



Regulating Supplementary Education: A Comparative Analysis



March 2024

Regulating Supplementary Education: A Comparative Analysis

March 2024



Koan Advisory Group is a New Delhi-based public policy consultancy. It specialises in policy and regulatory analysis in both traditional and emergent sectors and markets. For more information, please visit: www.koanadvisory.com

Authors

Vrinda Maheshwari, Srishti Joshi and Yashaswini Chauhan

© 2024 Koan Advisory Group

All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means without permission in writing from Koan Advisory Group

contactus@koanadvisory.com | www.koanadvisory.com

Table of Contents

Executive Summary	4
Overview of Supplementary Education in India	5
International Perspectives on Private Supplementary Education	9
China	10
South Korea	11
Japan	12
Turkey	13
Pakistan	14
Others	14
The Way Ahead	15

Executive Summary

Supplementary education, or structured forms of instruction that generally exists outside and separated from the formal education system, is a growing industry in India. Private supplementary tutoring or coaching has become prevalent in many parts of the world, and is especially prevalent in East Asia. In recent years, it has become the subject of some central as well as state guidelines in India, and this report examines best-practices and experiences of other countries in order to provide some guidance.

Countries like China, South Korean, Japan, Turkey, and Pakistan have taken diverse approaches towards the regulation of a proliferating supplementary education ecosystem in their jurisdictions. A high bar for academic excellence and similarly high societal expectations, contribute to a growing regulatory emphasis on children's well-being across these nations. Understanding shared concerns and particularly examining the regulatory approaches, reactions and resultant impact of coaching and tutoring on the education sector offer important guidance on practices to be avoided or replicated in India. Some of the key takeaways from the comparative analysis presented in subsequent sections are:

- Prohibitions or restrictions on popular means of supplementary education that parents rely on can lead to the mushrooming of small and unregulated coaching centres;
- Similarly, restricting coaching via measures like time-curfews is ineffective, especially in regions with inelastic demand. These lead to an increase in demand for more expensive private tutoring;
- Institutional and societal factors that contribute to the prevalence of private supplementary education (such as the underlying pressure of competitive exams) must be addressed on priority;
- Self-regulation can be a powerful tool for increasing oversight; partnering with private coaching and tutoring institutions can be beneficial to the government and community at large;
- The demand for private supplementary education exists despite poverty or constrained socio-economic circumstances, as evidenced in the Indian subcontinent. Educational policies must tackle the distrust towards educational systems while also provisioning for agile and practical regulation of the coaching industry.

Most countries have minimal regulations related to supplementary education. The countries with regulations tended to focus more on the business side (registration, contracts, taxation, etc.) and safety (fire escapes, toilets, etc.) than on educational matters such as curriculum and tutors' qualifications. This mirrors the trend across Indian states so far.

Overview of Supplementary Education in India

Supplementary education in India (popularly known as coaching) is an important element of the country's educational landscape. The National Sample Survey Office's 71st round revealed that over 25 percent of Indian students take private coaching.¹ Education is on the concurrent list of the Indian Constitution, meaning that both national and state governments can legislate on the subject. The Central government is expected to set overall directions while state governments proceed with more specific priorities according to their local contexts. In a largely decentralised system of regulation, states have been able to take action regulating coaching centres without the need for a central legislation.

In January 2024, the Central government passed the "Guidelines for the Regulation of Coaching Center", based on the National Education Policy, 2020. With the motivation of streamlining and standardising functioning of coaching centres, these are meant as model guidelines for States to enact based on their local requirements. The focus of these Model guidelines is to ensure that coaching centres provide adequate supervision and support for students pursuing study programmes, competitive exams, and academics.

