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government policies in South Korea and Japan“

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1. Introduction

1.1. Research Topic and Relevance

Traditionally, the primary focus of education planners has been on mainstream education systems starting from kindergartens through school to the university system. These systems have essential intrinsic and economic value for individuals and societies as a whole (Bray 2009, 11).

Over the past years, some scholars have been reporting the growth of the industry that is specialised in supplementation of formal schooling (Baker et al. 2001, 1-2; Bray 2006, 517-518). Various forms of out-of-school education from private tutoring to cram school business have emerged and gained popularity worldwide (Entrich 2018, 6). These shadow systems have received much less attention from policymakers and academicians from around the world, even though they also have significant economic and social impact. According to the study carried out by Baker et al. in 2001, on average ~50% of high school students in 40 countries participated in some form of extra schooling in order to meet examination requirements and gain a competitive advantage over their peers.

Prominence of shadow education sector in East Asian countries has been in the spotlight of attention (Mori and Baker 2010, 37). Compared to other counties in the region, South Korea and Japan are particularly interesting cases. In the former, a majority of primary and secondary school students consume services of cram schools (hagwon) in addition to mainstream schooling. Reports show that ~80% of primary school students and ~60% of secondary school students took part in supplementary schooling in 2012, including hagwons that account for 100.000 of institutions. Japan shows a similar trend: ~25% of primary school students and 65% of lower secondary school students attended one of 50.000 cram schools known as juku in 2007. The size of these industries was estimated at 17.3 billion USD in South Korea and 12 billion USD in Japan in 2010 (OECD 2012a, 72; 2014a, 95).

The entire practice of supplementary education usually aims at the enhancement of academic performance, targeting preparation for specific national or university entrance exams. Shadow system represents substantial household investment and is a subject of policy concern over the quality of education and the equality of educational opportunities (Lee 2005, 103; Bray 2009, 18; Lee et al. 2010, 98).

Flourishing shadow education industry in South Korea and Japan is often justified by the traditional perception of education in these countries. The perception that the entrance to highly ranked secondary schools and prestigious universities would lead to better employment and higher standards of living is actively shared within these societies (Sohn et al. 2010, 24). Additionally, the proliferation of shadow schooling in these countries is often attributed to a social belief that mainstream education systems are not able to provide the minimum learning environment that is required for moving up the education ladder (Williams et al. 2015, 31). Finally, the growth of shadow schooling is often attributed to the pedagogical tradition that focuses on examinations and the memorisation of a significant amount of information (Kin 2016, 167-168, 174-175; Entrich 2018, 48).

South Korean case is particularly interesting not only because it has one of the most sophisticatedly developed shadow education industries in the world but also because of a high number of policy responses from the government. The system experienced interventions that vary from strict regulations of all types of shadow education to policies designed to provide it as a part of the mainstream schooling. Even though the shadow education industry experienced many regulatory efforts, it keeps growing in size and its role in the South Korean education system increases (Bray 2009; Lee et al. 2010).

Japan is the second-largest consumer of shadow education industry in East Asia (OECD, 2014a, 90). Mori and Baker (2009) and Lee et al. (2010) emphasise the positive attitude of the Japanese government towards shadow education, in contrast to the South Korean government that mostly viewed it as a problematic issue. The more significant part of regulations in Japan was designed to support supplementary education for societal progress (Mori and Baker, 2009, 45; Lee et al. 2010, 100).

Socioeconomic impact of supplementary education is the subject of a discussion. In some countries, policy planners and educators have been highly critical of the role that shadow schooling plays in society. They argue that the system creates socioeconomic inequalities and disrupts the wellbeing of students. Furthermore, it consumes substantial human and financial resources which potentially could be more efficiently distributed (Bray 2009, 13). Shadow schooling is often viewed to be an indispensable component of educational success. It puts students of low-income families to disadvantage due to the cost of participation. Research shows evidence of a correlation between family income and participation in shadow schooling. Series of reports show that 47% of Korean students from families with a monthly income of less than

1.700 USD took part in supplementary education compared to 85% of the highest income segment (around 2.400 USD) (KOSIS, 2020). The split between rich and poor, accompanied by fierce educational competition, builds pressure on students and is believed to be one of the reasons for emerging social and health problems. There is a shred of evidence that supplementary education industry is one of the factors that sustain the "examination hell" problem in Japan and South Korea that is related to psychological and health problems (Roesgaard 2006, 179; OECD 2014b, 94-95). Critics further emphasise the negative influence of shadow schooling on the mainstream curriculum and on the learning process. However, this criticism does not imply that shadow schooling is a purely negative phenomenon. It helps students to learn and improves their human capital which can contribute to their personal development and to the economic development of the country (Bray 2009, 45-46). Moreover, it is an important source of income for tutors and mainstream teachers and can be an important socialising element for many pupils.

International conventions on education (e.g. Universal Declaration of Human Rights 1948; Education For All movement 2000; Incheon declaration 2015), constitutions and laws of many countries all around the world, including South Korea and Japan, secure equal educational opportunities for all its citizens as their indispensable rights. Governments strive to maintain the quality and accessibility of education for societal progress. Twofold nature of shadow education industry, its size and social impact creates a complex picture. Many educators and policy planners choose a laissez-faire approach leaving the system to the market forces. Efforts of policymakers and academicians are directed primarily at mainstream education, although the shadow that this system casts has significant economic and social implications. Only a few countries have been developing instruments to address the issues, among which South Korea and Japan. There is a piece of evidence that policies targeting education equality and student wellbeing, which shadow education is believed to influence, differ significantly in Japan and Korea. Hence an interest of this thesis lies in the comparison and further analysis of these responses. Much can be learned from these cases. A laissez-faire approach to shadow schooling can be problematic. The recognition of the shadow education phenomena can open new opportunities for the policymakers to regulate the education system. We will see that there is a choice of options to promote desirable forms of shadow schooling and discourage undesirable ones. Policymakers can influence assessment and selection systems, change elements of the curriculum or foster technology.

To sum up, the result of this comparative analysis would be beneficial for education planners and policymakers. Based on cases of South Korea and Japan, they can identify appropriate measures for their specific circumstances. Additionally, it would shed light on the reason why shadow schooling exists on the first place and give an insight on what can be done in the mainstream to make supplementary education less desirable and make it fit mainstream system harmoniously. These efforts are necessary not only for the reason of social equity and education equality but also to increase the efficiency of education systems.

1.2. Research Question and Outline

The purpose of this master thesis is to provide a detailed description of shadow education in South Korea and Japan and examine education policies that target this industry. The final research question was formulated as follows:

"What are the similarities and differences of South Korea's and Japan's government policies targeting equality of educational opportunities and student wellbeing (with the focus on shadow education system)?"

The master thesis has three aims. First, it should provide a comprehensive understanding of education systems of Japan and South Korea¹ and its "shadows". Second, it has to analyse a potential effect that supplementary tutoring industry might have on economy, society and education systems of both countries. Third, it should explain how supplementary tutoring industry was/is regulated in Korea and Japan, with a particular focus on those policies that target education equality and wellbeing. The comparative analysis of these two cases should outline a set of possible actions on how to regulate the shadow education system.

The paper consists of three main blocks. The theoretical and analytical framework consists of the literature review and the research design. The literature review includes the discussion of key definitions used in the paper (education policy, shadow education, equality of educational opportunities and students' wellbeing). Next, it discusses the methodological literature on the policy analysis and research that connect the issue of educational equity and government regulations of an education system. Finally, the review covers the existing body of research on shadow education. It includes the review of more general studies as well as the literature on specific country cases, including South Korea and Japan. The methodology presents a high-level "Context – Content – Process" framework and discusses its elements, criteria and sub-criteria on a more granular level.

The empirical part introduces the reader to the education systems of Korea and Japan. It explains the development of their shadow education systems and discusses its scale, intensity and mode of usage. Next, it theorises about the impact that shadow education might have on the

¹South Korea and Korea will be used interchangeably hereafter to refer to the Republic of Korea.

economy, society and education system of both countries. Finally, the empirical part explains how Korean and Japanese governments regulated the shadow industry (directly and indirectly).

Lastly, the analytical part presents the comparison of shadow education systems of Korea and Japan and government regulations. It discusses how education planners and policymakers can benefit from this research and spell out research gaps and opportunities for future studies.

The research has certain boundaries. First of all, this study focuses on the comparison of policies that target shadow education practices at primary and secondary schools. Supplementary tutoring exists at the pre-school and university levels as well, but it has different characteristics and raises different issues. Secondly, this study focuses mainly on the tutoring that is provided in exchange for a fee. Primary attention is put to the regulation of cram school business, but the research also targets those policies that regulate private tutoring and extra schooling provided within the mainstream system. Finally, this study concerns tutoring that is only related to the subjects that are taught at mainstream schools.

2. Theoretical and Analytical Framework

2.1. Literature Review²

2.1.1 Basic definitions

Education policy

Before heading on to the discussion of the literature on topics of education policy and shadow education, it is significant to clarify key concepts that are relevant for this research.

The definition of education policy, used in this research, is obtained from The United Nations Educational, Scientific and Cultural Organization (UNESCO). Education policy is a "*...statement that sets out the government's main goals and priorities. It is in line with the country's constitution and can be sector-wide [here: shadow education sector] or specific to a sub-sector [here: primary and secondary education] or a certain issue [here: education equality and wellbeing]*" (Yano, 2013, 7).

Trowler (2003) and Ball and Stevenson (2005) add an essential remark to this standard definition, suggesting to view it not only as a written statement of intentions (a "product")", but also as a dynamic and functional process (Trowler 2003, 95-96; Ball and Stevenson 2005, 37). The policy is a subject of a certain tension between policymakers and practitioners; any written policy is subject of continuous interpretation and implementation; the implementation of the policy is often a complex process that brings unpredictable results. This dynamic view on the policy was nicely put into words by Haddad (1995): "*an explicit or implicit single decision or group of decisions which may set out directives for guiding future decisions, initiate or retard action, or guide implementation of previous decisions*" (Haddad 1995, 18).

As a result, the thesis views education policy based on these two definitions which encompass its static, dynamic and functional natures.

Shadow education

The definition of shadow education is borrowed from the Organization for Economic Co-operation and Development (OECD): "*...more or less institutionalised and structured forms of*

² The literature review used in this paper is the final assignment developed by the author within the frame of the Master colloquium course (M5). The permission to use it as a part of a Master thesis was obtained from Univ.-Prof. Dr. Rüdiger Frank. EcoS faculty, University of Vienna, Summer semester 2020.

instruction that generally exist outside and separated from the formal education system to supplement learning that occurs in schools" (OECD, 2014a, 88).

The metaphor of shadow education used in this thesis had been previously employed by Bray (1999). Since then, it became a commonly used term in the field of comparative education (Baker et al. 2001, 2; Heyneman 2011, 183; Entrich 2018, 3). Key features of the system explain this metaphor: it always exists together with the mainstream schooling; it evolves and changes when the mainstream system does so; the focus of policymakers is usually on the mainstream rather than on its "shadow"; and finally, the features of the system are less distinct than those of the mainstream system (Bray 2009, 13). However, the use of the term "shadow" does not imply that these activities are hidden. In Japan and Korea, these practices make up a large and open enterprise (Stevenson and Baker 1992, 1640).

Equality of educational opportunities

The rising gap between advantaged and disadvantaged social groups ones more highlights the importance of education as a mean of achieving social justice (Parker et al. 2017, 7). The common approach to assess issues concerning fairness and social equality is through the concept of meritocracy (Baimenov and Phillips 2015, 4). Meritocracy is an idea that individuals get greater or lesser recognition and rewards based directly on their effort and abilities. The concept is based on common sense that those who have a talent and work hard deserve greater rewards, and those who do not – lesser, independent of their social status, race and gender (Parker et al. 2017, 9). In this context, equality of educational opportunities means that talented and hardworking individuals have open access to education of a good quality which would give them opportunities for personal and career development. It is essential to highlight that we are talking not only of an "equal" system that gives individuals the same resources but also of an "equitable" system that distributes resources based on individual needs (Lubienski 2017, 164).

This concept fits in the context and narrative of official policies and laws of Japan and Korea. Constitutions of both countries guarantee free mainstream education for all citizens. Article 26 of the Japanese Constitution declares that *"all people shall have the right to receive an equal education correspondent to their ability, as provided by law."* Article 31 of the Korean Constitution states the similar: *"all citizens have an equal right to receive an education corresponding to their abilities."* Furthermore, achieving social justice and educational equality are essential goals for both Ministries of Education. Japan ministry claims that *"the people must*

be given equal opportunities to receive an education suited to their abilities, and must not be subjected to discrimination in education on account of race, creed, sex, social status, economic position or family origin" (Basic Act on Education 2006, Article 4). Similarly, the Korean ministry pledges to *"...oversee the national school curriculum, ... , in order to ensure equal educational opportunity for all and maintain the quality of education."* (MEST 2020).

Students' wellbeing

Many education policies that target education equality also include such a multidimensional concept as "student wellbeing" in their agendas (World Education Forum 2015). Despite being subjective in its nature, it is essential to add this construct into the scope of the thesis, since there is evidence that some policies that regulate shadow education aim at the improvement of "student wellbeing" as well (Bray 2009).

"Students' wellbeing... refers to the psychological, cognitive, social and physical functioning and capabilities that students need to live a happy and fulfilling life" (OECD 2017, 61). Education system aims to produce individuals with a human capital that is required for the prosperous development of the country. However, the focus solely on the development of future skills overlooks important psychological, social, cognitive and physical domains that are important for the students in their daily lives as well as for their future development as healthy, active and engaged members of the society. The psychological dimension refers to motivation for achievement and is hindered by school-related stress and anxiety. The social dimension refers to the social life inside and outside the school. The cognitive dimension refers to students ability to use their knowledge in their daily lives for problem-solving as well as their ability to think critically. The physical dimension refers to the healthy lifestyle related to the study process (OECD 2017, 62-63). In a nutshell, one can intuitively describe wellbeing by using such words as "happiness", "satisfaction", "confidence", "health", connecting it to a broader term – a "quality of life".

Having spelt out key definitions, we move to the next parts of the literature review. There we are going to discuss analytical frameworks through which the policy process can be understood and interpreted. The issue of equality as a common aim for education policies is discussed, taking into consideration the context of globalisation. The review highlights qualitative and quantitative studies on the topic of shadow education. It carries on with the analysis of its

connection to the issue of educational equality and ends with a discussion of research on Korean and Japanese cases.

