

Two Policies, One Learner: A Comparative Directed Content Analysis of Policy Coherence between Digital-Education and Special-Education Frameworks for Learners with Disabilities in Malaysia and Indonesia

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ABSTRACT:

Inclusive education and digital transformation now sit side by side in the education policy of many middle-income states, yet the two agendas are seldom read together. This paper reports a directed qualitative content analysis of how the special-education and digital-education frameworks of Malaysia and Indonesia address learners with disabilities, and of whether the two streams cohere around digital accessibility and assistive technology. Policy texts were coded against a framework drawn from Universal Design for Learning, General Comment No. 4 on the right to inclusive education, the levels of the digital divide, and the study of policy coherence. Each country identifies disability through a medical or administrative process and states accommodation as a duty it then qualifies. Where digital accessibility is named as a material entitlement it sits within the special-education stream, unreached by the digital reform that will decide whether it is met. On every dimension examined, the two streams run in parallel rather than in synergy.

Keywords: inclusive education policy, digital education, assistive technology, Universal Design for Learning, policy coherence.

1. Introduction

Two ambitions dominate education reform across much of the Global South. The first is inclusion, the commitment that learners with disabilities be educated within a common system, now embedded in the fourth Sustainable Development Goal and in the Convention on the Rights of Persons with Disabilities (United Nations, 2006). The second is

digitalisation, the movement of teaching and assessment onto networked platforms, accelerated by the pandemic and increasingly shaped by artificial intelligence. Both ambitions carry their own policy apparatus, and the two are rarely read against one another, though they converge on the same child, the learner with a disability who must now learn through digital means.

Assistive technology takes many forms, from a screen reader that voices text for a blind learner, to a switch that lets a learner with limited movement operate a device, to captioning and symbol-based communication. Each depends on the ordinary platform being built to accept it. When a system procures devices and software without that requirement, it does not merely omit a feature; it forecloses the adaptations on which a range of learners depend (World Health Organization & United Nations Children's Fund, 2022).

Because learning increasingly moves through platforms, the convergence is not neutral, and a learner who cannot reach a platform is excluded from the ordinary business of schooling, not from some supplementary service. Read through the levels of the digital divide, disability meets reform at the level of access, where an inaccessible platform is a barrier whatever device runs it, and at the levels of skills and outcomes beyond it (van Dijk, 2020). Recent work argues that technology and policy are far from neutral tools and can operate as instruments of exclusion, a pattern named ableism by design (Ellis & Bryant, 2026).

Inclusion in the sense the Convention intends is not merely the placement of a disabled learner in a mainstream room. It is a claim on the design of the system itself, so that the curriculum, the materials, and the means of assessment are built to admit a range of learners instead of being adjusted for them one at a time (UNESCO, 2017). Digital access carries the same double character. Reaching a device is only the threshold; the substantive claim is on whether the learner can use the system to learn and to be assessed on equal terms, a claim increasingly recognised as a matter of rights, and no longer of welfare (Sanders & Scanlon, 2021).

By the estimate of the World Health Organization and UNICEF (2022), more than 2.5 billion people need at least one assistive product, and in some low-income countries as few as three in every hundred who need one can obtain it. Access is only the first level of the divide. Even where a device reaches a learner, the skills to use it and the outcomes it yields remain unequally distributed (Scheerder et al., 2017; van Deursen & van Dijk, 2019). For learners with disabilities a further barrier

precedes all of these, since a platform that is not accessible cannot be used at all, a disability divide in access and use documented well before the present wave of reform (Dobransky & Hargittai, 2006).

Malaysia and Indonesia make a productive comparison because both are middle-income states in Southeast Asia that have ratified the Convention, run parallel special-education and digital-education agendas, and have legislated for disability rights within the last two decades. They differ, however, in legal tradition and in how each has organised its digital reform, which lets the analysis ask whether a common gap appears across two different systems or is particular to one.