Within individual states, further diversity also arises from the perspectives and actions at district and lower levels. Keeping this in mind, several states have passed regional legislation to regulate coaching. Notable examples include Haryana, which in February 2024 passed The Haryana Registration and Regulation of Private Coaching Institutes Act, 2024, aimed at safeguarding student interests, reducing stress, and providing better academic support;² a similar draft has been proposed by the state of Rajasthan in the Rajasthan Coaching Institutes (Control & Regulation) Bill, 2023. Karnataka, Manipur, Bihar, Uttar Pradesh and Goa also have laws to regulate and delimit coaching/private tutoring. A summary of salient provisions, outside of penalties that vary from monetary fines to deregistration, is detailed below:

State	Enabling Enactment	Registration requirements	Imposition of age requirements for students	Physical infrastructure requirements	Mental health guidelines
Goa	<i>Goa Coaching Classes (Regulation) Act, 2001</i>	Fee payment; undertaking by the proprietor that the tutors are not government employees, the prospectus and material shall be provided by the coaching institute without a separate fee, etc.	No	No	No
Karnataka	<i>The Karnataka Tutorial Institutions (Registration and Regulation) Rules, 2001</i>	Fee payment; contingent upon provision of suitable facilities. Institutions are required to submit annual reports and be open to inspections.	No	One room for each class, 5-7 sq. feet space for each student, proper ventilation, drinking water, one blackboard in each class, separate washrooms etc.	No
Uttar Pradesh	<i>The Uttar Pradesh Regulation of Coaching Act, 2002</i>	Fee payment; undertaking that the institution will not engage or employ any teacher of a government institution.	No	No	No
Bihar	<i>The Bihar Coaching Institute (Control & Regulation), Act 2010</i>	Fee payment; provision of details related to the curriculum, qualifications of teachers, tuition fees, & physical infrastructure.	No	Minimum one sq. meter area available to each student, drinking water, furniture, toilets, fire extinguisher, first aid etc.	No
Manipur	<i>Manipur Coaching Institute (Control and Regulation) Act, 2017</i>	Provision of details of the curriculum, qualifications of teachers, tuition fees, physical infrastructure.	No	Minimum one sq. meter area available to each student, drinking water, furniture, toilets, fire extinguisher, first aid etc.	No

Rajasthan	<i>Rajasthan Coaching Institute (Control and Regulation) Bill 2023, Guidelines To Reduce Stress Among Students Studying In Coaching Institutes Run In The State And For Improving Mental Health, 2023</i>	The application must contain details of the curriculum, qualifications of teachers, tuition fees & physical infrastructure	No (September 2023 Guidelines advise the coaching centres not to encourage students under Class 9 to enrol)	Minimum one sq. meter area available to each student, drinking water, furniture, toilets, fire extinguisher, first aid etc.	Under the ‘ “Guidelines to reduce stress in students studying in coaching Institutes and for improving mental health”, institutes must hire an adequate number of certified and trained psychologists/counsellors who should be continuously available to the students. These will be monitored by the district authority.
Haryana	<i>Haryana Registration and Regulation of Private Coaching Institutes Act 2024</i>	Application should contain details of the curriculum, number of students, teachers’ qualifications, bio-data of a counsellor, facilities available.	No	Furniture, lighting, drinking water, first aid, fire safety etc.	Coaching centre to engage at least one full time counsellor.
Central Guidelines	<i>Guidelines for Regulation of Coaching Center, 2024</i>	Qualifications of tutors, commitment not to make misleading advertisements or enrolling students under 16, establishment of a counselling system, website to publish details such as fee structure, number of students, curriculum, exit policy etc.	16 years	Minimum one sq. meter area available to each student, drinking water, furniture, toilets, fire safety, medical treatment facilities, CCTVs etc.	Requirement of development of a counselling system consisting of trained and qualified counsellors, psychologists should be easily available to parents and students. Provision for psychotherapeutic services to students and regular workshops for teachers, parents and students on mental health and stress prevention. Tutors may undergo mental health training to increase sensitivity.

The evolution of Indian state laws regulating coaching shows commendable growth. Laws passed in the turn of the 21st century (for example, in Karnataka, Goa or Uttar Pradesh) tended to focus just on mandating registration requirements and putting overseeing mechanisms in place. Bihar and Manipur introduced minimum requirements for physical infrastructure which would be needed by students. The most recent laws and guidelines (Haryana, Rajasthan and the Central guidelines) have expanded in scope and additionally started catering to students' mental health requirements. These steps will go a long way in creating a more holistic environment for supplementary education in India.

The Central Guidelines raise a specific concern with their mandate that a coaching institute cannot enrol a student below 16 years of age or before their secondary school examinations.³ None of the state regulations related to coaching have set this minimum age bar. The Haryana Registration and Regulations of Private Coaching Institutes Act, 2024, which was passed by the State assembly on 28th February 2024 (that is, after the introduction of the Central Guidelines) also makes no mention of a minimum age for students.

