmatization, oppression, and discrimination, and leaving the resulting injustices durable over time (*ibid.*, pp. 13–17).

In contrast, Anderson defines integration as “the free interaction of citizens from all walks of life in terms of equality and mutual regard” (2010, p. 95). Integration then seems to require a level of freedom, equality, and trust between citizens. It is somewhat unclear whether this requirement is causal or constitutive – I would contend that integration requirements should be separated into causal processes and constitutive conditions. By “constitutive conditions” I mean integration that has been successfully attained instead of being in a state of progress or transition. “Casual processes” are the transitional actions and stages required to achieve the condition of integration. Successfully integrated conditions bring benefits to marginalized and non-marginalized groups. However, to achieve integrated conditions, integrationist processes must first take place. By integrating groups that were previously segregated, we bring together groups once defined by obscured, hostile, distorted, or antagonistic relations. As a result, integrating processes can themselves be hostile, uncomfortable, and burdensome, although they may not always be this way. It is these burdensome processes that are the focus of my concerns.

For Anderson, integrationist duties extend to the state and groups advantaged and disadvantaged by unjust group relations. State authority and power should be exercised to secure integration through mechanisms that encourage ongoing and meaningful contact between diverse groups and penalize exclusion and discrimination. The state cannot achieve integration alone; rather, the burdens imposed by the process of integration are *non-optional*, and all citizens ought to “bear their fair share of the costs of integration” (*ibid.*, pp. 148–149). For Anderson, those who self-segregate or marginalize others are acting *contrary to their duty of justice*.

3. The Goals and Moral Constraints of Integration

I contend that, for integration to be just, the costs of its causal processes must not outweigh the benefit of its constitutive conditions. Tommie Shelby and Michael Merry both highlight substantial costs in integrationist processes. Shelby is unconvinced by the claims that Black people have a duty to accept the burdens of integration, and that the state has a right to impose that they do so (Shelby, 2014). Black people are disproportionately burdened by the process of integration, facing hostility, violence, and rejection from White neighbours, while forgoing the solidarity that comes from living in homophilic communities (*ibid.*). Similarly, Merry argues that for stigmatized groups, integration can result in the harms it purports to resolve, namely decreased equality and citizenship through a loss of self-respect and civic virtue (Merry, 2013).⁹ While these virtues can be fostered in integrated conditions, stigmatized minority groups may have an increased capacity for civic participation and reshaping shared practices or institutions if they have established greater network density and self-respect therein.

⁹ In this sense, self-respect refers to a person’s positive self-regard and dignity, as well as their self-determination with respect to choices, and the ability to act meaningfully on those choices (Merry, 2013, p. 71). Self-respect is furthered where a person holds themselves as an equal within their community, or where equality and membership in the broader host community are established on their terms. Civic virtue refers to dispositions, habits, and actions rooted in a person’s character that contribute to and strengthen the communal good (*ibid.*, p. 73). Virtues necessary for this understanding of citizenship then revolve around a person’s capacity for enlarged thought, their imaginative capacity to see themselves as bound up with others through interdependent relations, shared history, and institutions, as well as their capacity to reshape shared practices and institutions through direct participation.

It may not be the case that the harms of involuntary integration described by Shelby and Merry directly apply to the case of integrating students with an I/BD. While the special education sector may be a more protected environment with potentially less bullying and exclusion, its staff will not necessarily have been freed from background stigmatizing conditions, and ableist beliefs may have shaped educational goals.¹⁰ As such, self-respect and civic virtue may not necessarily be better promoted within special education as compared to mainstream schools. Despite this, I take the thrust of Merry's and Shelby's argument to retain its same force: the goods of integration (such as self-respect and civic virtue) can come apart from integration. It is these goods that we are morally compelled to secure, and not integration for its own sake. If students with an I/BD would have to sacrifice the goods of integration by being compelled to integrate, then they should not be so compelled.

Although Andersonian integration as a condition may remain a worthy ideal, the process of integrating may unjustly burden vulnerable groups. Both Merry and Shelby hold that integration ought to be voluntary rather than a duty of justice. From their claims, I see two clear moral constraints on integration: 1) it ought not to unduly burden marginalized groups, and 2) it ought not to perpetuate the harms it intends to resolve. In addition, I call for a third constraint in cases in which integration conflicts with institutions' special moral duties: integration ought not to take priority over the special moral duties of institutions (see Goldman, 2018). For example, integration cannot take precedence over educational justice in the education sector or patients' health in the medical sector. Focusing on the case of educational integration, the remainder of this paper will demonstrate the need for each of these moral constraints if integrating processes are to be just. While educational contexts can provide hope for attaining just integrated conditions, they cannot do so by compelling vulnerable groups to shoulder unjust burdens.¹¹

