

# Professional Rights of Social Workers in Special Education: A Comparative Analysis of Europe, the United States and the Greek Context

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## Abstract

Social workers play a pivotal role in advancing inclusive education systems, particularly within special education settings. This paper provides a comprehensive comparative analysis of the

professional rights, legal recognition, and institutional integration of social workers in special education across selected countries in Europe—the United Kingdom, Germany, and Sweden—as well as the United States. These countries demonstrate strong institutional frameworks that embed social work through policy design, professional certification, and interdisciplinary collaboration. Social workers are positioned as essential stakeholders in Individualized Education Programs (IEPs) and multi-agency planning processes. By contrast, the Greek context reveals a substantial institutional void: the role of social workers in special education remains ambiguously defined, sporadically implemented, and legally unrecognized. Drawing upon international best practices, this study identifies key structural deficiencies in Greece—including legislative omissions, the absence of professional training pathways, and limited representation in education policymaking. Actionable policy proposals are offered, including formal legal recognition, integration into education systems, development of specialized academic programs, and enhanced advocacy strategies. The findings highlight an urgent imperative for Greece to align with global standards in order to advance educational equity and uphold the rights of students with disabilities.

**Keywords:** Social work, special education, professional rights, Greece, Europe, United States, educational policy, interdisciplinary collaboration

## 1. Introduction

Social workers in special education operate at the intersection of education, social policy, and disability rights. Their role extends beyond direct service provision to include systemic advocacy, resource mobilization, and empowerment of families. Their responsibilities commonly include psychosocial assessments, crisis intervention, facilitation of support groups, family outreach, and coordination with external community services. Crucially, school social workers are expected to have specialized knowledge of disability legislation, inclusive pedagogy, and child protection frameworks. Their ability to connect the home, school, and community environments renders them essential to fostering inclusive education (Franklin & Gerlach, 2017).

Collaboration with other professionals is a foundational principle of effective school social work. In inclusive educational systems, social workers serve as key intermediaries among educators, families, and community stakeholders. They facilitate shared decision-making processes through mechanisms such as Individualized Education Programs (IEPs) or their international equivalents. In countries like Sweden and the United States, the inclusion of social workers in school-based multidisciplinary teams—including psychologists, special education teachers, and speech-language therapists—is mandated by law. These teams engage in regular meetings to reassess student needs, adjust support strategies, and ensure continuity of care (Skolverket, 2020; Richardson, 2015).

Research consistently demonstrates that interdisciplinary collaboration not only enhances educational outcomes for students with disabilities but also contributes to an improved school climate overall. It promotes emotional well-being, fosters equity, and strengthens the school's capacity to respond to diverse needs (Franklin & Gerlach, 2017).

Social workers are indispensable contributors to inclusive educational environments, particularly within special education, where students' needs are multifaceted and demand holistic approaches. Their responsibilities encompass psychosocial support, family engagement, interdisciplinary coordination, and systemic advocacy (Allen-Meares, 2010). In numerous Western countries, including the United States, the United Kingdom, Sweden, and Germany, the function of school social workers is well-articulated and embedded in educational legislation and practice. Such frameworks typically integrate social workers as core members of multidisciplinary teams responsible for the development and evaluation of individualized support plans (Franklin & Gerlach, 2017).

For example, in the United States, the Individuals with Disabilities Education Act (IDEA) explicitly includes social workers as key contributors to Individualized Education Programs (IEPs) (Richardson, 2015). Similarly, the United Kingdom's Children and Families Act 2014 mandates multi-agency collaboration, recognizing social workers as essential stakeholders in the design and oversight of Education, Health and Care Plans (EHCPs) (Department for Education, 2015). These legislative measures institutionalize the role of social workers in educational settings, ensuring that their contributions are valued, formalized, and supported by funding mechanisms.

Sweden and Germany have further reinforced the integration of social workers through a combination of educational and social welfare legislation. These countries embed social work within interdisciplinary school teams, facilitating early intervention, comprehensive support services, and holistic educational planning (Schilling, 2018; Skolverket, 2020). Empirical evidence shows that such systemic inclusion enhances the quality of education for students with disabilities and promotes inclusive educational values.