Policies also travel, and because ideas about inclusion and about digital learning move between systems through borrowing and adaptation, reading two neighbouring states together can show which features belong to one system and which recur across both (Phillips & Ochs, 2003; Taylor et al., 1997). The comparison here is used in that spirit, to test whether a gap between the two frameworks is an artefact of one country's arrangements or a shared pattern.

Both agendas have their own scholarship, a literature on inclusive education that examines how systems classify, place, and support disabled learners, and a separate literature on the digital divide that examines how access to technology is distributed and to what effect. The two are rarely brought together, and studies that read a country's special-education and digital-education policies as a single field, against the learner who stands in both, remain scarce. This paper works in that gap.

The choice of Southeast Asia is deliberate, for middle-income states in the region have moved quickly to digitalise schooling, often faster than their systems for supporting disabled learners have matured, so that the question of whether the two agendas meet is both live and consequential. Malaysia and Indonesia are among the region's largest school systems, and their disability-rights frameworks are recent and still evolving, which makes them a demanding test of whether inclusion and digital reform are being reconciled.

This paper reads two policy streams together, the special-education framework and the digital-education framework of Malaysia and Indonesia, and asks how far they cohere around the learner who depends on both. Each stream is read against a common framework. The framing of provision is read against Universal Design for Learning, and identification against the medical and social models of disability. Reasonable accommodation and digital accessibility are read against General Comment No. 4, and the reach of each digital agenda against the levels of the digital divide (Committee on the Rights of Persons with Disabilities, 2016; Meyer et al., 2014; Oliver, 1996; van Dijk, 2020). The coherence between the two streams is then judged with the theory of policy coherence (Nilsson et al., 2012). The analysis pursues two questions, one descriptive, how each stream addresses disabled learners, and one comparative, whether the streams cohere at the point where digital reform and disability meet.

2. Methodology

2.1 Study design

The study uses directed qualitative content analysis, an approach that begins from existing theory and codes text against categories fixed in advance, in contrast to an inductive reading that lets them emerge from the text (Elo & Kyngäs, 2008; Hsieh & Shannon, 2005). The approach suits a question that is comparative and framework-led, since it holds the same analytical lens against two systems and reads each against a common standard. Policy documents are treated here as data, following established procedure for document analysis, in which the text is read for what it states, what it omits, and how it frames the entity it governs (Bowen, 2009).

2.2 Corpus

The corpus comprises the principal special-education and digital-education instruments of each country, chosen because they carry statutory or strategic authority and because together they define how each system addresses disabled learners. For Malaysia these are the reasonable-accommodation duty in section 28 of the *Persons with Disabilities Act 2008*, the *Education (Special Education) Regulations 2013*, the Zero Reject Policy

that has governed admission since 2019, and the *Digital Education Policy* of 2023 (Government of Malaysia, 2008; Ministry of Education Malaysia, 2013a, 2018, 2023). For Indonesia these are Law Number 8 of 2016 as the framework statute, Government Regulation Number 13 of 2020 on reasonable accommodation, the education-sector regulation that succeeds it in 2023, and the national digital-learning agenda with its inclusivity strategy (Government of Indonesia, 2016; Kementerian Pendidikan, Kebudayaan, Riset, dan Teknologi, 2023; Pemerintah Republik Indonesia, 2020; Zamjani et al., 2020). Each document was read in the language of issue, in Malay, Indonesian, or English.

The two digital streams are not symmetrical, and the difference is treated here as a finding rather than a flaw. Malaysia has consolidated its digital agenda into a single named policy, whereas Indonesia distributes its agenda across curriculum reform and platform initiatives without an equivalent consolidated instrument. Rather than force a false equivalence, the analysis reads each digital stream as it is constituted.