The Goals and Constraints of Educational Integration

Education is not a singular good; rather, it is a large cluster of goods. As educational spending and time are finite, certain goods must be prioritized, while trade-offs must be made between goods that conflict. If integration is to be considered an imperative, as Anderson claims, it seems *prima facie* that integration ought to take priority over educational goods where conflicts between integrational and educational goods arise. However, if integration conflicts with schools' special duties to provide adequate educational goods to children and young people, then it is these duties and not integration for its own sake that we should view as the overriding imperative in the educational context.¹²

Schools have multiple, overlapping, and potentially competing roles. Securing educational justice involves the provision of a large and varying cluster of goods. Within this cluster exists multiple social educational goods – for example, treating others as equals, civic and democratic competence, self-respect, and so on. Integration can and often will assist in securing these goods. Schools also often hold non-educational roles, being instruments of social integration, civil obedience, and the preservation of the state, public health, and so on. In many cases, non-educational and educational goals exist in harmony. However, educational and non-educational goals can and do come apart, and in some cases sharply conflict. Where goals conflict, schools have a responsibility to prioritize educational goods when so doing would not lead to the loss of more foundational or corrosive goods. For example, if securing educational goods would necessarily seriously risk public health and safety (the global coronavirus pandemic being a particularly salient example of this potential conflict of goals), then it is health and safety that take precedence. In cases in which the conflict involves educational goods and non-foundation goods, or goods that can be secured via other reasonable means, then education ought to take priority.

I take the educational goal of schools to be the promotion of opportunities for flourishing.¹³ Opportunities for flourishing refers broadly to the provision of educational goods that equip people with what they need for their lives to go well. While this is very broad, Brighouse, et al. posit six

¹⁰ I thank Ashley Taylor and Kevin McDonough for this point.

¹¹ Such as sacrificing their educational rights.

¹² Alternatively, if integration is an *additional* good rather than an educational good, it is educational goods that ought to take priority in the educational context.

¹³ This goal is well supported in the literature. For a particularly detailed defense, see Ahlberg, 2014.

capacities that generally support the flourishing of agents themselves and those within their society. These capacities are economic productivity, personal autonomy, democratic competence, healthy personal relations, regarding others as equals, and personal fulfilment (2016). The exact composition of capacities for flourishing will vary among individual students (Fredrickson & Losada, 2005). Each student's flourishing is furthered by education, although their outcomes and interests may differ. Students with and without an I/BD alike are capable of achieving such an educational end. This is regardless of the severity of a student's I/BD, although the flourishing of a student with a severe I/BD may look radically different from that of a student without such a disability. Such flourishing may require prioritizing, for example, social, sensory, and life skills over political competencies. All students can flourish in an education that furthers their specific ends and interests, and so opportunity for flourishing is an inclusive educational goal. As such, I will focus on the effect of integrationist policies on opportunities for flourishing.

Successfully facilitated just integration in schools can assist in securing integration in other contexts. Generalist schools offer highly valuable facilitative conditions for securing integration within and beyond the confines of the classroom. Schools are typically compulsory social institutions, often being the primary or only social institution in a society that almost all citizens will attend. While associations such as religious institutions, sporting clubs, and neighbourhood groups may see their constituencies lasting far longer than those of schools, they rarely capture the potential diversity that schools are so well placed to capture. Further, unlike these other social institutions, most school-aged children attend schools, and most adults have already done so. Importantly, a person's school years are typically the malleable foundational years of their life. Rather than merely enabling contact between diverse groups, through active, sustained, and positive contact between members of diverse groups, during a highly malleable period, students can overcome stigma and develop trust-based relations. As such, even if school graduates enter homogenous communities, their early exposure to diversity may overcome the emotional, social, and cognitive deficits associated with segregation in an enduring way – allowing a level of understanding and empathy to be retained across groups even once regular contact is lost or reduced.¹⁴

A person's own flourishing is furthered in a significant way by the belief that one is understood and seen as an equal by others (ibid., 2005). Integration claims to promote empathy and understanding between diverse groups, and so may promote the flourishing of students with an I/BD. The promotion of understanding and empathy towards people with an I/BD decreases hostility and stereotyping. This would then increase the ability of students without an I/BD to give equal weight to the actual interests of people with an I/BD in their decision making. Thus, integration promotes democratic goods and overcomes cognitive deficits for students without an I/BD. Over the course of their life, people with an I/BD may benefit from others' increased understanding of disability. Through greater recognition of their needs, people with an I/BD may attain greater social justice. This greater social justice, however, is distinct from educational justice. Some people with an I/BD (or their parents) may deem social justice to be a more important outcome and so elect to sacrifice educational goods in its pursuit. I do not claim that this would be wrong. Rather, I merely mean to highlight that *social and educational outcomes come apart*. While it may be best to pursue both social and educational justice, we have not yet hit upon what *educational justice* itself looks like for students with an I/BD.