In stark contrast, Greece has yet to establish a clear legal or institutional framework for the inclusion of social workers in special education. Despite isolated initiatives and partnerships, the absence of sustained legislative and policy support results in fragmented services with limited accountability and impact (Kallinikaki, 2019; UNICEF & SKLE, 2024).

This study seeks to address the critical gap in Greece by conducting a comparative analysis of professional rights and institutional practices concerning school social workers. The dual objectives are: first, to highlight best practices that facilitate the effective integration of social work into educational systems; and second, to formulate policy recommendations that would enable Greece to provide comprehensive, equitable, and professionally guided support services for students with disabilities and their families.

NVivo is a qualitative data analysis software widely used for organizing and analyzing non-numerical or unstructured data. It supports thematic coding, data visualization, and facilitates comparative analysis across large sets of qualitative documents. For more information, see: <https://www.qsrinternational.com/nvivo-qualitative-data-analysis-software/home>

## **2. Method and Materials**

To address the identified gaps in the Greek context, this research adopts a comparative qualitative methodology rooted in document analysis and thematic synthesis. The study

investigates the professional rights and institutional roles of social workers in special education across five countries: the United States, the United Kingdom, Germany, Sweden, and Greece. These countries were purposefully selected to represent diverse educational systems, legal frameworks, and degrees of integration of school social work.

Primary data sources include legislative texts, official policy documents, organizational reports from entities such as the National Association of Social Workers (NASW), the British Association of Social Workers (BASW), and the International Federation of Social Workers (IFSW), as well as peer-reviewed academic publications. Documents were retrieved from databases including Scopus and Web of Science, along with national government portals.

The analysis focuses on recurring themes such as legal recognition, professional certification, interdisciplinary participation, and systemic support structures. A thematic analysis approach was employed using NVivo to identify and categorize patterns across national contexts. Coding concentrated on categories like legal mandates, professional profiles, institutional funding, and collaborative mechanisms.

The Greek case was analyzed both independently and in contrast to international benchmarks, providing a dual lens for identifying domestic shortcomings and potential for reform. Through triangulation of data sources and comparative coding, the study ensures both analytical depth and contextual sensitivity.

This methodology enables a nuanced evaluation of how differing legislative and institutional landscapes influence the effectiveness and recognition of school social workers, while also supporting the formulation of policy recommendations tailored to Greece's structural and cultural realities.

### **3. Results**

Legal and institutional frameworks significantly shape the status, responsibilities, and effectiveness of social workers within special education systems. This section presents a comparative analysis of the regulatory and operational environments in five countries: the United States, the United Kingdom, Germany, Sweden, and Greece.

#### **3.1 United States**

In the United States, the Individuals with Disabilities Education Act (IDEA) is the primary federal legislation governing special education services. It mandates the inclusion of school social workers in IEP teams, assigning them roles in behavioral assessment, crisis intervention, and family engagement (Richardson, 2015). Licensure and professional standards are governed by state education authorities in collaboration with the National Association of Social Workers (NASW) and the Council on Social Work Education (CSWE). Funding under IDEA Part B guarantees institutional support for these roles across educational settings (NASW, 2023).

#### **3.2 United Kingdom**

The UK framework is centered around the Children and Families Act 2014 and the Special Educational Needs and Disabilities (SEND) Code of Practice. These legal instruments mandate

social care assessments as part of Education, Health and Care Plans (EHCPs) and ensure social workers are active participants in multidisciplinary teams (Department for Education, 2015). The British Association of Social Workers (BASW) oversees professional standards, training, and advocacy. Additionally, the Care Act 2014 reinforces the safeguarding role of social workers in educational contexts (BASW, 2024).