Curiously, neither the centre nor states make a distinction between coaching institutions and the hostel facilities which cater to students studying in such coaching institutions, and where students spend a majority of their time. While Karnataka's legislation⁴ requires details about the hostel facility while applying for registration, the standards to regulate hostel facilities are absent from the Act's scheme. Rajasthan's 'Guidelines to Reduce Stress among Students Studying in Coaching Institutes Run in the State and For Improving Mental Health' mention hostels only in passing under the compliance guidelines. The coaching institutes are mandated to maintain a peer evaluation system to monitor behaviour, where sudden changes to behaviour must be brought to the attention of teachers and hostel operators. The guidelines neglect to mention any such regulatory provisions for hostels. The Central guidelines also remain silent on the subject. Similarly, infrastructural requirements for coaching institutes have been covered by both state and central acts but so far, hostel facilities remain unexamined.

International Perspectives on Private Supplementary Education

There is expansion in the supplementary education market, underpinned by a growing notion that education is a marketable service. This is largely a bottom-up process, unlike government-initiated reforms. Across the world, regulation of the sector has lagged behind that of schooling, in part because relevant ministries have felt unwilling to enlarge their roles in a domain for which they have limited expertise and control.⁵

Over the last two decades, private supplementary tutoring has expanded around the world. Greece and the Republic of Korea are the best-known examples, but figures from OECD's PISA surveys also indicated high proportions in countries as diverse as Thailand, Brazil, Russia, and Turkey. While the dominant form of supplementary education was personal tutoring (paid or unpaid), in many countries, classes organised by commercial companies were prominent.⁶

Broadly seen, most countries have minimal regulations related to supplementary education. The countries with regulations tended to focus more on the business side (registration, contracts, taxation, etc.) and safety (fire escapes, toilets, etc.) than on educational matters such as curriculum and tutors' qualifications.⁵ This will be explored in some detail in this section.



China

China's education sector has a large student population and is known for its rigorous standards and competitiveness. With the aim of easing academic burden on children and financial spending on supplementary education by households, China has introduced two crucial policies in 2021 and 2024. In 2021, China introduced a sweeping ban on for-profit classes on school curriculum subjects.⁸ The guidelines focused on regulating compulsory education (Grades 1-9) and made it illegal to offer classes in Mandarin, English and mathematics for profit. Non-academic extracurricular programs, such as art and sports, remain unaffected.

Expansive changes were brought in to regulate institutions providing supplementary education through China's 2021 guidelines. The guidelines sought to regulate institutions providing after-school tutoring to children between the ages of 6-15 years. Existing tutoring centres were required to register as non-profit institutions and no new approvals for tutoring centres could be allowed by regional governments. The guidelines further instructed regional governments to scrutinise existing online tutoring centres and re-approve them according to the new measures. The guidelines also banned foreign investment in these institutions and limited the hiring of foreign teachers or staff. The guidelines called for control over "excessive" capital in training centres and to ensure that financing is primarily used for operational costs. In addition to restraints on financing, the guidelines also called for greater supervision and management over teaching methodology,⁹ while altogether banning the use of foreign teaching materials. If these institutions do not meet the updated standards, their registration and internet information service broad licence will be revoked.

These regulations have had a significant impact on the education sector. The initial and most direct implication of the move was layoffs in the industry, resulting in unprecedented job losses. Many companies had been driven to bankruptcy due to the move, and billions of dollars were wiped from the industry.¹⁰

The clampdown also resulted in the spawning of expensive, underground tutoring services. It has been reported that parents are paying 50 per cent more than they used to on in-person tutoring sessions and expected the costs to rise further.¹¹ Private tutors who used to teach big classes run by major education companies, now teach smaller groups, to avoid detection. To make up for the loss in student numbers, these same tutors now charge higher fees. It has been reported that some schools in Beijing and Shanghai started pilot programs offering free after-school tutoring, creating a new problem: overworked teachers.¹² **A 2021 study found that one-third of parents in China still considered shadow education necessary and anticipated continuing with it despite the ban.**¹³ Since the ban, there have been numerous raids on these underground private education institutions being launched all across the country. Many of those violating the rules were operating in hotels and apartment buildings, conducting curriculum tutoring under labels such as "education consultation". State authorities also warned tutors of engaging in illicit academic services disguised as non-curricular programs such as singing or painting.