Educational justice for students with an I/BD ought to recognize the educational interests of these students, rather than the educational benefits their classroom presence can bring for others, and so indirectly benefiting people with an I/BD socially over the course of their lifetime. Thus, even though integration may support the educational goals for students without an I/BD, and people with an I/BD may benefit indirectly from this, if the goals of education are so defined, integration may not necessarily support the educational goals of students with an I/BD, broadly speaking.

Educational integration is well placed to create integrated conditions beyond the educational context. On the other hand, as the next section will argue, poor integrating processes can be detrimental to educational outcomes and perpetuate the harms integration purports to resolve. Integration in schools can assist in securing many educational and non-educational goals. However, in cases in which integration would conflict with educational goals, as the goods of integration can come apart from the process of integration, integration itself ought not to be prioritized above educational

¹⁴ Anderson also emphasizes the importance of early intervention and using schools to expose students to other students from different groups. See Anderson, 2007, pp. 596 and 602.

goals. Rather, the goods of integration ought to be secured via other means. The following section will argue that the current distribution of the costs of integrating processes in the educational context conflicts with schools' special moral duties to secure educational justice

4. Integration or Segregation for Educationally Just Ends?

Educational integration for students with an I/BD will give rise to certain costs in order to attain Satz' purported end of civic equality (Satz, 2007). For Anderson, while the costs of integrationist processes might be high, they are non-optional, and we must all bear a fair share of these costs as a duty of justice (Anderson, 2010, pp. 148–149). Those who self-segregate or marginalize others are acting contrary to their duty of justice. From this, it seems that a student who self-segregated¹⁵ into a specialist education provider has acted contrary to their duties of justice. In this section, I will argue that, in cases in which integration would seriously compromise educational goods for students with an I/BD, it is a requirement of the special moral duties of schools that educational justice takes priority over securing integrated conditions. Self-segregation into specialist schools is not acting in a way that is contrary to duties of justice if integration would undermine rightful access to educational goods. A student sacrificing their owed educational goods is beyond what could be considered a "fair share of the costs of integration." The imperative to integrate only then extends to schools insofar as it does not result in educational injustice. Thus, if integration prevents students with an I/BD from meeting basic educational adequacy thresholds, regardless of whether in so doing integrated conditions are attained, educational integration is rendered unjust.

The process of integrating students with an I/BD into mainstream schools is distinct from other common integrationist initiatives for several reasons. For one, those who facilitate the integration of students with an I/BD (typically education staff and parents) and those who decide whether a child will be integrated or sent to a mainstream school (parents, schools boards, courts, or tribunals) are typically people from *outside* the minority group. That is, it is not people with an I/BD who make decisions about their own (or other in-group members') integration or segregation. While in most cases of educational integration it is often parents who choose where their child will go to school, in most other cases, parents typically belong to the same identity group as their child. Thus, there is an important disanalogy between parental choice in the case of I/BD and parental choice in cases of race, religion, or culture. Second, the educational needs of students with an I/BD are significantly more diverse and specialized than they are within racial, cultural, ethnic, or religious minority groups.

Students with an I/BD have significantly diverse educational needs, both from each other and from their peers without an I/BD (Lake, 2001). Despite this, students with an I/BD can benefit from inclusive and diverse educational systems (*ibid.*). Furthermore, there are significant benefits for everyone else in developing a just and diverse educational system that includes students with an I/BD (Page, 2008). In particular, empathy and understanding between diverse groups are established and strengthened, leading to positive social and political outcomes, both within the school environment and beyond it. The debate's complexity comes when we consider whether the benefits of an integrated classroom outweigh the benefits of special schooling for students with an I/BD.

For integration to be complete, it may need to reflect social demographics, thereby taking away the freedom and the choice of education provider from families. However, if this approach is taken, students with an I/BD may be isolated, and the goods that come from the community and the specialized attention of special education classrooms will be lost. This may include group formation, self-respect, self-advocacy, and the specialized support that might be needed to secure educational goods. Unlike racial or religious integration, considered in detail by Anderson, the success of educational integration for students with an I/BD *depends on* a facilitator being from outside that group.¹⁶ That is, teachers without a profound I/BD are tasked with integrating students with an I/BD.

¹⁵ Of course, it is far more common that segregation into special education is not self-segregation, but a choice made by parents or the local school board. This need not complicate the argument, so I will set this aside for now.

¹⁶ It may indeed be the case, even typically the case, that integrating students from racial or religious minorities will involve a facilitator from outside the minority group. However, I take it that this is not necessarily the case. Additionally, while there are many teachers with some level of I/BD, there are few (if any) with a profound intellectual disability.

Many of these teachers have minimal experience or exposure to people with an I/BD, and some even hold negative or hostile attitudes towards the idea of inclusive classrooms.¹⁷ This is of particular concern because, as noted, teacher attitudes and expectations are one of the most significant determinants of student success (Hattie, 2008).