### **3.3 Germany**

Germany employs a decentralized educational model, with individual federal states (Länder) responsible for education policy. Nonetheless, federal statutes such as the Sozialgesetzbuch VIII provide a cohesive legal framework for school social work. Social workers collaborate with educational psychologists and special education teachers to develop individualized student support plans. Funding is typically shared between the Ministries of Education and Social Affairs, fostering intersectoral cooperation (Schilling, 2018).

### **3.4 Sweden**

Sweden demonstrates a highly integrated model of school social work. The Swedish Education Act and guidelines from the National Agency for Education (Skolverket) require the inclusion of social workers within school health teams (elevhälsa) (Skolverket, 2020). These professionals collaborate with psychologists, nurses, and counselors to deliver preventive and responsive services. Their responsibilities span psychosocial assessments, referrals, and systemic advocacy. Financial sustainability is supported by municipal and national subsidies (Su.diva-portal.org, 2024).

### **3.5 Greece**

In contrast, Greece lacks a unified legal or institutional structure that clearly defines the role of social workers in special education. While some schools employ social workers through temporary projects, their integration remains inconsistent and inadequately supported. There is no formal specialization or certification path for school social workers, leading to role ambiguity and fragmented service provision. Recent collaborations between UNICEF and the Hellenic Association of Social Workers (SKLE) have aimed to bridge these gaps, but national policy reform is still lacking (UNICEF & SKLE, 2024).

### **3.6 Comparative Key Findings**

The cross-national analysis identifies stark contrasts in the recognition and integration of social workers in special education:

- **Legal Frameworks:** All countries except Greece have specific laws supporting school social work.
- **Certification:** Only Greece lacks formal certification or specialization programs.
- **Interdisciplinary Collaboration:** Mandated and implemented in all countries except Greece.
- **Funding:** Stable and institutionalized in the U.S., U.K., Sweden, and Germany; project-based and limited in Greece.

- Professional Role: Clearly defined elsewhere; ambiguous in the Greek context.

#### 4. Discussion

An important limitation in the Greek context is the cultural perception of social workers' roles, which often undermines their authority and restricts interdisciplinary collaboration. Parents and broader society may exhibit limited awareness or trust in psychosocial professionals within schools, a factor which impedes their integration into educational teams. Furthermore, the predominance of a teacher-centric model in Greek schools can marginalize the contribution of social workers and perpetuate institutional resistance to inclusive practices.

Despite the growing global consensus on the importance of school social workers in advancing inclusive education, Greece continues to lag behind in formally integrating this profession into its educational infrastructure. The obstacles are multidimensional—ranging from legislative and institutional shortcomings to cultural and financial barriers—that collectively hinder both the development of school social work and the realization of inclusive education goals (Christodoulou & Spyridonos, 2021; OECD, 2019).

The lack of formal legal recognition is the most immediate and significant barrier. In contrast to the United States' IDEA or the UK's Children and Families Act—both of which mandate the presence and role of social workers in educational teams—Greece lacks any statutory definition or protection for school social workers. This legislative void precludes their participation in IEPs or equivalent planning structures and excludes them from interdisciplinary decision-making processes (Kallinikaki & Agathonos, 2020).

Additionally, school social work in Greece is often dependent on short-term, externally funded projects, typically initiated through European Union programs or NGO partnerships. This reliance results in service fragmentation, unstable employment, and poor continuity of care for students and families (European Commission, 2022; Papadopoulos et al., 2020).

Comparatively, countries like Finland and Sweden institutionalize school social work within publicly funded, legally mandated educational systems (Huhtanen et al., 2021; Östberg, 2010). Greece, by contrast, lacks standard job descriptions, and social workers are frequently relegated to administrative or ad hoc duties, thereby undermining their core professional mission and visibility (Mikaeili & Tirgari, 2019; Karagianni & Psintrou, 2022).

Furthermore, the absence of formal training pathways exacerbates the problem. Unlike countries such as Germany and the Netherlands, where accredited postgraduate programs exist in school social work aligned with European Qualification Frameworks, Greek universities offer no targeted academic tracks or CPD frameworks to equip social workers for educational settings (Gronert et al., 2020).