2.1.2. Elements of an education policy

The methodology of policy analysis and its implementation

Scholars and international organisations propose different methods for the analysis of education policy. These methods can be divided into three main focus zones: some scholars concentrate on the process of policymaking, others highlight contextual and content elements of it, and some provide the combination of those above.

Haddad (1995) and Yano (2013) proposed conceptual models for the education policy development that resemble Deming – Shewhart "PDCA process cycle" (Process.st 2020). Similar to the "Plan-Do-Check-Act" principle, the authors introduced an approach that has three milestones: pre-policy decision activities; the decision process itself; and post-decision planning activities. Haddad decomposed the framework into seven parts. Pre-policy activities include analysis of the situation as well as generation and evaluation of policy options. Next, come the decision and the implementation. Post-decision activities include policy assessment and the planning of the next policy cycle (Haddad 1995, 23-39). The author emphasised that each policymaking process is case-specific and is greatly susceptible to particular economic, sectorial and socio-political influences that have to be analysed individually (Haddad 1995, 88-90). The author further distinguishes the modes of policy development: systemic, incremental, ad-hock and importation. Policies that are generated in those modes have to be further evaluated in terms of desirability, affordability and feasibility. Haddad emphasises that one has to view a policy analysis as a complex and continuous process rather than a one-time linear activity. Yano's model includes all above mentioned "process" elements, but it puts more attention to the analysis of key stakeholders for the education as direct influencers of political dynamics and education policy. Furthermore, the author focuses on the actual content of education policies and on key analytical dimensions that are used to review them: access and equity, quality, management, financing and monitoring and evaluation (Yano 2013, 26-40).

Like Haddad, Jie (2016) introduced the analytical framework that spells out the process of policy development. However, he put more emphasis on contextual and content elements of it. Just like Yano, he placed key stakeholders (actors, groups and organisations) into the centre of his model. Then he highlighted three pillars with which these stakeholders interact: content,

process and context of policymaking (Jie 2016, 3). The content of the education policy consists of resource allocation, teaching and learning and system-level policies. Similar to Haddad, the author broke down the process of policymaking into following steps: problem identification, policy formulation (on the judiciary and administrative levels), implementation ("top-down" and "bottom-up" approaches) and evaluation (Ng 2016, 8). The context of the education policy involves situational factors (transient, impermanent or idiosyncratic factors like wars, unrests, natural disasters), structural factors (a type of political system, bureaucracy structure, type of economy), cultural factors (level of traditionalism, values, customs) and international factors (international education policy, ideological trends) (Jie 2016, 4-7).

Commonwealth Secretariat (2017) and OECD (2019) paid closer attention to the context and content of education policy. Commonwealth outlined four cornerstones of a healthy education system: equity, quality, relevance and sustainability (Commonwealth 2017, 6). Four elements that are crucial for the policy development base on the following cornerstones: governance, which involves the political will, legislation, policy formulation and its implementation; knowledge, which includes research and development, information technology and communication; advocacy or the ways of communication and leadership; and capacity, which consists of professional development, curriculum, pedagogy, standards and workforce management (Commonwealth 2017, 11-19). OECD distinguished similar focus zones: equity, quality, governance and funding. However, its report has an additional value for this research because OECD carries out a comparative analysis of priorities for education policies across 43 participant countries. Additionally, it provided snapshots for each country-profile, including Japan and Korea (OECD 2015, 2016).

Goedegebuure et al. (1994) emphasised the content of policymaking as well. However, his focus lied on the regulatory analysis. The authors introduced a "triangle of coordination" model for the analysis of the governing mechanisms (Goedegebuure et al. 1994, 4). Depending on the coordination mode, the regulation of the education system can be influenced by "state authority", "market" and/or "academic oligarchy". In order to distinguish the coordination mode, the authors identify following analytical areas: the structure of education; the authority within education; the education policy; and the reflection of structure, authority and policy on institutional governance and management (Goedegebuure et al. 1994, 11-12). Structure of education involves the institutional composition of the system, admission and selection policies, student/staff enrolment and dropout rates. The second area involves an analysis of education

legislation, directed to coordination, funding (core funding, supplementary funding, allocation), and control over institution, education and research programs. The third area focuses on the goals of higher education, its structure and the role of main actors involved.

Universal education policy and comparative perspective

The nature of this research brings up the question of the limitations concerning the applicability of universal frameworks for the comparative analysis of education policies. What factors are important to take into account when we want to design a single framework for the comparison of two countries? Scholars mentioned below show that the synergy of local and global factors shapes a unique policy outcome for most country cases.

Ball and Stevenson (2015) and Mok (2006) demonstrate that social and economic changes push both developed and developing states to take relatively universal steps to foster growth and improve the economic competitiveness of the country. Ball and Stevenson highlight three global themes that shape educational policy: economic utility and human capital theory, the theme of citizenship and social justice and the theme of social justice and diversity. Mok adds that globalisation fosters a universal switch from traditional bureaucratic forms of government to deregulated forms. These forms include decentralisation, marketisation, privatisation and self-regulation (or a mix of those) (Mok 2016, 18-20). The author suggests that symbiosis between localisation and universalisation is observed in the field of education. He argues that both Korean and Japanese education systems have a range of critical shaping factors caused by local context and the impetus for change pushed by global processes (Mok 2016, 191).

Wiseman and Baker (2005) and Napier (2005) analyse the positive and negative effects of internationalised education policy. The former argues that it creates economically and a politically productive citizenry that establishes and maintains the competitiveness of the state in the international arena. However, similar to Mok's line of argument, they show that its effectiveness varies, depending on local factors and unique historical, cultural and ideological background (Napier 2005, 15-17; Wiseman and Baker 2005, 11-12). Napier emphasises the importance of such contextual elements in the process of policy analysis. Countries have to bargain between policies that target quality of education and its quantity; centralisation in regulation and decentralisation; local education goals (local financing, curriculum building, regional specialisation) and national goals (national financing directive, control over the curriculum). Policymakers also have to take into consideration the country's internal conditions

(specific historical, economic and cultural conditions) and external pressures (global trends in education policy) (Napier 2005, 66).

Peculiarities of international education policy are highlighted by Williams et al. (2015) as well. They argue that international models mirror Western priorities (usually based on Millennium development goals (MDGs) and Education for all concept (EFA)), but each education system may have its demand. As a result, the same universal policies applied to education systems of countries that unique socio-political and economic conditions can bring unexpected and even undesirable outcomes. For example, the authors confirm that universal policies massified education in many countries. However, they also argue that the massification created new issues concerning quality of education and resource allocation, whereas problems of affordability and inequality just evolved and remained there. Among other issues, the authors mention a worldwide spread of shadow schooling that *"seems to result from a failure of public school options to provide the minimum learning environment that parents require"* (Williams et al. 2015, 31).

Education policy and educational equality

Having discussed the structure of education policy and the issue of applicability of universal frameworks for the comparative analysis we move on to the review the research that is focused on the educational equality as a significant target for the policy intervention. Some scholars and international organisations see education policy as a primary mean to make education systems more equal and equitable.

Hossain et al. (2012) present evidence of a connection between the quality of education and chronic poverty (Hossain et al. 2012, 13). Particular focus is put on pre-school programs and school governance. They develop a set of tools to promote education to minority groups and discuss second chance schemes", market-oriented programs and programs of scholarships to promote equal access (Hossain et al. 2012, 24, 40). Authors demonstrate that *"...education interventions are among the best means of tackling inequality, particularly if they interrupt its transmission across generations"* (Hossain et al. 2012, 57).

Raffo and Gunter (2008) address the issue of social inclusion, as well. In line with previous authors, they claim that education policy has to promote economic and cultural inclusion of more disadvantaged part of the population (Raffo and Gunter 2008, 397-398). Their framework connects issues of social inclusion, educational policy and school leadership,

where the former serves as a key for bringing about the change (Raffo and Gunter 2008, 411). Raffo and Gunter highlight such leadership rationales as focus on delivery, localisation and democratisation (Raffo and Gunter 2008, 405).

Lubienski (2017) and Shields et al. (2017) discussed the role of regulatory interventions in creating not only equal but also equitable education systems (Lubienski 2017, 153-155). The authors claim that "equal" systems give individuals the same resources, whereas "equitable" systems target the distribution of resources based on individual needs. Shields et al. show that global massification of education and the rise of fierce competition made the scarcity of resources even more evident, what gave rise to private expenditures on education and caused private tutoring industry to flourish.

International organisations such as UNESCO (2013), Commonwealth (2017) and OECD (2019) give utmost priority to making education systems more equal and equitable. *"Achieving greater equity in education is not only a social-justice imperative, but it is also a way to use resources more efficiently, and to increase the supply of knowledge and skills that fuel economic growth and promote social cohesion"* (OECD 2019, 3). UNESCO highlights the importance of equity in education, referring to Article 26 of the Universal Declaration of Human Rights, which defines the right to education as one of the fundamental rights of all people (UNESCO 2020). Commonwealth secretariat proclaims equity in education as a human right as well. In addition to the provision of access to educational opportunities, it sees quality, sustainability and relevance as three extra indispensable components of making an overall education system more equitable (Commonwealth 2017, 6).

As a result, this part of the literature review has shown a variety of approaches for an education policy analysis and criteria that are important to take into account in its course. The next section of the review narrows the discussion down to the topic of shadow education and its relation to educational equality. The review covers research on shadow education business. Next, it explores general studies on shadow schooling, case studies of Korea and Japan as well as other country cases.

2.1.3. Shadow education system and educational equality

Shadow education business in South Korea and Japan

Rohlen (1980), Harnisch (1994), Russel (1997), Roesgaard (2006) and Mawer (2015) researched the origin, curriculum and content elements of the most common Japanese shadow education

formations, known as *juku*. They formulated its typology, addressing the needs of students that they accommodate and studied the culture of teaching and learning in *juku*. Russel discussed the particular type of highly intensive cram schools – *yobiko* (Russel 1997, 153). Roesgaard systematised *juku* types, emphasising that policymakers have to regulate specific types of *juku* separately since they serve different purposes. (Roesgaard 2006, 145) Mawer provided a snapshot of *juku* variety as well, highlighting remedial, preparatory and enrichment purposes of those institutions (Mawer 2015, 134-137). Harnish discussed the pros and cons of *juku* and focused primarily on disruptive features of *juku* concerning formal schooling. He argues that *juku* serves as a necessary supplementary extension to a public school system, without which many students cannot realise their potential and go through the allocation system successfully. The reasoning for *juku* proliferation was explored by Rohlen, who theorised that such a competitive educational environment originates from the Confucian humanistic tradition of schooling, which places a higher social value on the educational attainment (Rohlen 1997, 242).

Similar studies were made with a focus on the Korean case. Kim (2016) studied Korean *hagwon* (institutions similar to Japanese *juku*) and analysed its types, curriculum, size of the market and its twofold influence on the education system. Kim's remarks on the origin and purpose of *hagwon* match those that were communicated by Rohlen, Harnish and Mawer for Japanese *juku*. *Hagwon* is shown as a socially supported indispensable component (a microsystem) of a mainstream education system that exists in different shapes and forms, serving remedial, preparatory and enrichment purposes (Kim 2016). Kim explores the economic and social significance of *hagwon*, discussing both its positive and negative aspects. He distinguishes individual approach, improvement in academic performance, specialisation in systematisation in learning and textbook improvement among pros of shadow schooling (Kim 2016, 154, 164). On the other hand, he mentions an economic burden and a distortion of student wellbeing that is caused by fierce competition, anxiety and demanding workload among negative aspects of it. Furthermore, he mentions that *the hagwon* system can cause the reproduction of educational and social inequality through generations (Kim 2016, 169).

Shadow education and equality: cases of South Korea and Japan

A broader analysis of the shadow education industry and education equality was done by Bray (2003, 2006). He investigated backgrounds of the phenomenon, reasons for its worldwide growth and analysed its impacts on the education system and society. Similar research was carried out by

Bray and Lykins (2012) that focused explicitly on Asian context and on the specificity of shadow education in these countries. Authors showed that shadow education, on the one hand, distorts formal education and exacerbates inequality, but, on the other hand, promotes personal development and stimulates learning (Bray and Lykins 2012, 32-33, 44-47). The issue of inequality in connection to shadow schooling was revisited by Bray and Kwo (2013), where they pointed out its contradiction with the fundamental principles of Universal Declaration of Human Rights and the Education for All movement of UNESCO (Bray and Kwo 2013, 492).

Heyneman (2011) examined the relationship between shadow education and social coercion. Similarly to Bray, he states that: "*...effective government policies require an acknowledgement that private tutoring has both positive and negative elements and contain some characteristics that might well be encouraged, even publicly subsidised, and other characteristics that should be illegal*" (Heyneman 2011, 186). The author finds it necessary to improve statistical monitoring over the breadth and depth of private tutoring because it is directly related to the effectiveness of shadow education policies. According to Heyneman, it is a role of the state to equalise educational opportunity for those who cannot afford private tutoring.

Stevenson and Baker (1992) were among the first scholars to study the relationship between students' participation in shadow education and their university enrolment results in Japan. They showed that students with better socioeconomic backgrounds are more likely to participate in shadow education and that students who participate in some forms of shadow education are more likely to attend university than those who do not (Stevenson and Baker 1992, 1654-1655). The authors argued that the intensity of shadow education comes from the nature of allocation processes embedded in the education system. The shadow education system has particular significance in societies which have centrally administered examinations, high level of the contest for the university admission and tight linkage between educational allocation and future occupational positions or general social status. The authors called this meritocratic allocation process – "*contested sponsorship*". Stevenson and Baker outlined four main types of shadow schooling activities in Japan: practice examination courses, correspondence courses, after-school classes (*juku*) and private tutoring. Similar conclusions concerning the relation of tutoring in mathematics to higher academic performance were derived by Choi et al. (2012) for the Korean case (Choi et al. 2012, 299).

The evidence presented by Stevenson and Baker was supported by Matsuoka (2015), who showed that family income plays an important role in shadow education participation in Japan.