Anderson may respond that, while educational integration in unjust circumstances has immediate educational costs, the social goods it promotes will help to alleviate precisely the stigmatizing background conditions that cause these competing educational costs. So *future* students will benefit educationally from current integration. Indeed, if integration is the great social good that Anderson believes it is, then a concern for educational justice actually supports the claim that integration now is, contrary to my argument here, a duty of (long-term) educational justice. Unfortunately, however, qualitative data does not support such a claim. As I will detail in section 5, increased exposure of teachers to students with an I/BD does not necessarily reduce their hostility; it can actually increase hostility. Negative attitudes hinder student flourishing, and reduce academic outcomes for targeted students (Phillips, 2014). The potential social goods that integration purports to offer are then lost when integrating processes are poor – this may prevent students with an I/BD from securing a just education *and* just social outcomes in both the short and long term. Integration done poorly is worse than not integrating. This is not to say that integration then ought to be abandoned. Rather, it must be done carefully. We cannot and should not sacrifice the education of present students for the potential good of future successfully integrated conditions – especially when poor integrating processes come with significant burdens.

Those who will integrate at the beginning of an integrating process (especially a poorly facilitated process), rather than towards the middle or end, will face the heaviest burdens: peers, teachers, parents, and society generally will not have been exposed to difference and may treat the newly integrated with hostility. This was the experience of the first Black students to integrate into White schools in the United States.¹⁸ If the burdens shouldered by the vanguard are too great or if they are not distributed more broadly to enable more effective facilitation of integration, then the tail of the vanguard may stretch for decades.

For students with an I/BD, as a small and highly diverse minority group, integration into general education may result in students being isolated from other members of their minority group. The limited scope for homophilic relations can have a negative impact on group formation and both self-respect and civic virtue when students with an I/BD face stigmatization from their fellow students or teachers, and have reduced capacity to interact with others with an I/BD. This breeds isolation within the “integrated” community, diminishing the student’s feelings of self-determination, dignity, or community connectedness. As a result, stigmatized students with an I/BD will have lost some of the goods they are owed as part of educational justice: specifically, goods such as positive and fulfilling experiences during one’s schooling, and positive peer relationships. Importantly, these goods often determine access to other educational goods. For example, evidence demonstrates that students’ academic outcomes are negatively affected when they feel unsafe or disconnected from others within their school (Hattie, 2008).

Unless we consider the weight and distribution of the costs of educational integration, we risk privileging collective goods ahead of the educational wants and needs of students with an I/BD. For Anderson, while the costs of integrationist processes might be high, they are non-optional, and we must all bear a fair share of these costs as a duty of justice. Those who self-segregate or marginalize others are acting contrary to their duty of justice. From this, it seems that a student who self-segregates into a specialist education provider has acted contrary to their duties of justice. So, too, has the parent who enrolls their child in a specialist school.

In the educational context, schools’ special moral duties require that educational justice be prioritized over securing integrated conditions. Self-segregation into specialist schools is not a shirking

¹⁷ See section 5 for examples.

¹⁸ For Black students, the process of integration has not yet fully eased their inclusion. Instead, failed integrating processes have meant that Black integration has gone backwards across some measures: schools are less racially diverse in America today than they were during the late 1960s. It has been reported that in the United States, “More than half of the nation’s schoolchildren are in racially concentrated districts, where over 75 per cent of students are either white or nonwhite.” While access to higher education and local schools has improved significantly for Black students, the case demonstrates just how long and winding the integration process can be. See EdBuild, 2019, a report into discriminatory school funding processes in the United States.

of one's duties of justice if integration would undermine a rightful access to educational goods. A student sacrificing the educational goods they are owed is beyond what could be considered a "fair share of the costs of integration." Rather, special roles and responsibilities for the education sector arise from the moral division of labour that has been struck within most societies. Schools, and the education sector broadly, have been specially tasked with securing educational goods for society. While these goods may vary somewhat based on contextual factors, the attainment of these goods ought to be taken as the priority of schools. Schools do not have a responsibility to provide non-educational, non-foundational goods where so doing would result in students falling below a threshold of the adequate educational goods needed for flourishing over the course of their life. This is the case even where these non-educational goods may be desirable or more easily secured within an educational context, or even where they are considered an imperative for society more broadly. The imperative to integrate then only extends to schools insofar as it does not result in educational injustice. Thus, regardless of whether integrated conditions are attained, if integration prevents students with an I/BD from meeting basic thresholds of educational adequacy, then compulsory educational integration is rendered unjust.