Many have questioned the effectiveness of the ban when the system of entrance exams still prevails in the country. Schools and colleges primary selection criteria were solely based on the scores achieved in high-stakes entrance exams, a method also common in the Indian education system. China's college entrance exam is notoriously competitive, with over 10 million students taking the exams each year. Getting into a quality institution was therefore difficult, indicating that the demand for test preparation still remained strong. Without changes to the entrance exam system that decides a students' fate of qualifying for a good school or university, the demand for private coaching remains high.

In 2024, China's Ministry of Education unveiled a new set of draft regulations aimed at further reforming the after-school tutoring industry.¹⁴ The 2024 regulations have clearly defined after-school tutoring ("organized or systematic educational training activities conducted outside the school education system, targeting primary and secondary school students as well as preschool children aged 3 to 6 with the main purpose of improving academic performance or cultivating their interests and talents"), and laid down specific rules for their regulation which have been designed to enhance oversight and further consolidate the regulation on supplementary education. The draft regulations contain extensive provisions on government control over pricing and financial management over these institutions. Additionally, a centralised national oversight platform is intended to be established for after-school tutoring information, requiring institutions to report and update their data.¹⁵

These updated rules imply that after school tutoring is no longer banned in China - as long as institutions follow the rigorous rules.



Insight for India

Prohibitions on socially acceptable means of supplementary education can lead to the mushrooming of small and unregulated coaching centres. Furthermore, unless the underlying pressure of competitive exams is addressed, bans are unlikely to be successful in curbing the demand for test preparation through supplementary education.



South Korea

South Korean students score quite highly in international surveys of school readiness; for example, in the 2022 edition of the Programme for International Student Assessment conducted by the OECD member states, their overall performance was significantly above the surveyed average.¹⁶ Despite this, the practice of enrolling for supplementary education remains very popular.

The government of South Korea has made several attempts to control and reduce the monetary and temporal resources spent on private tutoring.¹⁷ These reforms included the Educational Broadcasting System¹⁸ (EBS) lectures specially focusing on preparing students for the College Scholastic Ability Test. Additionally, they also introduced 'after-school programs'. The government also reformed the university entrance system¹⁹ several times by introducing elements in the admission process that would require active critical thinking instead of simple memorisation. As a result, greater importance came to be given to high-school records, extracurriculars, social service involvement and so on.

However, these measures have done little to curb the demand for private tutoring. For example, *hagwon* (the Korean term for a for-profit private educational institution) that specifically focused on the EBS lectures became very popular. Newer forms of private tutoring have emerged with a shifted focus on newer requirements. It has been documented that in 2022, the private education participation rate of South Korean students stood at over 78 percent, up from 75.5 percent in 2021.²⁰ South Korean *hagwons* extend their operations across age groups. As of 2021, 82% of elementary school students were receiving private tutoring of some kind (one-on-one, group, via the Internet, at home, and in private institutes).²¹ The figures for lower-secondary and upper-secondary students were 73% and 65% respectively.²²

In 2006, the “Act on the establishment and operation of private teaching institutes and extracurricular lessons” was introduced to strengthen the regulatory authority of each of the municipal and provincial education offices over private education. In 2009, a curfew was imposed to limit the operating hours of *hagwon* till 10 PM.²³ Incidentally, the move faced strong opposition from parents, students and *hagwon* owners who claimed the policy would only lead to a shift in timings for students who would be forced to go to early mornings and on weekends, especially since many schools kept pupils till 10 or 11 P.M. Further, parents would be forced to take recourse to more expensive at-home private tutoring, which would reduce access to educational opportunities for the lower-income families.