2.3 The coding framework

Coding proceeded against five dimensions drawn from four bodies of theory, set out with their categories in Table 1. The framing of provision was read against Universal Design for Learning, which distinguishes an environment designed for a range of learners from a setting to which the individual must be accommodated (Meyer et al., 2014). The model of identification was read against the distinction between the medical and social models of disability, which separate the location of disability in the individual from its location in a disabling environment (Oliver, 1996; WHO, 2001). Reasonable accommodation and the accessibility of digital resources were read against General Comment No. 4 on the right to inclusive education, which frames both as obligations rather than concessions (Committee on the Rights of Persons with Disabilities, 2016). The level of the divide addressed was read against the levels of the digital divide, which separate inequality of access from inequality of skills and of outcomes (van Dijk, 2020).

2.4 Analysis and coherence

Every passage bearing on learners with disabilities, on accessibility, on assistive or digital technology, or on the identification of special needs was extracted and assigned to one or more dimensions. Coded passages were arranged in a matrix with the dimensions as rows and the two countries, each divided into its special-education and digital-education streams, as columns, so that the position of each stream could be compared within a country and across the two. Coherence between the streams was then judged on each dimension against the study of policy coherence, which distinguishes horizontal coherence between sectors at the same level of government (Nilsson et al., 2012). A relationship was read as synergistic where the streams reinforce a shared objective, as conflicting where they pull in opposite directions, and as parallel where each addresses the dimension in isolation.

2.5 Trustworthiness

Because a single analyst coded the corpus, the study follows the established criteria for trustworthiness in qualitative inquiry (Lincoln & Guba, 1985). Credibility rests on definitions fixed before coding and on triangulation of each policy claim against an independent source. Dependability and confirmability rest on an audit trail that records each extracted passage, its assigned dimension, and the basis for the assignment. Transferability rests on the detailed description of the corpus and the coding scheme, which allow the framework to be reapplied to other jurisdictions. The study analysed publicly available policy texts and involved no human participants.

3. Results

Each country runs two policy streams that address the same learner. In Malaysia a special-education framework built on the Persons with Disabilities Act, the special-education regulations, and the Zero Reject Policy sits alongside a digital-education policy issued in 2023. In Indonesia a rights-and-accommodation framework built on the disability law, Government Regulation Number 13 of 2020, and the education-sector regulation of 2023 sits alongside a national digital-learning agenda. The

analysis reads both streams of each country against the five dimensions in turn.

The findings follow the five dimensions and are summarised in Table 2.

3.1 Framing of provision

Malaysia frames provision as an adjustment made for the individual. Section 28(2) of the Act requires providers to make reasonable accommodation in, among other things, infrastructure, equipment and teaching materials, teaching methods, and curriculum. The special-education curriculum is in turn defined by the Regulations as the national curriculum, the national curriculum as modified by the Chief Registrar, or a curriculum specially designed by the Chief Registrar (Ministry of Education Malaysia, 2013a). Provision is routed through an administrative authority; it is not designed into the ordinary setting. The *Digital Education Policy* frames provision as coverage, recording that digital learning applies to all pupils, including those with special educational needs, across every level from preschool to matriculation, without attaching a provision to that inclusion. Indonesia frames accommodation as modification and adjustment, defining it as the appropriate and necessary change required to guarantee the enjoyment of rights on an equal basis, and frames its digital agenda as the widening of access (Pemerintah Republik Indonesia, 2020; Zamjani et al., 2020). The Malaysia Education Blueprint, which sets the direction of the system to 2025, treats special educational needs largely as a matter of physical resources and teacher training (Ministry of Education Malaysia, 2013b). Its parallel commitment to information and communication technology is written for pupils in general, with nothing that joins the two.