Students with high socioeconomic status (SES) tend to attend high-ranked schools and are more likely to attend (and with higher frequency) cram schools than those with lower SES (Matsuoka 2015, 280-285). The findings indicate that: "...the existing tracking system widens the learning opportunity gap based on one's SES with the shadow education market" (Matsuoka 2015, 286). Mimizuka (2007) also adds geographic location as an important variable that affects the learning opportunity gap. The results indicate that Japanese students living in larger cities have greater educational opportunities due to the higher availability of shadow education.

Baker et al. (2001) carried a research that is similar to Stevenson and Baker but this time on a cross-national scale, focusing precisely on the tutoring in math and its relation to further academic achievement. The authors showed that supplementary schooling is used to a different degree across numerous education systems, even in those countries where its existence was not previously reported (Baker et al. 2001, 11-12). They found high participation rates (~75%) in Asian countries (including Japan and Korea) and in some European countries as well (e.g. Hungary, Czech Republic and Latvia). ~20% rate is reported for Germany, France or Norway. Their results further indicate that the majority of students use shadow schooling for remedial purposes. Korea is among a few countries in the sample where shadow education is massively used for enrichment reasons, whereas in Japan, the usage is driven by the combination of both enrichment and remedial purposes. (However, Entrich (2014) later comments, that since 1990s Japan has advanced from mixed to a predominantly enrichment shadow education system (Entrich 2014, 95) The authors argue that: "...shadow education [adds] a significant non-public component to the education process" (Baker et al. 2001, 14). It is especially evident in the case of Japan, where shadow schooling plays an important institutional role in the allocation process. Baker et al. indicated the potential for the change of shadow education governance by merging classical public education services and these supplementary settings into new institutional arrangements. A similar idea was previously shared by Heyneman (2011), who proposed to subsidise low-income families to grant them access to supplementary schooling (Heyneman 2011, 186).

Entrich (2014) compared cases of Germany and Japan. The research showed that shadow education is used by a nearly second student in Japan primarily for enrichment and competition purposes. In Germany, it was shown that private tutoring is used primarily for remedial reasons by students who find it hard to catch up with their peers. Furthermore, in line with Mori's results, the data suggest neutralising effect of private tutoring on educational disadvantages caused by

SES of families that are living in densely populated areas where the supply of education services is higher in both quantity, quality and variety (Entrich 2014, 95). The author theorised that the enrichment nature of Japanese private tutoring might be the reason for its high rankings in cross-national comparisons on academic achievement (OECD comparison, in particular). The same notion was expressed by Dolly (1993).

Shadow education and equality: a worldwide perspective

Korea and Japan are the most common reference cases when one mentions the shadow education industry (Bray 2006). Nevertheless, numerous studies focus on less common country cases, the results of which often indicate its growing importance.

Ghosh and Bray (2018) reported that the combination of high-stake exams and curriculum overload creates a high demand for private tutoring in India, access to which is limited depending on the SES of individuals (Ghosh and Bray 2018, 47). Buchmann et al. (2010) also examined the relationship between the participation in the preparatory courses for the high school state exam, college enrolment rates and SES of students taking part in such courses in the USA. Similar to Stevenson and Baker and to Matsuoka, the authors found that social class inequalities have at least moderate effect on successful college enrolment. Racial/ethnic variations are also notable in the usage of private tutoring (Buchmann et al. 2010, 456). Scholars also showed the growth in shadow education business franchises in the USA, similar to Japan's *juku* and Korean's *hagwon*.

Similar growth was reported in Canada by Aurini and Scott (2004), which he explains by high "customisation" of private tutoring business to the individual needs of the clients (Aurini and Scott 2004, 436). Bray and Kobakhidze (2015) explained the growth of business franchises for the case of Hong-Kong. The main driving forces for was by rising social competition, shrinking family size, and the power of commercial advertising. They further state that the expansion of the cram school business changes the attitude and values of the society towards public schooling systems (Bray and Kobakhidze 2015, 478).

The radical case of such value change and a de-facto dominance of private tutoring over the public system in Egypt was reported by Sobhy (2014). Because of the distrust for public schooling, corruption and material conditions of teachers, the market displaced the mainstream system (Sobhy 2014, 62).

Similar tendencies were reported by Popa and Acedo (2006) for Romania and by Bray and Silova (2006) for the cases of other former socialist countries (Popa and Acedo 2006, 108).

The former has highlighted that distrust in the quality of the mainstream system coupled with low salaries and social status of teachers stimulated the growth of shadow schooling (Bray and Silova 2006, 13-16). Similar evidence was reported by Mashraky (2019) for the case of Bangladesh and by Bray et al. (2016) for the case of Cambodia (Bray et al. 2016, 297).

The role of SES as a deterrent of shadow education consumption was the focus of Tan (2017) as well. Based on the case study of Singapore, the author examined the connection between private tutoring and "parentocracy". They showed that despite the accessibility of shadow schooling, it is still manipulated by higher SES parents to enable their children to access the best available educational resources and experiences. Nevertheless, the effect of shadow schooling on the enrolment rates in Singapore is still to be explored (Tan 2017, 326).

To sum up, this part of the review indicates a growing research interest in the issue of shadow education, especially in its connection to inequality. Multiple studies focus on cram school business as the most common type of shadow schooling in Japan and Korea. Focused studies show a great variety of impact that tutoring has on the ecology of education in different country cases. The last section of the literature review highlights research on specific government policies in Korea and Japan that target shadow education.

2.1.4. Policy responses to shadow education

Lee et al. (2010) outlined all policy responses taken by the Korean government up to this date. They have categorised four patterns of these responses: equalisation of schools, enhancement of public education (indirect responses), the prohibition of shadow education and provision of supplementary tutoring program (direct responses) (Lee et al. 2010, 106). The authors showed that these responses were ineffective and that vertical and hierarchical structure of the South Korean education system has been a major demand mechanism that leads to shadow education. They believe that policies that aim at a more horizontal and diversified model of the education system will possibly lead to more meaningful results.

Kim and Lee (2010) have largely confirmed previous conclusions, saying that the heavy regulation, focused on high-school equalisation in the hierarchical education system, makes a goal to equalise educational opportunities unattainable. They claim that policies, aiming at the equalisation of the higher education system and the elimination of competitive university entrance examinations are more likely to bring results (Kim and Lee 2010, 288) Furthermore,

contra to the official view, the authors suggest that private tutoring should be considered as an integral part of the entire education system (Kim and Lee 2010, 291).

Choi and Cho (2015) carried out a quantitative study attempting to measure the effect of the last 2006 radical policy response of the Korean government - *hagwon* curfew. The study revealed that the enforcement of the curfew did not reduce the total time spent and household expenses for private tutoring significantly. They showed that government intervention was only successful in reducing *hagwon*-tutoring costs. Moreover, the authors emphasised that the curfew policy did not affect the consumption of private tutoring by students of the highest socioeconomic status group, which puts its overall effectiveness to the question (Choi and Cho 2015, 617). Furthermore, they highlight that shadow education curfew in Korea lead to the growth of black market activities. Choi and Choi (2016) claimed that curfew methods indeed could have an impact on the consumption of *hagwon* services, but its effect is hard to predict for different country cases as it depends on the elasticity of demand of these services, the existence of substitutes and on the profile of customers.

Yamato and Zhang (2017) and Mori and Baker (2009) reviewed shadow education as a global phenomenon, focusing on the case of Japan. Authors speculate that in the future, mass shadow education will be a legitimate part of an overall education system worldwide. Mori and Baker argued that governments of Japan, Korea gradually accept the logic behind shadow education, supporting its spread for the sake of societal progress (Yamato and Zhang 2017, 340; Mori and Baker 2009, 37-38). Rather than eliminating shadow education, local and national governments frequently try to create equitable opportunities for learning, either by offering after-school public programs or by collaborating with private shadow education companies (Mori and Baker 2009, 40; 45-46). The private-public collaboration was also proposed by Heyneman (2011) as one of the regulation methods (Heyneman 2011, 186).

Bray (2009) examined policymaking from a broader perspective. He argued that response patterns have to be applied to different types of private tutoring (Bray 2009, 71). Bray and Kwo (2014) highlighted tutoring companies, internet tutoring, teachers providing tutoring and self-employed persons providing tutoring as key actors for regulation. Policymakers have to map key actors of shadow education, the context, objectives and structures of private tutoring as well as its socioeconomic and educational impact in order to formulate an appropriate policy. Even for cases of Korea and Japan that seem identical from the first glance, Bray and Lykins (2012) have

distinguished different features of shadow education as well as regulatory patterns (Bray and Lykins 2012, 69).

Finally, the challenges of education policymaking in Korea and Japan were addressed by OECD (2012a, 2014a) reports. Both of them review government responses to *hagwon* and *juku* industries and support the idea that a certain degree of centralised regulation of the industry is necessary to level its adverse effects on the education system (OECD 2012a, 72; OECD 2014a, 95).

2.3. Methodology

2.3.1. Introduction

This part presents a comparative framework with criteria to answer the research question of the thesis: “*What are the similarities and differences of South Korea’s and Japan’s government policies targeting equality of educational opportunities and student wellbeing (with the focus on shadow education system)?*” The framework proposed in this thesis owes an intellectual debt to the foundation of the literature on the topic of policy analysis and shadow education studies discussed in the literature review section. Next parts give a more detailed description of the frameworks’ rationale.

2.3.2. Comparative framework and criteria

Research design

The review of the methodological literature has shown a variety of approaches to develop education policy, most of which are of a multipurpose nature (Goedegebuure et al 1994; Haddad 1995; Yano 2013; Jie 2016; Commonwealth Secretariat 2017; OECD 2019). These frameworks serve mostly as a guideline for education planners, offering a high-level logic and different combinations of criteria to proceed with policy development.

Despite having a temptation to employ one of those approaches to this study, it is not possible for three main reasons:

- The nature of this research requires a precise focus:
 - On the issue: educational equality and students’ wellbeing.
 - On the sector: shadow education.
 - On the method: case comparison.
- It aims at a thorough analysis and comparison of cases and not at the policy development.
- Finally, this research has a high reliance on the information from the secondary sources, meaning that the application of some criteria for the contextual policy analysis is limited.

Therefore, the decision was made to apply an eclectic approach to the framework and criteria development.

Having analysed methodological literature, we can identify some similar patterns.

Firstly, many scholars emphasise the importance of *contextual* elements in the pre-policy analysis. Haddad (1995) claimed that policy decisions should be made based on their desirability,

affordability and feasibility assessments (Haddad 1995, 33). These assessments are highly case-specific and are greatly susceptible to unique economic, sectorial and socio-political influences that have to be analysed individually. Yano (2013) has further added geography and demography to this list, and the OECD (2017) model highlights the national goals for education development as an important analytical element (OECD 2017, 40-41; Yano 2013, 12). The importance of the context was also mentioned by Mok (2006), Wiseman and Baker (2005) and Napier (2005) who emphasised the limitation of multipurpose models when it comes down to the specific case study and the comparative analysis.

Secondly, the authors paid attention to the *content* of policymaking. It involves the process of problem-identification mentioned by Haddad (1995) and Jie (2016). The target of the policy response is analysed in terms of its impact on the education system, economy and society of a country. Key issues arising from this impact analysis are evaluated to develop a policy response (Yano 2013).

Finally, researchers commonly focus on the *process* of policy development. The process involves actions that are required to respond to the identified issues: measures in the form of legal acts, directives and programs. Goedegebuure et al. (1994), Commonwealth Secretariat (2017) and OECD (2017) separate these actions into those that target: school improvement; evaluation and assessment mechanisms; and governance and funding.

The combination of above-mentioned ideas resulted in a “Context – Content – Process” framework (see Figure 1).

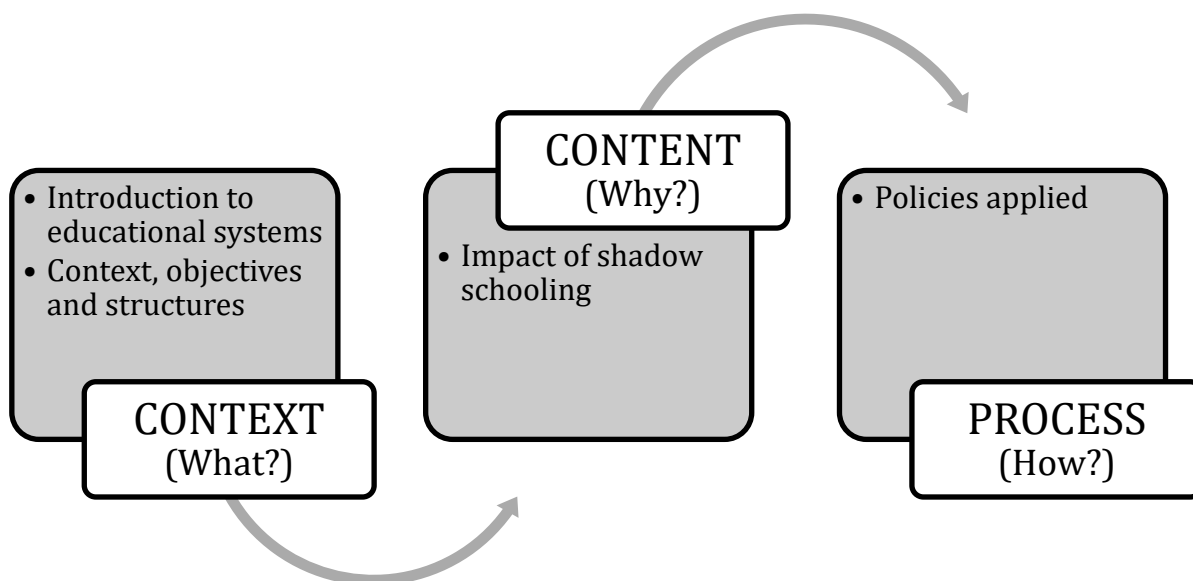


Figure 1. “Context – Content – Process” framework.

The *context* part gives an answer to the “*What?*” question: “*What are the key contextual aspects of Korean and Japanese educational systems and of its “shadows?”*”

The *content* part provides an answer to the “*Why?*” question: “*Why does the discussion about the impact of shadow schooling create the debate about equality of educational opportunities and student's wellbeing in Korea and Japan?*”

The *process* part provides an answer to the “*How?*” question: “*How did Korean and Japanese governments regulate the shadow industry?*”

Next parts of the methodology are going to provide a more detailed description of four key blocks of the “Context – Content – Process” framework as well as of their criteria and sub-criteria:

- Introduction to the education system
- Context, objectives and structures
- Impact of shadow education
- Regulations applied

The summary of the framework with key blocks, criteria and sub-criteria can be found at the end of the methodology (see Table 2.2).