A Constitutional Court upheld the curfew²⁴ in response to a representation made by a group of *hagwon* owners, which claimed that the curfew was violative of the children’s educational rights. However, efforts to crack down on curfew violations has been a struggle. In 2020, more than 73,000 *hagwons* in the capital region alone were reported²⁵ to be operating. Many local government councils refused to implement the curfew.²⁶ It was reported that implementation of the curfew is still uncertain due to an inconsistency in policy between central and local ordinances. Reports criticised the regulations as ineffectual as the local councils possessed very inadequate resources to monitor and enforce them.²⁷ For now, governmental efforts to intervene in the sector continue; in October 2023 the Education Ministry unveiled a three-stage plan to rein in exorbitant *hagwon* fees and curb private tutoring costs; its efficacy will be tested in the coming months.

A 2015 evaluation²⁸ of the impact of the curfew on consumption of private tutoring in South Korea, found that enforcing the curfew did not generate a significant reduction in the hours and resources spent on private tutoring. Secondly, demand for private tutoring seemed to be especially inelastic for high school students, who increased their consumption of alternative, more expensive forms of private tutoring. This raised equity concerns about the access to educational opportunities.



Insight for India

Restricting coaching via measures like time-curfews is ineffective, especially in regions with inelastic demand. These lead to an increase in demand for more expensive private tutoring.



Japan

The ‘*Juku*’ (private education institutes) of Japan were formed in response to the widening gap between school curriculum and college entrance exams. In 1986, the Ministry of Economy, Trade and Industry (METI) began promoting self-regulation of the supplementary education industry. In 1988, presidents of six *juku* organisations in Tokyo formed the Japan Juku Association (JJA),²⁹ which received sanction from METI to set up a regulation system for the industry. The JJA’s main tasks were to settle ‘self-standards of appropriate business activities in the *juku* industry’ including³⁰ self-regulation, establishment of a certification system for *juku* teachers, and enforcing a service evaluation system (amongst others).

In terms of regulation, the government’s oversight has been mostly commercial rather than educational. Self-regulation started with bottom-up initiatives and was reinforced by METI through its engagement

with the JJA. These initiatives have taken the form of health and safety measures (such as the implementation of CCTV cameras in the premises) or setting standards for certification for *juku* teachers. As a result of this leeway in operation, there is a proliferation in both bigger *juku* (which can also be corporatized and franchise operations in a highly competitive market) as well as smaller operations which serve social functions such as providing daycare, along with giving supplementary education.³¹

The Japanese case shows that self-regulatory measures can develop independent of government oversight. The government has been working with the belief that reform in the education sector would only be driven by partnership and coordination with the shadow education sector, which has already developed a strong and independent system operating on its own norms and rules. The partnership could improve student achievements, support low-income students and fill the gaps in the education system.³² It is interesting to note that the *juku* are regulated by METI as a service industry, rather than by the Ministry of Education, Culture, Sports, Science and Technology (MEXT) as educational institutions.³³

The public-private partnership between the government and *juku* has increased over the last decade, since the MEXT acknowledged the private education industry as a partner in tutoring and experiential learning. For example, schools began partnering with *juku* to hold classes for students from low-income families, even hiring teachers from these institutes, though the latter move was criticised for reducing accessibility as it led to an increase in the tuition fees.³⁴ In 2013, the government amended the School Ordinance to encourage active participation of local *juku* and the community in the classes conducted by it on Saturdays. In 2017, a volunteer *juku* society (All Japan Education Volunteers Society) was established to help the government meet its objectives in the education sector and to facilitate the collaboration between them.³⁵



Insight for India

Self-regulation can be a powerful tactic to drive improvements in the education sector; partnering with private coaching and tutoring institutions can be beneficial to the government and community at large.



Turkey

In 2014, Turkey's "dershane" (prep schools for high school or university examinations) were mandated to transition to private schools over a two-year period. They were also granted incentives by the Council of Ministers in case they met the requirements for registration (including the allocation of property, tax exemptions and low interest loans).³⁶ Certain restrictions have also been placed on the centres, capping the attendance at sixteen students at a time.³⁷ Despite these, private coaching remains popular; a 2021 study found that almost half of the participants reported having received private tutoring at private teaching institutions in the previous year.³⁸ Exam-focused learning and poor classroom teaching were cited as the most important reasons for parents to push their children towards coaching.



Insight for India

Institutional and societal factors that contribute to the prevalence of private supplementary education must assume priority.