3.2 Identification of the learner

Indonesia routes the recognition of disability through a certificate from a doctor, a requirement carried from Government Regulation Number 13 of 2020 into the education-sector regulation of 2023 (Kementerian Pendidikan, Kebudayaan, Riset, dan Teknologi, 2023; Pemerintah Republik Indonesia, 2020). The regulation names the personnel who may determine a disability, namely doctors and specialist doctors, and a pupil showing

indications of disability is referred to a doctor, a specialist, or a clinical psychologist before provision follows. Malaysia reaches identification administratively. Section 28(1) of the Act frames the matter as one of setting, not diagnosis, providing that persons with disabilities shall not be excluded from the general education system on the basis of disability. The Zero Reject Policy guarantees that no learner is refused enrolment, yet placement in a mainstream inclusive class remains conditional on a readiness checklist, a condition that has itself been read as a qualification of the anti-exclusion promise the policy makes (Chin, 2023; Ministry of Education Malaysia, 2018). The digital instruments of both countries address an already-identified population.

3.3 Reasonable accommodation

Both states declare the duty, and both trace it to a framework instrument. Malaysia's Act provides that government and private education providers shall provide reasonable accommodation suited to need, yet it states the duty in mandatory terms without supplying a route by which a learner refused accommodation might secure it. Indonesia's Law Number 8 of 2016 guarantees the right of persons with disabilities to education and to the use of technology, information, and communication (Government of Indonesia, 2016). Government Regulation Number 13 of 2020 then requires central and regional government to facilitate reasonable accommodation, though it directs that the facilitation be delivered in stages, with priority given to institutions that already enrol pupils with disabilities (Pemerintah Republik Indonesia, 2020). The education-sector regulation of 2023 adds machinery the earlier instruments lacked, requiring each formal institution to establish a disability service unit, permitting flexibility in learning outcomes, materials, and process on the recommendation of a needs assessment, and attaching administrative sanctions to non-compliance (Kementerian Pendidikan, Kebudayaan, Riset, dan Teknologi, 2023). The disability service unit the 2023 regulation requires gives the Indonesian duty an institutional home, an office charged with coordinating provision and supplying the accommodations an assessment identifies, which the Malaysian duty lacks.

3.4 Accessibility of digital resources

The clearest naming of digital accessibility appears in Indonesia's accommodation regulation, and it sits within the special-education stream, at a remove from the digital one. Government Regulation Number 13 of 2020 requires the application of accessible website standards in the use of technology, applications, and technology-based equipment across registration, administration, teaching, and assessment. It requires the provision of adaptive technology, which it defines as technology that can be adapted for the educational and social needs of persons with disabilities, together with books in accessible formats and the learning media and assistive devices a pupil requires (Pemerintah Republik Indonesia, 2020). Malaysia's rights instrument names accessibility to information and communication in its recitals, yet its operative education section carries no equivalent duty, and the information-technology provisions of its blueprint are silent on disability. The digital instruments of both countries name neither accessible standards nor assistive technology.

3.5 Level of the divide addressed

Each digital strategy addresses the divide at the level of access. Malaysia's *Digital Education Policy* sets out to provide access to digital devices and support services for every pupil and names the reduction of the digital divide as an intended outcome, with particular attention to rural areas. Indonesia's strategy paper names the divide directly, describing it as the unequal access to technology between regions and groups, and observes that digital learning has so far been taken up more by children already in school than by those out of it (Zamjani et al., 2020). Neither instrument maps disability onto the levels of skills and outcomes, and neither special-education instrument frames its provision through the divide at all.

3.6 Coherence of the two streams

On no dimension in either country do the two streams reinforce one another, and on none do they conflict. The recurring relationship is parallel. Indonesia's material provision for accessible technology remains in the accommodation stream, apart from the digital agenda, and Malaysia's

streams meet only in the single, unelaborated mention of learners with special needs in its digital policy.

Table 1. The coding framework: five dimensions and their categories.

Dimension	Source	Categories coded
Framing of provision	Universal Design for Learning (Meyer et al., 2014)	Environmental / Individual
Identification model	Medical–social model (Oliver, 1996; WHO, 2001)	Medical / Social
Reasonable accommodation	CRPD General Comment No. 4 (2016)	Entitlement / Discretionary
Accessibility of digital resources	CRPD General Comment No. 4 (2016)	Named / Absent
Level of divide addressed	Divide levels (van Dijk, 2020)	Access / Skills / Outcomes / None

Table 2. Position of each policy stream and horizontal coherence, by dimension.