Introduction to education systems of South Korea and Japan

Before heading on to the description of the shadow education sector, it is essential to explain the key demographic and economic characteristics of Korea and Japan.

Firstly, the section provides a summary of economic indicators such as gross domestic product (GDP), the consumer price index (CPI), inflation, labour market statistics; and demographic indicators that include population and vital statistics. Such country profiles and their comparison are required for the high-level understanding of the economic contexts of both countries.

Secondly, it gives a detailed description of the structure of the mainstream education system with the emphasis on its development, its current policy directions and regulation. Besides that, this section will review and compare some key indicators concerning participation rates in education and access to it, outcomes of education, financial recourses invested in education and the learning environment. Such efforts would help us understand the education systems of both countries, more in detail.

Finally, national goals and priorities in education will be outlined, and the role of equitability of education and students' wellbeing will be discussed.

Context, objectives and structures of shadow education

The second part of context research focuses on the way shadow education systems of Korea and Japan are structured.

There are several difficulties that arise from the process of shadow education research. One of them is that precise data on the size and structure of this industry is hard to get. That happens because key actors of tutoring: students, parents and tutors are often not willing to share the information about the participation in these activities. There can be several reasons behind that. Some tutors provide their services as an informal activity, earning an untaxed income. Students may not fully reflect on their participation for the fear that they gain an unfair advantage over their peers or may be perceived as underperforming (Bray 2009). Additionally, tutoring varies in its forms and regularity of usage, which does not simplify the research process either. Nevertheless, there are several studies that have been conducted that allow to construct a rough picture of the phenomena in both countries (Baker et al. 2001; Roesgaard 2006; Mawer 2015; Kim 2016).

Criteria that are used to study the context, objectives and structure of tutoring are borrowed from Bray (2009) (17). These criteria are also applied in other cross-country and case-specific studies of shadow schooling (Bray and Silova 2006; Bray and Lykins 2012; Bray and Kwo 2013). The industry is examined, using three main criteria: *scale*, *mode* and *intensity*.

Scale

This criterion is used to assess the spread of tutoring. The scale of shadow education is measured by the % of students receiving tutoring and the number of tutoring institutions in the country.

Mode

The purpose of this criterion is to understand the supply and demand patterns of shadow education. Here we are looking at common types of tutoring in both countries and the primary purpose why students use it: remedial or enrichment (Baker et al. 2001, 3).

Intensity

This criterion distinguishes the pattern of usage. It is measured by the number of hours of tutoring received, by the number of subjects taken and by costs of participation.

Impact of shadow education

After finishing studying the context of shadow education we need to understand what influence does it have on the economy, society and education system of both countries and how does that influence bring the discussion on the equity of educational opportunities. The study of influence and any kind of causality can make the research biased thus not objective. It is important to note that the aim of this part is not to make any cause-effect conclusions that are carved in stone, but rather to gather evidence based on the results of available academic research in order to theorise on the possibility of such impact. That is a necessary foundation to understand the driving forces of policy responses that are going to be discussed afterwards.

Economy

There is evidence that shadow schooling is big business in Korea and Japan. Here we will try to assess the size of the sector, its growth, total household expenditures and the role it has in teacher's income.

Society

As it is reflected in the state of the art, private tutoring, on the one hand, can distort formal education and exacerbate inequality, but, on the other hand, promote personal development and stimulate learning (Kim 2016, 154, 169). Here we try to understand why shadow education has a demand in Korea and Japan. Based on existing studies, we will theorise about the potential reason why people see shadow education as an integral part of the whole education system. Furthermore, we will investigate if there are any gender differences reported concerning the consumption of shadow schooling as well as differences based on the geographical distribution of these institutions.

Education system

Finally, we will try to examine what impact shadow schooling has on the education systems of both countries. Theoretically, supplementary education can have a positive effect on mainstream schooling since it acts as an additional avenue to learn the material better. However, in some

circumstances, it can undermine the mainstream system. Bray (2009) has set up a general list of impact domains and types of impact (adapted from Poisson (2007)), which shadow education might have on a mainstream (Bray 2009, 45-46). These domains and types of are spelt out in Table 1.

Table 1. The impact of shadow education on the mainstream education system. Based on Bray 2009, 45-46. The impact domains were selectively chosen by the author to match the purpose of this research.

Impact domain	Positive type	Negative type
Instructional time and teachers performance	More efficient use of out-of-school time (especially for unsupervised youth).	- Possible increase in teachers' absenteeism. - Teachers might neglect their mainstream duties in favour of tutorial work. - Curriculum might be taught partially.
Student learning, achievements and classroom dynamics	- Helps students to learn the material better. - Might improve student learning and competitiveness in the educational market.	- Heavy workload and student fatigue. - Possible student absenteeism and lack of interest in classroom activities. - Increased social inequalities between students. - Widened gaps when high achievers receive extra tutoring. - Favouritism of pupils receiving private tutoring. - Penalisation of pupils who do not attend private tutoring (deliberate failing). - Cramming approaches.
Assessment and selection procedures		- Requirements for examinations might be raised to justify tutoring. - Skewing of the university admission process.

The impact pattern can vary significantly from case to case. Based on existing research, we will try to investigate which domains are claimed to be affected in Korea and Japan and which positive and negative impact on the education system is emphasised by scholars.

Regulations applied

Having discussed the *context* and *content* of shadow schooling finally, we move to the *process* part: the analysis of policies applied in Korea and Japan.

OECD (2014a), Lee et al. (2010) and Bray (2009) propose similar methods to classify policies that target shadow education by the type of the response and by the issue that they aim at. All these responses can be summarised into four broad patterns:

- Policies equalising school allocation and regulating resources
- Policies limiting private tutoring
- Policies improving the quality of mainstream education
- Policies broadening access to supplementary education (Bray 2009, 71-100; Lee et al. 2010, 106; OECD 2014a, 95-97).

The first type of policy response aims at controlling the expansion of private tutoring by equalising the quality of mainstream education and eliminating entrance barriers (selectivity based on high-stakes examinations) that are considered to be one of the key demand mechanisms that lead to shadow education (Stevenson and Baker 1992, 1654-1655).

The second type of policy response to shadow education is the implementation of controlling measures on the provision and consumption of private tutoring (both supply and demand).

The third type of policy response is based on the idea that the low quality of public schools can be one of the key reasons for the demand for tutoring (Bray and Silova 2006, 13-16). Such efforts as the reduction of student-teacher ratio, better assessment of students and teachers performance and introduction of differential curricula, are one of the examples of policy responses that fit the pattern (Lee et al. 2010, 104).

The last type of policy response aims at providing public alternatives to private supplementary education that can increase learning opportunities of students from disadvantaged backgrounds within the mainstream system. Provision of after-school programs as well as embracing new technologies to boost learning opportunities (e-learning systems, educational broadcasting) are some examples of this type of policy response.

As a result, the combination of these response patterns will be used as criteria for the classification of shadow education regulations in Korea and Japan.

An overall summary of key blocks of the framework that were discussed in this part as well as criteria and sub-criteria can be found below (see Table 2.).

Table 2. Summary of the analytical framework with criteria.

	Key blocks	Criteria	Sub-criteria
CONTEXT What?	Introduction to education systems of South Korea and Japan	Key economic and demographic characteristics	▪ Country profiles. ○ Country facts. ○ Key economic indicators. ○ Key demographic indicators.
		Key educational characteristics	▪ A brief overview of education systems. ▪ Structure of the education systems. ▪ Administration of the education systems. ▪ Key education indicators. ○ Access and participation rates. ○ Financial resources invested. ○ Outcomes of education. ○ Learning environments.
	Context, objectives and structures of shadow education	The emergence of shadow education systems	▪ The development of the demand.
		Scale	▪ Enrolment rates. ▪ Size of private tutoring.
		Mode	▪ Reasons for usage. ▪ Main types of tutoring.
		Intensity	▪ The number of hours received. ▪ Cost of tutoring and subjects.
CONTENT Why?	Impact of shadow education	Economy	▪ Size of the market and household expenditures. ▪ Shadow education and teachers' income.
		Society	▪ Cultural perception of supplementary education. ▪ Inequalities in consumption. ○ Rich vs poor. ○ Gender dimensions. ○ Rural vs urban.
		Education system	▪ Instructional time and teachers performance. ▪ Educational content and pedagogy. ▪ Student learning, achievements and classroom dynamics. ▪ Assessment and selection procedures.
PROCESS How?	Regulations applied	Policies equalising school allocation and regulating resources	▪ Legal acts, normative documents. ▪ School reforms and programs. ▪ Government subsidies and investment.
		Policies limiting private tutoring	
		Policies improving the quality of mainstream education	
		Policies broadening access to supplementary education	

3. Empirical part

3.1. Introduction to education systems of South Korea and Japan

3.1.1. Key economic and demographic characteristics

South Korea

South Korea, (Republic of Korea (ROK)), is a country in East Asia, which is located in the south of the Korean peninsula. It has a land border with North Korea in the north, and it shares maritime borders with Japan and China. Its area is 99.678 km², and it has a highly homogeneous population of 51,6 million inhabitants (OECD 2018). Its capital is Seoul, and other major cities are Busan, Daegu, Daejeon and Gwangju. The official language is Korean. The country does not have a national religion and a uniformity of belief (56,9% (2015 est.) of respondents of a recent survey report no religious affiliation), but such beliefs as shamanism, Buddhism, Confucianism and a relatively recently introduced Christianity (late 18 century) played a significant role in its sociocultural development. After a couple of decades of rapid urbanization, 81,5% of the Korean population is located in urban areas, and 18,5% in rural (World Bank 2008; CIA 2020).

The country has experienced rapid economic growth since the 1960s, emerging from a poor agrarian country into one of the world's industrialized countries. According to OECD, Korea is considered as an advanced economy with a GDP of 1,6 trillion USD (2,06 trillion USD PPP) and GDP per capita of 31,380 USD. Country's inflation rate is 0,5% (OECD 2008). The bigger part of GDP comes from the service sector (58,3%), 39,3% from industry and 2,2% from agriculture (2017 est.) (CIA 2020, est.).

Korea's unemployment rate is 3,8% of its population. Its total poverty rate is 0,17 (the ratio of the number of people, whose income falls below the poverty line) and the poverty rate of elderly is 0,44 what is remarkably higher, compared to other OECD countries (OECD 2017). The poverty gap (the ratio by which the mean income of the poor falls below the poverty line) is 0,355. Gini coefficient of Korea is 0,35, which reflects inequalities in the income distribution.

Korea is one of the world's fastest ageing countries. The share of the working-age population in the total population is 72,8 % (aged 15 to 64). The share of young people is 12,9% (aged below 15) and of the elderly is 14,29% (aged above 64) (OECD 2018). Age dependency ratio is 37,7% from which 17,9% is for young people, and 19,8 % is for the elderly. Korea's rapid ageing trend is also closely related to its decreasing birthrate. Korea's fertility rate of 0,977 (births per woman) makes it the only country with a rate below 1 (World Bank 2018). If these trends

remain, the % of the working-age population will likely decrease by 49,7% in 2060 (KOSTAT projection 2011).

The summary of key economic and demographic indicators can be found below (Table 3).

Japan

Japan is an island country in East Asia in the North Pacific Ocean. Its main islands are Hokkaido, Honshu, Shikoku, and Kyushu (from north to south). The country shares maritime borders with China, South Korea, North Korea, the Philippines, Russia, and Taiwan. Its area is 377,915 km², and it has a highly homogeneous population of 126,5 million inhabitants (2018). Its capital is Tokyo, and other major cities are Fukuoka, Fukushima, Kobe, Kyoto, Nagoya, Osaka, Sapporo, Sendai, and Yokohama. The official language is Japanese. There is no state religion in Japan as well as a single dominant one, however 70.4% of population show affiliation to Shintoism and 69.8% to Buddhism (some practice both at the same time), whereas 1,5% practice Christianity and 6.9% have other beliefs (CIA 2020 (2017 est.)). Shintoism and Buddhism had a significant role in the cultural development of a country. The majority of the population (91,6%) is concentrated the urban zones and 8,4% in rural (World Bank 2018).

Japan is remarkable for its rapid economic growth after World War II. Its GDP of 4,97 trillion USD (5,2 trillion USD PPP) makes it the third-largest economy in the world after the USA and China. The country belongs to the high-income group with GDP per capita of 39.290 current USD. The inflation rate is 0,5 (OECD 2008). The bigger part of Japan's GDP comes from the service sector (68.7%), 30,31% from industry and 1,1% from agriculture (CIA 2020 (2017 est.)).

The country's unemployment rate is 2,5% of its population. Its total poverty rate is 0,157, and its gap is 0,337. Gini coefficient is 0,34 (OECD, 2015).

Considering demography, we can see that the first notable aspect is Japan's ageing population. However, compared to the case of Korea above, the imbalance between young and elderly is even bigger (NIPSSR 2010). The working-age population is 59,7%. The share of young people is 12,2% and of the elderly is 28,1% (OECD 2018). Age dependency ratio is 67,5% from which 21,4% is for young and 46,1% for elderly. The fertility rate is 1,4, which does not ensure a broadly stable population (World Bank 2018). If the trend is going to continue, projections show that Japan's population will shrink by one third and the proportion of elderly will double to 40% (National Institute of population and social security research 2011).

The summary of key economic and demographic indicators can be found below (Table 3).

Table 3. Summary of key economic and demographic indicators for Japan and Korea.

Source: World Bank, OECD, CIA, Data retrieved on March 1, 2020.