As per Merry and Shelby, what can follow from the above is that self-segregation may be the just and rational choice for marginalized groups under certain circumstances. Students with an I/BD should not be compelled to integrate if special education providers attend to the educational justice requirements owed to students, and better foster the concomitant goals of integration, such as equality and citizenship. Some goals of integration can be separated from integration and achieved separately. However, segregation may not free marginalized groups from stigma; it may only reduce peoples' exposure to stigma-related harm. While lessening students' exposure to harm, segregated schools may struggle to combat prejudice head on, which may lead to greater harm over a person's lifetime. These harms may include failed social understanding, inaccurate political representation, increased life-long isolation, or prejudicial treatment. Thus, even in cases in which separate schooling might offer better educational options and experiences for students with an I/BD,¹⁹ the harm of not integrating may still be significant over their lifetime. To integrate poorly results in a loss of educational goods, while not integrating can result in a loss of social and political goods.

In the case of I/BD, the choice to bear the burdens of either integrating or segregating is rarely made by the student with an I/BD themselves. School choice is typically made by parents. This will often mean that in the case of I/BD, the weighing of the burdens of integration are made by members from outside the group. This can be a difficult and even painful decision for parents, as either choice may come with significant burdens, and because they lack the experiential knowledge of disability to make a truly informed decision. As convincing as one might find arguments for a retained right to voluntary self-segregation, for many students with an I/BD, this option is beyond their reach.

With an adequate theory of commensurability, parents, advocates, schoolboards, politicians, and policy makers could weigh the burdens of integration and segregation, and determine the least harmful outcome, paying significant attention to the voices of people with an I/BD (where possible). However, the just and ideal approach would be to find a process of integration that does not require such a calculation. Mainstream schools could serve many students with an I/BD well if the costs of integration were alleviated.²⁰ While it may still follow that integration is not a duty of justice for all students with an I/BD,²¹ it is important also to consider how the burdens of integration could be alleviated. In the following section, I suggest that many of the burdens shouldered by students with an I/BD arise from negative attitudes towards disability and inclusion. When these negative attitudes hinder student flourishing, compulsory integration *can* be seen as preventing students with an I/BD from securing a just education. More positively, however, as schools have a duty to secure educational justice; where negative attitudes towards integration result in an unjust education, schools have a duty to mitigate this conflict. If we take the imperative of integration seriously, this is best done by overcoming negative attitudes rather than segregating those students towards which negative attitudes are held.²²

¹⁹ Such as learning in a safe environment and gaining confidence in skills important to their flourishing.

²⁰ Such as social and academic isolation and a lack of specialized support and understanding.

²¹ For some students with an I/BD, the costs of integration may always remain too high, or its benefits may be insignificant in comparison to the goods they would secure in a segregated setting.

²² I note now, that this will not alleviate the concerns of integration hindering group formation. Where group members hold that their segregation was critical for group formation, self-respect, and group-advocacy, I would contend that compulsory segregation remains unjust.

5. Teacher Attitudes as Gatekeeping for Successful Integration

Education is distinguished from other integrationist initiatives, as the process and success of integration can be directly facilitated by teachers. We do not refer to a school as “successfully integrated” by looking at the student population’s diversity alone. Even with curriculum or environmental accommodations, students’ mere physical proximity to each other cannot ensure that they will interact in meaningful ways. Instead, teachers have a unique role in preparing, guiding, and encouraging students to interact in ways that promote and secure integration.

Successfully securing educational goods can be best likened to the medical context. Patients need a doctor to play a facilitating role in order to secure medical goods. How and whether they will secure these goods often depends on certain stigmatizing background conditions, such as race and socio-economic class. These background conditions can (mis)inform doctors’ attitudes and beliefs (be they conscious or not) about their patients’ race or class, thus influencing the treatment plan. This can be seen in the increased rate of opioid addiction found in White populations in the United States (Pletcher, et al., 2008). Doctors, influenced by stigmatizing beliefs about pain tolerance and race, have been less inclined to prescribe pain medication to Black patients than White patients. In education, too, background conditions will inform teachers’ attitudes towards their students.²³ Given that teachers’ attitudes and self-efficacy are some of the strongest determinants of whether students will successfully secure educational goods (Hattie, 2008), teachers also need to be guided to overcome stigmatizing background conditions if integration is to be achieved.

In the medical context, the content of health-related goods is typically independent of stigmatizing conditions.²⁴ Promoting health-related goods requires correcting or compensating for stigmatizing background conditions. This does not necessarily imply any need to amend or rethink the goods themselves, or the means of promoting these goods. The problem is not that the kinds of health problems that appropriately call for a pain medication prescription differ depending on race and class backgrounds. The problem is that racist or classist attitudes – background conditions that are irrelevant to the medical diagnosis – end up determining differential medical diagnoses and prescriptions. So, what needs to change is the attitudes but not the epistemic basis of medical aims, goals, or goods. This is where the case of students with an I/BD remains distinct: stigmatizing conceptions of disability are not just “background conditions” that affect the delivery of educational goods; they can actually shape and distort the content of those goods themselves.²⁵ If we are to take integration seriously, we must set up the conditions that would allow it to be successful. This involves changing attitudes – the stigmatizing background conditions – *and* changing the epistemic basis of education and integration goods. I will use this paper to tackle the former, but recognize that the work of the latter will also need to be done.