Pakistan

While the Constitution of Pakistan provides for free education for children under Article 25A, additionally purchased private tuition lessons end up being an economic reality for parents. For example, ASER Pakistan's 2019 survey found that in rural areas, 22% children from private schools were supplementing school education with private coaching (while only 6% children from government schools did the same).³⁹ The incidence was higher in urban areas, with 33% of children from private schools and 21% of children from public schools availing private tuitions.⁴⁰ **This trend to opt for private tuition is driven by the overall trust deficit among parents regarding public schools, classroom environment, and teachers' attitude.**⁴¹

Islamabad was the first region to create a free-standing Private Educational Institutions Regulatory Authority (PEIRA) in 2013. Its mandate covered privately managed schools, colleges and what in Pakistan are called "tuitions centres". Since then, other jurisdictions in Pakistan have followed suit; for example, the Gilgit-Baltistan Private Educational Institutions (Registration and Regulation) Act was passed in 2023 which gives the relevant educational department the power to regulate private educational institutions.



Insight for India

The demand for private supplementary education exists despite poverty or constrained socio-economic circumstances. Educational policies must tackle the distrust towards education systems while also provisioning for an agile and practical regulation of coaching.



Others

Countries like Bangladesh and Malaysia are also taking steps to regulate supplementary education. For instance, Bangladesh's draft Education Bill proposes mandatory registration of coaching centres and restricts teachers from teaching students from their school in any coaching centre or private tuition.⁴² Malaysia on the other hand has also enforced registration requirements for "tuition centres". At the primary and secondary levels, licences for tuition centres are only granted to institutions that provide tutoring on academic subjects based on the Malaysian curriculum.⁴³ However, assessing the true impact of these regulatory efforts is challenging due to the lack of verifiable data.

The Way ahead

Private supplementary education has been a cornerstone of education in Asian countries, and has developed uniquely in different regions based on local requirements. These countries have been able to identify the value of personalized attention and tailored learning in offering students an extra academic edge through coaching/tutoring. Supplementary educational institutions will have to adapt to meet future student needs as technology and career options evolve. Even outside of competitive standardised testing, there is likely going to be a role for supplementary education, because the world is getting tougher for children to navigate without some added support.

Technology is also likely to lead an important role in the evolution of supplementary education. The abrupt shift to digitalisation of services necessitated by the coronavirus pandemic has given an impetus to educators shifting their focus online.⁴⁴ As an illustration, online test preparation and coaching services are becoming popular. The Department of Higher Education itself has made arrangements for online learning for competitive exams through portals such as IITPAL and E-Abhyas.⁴⁵ Private sector enterprises which offer supplementary education services have already begun expanding their product lines to include online material and training, with newer formats of content delivery evolving continually. Hybrid educational solutions which rely on technology are likely to become an important weapon in the arsenal of private supplementary educators in India. They will have to work closely with Central and state governments to determine how best these solutions can be deployed for students in an effective manner.

Technology can additionally be used to add a layer of care and address some of the prevalent issues with coaching in India. For example, some private coaching institutes have provided for mobile apps where students can access mental health support and engage with counsellors. Such solutions can be scaled and applied in India, providing an effective solution for problems where state capacity might be limited.

Regulators in India are already evolving with times; for example, a new generation state legislations as well as central guidelines related to coaching devote attention to students' mental health and ensuring that adequate physical infrastructure is made available. Authorities will continue to have to find agile yet comprehensive ways through which they can regulate the diversity in supplementary education, which both students and parents in India rely on. An effective approach can be through co-regulation, where both public and private policy instruments are used to strengthen their stand-alone capabilities towards a common policy objective. Private sector coaching institutes can be tasked to work with central and state governments in order to come up with best practices, and standards that promote student welfare and meet their educational needs.