Dimension	Malaysia	Indonesia	Coherence
Framing of provision	Individual adjustment with an administratively set curriculum in special education; coverage asserted in the digital stream	Modification and adjustment in special education; widening of access in the digital stream	Parallel
Identification	Administrative gatekeeping through Zero Reject and a readiness checklist; digital stream silent	A medical certificate; digital stream silent	Parallel
Reasonable accommodation	Duty stated but unenforced; digital stream silent	Enforceable, staged duty with service units and sanctions; digital stream silent	Parallel
Accessibility of digital resources	Absent, save one symbolic mention of learners; digital stream silent	Named in special education as accessible standards and adaptive technology; digital stream silent	Parallel
Level of divide addressed	Access only in the digital stream; no mapping to skills or outcomes	Access only in the digital stream; no mapping to skills or outcomes	Parallel

Note. On no dimension do the streams conflict; the recurring relationship is parallel, an absence of synergy rather than a contradiction.

4. Discussion

4.1 Two streams that do not meet

The two streams were built for different purposes and continue to run on separate tracks. That

separation would matter little if digital reform left disabled learners where it found them, but it does not. Learning now moves through platforms, and the point at which the special-education and digital

streams fail to meet is the point at which the promise of inclusion is most tested.

4.2 From access to amplification

Read through the levels of the digital divide, the pattern is not neutral. Both countries address the divide at its most tractable level, that of access, and neither carries the analysis to the levels at which disability becomes decisive (van Dijk, 2020). A device delivered to a learner who is blind is not access when the software on it cannot be read aloud. A reform that names universal coverage without naming accessibility does not hold disability constant, and it allows the advantage of those who can already use the system to compound (Robinson et al., 2015; Scheerder et al., 2017). The same logic reaches assessment, where a platform that scores a learner on responses it was not built to accept can record a disability as a deficit in performance. The concern that technology designed without disability in view reproduces exclusion is written into the silence at the centre of these documents (Ellis & Bryant, 2026).

4.3 The persistence of the medical model

The identification provisions pull against the inclusion each system professes. Indonesia routes recognition through a doctor's certificate and Malaysia through administrative screening, yet both make provision conditional on a prior act of classification. That is the logic of the medical model, which locates disability in the individual, and which the social model and the framework of the World Health Organization were developed to displace (Oliver, 1996; WHO, 2001). Beneath the language of inclusion sits an apparatus that still begins from a diagnosis of the individual.

In a digital system the medical model's demand for prior classification carries a particular consequence. When recognition depends on a certificate and provision follows from a category, the learner must be classified before the system will adapt to them, yet the platforms that now carry teaching are built to standard specifications set before any particular learner appears. A learner whose needs are established only after enrolment meets an infrastructure already designed without them. The classification the medical model requires is thus not

only slow; in a digital system it arrives after the decisions that matter have already been taken.

4.4 Asymmetry, borrowing, and the symbolic-material line

The asymmetry in the Indonesian case is instructive, since its accommodation instruments hold a developed language of digital accessibility and, in the regulation of 2023, an enforceable duty, while its digital agenda does not take that language up. Coherence fails here because a sound provision sits in the stream least able to act on it. Malaysia presents a different case, since neither of its streams carries the provision at all. The comparison suggests a modest exchange in each direction, in which Malaysia might take from Indonesia the language that names accessible standards as an entitlement, and Indonesia might write that entitlement into the digital strategy that will decide whether it is met (Nilsson et al., 2012).