Key economic and demographic indicators	Japan	Korea
	2018	2018
GDP (trillion USD, current)	4,97	1,6
GDP (PPP, current USD)	5,2	2,05
GDP (Annual % change)	0.8%	2,7%
GDP per Capita (USD, current)	39.290 USD	31.380 USD
Household disposable income (per capita, gross adjusted, USD, current)	29.756 USD	25.530 USD
GDP by sector (%)	Service - 68,6%; Industry - 30,3%; Agriculture - 1,1% (2017 est.)	Service - 58,4%; Industry - 39,4%; Agriculture - 2,2% (2017 est.)
Inflation Rate (%)	0,98%	0,5%
Total population (million)	126,5	51,6
Urban/rural (%) of total population	91,6% – urban; 8,4% - rural	81,5% – urban; 18,5% - rural
Working age population	59,7%	72,8 %
Age dependency ratio	Young - 21,4%; Elderly - 46,1%	Young - 12,9%; Elderly - 14,29%
Fertility rate	1,4	0,97
Unemployment (% of total labor force) (national estimate)	2,5%	3,8%
Poverty rate	0,157	0,44
Poverty gap	0,337	0,355
Gini coefficient	0,34	0,35

Having made a brief overview of the economic and demographic conditions of Japan and Korea, let us move on and examine how the education systems of both countries are structured. Here we are going to briefly look at the development of the education system and at key policy

targets that both governments have today. Furthermore, we are going to look at the regulation of the education system, at its structure and at key educational indicators.

3.1.2. Key educational characteristics

South Korea

Brief overview

The modern Korean education system was established after 1945 when the country was liberated from Japanese rule. A single-track 6-3-3-4 system (six years of primary, three years of junior secondary, three years of senior secondary and four years of tertiary education) was introduced by the Education Law with the first nine years of compulsory education (MEST 2020).

After the Korean war (in the 60s and 70s), the efforts to further standardize the curriculum, textbooks and admission systems continued. The focus was also put on the quantitative expansion of education. The number of the student population, education facilities, and the number of teachers increased dramatically, what caused the next wave of regulations that focused on the improvement of teachers education and on the restructuring of admission systems (MEST 2020).

The period of 1980s was marked by the efforts to improve the qualitative characteristics of the education sector. Life-long education and the emphasis on raising wholesome citizens of society were the targets of education reforms. The Commission for Educational Reform, as well as the Advisory Council for Educational Policy for the Minister of Education, were established to pursue these goals (MEST 2020).

Finally, the period from the 1990s until now is marked by governments emphasis on the provision of education without discrimination and according to the principles of meritocracy (MEST 2020).

The current declared general principles and goal of Korean ministry of education is *"to create an education system that cherishes the great value of cooperation and co-existence while focusing on promoting comprehensive growth of students [and to provide] personalized education to students to meet the demands of their different life cycles, while respecting their unique aptitudes and capacities"* (MEST 2020). Key policy directions are:

- *"Happy Education for All Students"* and *"Safe School Environment"* that focus on students' well-being, especially targeting the issue of "examination hell", stressful learning environments and juvenile delinquency.

- *"Raising Intelligent Learners for Society"* that focuses on reforms aiming to fit demands of the country's economy and society.
- *"Education that Leaves No Child Behind"* that targets equality in educational opportunities.
- *"Korean Education that Harmonizes with the World"* that is focused on international cooperation (MEST 2020).

The Korean government has a special focus to further improve the equity of educational opportunities by developing policies that target low-income households. Due to the substantial importance that society puts on education attainment and on admission to top universities, there is a strong demand for shadow education institutions (including *hagwon*). Having recognized such demand, the government aims at equalizing education delivery, releasing financial burden from households and improving the educational environment (OECD 2016, 4).

Administration of the education system

The management of the Korean education system is carried out by three authorities. At a national level, it is regulated by the Ministry of Education. Provincial and municipal levels are managed by Offices of Education, and local Offices of Education act on the county level. These authorities directly supervise primary and middle schools (MEST 2020).

The Ministry of Education, Science and Technology (MEST) is the central authority that defines educational policies on the national level in close cooperation with other ministries. It also guides and consults other educational entities at the local level. In order to protect educational autonomy, MEST determines primary goals and contents of education at the high level and issues the framework within which schools organize and implement the curriculum on their own (UNESCO 2011a).

Offices of Education are in charge of issuing rules and regulations regarding budget planning, and they also manage the school curriculum, school facilities and equipment (MEST 2020).

Public and private schools also have a School Council that is established to reassure schools' autonomy and to maximize community participation in it (MEST 2020).

In order to decentralize the regulation of education system, several separate bodies were founded that are not directly supervised by MEST. For example, the university admission system is regulated by the Korean Council for University Education; information communications

technology solutions are provided by the Korea Education and Research Information Service (KERIS). Additionally, several institutes operate in Korea, which supports policy development with their research. Among them: Korean Educational Development Institute (KEDI); Korea Institute of Curriculum and Evaluation (KICE), which supervises College Scholastic Ability Test (CSAT) and develops other national tests; and the National Institute for Lifelong Education (NILE) (UNESCO 2011a).

In addition to MEST, the Ministry of Finance and Economy (MOFE), the Ministry of Labor (MOL) and The Ministry of Health and Welfare are also involved into the policy formulation, concerning human resource development (UNESCO 2011a).

Structure of the education system

The detailed graphical representation of the current structure of the Korean education system can be found in Appendix 1, Figure 15.

Pre-school education is not compulsory and is designed for children aged 3 to 5. The state is willing to expand free kindergarten education as well.

Primary school is free, compulsory and lasts six years.

Middle school is free and compulsory, and high schools are partially free. Students, living in rural areas and that fit the requirements that are specified under the Special Education Promotion Act can receive free high education. From 2021, high schools will be entirely made free of charge (The Korea Times 2019). Primary school graduates are randomly allocated to schools based on their area of residence. This "lottery method" is applied to both public and private schools. Lower secondary school lasts for three years, and the admission to upper secondary school is based on the results of a highly competitive entrance examination. Graduates of upper secondary school must sit the entrance examination (College Scholastic Aptitude Test, introduced in 2004) for entering higher education. College Scholastic Aptitude Test is one of the most critical transition points for students entering universities in Korea (UNESCO 2011a).

Higher education is offered by universities, colleges, and research and other higher education institutions. Typically, the University bachelor's degree lasts for four years, masters for two years and doctoral at least three years (UNESCO 2011a).

Key educational characteristics

Korea is the top-performing country in PISA (OECD's Programme for International Student Assessment) with the highest proportion of young people (25-34-year-old) who have completed secondary and tertiary education (70% (75,7% women; 64,1% are men)) (OECD 2018). 2020a

Net enrolment rates are high: 97% for primary schools, 98% for secondary schools with no major gender differences (UNESCO 2017). Gross enrolment rate to tertiary education is (estimation) 95,35% (World Bank, 2017) with the biggest % of graduates in engineering (20,3%), arts (16%), health (15,5%) and business (15,1%) (OECD 2015).

Public spending on education in Korea is 4,2% of GDP, and the country is in the leading positions for private spending on education which is 1,67% of GDP. Korea has one of the highest levels of household spending on tertiary education, which is 45,4% of total education spending (OECD 2015).

Teachers salary is about 56,5 thousand USD (OECD 2018). Student per-teacher ratio is 13,5 for secondary school (OECD 2018).

According to PISA, students in Korea show the second-highest scores in mathematics, forth result in science and fifth in reading (OECD 2018).

The summary of key educational indicators can be found below (see Table 4).

Japan

Brief overview

The modern education system of Japan dates back to the promulgation of the school system in 1872. After the World War II, the reform of education under the alleged Occupation resulted in the Fundamental Law of Education, which established the 6-3-3-4-year system of school education (six years of elementary, three years of middle school, three years of high school and four years of higher education). The reform included the restructuring of the curriculum, textbook revision and the formation of teachers unions (MEXT 2019a).

In 1950s modern system of upper secondary schools, universities, junior colleges and colleges of technology were established. This period was also marked by the promotion of technical and science education. Furthermore, the government introduced a free distribution of textbooks at a compulsory level (MEXT 2019a).

The 1960s were marked by the quantitative expansion of education, both in terms of a number of institutions, personnel and students whereas 1970s and 80s are notable as a period of the qualitative reform attempt (MEXT 2019a).

General principles of the current policy direction of Japan are stated in Chapter 1 of the Basic Act of Education 2006. The aim of education is to *"develop the individual character... cultivate people that are sound in mind and body... with the qualities that are necessary [for] a peaceful and democratic nation and society"* (Basic Act of Education, 2006, Article 1). Articles 3 and 4 also specify that the goal of the policy development is to provide the citizens with an opportunity to continue learning throughout their lives – *The concept of lifelong learning*; and to have an *Equal opportunity in education* based on the principles of meritocracy (Basic Act of Education, 2006). (See Appendix 2, Japan)

Administration of the education system

The central regulator of the education sector is the Ministry of Education, Culture, Sports, Science and Technology (MEXT). The institution has an authority to develop education policy, national curriculum, school materials etc. (MEXT 2019a).

Schools, national universities and colleges are operated autonomously with guidance and directions from MEXT. Prefectural Board of Education and Municipal Board of Education act as a central authority in the prefecture, which is responsible for administration and management of all institutions, related to education (UNESCO 2011b).

The system also has a number of advisory bodies that support MEXT in the process of policy development. Among those are the Central Council of Education, the University Council and the Lifelong Learning Council as well as research institutions such as The National Institute for Educational Policy Research (NIER) (UNESCO 2011b).

The National Center for University Entrance Examinations, under the control of MEXT, is an independent administrative institution that is responsible for the National Center Test.

The Japan Scholarship Foundation and Japan Private School Promotion Foundations aim at providing scholarships and loans for best performers with difficult socioeconomic conditions (UNESCO 2011b).

Structure of the education system

The detailed graphical representation of the current structure of the Japanese education system can be found in Appendix 1, Figure 16.

Pre-school education is not compulsory; it is mainly provided by private institutions and is designed for children aged from 3-5 years.

First nine years of public education in Japan is free of charge. Primary school is the first compulsory level that lasts for six years.

Lower-secondary education lasts for three years, and it is the last compulsory stage of public schooling. Upon completion, students get their graduation certificate and can sit high school (or college) entrance examinations that last three additional years. After finishing the high school students school certificate of graduation. Further admission to tertiary education depends mainly on the results of entrance examinations, particularly on National Center Test. National Center Test is one of the most important transition points for students entering universities (UNESCO 2011b).

Korean tertiary education includes universities, colleges and other higher education institutions. Like in Korea, the University bachelor's degree lasts for four years, masters for two years and doctoral at least three years (MEXT 2019a).

Key educational characteristics

Japan is one of the top-performing countries in PISA, taking fourth place after Korea, Russia and Canada with 60,7% (64% women; 57,7% men) of young people who have completed secondary and tertiary education (OECD 2018).

Net enrolment rates in Japan are outstanding: 99,96% for primary and lower secondary school, 98,4% for upper secondary school (World Bank 2017). Gross enrolment rate to tertiary is about (estimation) 80%. (Entrich, 2018, p.33) The highest % of graduates from tertiary education are in the field of business (20%), engineering (18,3%), arts (15,1%) and health (15,7%) (OECD 2018).

Public spending on education in Japan is 2,5% of GDP, and private spending on education is 1,14% of GDP. The country has one of the highest levels of household spending on tertiary education among OECD countries, which is 52% of total expenditures on education (OECD 2015).

Teachers salary is about 51,3 thousand USD. Student per-teacher ratio is 12,4 for secondary school (OECD 2018).

According to PISA, students in Japan are the top performers in mathematics and have a second result in science (OECD 2018).

The summary of key educational indicators can be found below (Table 4).

Having made an overview of the education systems of Korea and Japan, let us finally move on to its specific element – supplementary education. Firstly, we will try to understand its development process and to answer the question: “*How did the current demand for private tutoring emerge?*” Afterwards, we will look at current statistics in order to measure (approximately) its scale, intensity and mode.

Table 4. Summary of key educational indicators for Japan and Korea.

Source: OECD 2015, 2018; PISA 2018; World Bank 2017; UNESCO 2017; Entrich 2018. Data retrieved on May 10, 2020.

Key educational indicators	Japan	Korea
	2018	2018
Young people (aged 25-34) that completed education	4 th place among OECD countries. 60,7% (64% women; 57,7% men)	1 st place among OECD countries. 70% (75,7% women; 64,1% men)
Net enrolment rate	99,96% primary school. 98,4% secondary school. (2017)	97% primary school. 98% secondary school. (2017)
Enrolment rate (tertiary, approximation)	80% (2017)	95,35 % (2014)
% of graduates by field	Business (20%), Engineering (18,3%), Arts (15,1%) Health (15,7%)	Engineering (20,3%), Arts (16%), Health (15,5%) Business (15,1%)
Public spending on education (% of GDP)	2,5% (2015)	4,2% (2015)
Private spending on education (% of GDP)	1,14% (2015)	1,67% (2015)
Household spending on tertiary (% of total education spending)	52% (2015)	45,4% (2015)
Average teacher’s salary	51.300 USD	56.000 USD
Student per-teacher ratio	12,4 (secondary school)	13,5 (secondary school)
PISA results	1 st place among OECD countries in mathematics; 2 nd place in science.	2 nd place among OECD countries in mathematics; 4 th place in reading.

3.2. Context, objectives and structures of shadow education

3.2.1. The emergence of modern shadow education systems

South Korea

In order to understand how the demand for extensive tutoring emerged in Korea, we have to take a step back and trace what was happening with the Korean education system after 1945.

When Korea was liberated from Japanese colonial rule, the enrolment rates to primary and secondary school were just around 65% and 25% respectively. Besides, about 40% of primary and 70% of secondary school teachers were of Japanese origin, who returned back to their country after the liberation took place (Kim and Lee 2010, 263). A couple of years later, a number of educational facilities were damaged or destroyed during the Korean War (1950–53). These factors caused quantitative and qualitative problems in the education sector.

In spite of the dramatic lack of recourses and poor economic conditions, the Korean government under Rhee Syngman (1948–60) focused on the restoration of primary school education and its expansion. As a result, the enrollment rate to primary school increased from 1.37 million in 1945 to 4.94 million in 1965, and the number of teachers increased from 20,000 in 1945 to 79,000 in 1965. Due to the emphasis on quantity and the lack of resources, the government had to sacrifice the quality of education. For instance, the teachers' enrollment rate at that time was about 60, and households had to invest in textbooks, supplies for school etc. (Kim and Lee 2010, 264).