Within the context of schools, the facilitation of integration may involve but is not limited to modelling of and explicitly teaching inclusive behaviour; treating all students as equal members of the community; attending to diverse needs; and challenging negative assumptions about students’ unchosen characteristics. This facilitation ensures that students learn about diversity, interact with a diversity of other students in meaningful ways, and overcome stigma-based cognitive deficits. Additionally, students feel welcome, understood, safe, and treated as equals: all of which are essential in creating an effective learning environment (*ibid.*).

Integration tends to be unsuccessful when teachers hold either conscious or unconscious negative attitudes towards I/BD. Teachers in such classrooms fail to model inclusive behaviour to students while entrenching stigma and impeding students’ social, emotional, and educational success. As teachers’ negative expectations and attitudes can block or limit student experiences and outcomes (*ibid.*), overcoming segregated background conditions will be essential if integration is to be educationally just. Stigma increases conflict between integration and educational justice for students with an I/BD. In order to minimize conflicts where students with an I/BD are integrated, teachers cannot hold stigmatized attitudes.

²³ Details provided in section 5.

²⁴ However, even some health-related goods, such as those related to mental health, can be grounded on stigmatizing background conditions. I thank Antonia Smyth for our many engaging conversations on this point.

²⁵ I thank Ashley Taylor and Kevin McDonough for their clarification of this claim.

This argument is not a hypothetical one. Rather, significant qualitative research within education has found that both teachers and students without disabilities hold negative attitudes towards students with an I/BD (Trump & Hange, 1996; D'Alonzo, Giordano, & Cross, 1996; deBettencourt, 1999). Additionally, teacher estimates of student achievement and teacher self-efficacy are the most significant factors contributing to actual student achievement, amounting to a 1.62 and 1.57 effect size.²⁶ Unsurprisingly, teachers' attitudes towards inclusion have dramatically affected the success of students with an I/BD in the classroom (D'Alonzo, Giordano, & Cross, 1996). Studies have revealed common negative attitudes towards inclusive education, with many teachers expressing resistant, hostile, or noncommittal attitudes towards teaching students with an I/BD within general education classrooms (Trump & Hange, 1996). Teachers' attitudes towards inclusion vary with their perception of the specific disability itself, as well as with their beliefs regarding the demands placed on them by a student's instructional and management needs (Trump & Hange, 1996; Smith & Smith, 2000). These concerns also centre on the curriculum modifications that may need to be made, a lack of training and support, and how they will teach a student with an I/BD effectively while also teaching many students without an I/BD (Buell, et al., 1999; deBettencourt, 1999). Qualitative research conducted by Trump and Hange led them to conclude that students' "lives are being negatively affected today, as some are being placed in general education classes with untrained teachers who are angry at being forced to receive within their class a student with disabilities" (Trump & Hange, 1996, p. 342).

Teachers' individual experiences and attitudes towards diversity and disability vary. These attitudes impact significantly on the success of their students (ibid., p. 342). Common attitudes were influenced by teacher training, support or collaboration opportunities, teaching experience, and the nature or severity of the disability (D'Alonzo, Giordano, & Cross, 1996). While many factors contribute to the positivity or negativity of teachers' attitudes, teacher efficacy and experience are central to shaping attitudes (ibid.). The nature and number of disabilities within the classroom also contributed significantly (ibid.). In reverse, then, the changes that should have the most decisive positive impact on improving teachers' attitudes would be limiting the nature and number of students with an I/BD in mainstream schools or, more positively, supporting and improving teachers' skillsets.

Teachers' positive attitudes are central to effective, successful integrationist practices (Olson, 2003, p. 31). Negative teacher responses to students with an I/BD can have a flow-on effect on how students without an I/BD perceive and interact with their peers with an I/BD (deBettencourt, 1999). Where difficulty and difference are highlighted in interactions, peers may be more likely to recognize differences and place them at the centre of their interactions (ibid.). This may result in failed peer-to-peer interactions and increased stigma directed towards students with an I/BD. It is here that the necessarily facilitated nature of school-based integration is made clear. Integration is not achieved in schools by simply placing diverse students in the same classroom: success requires the effective facilitation of integration by a teacher. However, teachers cannot successfully facilitate integration if they hold negative attitudes or stigmatizing beliefs towards the integrating groups.

Shifting Burdens: Supporting Teachers as Facilitators

Determining whether segregation constitutes a shirking of the duties of justice requires factoring in the realities of integration. Teacher attitudes function as a way of gatekeeping the success of integration, so teachers' wants and needs must be considered. This is not to say that the segregation of students with an I/BD is justified if teachers desire higher concentrations of students without an I/BD in their classrooms. Rather, as this is a desire within the profession, it must be understood so that it can be overcome. This is especially important because poor outcomes arise where students with an I/BD are taught by teachers who hold negative attitudes towards them.