Whether a commitment is material or symbolic can be read from what is attached to it. Malaysia states the duty to accommodate in mandatory terms yet supplies no route by which a learner refused accommodation might secure it, so the duty is declared without being owed to anyone in particular (Hardy & Woodcock, 2015). Indonesia's regulation of 2023 is more precise and, unusually, attaches administrative sanctions to non-compliance, yet it releases the duty in stages and confines the material provision for accessible technology to the special-education stream. In each system the stronger language is qualified by the mechanism attached to it, and the qualification, in turn, bears on the population the language addresses.

The two systems differ, finally, in the institutional form the duty takes. Indonesia's duty has a place to live, in the service unit, in the sanction, and in the assessment that triggers provision, whereas Malaysia's duty, though stated in mandatory terms, has no office charged with delivering it and no consequence for failing to. Coherence with the digital stream is harder to build where the accommodation duty itself has no administrative body through which a digital obligation could be routed.

4.5 What coherence would require

The accessibility standards and assistive-technology provisions that already exist in the special-education stream would need only to be named as obligations within the digital strategy that procures devices, builds platforms, and trains teachers, so that the reform now carrying teaching is bound by them. What coherence requires, in other words, is less the creation of new provision than the connection of provisions the systems already hold (Nilsson et al., 2012).

The pattern is unlikely to be confined to these two states. Across middle-income systems that have legislated for disability rights while pursuing rapid digital reform, the two agendas tend to be housed in different ministries, funded through different lines, and monitored by different officials, which makes a parallel relationship the path of least resistance. The value of reading two systems together is that it separates what follows from a particular legal tradition from what follows from this common administrative division of labour, and the recurrence of the parallel pattern across two different traditions points to the second.

The stakes sharpen as teaching moves onto adaptive and increasingly automated platforms, where the decisions that shape access are taken earlier and are harder to see, embedded in procurement, in interface design, and in the data a system expects a learner to produce. A policy that leaves accessibility to the special-education stream while the digital stream builds the infrastructure cedes those decisions to the moment of design, where disability is least likely to be present. The remedy is not to slow the reform but to carry the accessibility obligation into it, so that the platforms a system adopts are required from the outset to be usable by the learners the system has promised to include (Ellis & Bryant, 2026).

The gap becomes concrete in the ordinary work of a school. A teacher asked to move a class onto a platform receives no accessible version for the pupil who cannot use the standard one, because the instrument that procured the platform did not require it and the instrument that guarantees accommodation does not reach the procurement. The entitlement exists, but in a stream that does not

touch the device in front of the learner. Closing the gap in policy is what would let a teacher meet it in practice.

4.6 Treaty monitoring and limitations

Both states have ratified the Convention on the Rights of Persons with Disabilities, which obliges them to ensure an inclusive education system and to take appropriate measures on accessible information and communication technology (Committee on the Rights of Persons with Disabilities, 2016; United Nations, 2006). A review that examined either stream alone would misjudge whether that obligation is kept, since the special-education stream can appear compliant while the reform that now carries teaching leaves accessibility unaddressed. Reading the two streams together is a condition of seeing whether the commitment survives.

These claims carry the qualifications of their method. The analysis rests on policy texts, which state intention rather than practice, so what a ministry funds and what a school does may depart from what a regulation declares. Coding was conducted by a single analyst, and the judgement of coherence in particular rests on reading two instruments together, where a second analyst might weigh a marginal case differently. A study of implementation, drawing on schools, teachers, and disabled learners, would test whether the gaps identified on paper are felt where learning takes place.

5. Conclusion

Malaysia and Indonesia have each built a serious apparatus for identifying and accommodating disabled learners, and both have committed to a digital transformation of their schools, but the two commitments were made in different rooms and have not been reconciled. On every dimension examined, the streams run in parallel. One change would write accessibility and assistive technology into the digital stream as an entitlement, in the language the Convention already provides. A second would monitor the two together, since a review of either alone will misjudge whether inclusion survives contact with the technology now carrying it. Neither change requires new money so much as a decision to treat accessibility as a built-in

property of the digital system, so that it is no longer left to the special-education stream to supply. The

learner who depends on both streams cannot wait for them to be joined by accident.

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