After 1961 the government under General Park Chung-Hee has developed a set of policies that initiated successful economic growth. The rising number of elementary school graduates, increasing incomes and after-war baby boom have created a strong demand for secondary education (Kim 2016, 19). At the same time, secondary schools that selected students through competitive entrance examinations were still limited in number. Moreover, certain elementary and secondary schools were assigned an informal "ranking", based on the school's reputation, which leads to an unbalanced selection of students from the elementary level. Because of the increasing number of primary students that were preparing for the entrance to secondary schools, the management of middle schools had to change admission rules around six times every 3–4 years from 1945 to 1968 (Kim 2016, 18). Parents were forced to invest a substantial amount of money in preparing their kids for the examination. That was the point where strong demand for different types of shadow schooling, especially cram schools (*hagwon*) started to multiply across the country. Fierce competition that forced students to study over time and to use extra education

options was often called "examination hell". The government made a decision to implement the school equalization policy as a reaction to these problems (1969-1971) (Kim and Lee 2010, 264).

The equalization policy fully eliminated entrance examinations to secondary schools. Students were allocated to different public or private schools, depending on their district of residence by lottery providing that they passed elementary school graduation exams. The policy further standardized the curricula in public and private schools, the level of tuition fees and salaries of teachers. Additionally, the equalization policy for high schools was partially implemented in most of the cities (including Seoul and Pusan) (Kim 2016, 20). The elimination of "examination hell" problem and excessive demand for shadow education were primary targets of this equalization policy. However, even though the competition was eliminated between primary, lower secondary and higher secondary levels, it was moved to the last major transitional point in student's life: the entrance to universities, which had a fixed enrolment quota (only about 40% of applicants for the tertiary education could obtain admission. (Kim 2016, 20)) and a strict student selection procedure. Despite the expectations, the shadow education industry still continued its rise. According to Kim, around 90% of middle school students received private tutoring for four hours a day in the mid-1970s (Kim and Lee 2010, 265; Kim 2016, 20). In 1960s first early forms of College Scholastic Ability Test (CSAT) started to emerge, standardizing admission procedures to national universities, making more high school graduates eligible for the admission, what fueled the competition and demand for tutoring.

In 1980, the government of General Chun Doo-Hwan made a radical decision to ban all major forms of private tutoring. Additionally, the government allowed universities to increase their enrolment quota. However, the combination of the lottery system that was introduced previously, the radical ban of private tutoring and the strict standardization of the curriculum caused a dramatic deterioration of the quality of public education. Due to the ban on private tutoring, it is hard to obtain precise data on the number of shadow education entities. Nevertheless, it is believed, that despite the increase in university enrolment opportunities and the strict ban of private tutoring, it continued to exist, since the measure was very unpopular among parents and students (Kim and Lee 2010, 265). The shadow education went even deeper into shadow, creating a black market for private tutoring with high fees (Kim 2016, 23).

In 1998, the democratic government led by President Kim Young-Sam relaxed this ban significantly. In 2000 the ban was considered unconstitutional since it limits the freedom of students to pursue their careers, their right for free expression, and the right for self-education

(Kim 2016, 27). A new policy allowed two types of private tutoring: *hagwon* and private tutoring by university students. However, several strict regulations remained. For example, school teachers are not allowed to give private lessons, and *hagwon* teachers are not allowed to give private lessons outside *hagwon*. Furthermore, in order to establish *hagwon*, an individual needs a special permit from the government and has to follow its guidelines on required academic qualifications, levels of tuition fee, operation hours and physical requirements (Kim and Lee 2010, 265; Korea 2019a). Additionally, despite allowing shadow schooling, the government tried to limit the demand for it by standardizing the admission system to higher education through the introduction of CSAT (first modern version established in 1993). In contrast to previous assessment that had two key subjects (Korean language and math) and often an additional university entrance exam, this test increased the number of subjects that student can choose to pass (and its variation) and made it the major acceptance criteria for the university enrolment. Ideally, public school curriculum was thought to be enough for the successful pass of this standardized exam, which should have decreased the demand for shadow schooling (Kim 2016, 26). In reality, CSAT made *hagwons* even more successful, since the nature of the test required cramming approaches and intense memorization of the material.

After 1998, a large number of different types of academic *hagwons* developed, in response to the personalized demands of students and their parents. Furthermore, the introduction of special-purpose high schools (SPHSs) and independent high schools (IHSs) (since the 2000s) that target specific academic areas caused an extra demand for *hagwon* among elementary and middle school kids. (Kim 2016, 28). Also these days, *the hagwon* and shadow education industry keep growing further (Choi and Cho 2016, 618).

Japan

The development of the current shadow education sector in Japan has different features, compared to Korea. Firstly, it emerged later than in Korea (in the 1970s) (Aurini et al. 2013, 5). Secondly, it is harder to trace the milestones of its development, since Japanese government, compared to Korean, never addressed shadow education sector with such direct regulations, taking a "laissez-faire" (or indirect approaches) in its regulation (Bray and Lykins 2012, 67). The issue of *juku* proliferation in its connection to the "examination hell" problem, was addressed by Prime Minister Nakasone and MEXT in the early 1980s, but it never resulted in direct policies that target shadow education (JIKA 2004, 31).

The post-war period was marked by the rapid quantitative expansion of education. By 1950s, primary and secondary school enrollment rate reached 99%. Enrollment rate to upper secondary schools rose from 42,5% in 1950 to 82,1% in 1970 (JICA 2004, 29). Additionally, there was a strikingly high expansion of the tertiary education sector in from the 1960s (colleges) and 1970s and 80s universities. The enrollment rate to higher education rose from 10% in 1954 to 37% in 1980 and proportion of women receiving higher education became higher (15.3% of male, 4.6% of female in 1954 vs 41.3% of male and 33.7% of female in 1980) (JICA 2004, 30).

Government standardization of university entrance examinations in the 1970s created as a single most important transition point to higher education. In the 1990s the system became even more standardized, since not only national (as it was in 1970s and 80s), but also private universities started to accept the standardized test as a main criterion for the enrolment (Mori and Baker 2009, 42; Entrich 2018, 38). Before the 1970s, a very few *juku* institutions existed (Aurini et al. 2013, 5-6). After the 1970s, rapid massification of education described above, the fast growth of household income, switch from the traditional type of families to nuclear, and quantitative expansion of education opportunities led to fierce competition among students to enter best-ranked schools, top colleges and universities. Moreover, after the standardization of university exams in the 1970s, the majority of students became eligible for tertiary education, but the quota in colleges and universities was still incomparable to the number of graduates, what further intensified competition. Additionally, the cultural emphasis on educational attainment, combined with multiple transition points between school levels forced parents to invest in supplementary education for their children. That was when "*juku*-boom" started (Rohlen, 1980, 224).

In the 1980s some *jukus* started to turn into big franchise-based corporations. Despite the economic depression that in the late 1980s, the students' demand for university education increased dramatically, and so did the shadow education industry (Entrich 2018, 33). In 1988 the Ministry of International Trade and Industry started to regulate the industry and the Ministry of Education to monitor it. In the 1990s and 2000s, high demand for *juku* and strong competition created a variety of customized shadow education services that match the individual needs of students (Mori and Baker 2009, 42-44; Aurini et al. 2013, 5-6).

Having understood the development path of shadow education sector in Korea and Japan, we move to the next parts of the Context analysis – the assessment of the current status of

shadow education in both countries. Before carrying on, certain limitations have to be mentioned. The nature of the sector (shadow sector) and the limited number of existing research with varied methodologies do not allow us to make precise conclusions on the size of the sector and the enrolment rates. Some scholars address primary education, others secondary. Some of them use larger databases, and others rely on smaller. Some scholars have a precise definition of shadow schooling, others less distinct. The only partial exception is the data for Korean shadow education sector. The fact that it was heavily regulated and measured by the authorities makes it possible to retrieve more or less reliable data from the official source (e.g. Statistics Korea (KOSIS)). Nevertheless, unreported tutoring activities will remain in the shadow. Concerning Japan, even though we cannot put all the existing data on one scale, there is still a possibility to theorize on the intensity of the demand for the shadow schooling by aggregating and comparing available data.

3.2.2. Scale

South Korea

Enrollment rates

According to KOSIS (2020), the total average participation rate for shadow education in all school levels is 74,8%. For students living in large cities, the rate is 77% (see Figure 2).

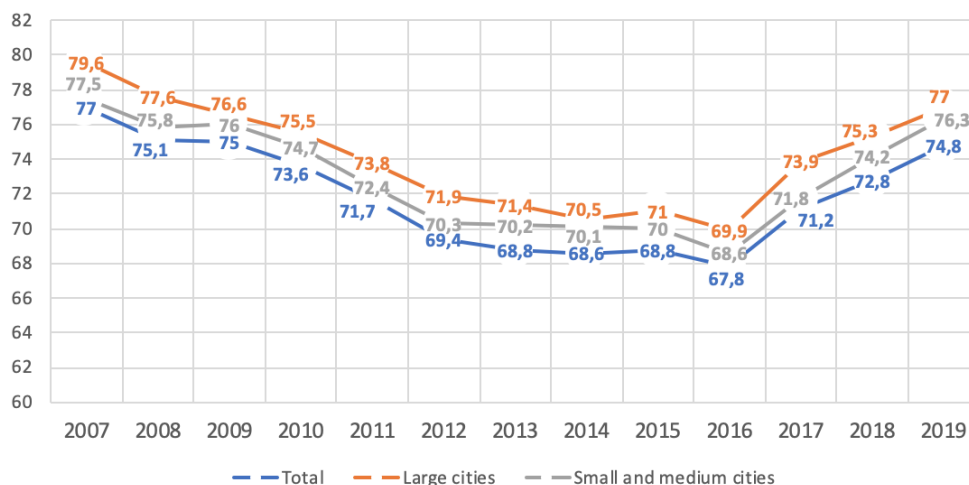


Figure 2. Total participation rates in shadow education, % of students (all school levels), 2007 – 2019, Korea.

Source: KOSIS, Private Education Expenditures Survey. Data retrieved on May 15, 2020.

There was a 10% drop in the average participation rate from 2007 to 2016. However, the rate started to go up again, almost reaching the level of the year 2008. The similar tendency exists

in participation rates of elementary school children, whereas rates for middle and high school kids remained roughly the same from 2007 to 2019. The difference between participation rates in larger and smaller cities have been around 1-2% through the whole reviewed period.

One can see significant differences in participation, depending on the level of education (see Appendix 1, Figures 17, 18 and 19). In 2019, 83,5% of elementary school children consumed some sort of private tutoring. Among them, 57,9% have used it to learn subjects that are taught in the general school curriculum. For middle school, the total rate is 71,4% and 61,8% for school subjects. Finally, 67,9% of high school students use shadow schooling, and 57,8% attend those that offer lessons based on the school curriculum.

There is no significant difference in the enrolment rates based on gender.

Size of private tutoring

Since there is no publicly available data on the number of *hagwon* from the government, we can make only rough estimations of the number of private institutions.

Kim and Lee (2010) claim that in 2007 there were about 24.000 *hagwons* that provided lessons in non-academic subjects and 31.000 *hagwons* teaching school-related material (55.000 in total) (Kim and Lee 2010, 266). OECD's estimation of the number of *hagwon* institutions is about 100.000 (academic and non-academic) for the year 2012 (OECD 2014a). According to the estimation made by Kim (2016), in 2014, there were 69.678 *hagwons* (academic and non-academic), in which about 7.193.705 of students were taught throughout the year by 277.028 *hagwon* instructors (Kim 2016, 186).

Since the data above concerns only *hagwon*, one can only theorize about the number of other types of private tutoring. KOSIS data for 2017 shows that on average, 36,4% of all students from elementary to high school attended *hagwon*, and 15,8% also practised different modes of one-to-one tutoring, group tutoring and internet tutoring. (Respondents that took part in the survey were able to choose more than one type of shadow schooling that they attend.) According to the World Bank, the total number of primary and secondary students in Korea in 2017 was around 5,8 million (World Bank, 2020). That means that around 900 thousand students consumed non-*hagwon* shadow schooling (one-on-one tutoring, group tutoring, internet courses etc.)

Japan

Enrollment rates

According to the Ministry of Education (MEXT) research in 2007, on average, 81,6% of elementary school students and 75,9% of middle school students participated in some kind of shadow education (See Figure 3).

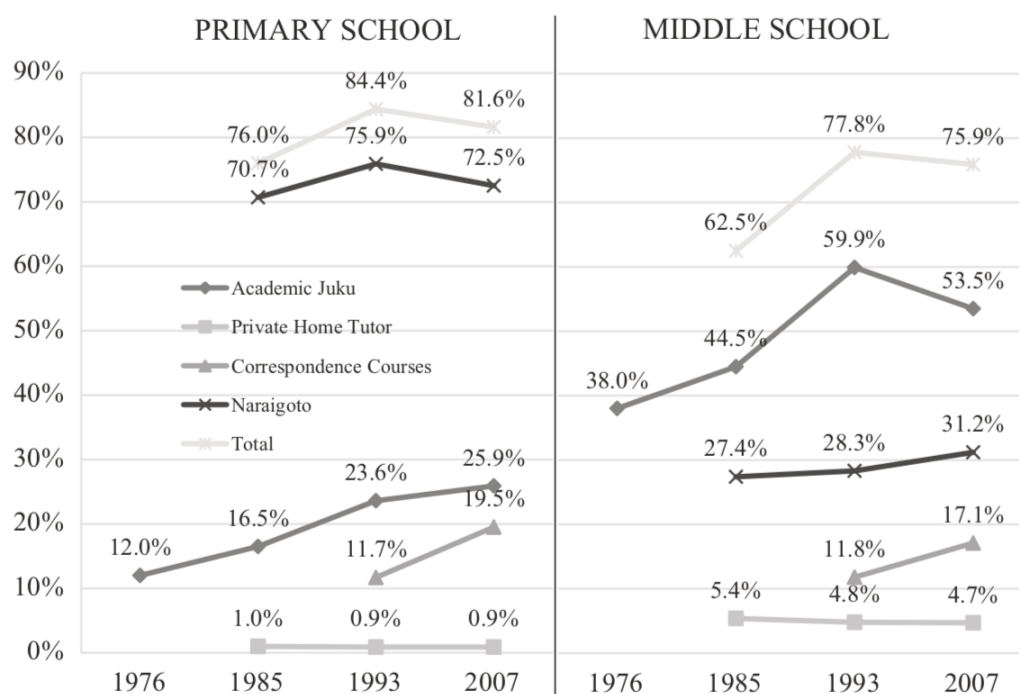


Figure 3. Enrollment in supplementary tutoring by type, elementary and middle school, 1976-2007, Japan. Source: MEXT 2007; in Enrich 2018, 66.