Teachers, and the education sector more broadly, are tasked with the special moral responsibility of securing educational justice for students. As stated, if integration prevents students with an I/BD from meeting necessary thresholds of educational adequacy, regardless of whether in so doing integrated conditions are attained, educational integration is rendered unjust. This may mean that, at

²⁶ As a rule of thumb, a 0.5 effect size equates to one grade-level improvement in GCSE or A-Levels. The hinge point sits at 0.4 (being the level of growth that is *achieved* compared to the natural development that occurs as students age), and an effect size above 0.8 is considered large. See Hattie, 2008.

least until more positive attitudes prevail,²⁷ segregation can better serve a student's need for understanding and community. Additionally, to minimize conflict, generalist teachers need to be supplied with resources to promote positive attitudes towards integration.

Negative attitudes held by general classroom teachers can be overcome by increased recognition of the origin and impact of these attitudes. The success of integration is related to several factors, the most significant being teachers' skills, training, preparation, attitudes, and collaborative opportunities (Trump & Hange, 1996). Many factors that increase positive attitudes are simple: preservice and in-service training and providing teachers time to collaborate. These factors have positively affected teacher efficacy, which has a profound impact on reshaping attitudes (*ibid.*).

As professionals within the field tasked with the special moral duty of attaining educational justice for all students, teachers hold special obligations to promote such goods. This means that those training, leading, and supporting teachers have an obligation to best prepare and support teachers in facilitating educational justice – that is, they have a moral and professional obligation to provide teachers with the time and training that is needed to facilitate integration. Where diversity is increasingly part of the general classroom, teacher training must identify and overcome negative attitudes so that stigma will not prevent the successful facilitation of educational goods. If the schooling system is integrated, teachers qua teachers cannot retain negative attitudes towards I/BD. To do so would undermine their special moral duty to secure educational justice for all students. If the profession is unable or unwilling to do this, then separate schooling could be justified for students with an I/BD.²⁸

6. Conclusions

The general underlying question this paper has sought to answer is how ethical work should be distributed. The discussion has focused on the specific context of schools and the education of students with an I/BD because schools are a uniquely important site to do, or fail to do, ethical work in our society. They are typically the only compulsory social institution that most of us enter in our lives. Within this unique and socially vital context, the appropriate distribution of ethical work makes it the case that schools' primary duty is to achieve educational justice for their students. Other practical or even justice-related (non-foundational) imperatives we may face as a society should not extend to the educational context when doing so would prevent schools from providing students with educational goods to at least a threshold of basic adequacy.

Several conclusions result from the above arguments. Firstly, within schools, integration currently entails undesirable processes and fails to bring about the state of affairs schools are tasked to achieve: securing adequate educational goods for the school-aged population. Since integration can and does conflict with the attainment of an adequate level of educational goods for students with an I/BD, in its current form integration ought not to be considered an *imperative* for students with an I/BD. The subsequent conclusion is that voluntary segregation is justified if separated learning better attends to educational justice for students with an I/BD. Thirdly, as integration has already been adopted within the education context, significant work can and should be done to redistribute the burdens integration places on students with an I/BD so that they can justly attain educational goods within an integrated classroom. Finally, as schools are charged with the work of educational justice, it ought to be concluded that it is the professional moral duty of the education sector to attend to the requirements of educational justice. As schools are already commonly integrated, it then becomes the duty of schools and teacher-training institutions to minimize conflicts between integration and educational justice. This can be done via relatively minor institutional changes, such as preservice training, special education practicums, and collaborative opportunities between teachers.

These conclusions are motivated by this paper's central claim: certain moral constraints govern the integration processes within the educational context. Here, integration as a process requires meaningful,

²⁷ And in certain circumstances, even if more positive attitudes do already prevail.

²⁸ Negative beliefs regarding an I/BD will be reflected in teachers' pedagogy, impacting students with and without an I/BD in a way that lessens or blocks student educational outcomes. Teachers found to hold negative attitudes towards I/BDs should then be seen as failing their professional moral duties. This ought to be treated in the same way that schools would treat any dereliction of duty. Such cases would typically see the teacher tasked with rectifying their professional standards, rather than requiring the student to attend a different school.

sustained, and positive contact between diverse groups. It may involve the limiting of individual freedom and comfort, but, in order to be deemed just, it ought not to:

1. unduly burden vulnerable groups,
2. perpetuate the harms it proposes to resolve, or
3. impede the special moral duties of institutions or groups.

These constraints can be generalized across other institutions or groups tasked with special moral duties. For example, if a state's health industry could secure social integration, it ought not to do so at the cost of its special moral duty to support individual members' good health. To do so would be to fail to respect those persons as persons, and to treat them merely as a means to achieving some broader social good. Equally, integrating processes are outweighed by ethically significant costs, such as compounding social inequalities by unjustly burdening vulnerable groups with geographic, social, or political isolation. Policy makers, thus, must take these distributive values into account when designing and implementing integrationist initiatives. The educational context demonstrates that integration is not an overriding imperative. Instead, like many specific goods in our lives, it needs to be weighed against conflicting goods to determine whether its pursuit is just.