On a cultural level, Greek educational institutions are characterized by hierarchical and teacher-centric models that resist interdisciplinary collaboration. This institutional culture inhibits the effective integration of external professionals and perpetuates bureaucratic inertia (Sotiropoulou, 2017; Ioannidi & Kourachanis, 2020). As a result, students facing complex



challenges—including disability, trauma, or socioeconomic disadvantage—are often left without appropriate psychosocial support (OECD, 2019; WHO, 2022).

Comprehensive reform is urgently needed. First and foremost, legal recognition of school social workers should be established through national legislation modeled on international examples such as IDEA and the Children and Families Act. This should include a clearly defined role, job description, and mandatory participation in interdisciplinary teams.

In tandem, Greek universities must develop accredited postgraduate programs in school social work, designed in alignment with European standards and disability rights frameworks. A national continuing professional development (CPD) strategy should also be created to support practitioners throughout their careers (Karagianni & Psintrou, 2022).

The inclusion of school social workers in educational policymaking and governance structures is equally crucial. Representation in decision-making bodies ensures that psychosocial dimensions are considered alongside pedagogical and clinical models (Katsikis & Kalambouka, 2023; United Nations, 2016).

Stable, state-funded positions must replace temporary project-based roles. This includes the provision of necessary infrastructure, such as private consultation rooms and digital case management systems (European Commission, 2022).

Public awareness campaigns and pilot programs can play a pivotal role in demonstrating the value of school social work and cultivating institutional acceptance (Christodoulou & Spyridonos, 2021). Schools should also institutionalize multi-professional teams—including social workers, psychologists, and special educators—who operate collaboratively with designated coordination time (Fleming & Monda-Amaya, 2001).

Finally, the implementation of monitoring and evaluation systems is critical. National indicators should be established to assess the impact of school social work on student outcomes, interprofessional collaboration, and family satisfaction. Independent evaluations, conducted by academic or public institutions, will ensure transparency, quality improvement, and accountability (WHO, 2022; OECD, 2019).

The integration of social workers into Greece's special education system is not merely a matter of professional equity—it is a structural imperative for achieving inclusive and just education for all learners.

## **5. Conclusion**

The integration of social workers into special education is not a supplementary consideration—it is a fundamental component of a just and inclusive educational system. Social workers offer a critical psychosocial perspective, contributing expertise in areas such as family engagement, trauma-informed care, behavioral intervention, and inter-agency collaboration. These dimensions are often overlooked in strictly pedagogical models, yet they are essential for ensuring that students with disabilities receive equitable support.

International examples demonstrate that when school social work is institutionalized—through

legal mandates, stable funding, and professional development pathways—the quality and inclusiveness of education systems improve significantly. In countries such as the United States, the United Kingdom, Sweden, and Germany, school social workers are integral to educational planning, early intervention, and policy formation. Their presence supports the realization of children's rights and enhances systemic responsiveness.

By contrast, Greece remains constrained by legislative ambiguity, structural limitations, underfunding, and a cultural resistance to interdisciplinary practices. Without immediate and strategic reform, these gaps will continue to hinder the realization of inclusive education goals and perpetuate inequalities for students with disabilities.

To overcome these challenges, Greece must prioritize a multi-pronged reform agenda. Legal recognition of school social workers is the first and most vital step. This should be supported by the development of postgraduate training programs, continuing professional development frameworks, and secure employment mechanisms. School social workers must also be included in governance structures and curriculum development processes to ensure that psychosocial and equity considerations inform educational policy.

Ultimately, building an inclusive education system requires a shift in understanding: education must be viewed not merely as an academic process, but as a social, emotional, and rights-based endeavor. By embedding social workers into the core of educational systems, Greece can move toward a future where all learners—regardless of ability, background, or circumstance—can thrive in an environment that is supportive, inclusive, and just.

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### **Data Availability Statement**

The data that support the findings of this study are available on request.

### **Competing Interests Statement**

The authors declare that there are no competing or potential conflicts of interest.

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