Unfortunately, MEXT did not include high school students in their research and did not provide more granule data for private tutoring (statistics includes all kinds of tutoring from arts and music (hobby-related) to math and English (school-related)). Furthermore, it includes *naraigoto* – any kind of fee-based extracurricular activities that students practice inside the public school. However, since the nature of academic *juku* has a direct relation to school subjects and examinations, we can suggest that in 2007 at least 25,9% of elementary school students and 53,5% of middle school students were consuming some kind of academic tutoring services. Later research by MEXT in 2013 highlights that the average attendance rate to *juku* increased for elementary school students (from 25,9% in 2007 to 49,7% in 2013) and middle school students (from 53,5% in 2007 to 60% in 2013) (MEXT 2013; in Mawer 2015, 132).

The Benesse Educational Research and Development Institute (BRET) has been monitoring Japanese shadow education since 2009. The latest data for 2017 suggest that on average ca. 47% of students of all schools levels were participating in some kind of

supplementary education for academic purposes outside their homes (class-room style, such as *juku*) (see Figure 4).

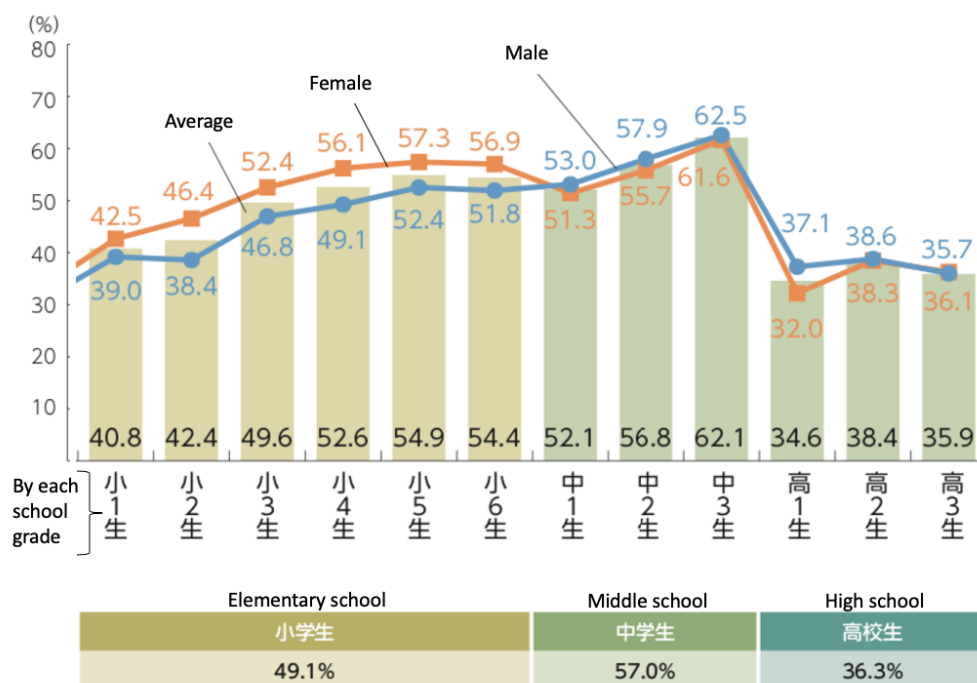


Figure 4. Participation in fee-based tutoring for academic subjects in 2017, Japan.
Source: BERD 2017, 7; (The graph was visually modified to fit the purpose of the research.)

On average, 49,1% of elementary, 57% of middle school and 36,3% of high school students used some kind of extra tutoring, which is compatible with MEXT data for 2013. The number of participants from high schools shows a significant drop. BRED's research for 2009, 2013 and 2017 did not show significant changes in the participation rates (BRET 2017, 11). Research of the participation in shadow schooling by Entrich (2018) shows similar to BRED's and MEXT's data levels of participation, however, he showed significantly higher rates for middle school children from 2006 to 2008 – 72,5% (academic *juku*) (Entrich 2018, 93).

Size of private tutoring

According to BERD, there were approximately 50.000 *juku* in 2007 in Japan, with ~280.500 employees, which is comparable with the number of teachers in middle or high schools (BERD 2007; in Entrich 2018, 49). Same estimations regarding the number of institutions are made by Dirkens (2010) and OECD (2014a). Using MEXT statistics for 2007 for the number of elementary and middle school students (10.747.426 of students) and MEXT data on participation

in *juku*, we can estimate that roughly 3.8 million students consumed *juku* services in 2007 (MEXT 2020).

3.2.3. Mode

South Korea

Reasons for usage

KOSIS data (survey respondents had an option to select more than one reason for participation) suggests that in 2019 the prevailing reason why students use supplementary tutoring is remedial (about 85% of students have stated this reason) (see Figure 5).

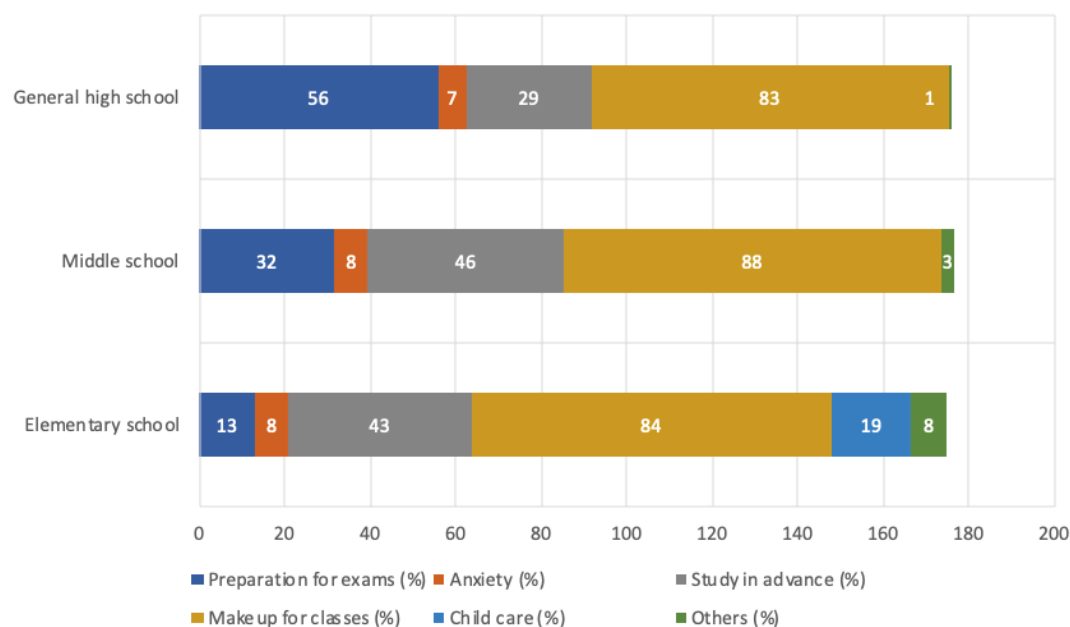


Figure 5. Reasons for participation in shadow education by school level, %, 2019, Korea.
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 15, 2020.

Nevertheless, the competition seems to play an important role as well, since 43% of primary and 46% of middle school children used shadow education to study in advance and 56% of high school students to prepare for exams. As students go higher up the education ladder, the preparation for exams becomes more important. Finally, in the elementary level, such reason as “child care” (~20%) appears, which is not reported in higher stages of schooling. Here the tutoring might have the role of a child-minding agent, that was mentioned by Bray and Lykins (2012) (10).

Baker et al. (2001) theorized that Korean national strategy motivating shadow education consumption is for purely enrichment purposes, meaning that students “*tend to use shadow education for strategic advantages in future educational contests*” (Baker et al. 2001, 6). The data

gathered by KOSIS more than 18 years later suggests that the current mode of usage is rather mixed (remedial and enrichment) than solely competitive, but the latter reason indeed seems to play a crucial role for Korean students (Kim 2016). For instance, 61% of top performers in school used tutoring for the preparation for exams and, 27,5% of them mentioned studying in advance among the main reasons for usage (KOSIS 2020).

Main types of tutoring

Based on existing research, we can identify the following key types Korean shadow education industry:

- *Hagwon*. These are business organizations that offer education services.
- *One-on-one tutoring*. Classical type of tutoring, provided by individuals.
- *Group tutoring*. The same type of tutoring, but delivered for bigger groups. (Often cheaper than the previous option.)
- *Textbooks with tutors visit*. Same as one-on-one tutoring, which focuses more on the support of the learning process, rather than on comprehensive teaching. (Often provided by high-school and university students).
- *Internet-based courses/correspondence lectures etc.* Provided by physical hagwons or by purely online companies (Lee et al. 2010; Kim 2016; KOSIS 2020).

KOSIS (2020) reported that in 2019 on average, 57,7% of students of all school levels participated in some type of private academic tutoring (see Figure 6).

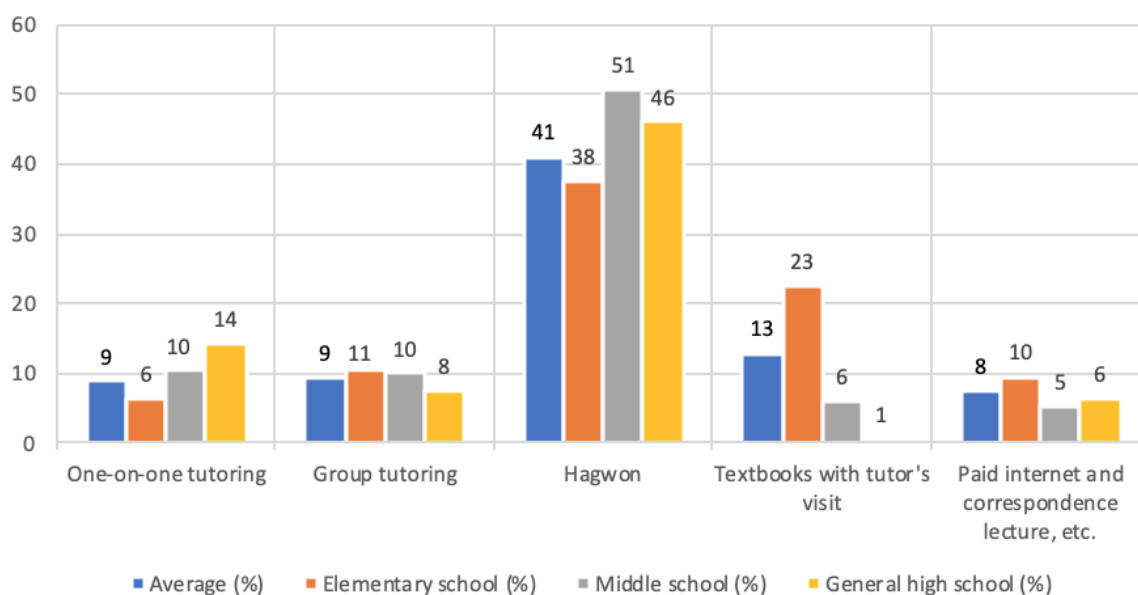


Figure 6. Average participation rate by school level and type of tutoring in shadow education, %, 2019, Korea.

Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 20, 2020.

Among those students, 41% of them responded that they used at least *hagwon*. These rates get even higher (51%) in high school.

Hagwon, as the common shadow education entity, exists in different types, providing service for different needs of students. Kim (2016) outlined three key types of hagwon that are related to specific subjects taught in school (Kim 2016, 33). These are key areas that are necessary for graduate examinations, including those required for tertiary education:

- English language *hagwons*. English language proficiency is an essential criterion for the admission to the majority of top special purpose schools and for getting a good score for CSAT in order to be admitted to the top universities. These type of hagwon exists for all school levels, from elementary to middle school and are usually quite expensive (tuition fees can reach 1.500-2.000 USD for a course) (Kim 2016, 34).
- Math *hagwons*. Similarly to English *hagwon*, the primary purpose of math *hagwon* is to increase school scores and to prepare for entrance examinations, especially for CSAT (Kim 2016, 36).
- Logical writing *hagwon*. Finally, there types of hagwon that prepare for the third main pillar of CSAT – Logical writing, which was introduced in 1993 in order to allow students to show their personal and critical thinking abilities. The general cost for a month is about 2.000 USD (Kim 2016, 38).

There are also comprehensive hagwons, which are more similar to the usual school, offering a range of subjects to students. They use students' academic records in order to determine areas of subject focus.

Two more types of *hagwon* are focused on students that have higher potential and which aim to apply for prestigious universities. Usually, they offer more advanced materials that are not adequately taught in public schools:

- Special Purpose High School *hagwons*. These *hagwons* prepare students to enter top elite high schools in Korea, which are only of a very limited number due to school equalization policy (will be discussed in detail later). In 2016 there were 27 science schools, 31 foreign language schools and six international schools in Korea (Kim 2016, 42).
- *Hagwons* for gifted students. These hagwons are partially similar to Japanese *shingaku juku* (will be discussed later). In order to attend this type of *hagwon*, students are required to pass demanding entrance examinations. However, compared to *shingaku juku*, which

support fierce competition and stimulate intensive cramming methods, *hagwons* for gifted students offer highly flexible, individual and in-depth studies, but yet very demanding in terms of workload (Kim 2016, 44).

Additionally, there is a special type that is called: boarding *hagwon* (the analogue of Japanese *yobiko*). This is a particular type of highly intensive in terms of content cramming school that prepares student only for specific examinations. (Mostly for CSAT – the major admission test for tertiary level.) That type is often used by students that failed to enrol into prestigious universities of their choices.

Finally, the last type of *hagwon* is internet-based courses, which Kim includes in his classification.

Kim (2016) argues that the reason why hagwon business expands, slowly eliminating traditional forms of tutoring (such as one-on-one free-lance tutoring), because high demand and supply of these services creates highly customized services that match individual needs of students (Kim 2016, 31).

Japan

Reasons for usage

According to MEXT, the most common reason for elementary and middle school students to attend *juku* was remedial. More than half of respondents said that they attend *jukus* to make up for their lessons in public schools or because they are better taught there. One more important reason for attendance is socialization: almost 50% of middle school students replied that they go to *juku* because they meet their friends there. Interestingly enough, the data suggest that competition for better school performance is not the main reason to attend *juku* (at least in 2007, based on this survey), what can be interpreted as contrasting with Korean data³ (see Figure 7).