Endnotes

- 1 NSS 71st Round on Education in India, 2014, available at https://www.mospi.gov.in/sites/default/files/publication_reports/nss_rep_575.pdf.
- 2 Ajay Sura, "Haryana assembly passes law to curb malpractices in coaching institutes", <https://timesofindia.indiatimes.com/city/chandigarh/haryana-assembly-passes-law-to-curb-malpractices-in-coaching-institutes/articleshow/108072741.cms>.
- 3 Guidelines for Regulation of a Coaching Centre https://www.education.gov.in/sites/upload_files/mhrd/files/Guideliens_Coaching_Centres_en.pdf
- 4 The Karnataka Tutorial Institutions (Registration and Regulation) Rules, 2001 https://upload.indiacode.nic.in/showfile?actid=AC_KA_71_581_00003_KARNATAKA%20ACT%20No.%201%20OF%201995_1543313553975&type=rule&filename=40_edu.pdf
- 5 Mark Bray, "Schooling and Its Supplements: Changing Global Patterns and Implications for Comparative Education", <https://www.journals.uchicago.edu/doi/10.1086/692709>.
- 6 Hyunjoon Park et al, 2016. "Learning Beyond the School Walls: Trends and Implications." *Annual Review of Sociology* 42:231-52.
- 7 *Supra* note 6.
- 8 Guidelines for Further Easing the Burden of Excessive Homework and Off-campus Tutoring for Students at the State of Compulsory Education https://www.gov.cn/zhengce/2021-07/24/content_5627132.htm
- 9 For example, the guidelines prohibited tutoring on weekends, public holidays, and winter and summer vacations, which are popular for campus education. The guidelines required that lessons should not be more than 30 minutes, with intervals between lessons of at least 10 minutes, and should end by 9pm.
- 10 Nisha Anand, "Xi's China also banned private tutoring in 2021. Here's what happened next", https://www.business-standard.com/education/news/xi-s-china-also-banned-private-tutoring-in-2021-here-s-what-happened-next-124011900399_1.html.
- 11 "How China's tuition ban has led to mushrooming of illegal classes", <https://www.firstpost.com/explainers/china-tuition-ban-mushrooming-of-illegal-classes-double-reduction-policy-12898932.html>.
- 12 Yi-Ling Liu, "The Larger Meaning of China's Crackdown on School Tutoring", <https://www.newyorker.com/culture/culture-desk/the-larger-meaning-of-chinas-crackdown-on-school-tutoring>
- 13 Zhang, Wei (2021a): 'Analysis of Online Surveys before and after Double Reduction on Demand for Tutoring'. Field notes. Centre for International Research in Supplementary Tutoring, East China Normal University, Shanghai.
- 14 Regulations on the Management of Off-Campus (Draft for Solicitation of Comments) http://www.moe.gov.cn/jyb_xwfb/s248/202402/t20240208_1114758.html
- 15 "China's New Draft Regulations for After School Tutoring", <https://www.china-briefing.com/news/china-after-school-tutoring-new-draft-regulations-key-points/>.
- 16 PISA 2022 Results: Factsheets for Korea, <https://www.oecd.org/publication/pisa-2022-results/country-notes/korea-4e0cc43a/>
- 17 Choi H. & Choi A., 'When One Door Closes: The Impact of the Hagwon Curfew on the Consumption of Private Tutoring in the Republic of Korea' (2015) Institut d'Economia de Barcelona, Vol.32.
- 18 The EBS is a public broadcasting organization that provides worldwide broadcasting of educational lectures. The Company offers a wide range of documentaries dealing with subjects, such as knowledge, science, culture, and others.
- 19 As recently as 2023, the government decided to remove the so-called 'killer question' (notoriously difficult questions, which are beyond school curricula) from the 8-hour CSAT exam in an effort to lessen the need and burden on private education.
- 20 "Private education participation rate of students in South Korea from 2012 to 2022", <https://www.statista.com/statistics/1042909/south-korea-private-education-participation-rate>.
- 21 Bray M. (2022) Shadow Education in Asia and the Pacific: Features and Implications of Private Supplementary Tutoring, https://kcs.ecnu.edu.cn/kindeditor/Upload/file/20220613/20220613103958_3791.pdf.
- 22 *Id.*
- 23 "Will Hagwon Curfew Work", available at <https://www.koreatimes.co.kr/www2/common/viewpage.asp?newsIdx=43860&categoryCode=113>.
- 24 "Hagwon Curfew Ruled Constitutional", available at <https://www.koreatimes.co.kr/www2/common/viewpage.asp?newsIdx=54520&categoryCode=113>.