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References

- ABC News. (2017). Pauline Hanson comments about kids with disabilities, autism misguided, education expert says. <http://www.abc.net.au/news/2017-06-22/pauline-hanson-autism-comments-misguided-education-expert-says/8641440>.
- Ahlberg, J. (2014). Educational justice for students with cognitive disabilities. *Social Philosophy and Policy*, 31(1), 150–175.
- Anderson, E. (2007). Fair opportunity in education: A democratic equality perspective. *Ethics*, 117, 595–622.
- Anderson, E. (2010). *The imperative of integration*. Princeton University Press: Princeton and Oxford.
- Australian Government. (2005). Disability standards for education 2005.
- Brighouse, H., Ladd, H. F., Loeb, S., & Swift, A. (2016). Educational goods and values: A framework for decision makers. *Theory and Research in Education*, 14(1), 3–25.
- Buell, M. J., Hallam, R., Gamel-McCormick, M., & Scheer, S. (1999). A survey of general and special education teachers' perceptions and inservice needs concerning inclusion. *International Journal of Disability, Development and Education*, 46(2), 143–156.

- D'Alonzo, B. J., Giordano, G., & Cross, T. L. (1996). Improving teachers' attitudes through teacher education toward the inclusion of students with disabilities into their classrooms. *Teacher Educator*, 31(4), 304–312.
- deBettencourt, L. U. (1999). General educators' attitudes toward students with mild disabilities and their use of instructional strategies: Implications for training. *Remedial and Special Education*, 20(1), 27–35.
- EdBuild. (2019). \$23 billion. <https://edbuild.org/content/23-billion/full-report.pdf>.
- Fredrickson, B. L. & Losada, M. F. (2005). Positive affect and the complex dynamics of human flourishing. *American Psychologist*, 60(7), 678–686.
- Goldman, A. (2018). Moral epistemology and professional codes of ethics. In A. Zimmerman & K. Jones and M. Timmons (Eds.), *Routledge handbook of moral epistemology* (pp. 482–492). New York: Routledge.
- Hattie, J. (2008). *Visible learning: A synthesis of over 800 meta-analyses relating to achievement*. London: Routledge.
- Lake, J. (2001). Better services, better outcomes in Victorian government schools: A review of educational services for students with special educational needs. Melbourne, Australia: Department of Education, Employment and Training.
- LaVeist, T. A., Rolley, N. C., Diala, C. (2003). Prevalence and patterns of discrimination among US health care consumers. *International Journal of Health Services*, 33(2), 331–344.
- Macleod, C. (2010). Justice, educational equality, and sufficiency. *Canadian Journal of Philosophy*, 40(supp 1), 151–175.
- McMenamin, P. R. (2015). *A puzzling matter: Special schools, justice, and inclusion* [Doctoral dissertation, University of Canterbury].
- Merry, M. S. (2013) *Equality, citizenship, and segregation: A defence of separation*. Palgrave MacMillian: UK.
- Mickelson, R. A. (2008). Twenty-first century social science research on school diversity and educational outcomes. *Ohio State Law Journal*, 69, 1,173–1,228.
- Olson, J. M. (2003). Special education and general education teacher attitudes toward inclusion. [Unpublished MSC thesis, University of Wisconsin-Stout].
- Page, S. E. (2008), *The difference: How the power of diversity creates better groups, firms, schools, and societies*. Princeton, NJ: Princeton University Press.
- Phillips, K. (2014). How diversity makes us smarter, *Scientific American*, 311(4).
- Pletcher, M. J., Kertesz, S. G., Kohn, M. A., & Gonzales, R. (2008). Trends in opioid prescribing by race/ethnicity for patients seeking care in US emergency departments. *JAMA*, 299(1), 70–78.
- Pugach, M. C., & Johnson, L. J. (1988). Rethinking the relationship between consultation and collaborative problem solving. *Focus on Exceptional Children*, 21(4), 1–8.
- Satz, D. (2007). Equality, adequacy and education for citizenship. *Ethics*, 117, 623–48.
- Shelby, T. (2014). Integration, inequality, and imperatives of justice: A review essay. *Philosophy and Public Affairs*, 42(3), 253–285.
- Smith, M. K., & Smith, K. E. (2000). “I believe in inclusion, but...”: Regular education early childhood teachers' perceptions of successful inclusion. *Journal of Research in Childhood Education*, 14(2), 161–180.
- Trump, G. C., & Hange, J. E. (1996). Teacher perceptions of and strategies for inclusion: A regional Summary of focus group interview findings.

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