- 25 Fabian Kretschmer, “S. Korea struggles to clamp down on cram schools”, <https://www.dw.com/en/china-clamps-down-on-cram-schools-but-south-korea-is-a-different-story/a-58760942>.
- 26 “Hagwon Curfew Backsliding”, <https://www.koreatimes.co.kr/www2/common/viewpage.asp?newsIdx=63489&categoryCode=113>
- 27 “Hagwon Easily Dodge Crack Down”, <https://www.koreatimes.co.kr/www/news/include/print.asp?newsIdx=33321>
- 28 Choi H. & Choi A., ‘When One Door Closes: The Impact of the Hagwon Curfew on the Consumption of Private Tutoring in the Republic of Korea’ (2015) Institut d’Economia de Barcelona, Vol. 32.
- 29 The JJA is one of many *juku* organisations and its membership forms only 0.8% of the industry. More than 100 *juku* organisations operate at a local level. Many associations regularly collaborate with each other to exchange knowledge about curriculum, tutor training, institutional management and business operations. (Zhang W., ‘Taming the Wild Horse of Shadow Education’ (2023) London, Routledge.)
- 30 Hayasaka M., ‘Self-Regulation and Quality of Assurance of the Juku’ (2015), https://u-gakugei.repo.nii.ac.jp/record/31164/files/13447068_27_02_ab_e.pdf.
- 31 Dierkes J, “Supplementary Education in Japan” (2011), https://www.ias.asia/sites/ias/files/nwl_article/2019-05/IIAS_NL56_2425_0.pdf.
- 32 *Supra* note 30.
- 33 Bray et al, “Regulating Private Tutoring for Public Good”, available at <https://unesdoc.unesco.org/ark:/48223/pf0000227026/PDF/227026eng.pdf.multi>.
- 34 Zhang W., ‘Non-State Actors in Education: The Nature, Dynamics and Regulatory Implications of Private Supplementary Tutoring’ (2022) Global Education Monitoring Report, UNESCO, <https://gem-report-2021.unesco.org/wp-content/uploads/2021/12/03-Wei.pdf>.
- 35 Yamato Y. & Zhang W., ‘Changing Schooling, changing shadow: shapes and functions of juku in Japan’ (2017) Asia Pacific Journal of Education, Vol. 37 (3).
- 36 “Details on new Prep School Regulations” , <https://www.dailysabah.com/turkey/2013/11/16/details-on-the-new-dershane-prep-school-regulations>.
- 37 “Turkey reforms private school network”, <https://www.aa.com.tr/en/education/turkey-reforms-private-school-network/18541>.
- 38 Ozdere, The Demand for Private Tutoring in Turkey: An Analysis of Private Tutoring Participation and Spending, <https://files.eric.ed.gov/fulltext/EJ1300440.pdf>.
- 39 ASER Pakistan, 2019 A, https://asERPakistan.org/document/aser/2019/reports/national/ASER_National_2019.pdf.
- 40 ASER Pakistan, 2019 B, https://asERPakistan.org/document/aser/2019/reports/national/ASER_National_2019.pdf.
- 41 Yousaf et al, “Drivers and Demand for Shadow Education: A Case Study of Islamabad-Pakistan”, available at https://www.researchgate.net/publication/374630059_Drivers_and_Demand_for_Shadow_Education_A_Case_Study_of_Islamabad-Pakistan.
- 42 Mamun Abdullah, “Government planning to pass Education Act in next term”, <https://www.dhakatribune.com/bangladesh/education/330986/government-planning-to-pass-education-act-in-next>
- 43 “How do you tell Malaysian tuition centres are illegal?”, <https://asklegal.my/p/illegal-private-learning-centres-license-education-act-malaysia>
- 44 Pimlott-Wilson H, Holloway SL. “Supplementary education and the coronavirus pandemic: Economic vitality, business spatiality and societal value in the private tuition industry during the first wave of Covid-19 in England.” *Geoforum*. 2021 Dec;127:71-80. doi: 10.1016/j.geoforum.2021.09.009. Epub 2021.
- 45 “Online Coaching for Competitive Exams”, <https://pmevidya.education.gov.in/online-coaching.html>.



©2024 Koan Advisory Group

All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means without permission in writing from Koan Advisory Group

contactus@koanadvisory.com | www.koanadvisory.com