Parents gave the following reasons why they send their children to *juku* (multiple responses were possible):

- One-third of them stated that school lessons are not enough to prepare for exams.
- More than 30% also mentioned that their children simply want to go there.
- Another third replied that *juku* is used as a child-minding agent.

³ If we theorize that "Study in advance" in Korean survey (KOSIS 2020) and "Achieving higher grades" in Japanese survey (MEXT) can be comparable in terms of measuring the level of students' competitiveness.

The last point is interesting, since even parents of middle school kids gave it as a valid reason for the attendance, what contrasts with Korean data, according to which this motive is present only in relation to elementary school kids. In 2008, another MEXT survey showed that 66,5% of parents send their children to *juku* due to insecurity that they have if they send them only to public school (MEXT 2008; in Dawson 2010, 17).

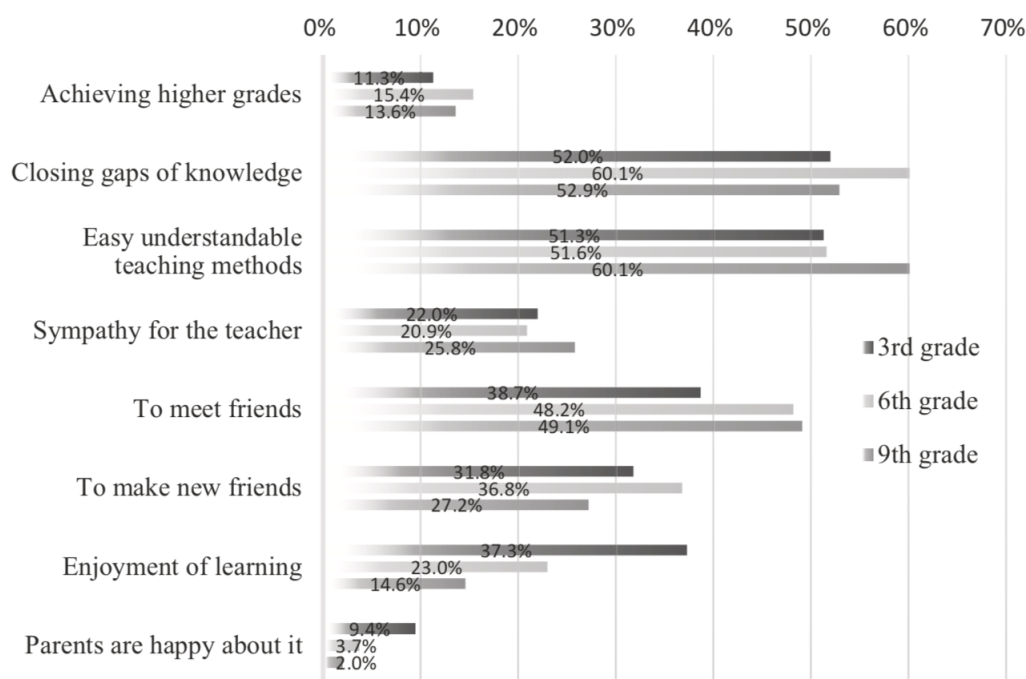


Figure 7. Reasons for attending *juku*, 2007, Japan.
Source: MEXT 2007; in Entrich 2018, 56.

Nevertheless, here we have to be careful with our assumptions, since the results, published by MEXT, concern all kinds of *juku* business (both academic and non-academic *juku*). For instance, results of BERD for 2017 indicate that 32% of middle school students and 20% of high school students who attend *juku*, visit it with an aim to cram for graduation exams (BERD 2017). The very similar result was obtained by Entrich (2018) for high school students – 22% (Entrich 2018, 98).

Main types of tutoring

One can identify the following major types of shadow education entities, that are most often identified by scholars and MEXT:

- *Juku*. Business organizations that offer education services. (Analogue of Korean *hagwon*)
- Private tutoring. Provided by solo tutors.

- Correspondence courses/internet courses. Internet-based supplementary courses (previously practised via post) (Roesgaard 2006; MEXT 2007; Entrich 2018, 10).

So far, the most comprehensive systematization of *juku* types was accomplished by Roesgaard (2006). She identified four key types of *juku*:

- Cram schools for exam preparation (*shingaku juku*). This type of *juku* often has its own entrance exams, and it usually provides services to students that already have a high level of performance. *Shingaku juku* exist specifically for the preparation for the entrance to specific high schools, universities and colleges and are usually the most expensive type of *juku*. The main audience is middle school and high school students. This type of *juku* provides students with its own teaching materials, maintains strict discipline and has a competitive atmosphere. High admission records of their clients to the top universities are the goals *shingaku jukus* are aiming at (Roesgaard 2006, 35).
- *Jukus* for the remedial purpose (*hoshu juku*). This type of *juku* offers services to students that have average or below-average performance and need assistance. Compared to *shingaku juku*, *hoshu jukus* help students to prepare their homework and to practice material that is not clear for them. The goal of these institutions is to improve school grades of students. There are even cases reported of cooperation between some *hoshu jukus* and public schools when the teacher advises low-achievers to attend *hoshu juku*, and tutors advise students to go to specific public schools (Roesgaard 2006, 37).
- Cram schools that focus on drills in the basics academic skills. (*doriru juku*). This type of *juku* resembles *hoshu juku* but has different features and uses mainly cramming approaches. *Doriru juku* is seen mainly as a supplement to public schools and does not force students to cram for specific exams like *shingaku juku* does. Students are usually not separated into different classes by the level but are given their own cramming materials based on personal assessment. There is no lecturing as such, but students can get assistance from the classroom mentor. The biggest *juku* chain enterprises like Kumon, Benesse and Gakken are examples of *doriru jukus* (Roesgaard 2006, 40).
- *Jukus* for poor performers (*kyosai juku*). This type of *juku* is similar to *hoshu juku*, but its main audience is poor performers and children who have behavioural or other problems in school. Classes in these types of *juku* are often very small, and teaching methods are very personal, and materials are selected depending on the needs of a specific child (Roesgaard 2006, 41).

Entrich also added *sogo juku* to this list: a comprehensive type which includes elements of *shingaku* and *hosshu juku*. (*sogo juku*) (Entrich 2018, 97).

Finally, there is one more type of *juku* that is similar to "boarding *hagwon*" in Korea – *yobiko*. These are highly intensive and expensive full-time cramming organizations for high school students that failed to reach their desirable score for a graduation test in the first try but chose to keep on studying to reach their goal (e.g. for National Center Test) (Russel 1997, 153).

As it was discussed in the "*enrolment rates*" section, *juku* takes the substantial part of all out-of-school shadow education activities of elementary and middle school children. (49,7% academic *juku* participation rate for elementary school students and 60% for middle school students in 2013.)

3.2.4. Intensity

South Korea

Number of hours received

According to KOSIS (2020) in 2019, on average students spent 6,5 hours per week for shadow schooling with longer hours for students living in big cities (see Figure 8).

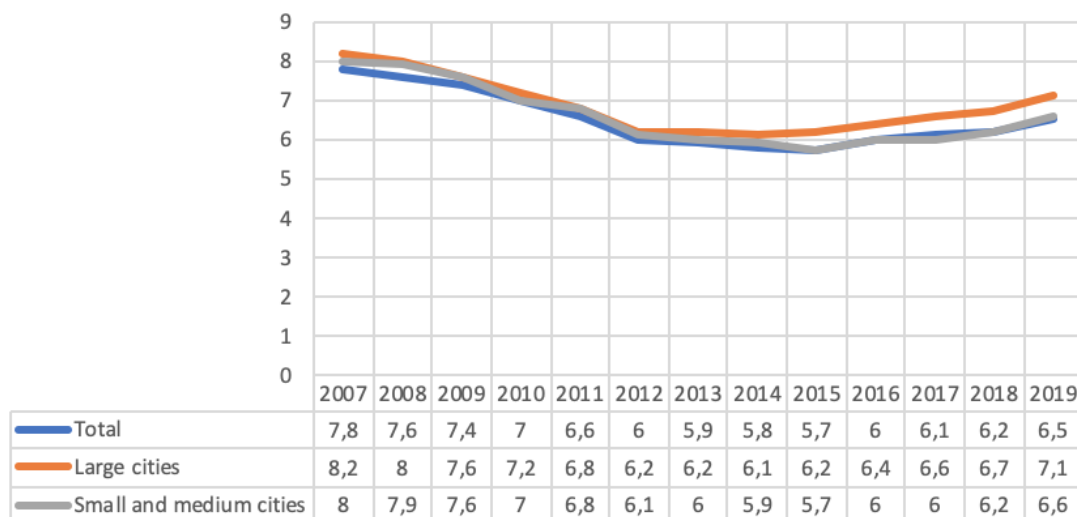


Figure 8. Average time spent on private lessons during a week in hours, 2007 – 2019, Korea.
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 20, 2020.

In Seoul, the amount is the highest, compared to other cities – 7,8 hours per week. In 2007 students spent ~1 hour more for private lessons, however from 2014 we can see an upward dynamic.

If we look at more granular data, average hours spent by elementary and middle school students for extra classes has dropped significantly since 2007 (from 8,9 hours to 6,8 hours). However, the data of general high school kids show a contrasting tendency. (Hours spent increased from the average of 5,2 to 6,5). (See Appendix 1, Figures 20, 21, 22.)

It was found that in March 2020 KOSIS did a new update of statistics that concerns hours of participation in shadow education in 2019. The data published contradicts with the one that was gathered according to the methodology of the year 2007 (hours reported are significantly higher) (see Table 5). According to the update, students spend, on average, 8,7 hours per week for shadow schooling. The highest expenditure is among general high school students living in big cities – 10,2 hours.

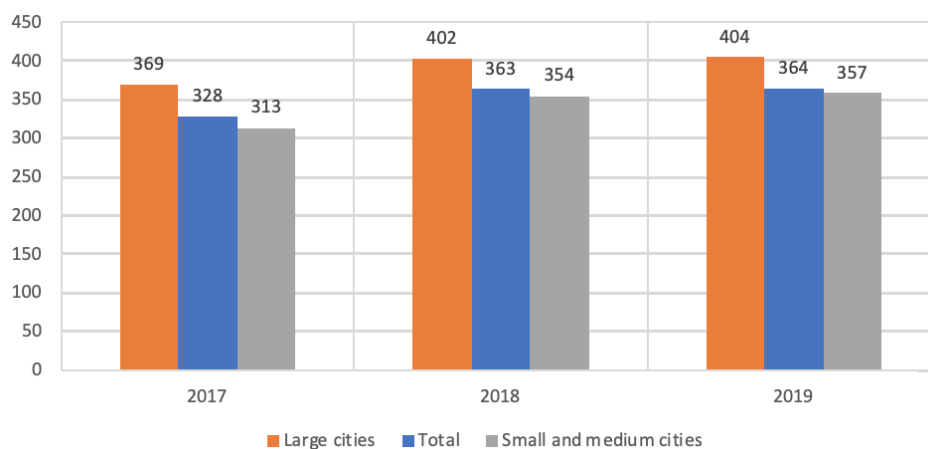
Table 5. Weekly hours spent for private lessons from in 2019, Korea.

Source: Statistics Korea, Private Education Expenditures Survey.

Characteristics	Average (h)	Elementary school (h)	Middle school (h)	General high school (h)
Total	8,7	8,1	9,6	9,6
Large cities	9,2	8,5	10,1	10,2
Small and medium cities	8,6	8,0	9,5	9,6

Cost of tutoring and subjects ⁴

Average monthly expenditure for supplementary education in 2019 was 364USD. Larger amounts were spent in bigger cities (see Figure 9). For example, in Seoul, students spent on average 478USD for private courses.



⁴ Average yearly exchange rates were used for converting foreign currencies into USD.

Figure 9. Average monthly expenditures on shadow education, all levels of education, all types of tutoring, USD, 2017–2019, Korea.

Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 20, 2020.

If we look at the distribution of funds, depending on the subjects taken by students, we can see that the English language and math had the most demand in 2019 (see Figure 10).

Students that are enrolled in the general high school spent much more on tutoring, compared to their elementary and middle school counterparts.

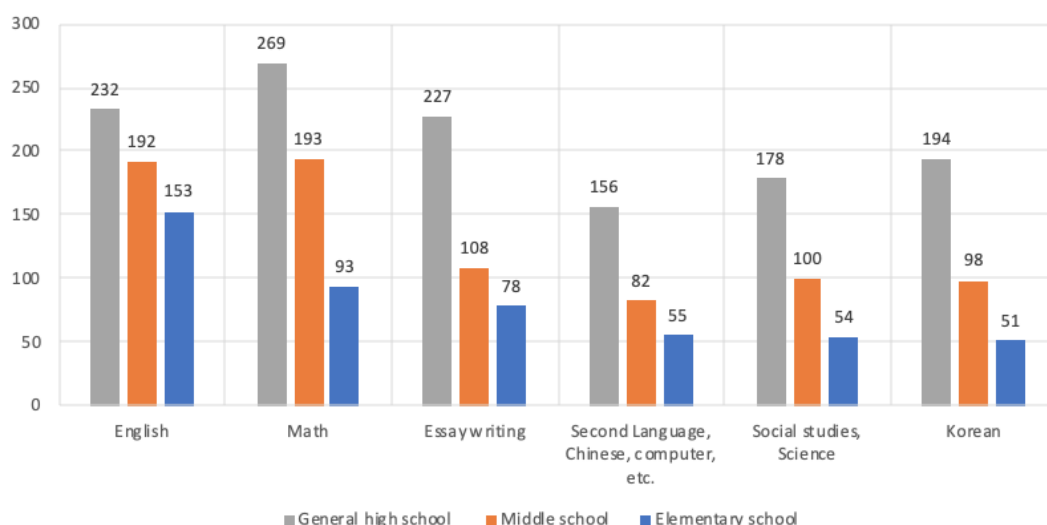


Figure 10. Average monthly expenditures on shadow education by school level and type of subject, USD, 2019, Korea.

Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 20, 2020.

Concerning the consumption of specific types of shadow education, students of all seniority levels spent the most on *hagwon* and on one-on-one tutoring (see Figure 11).

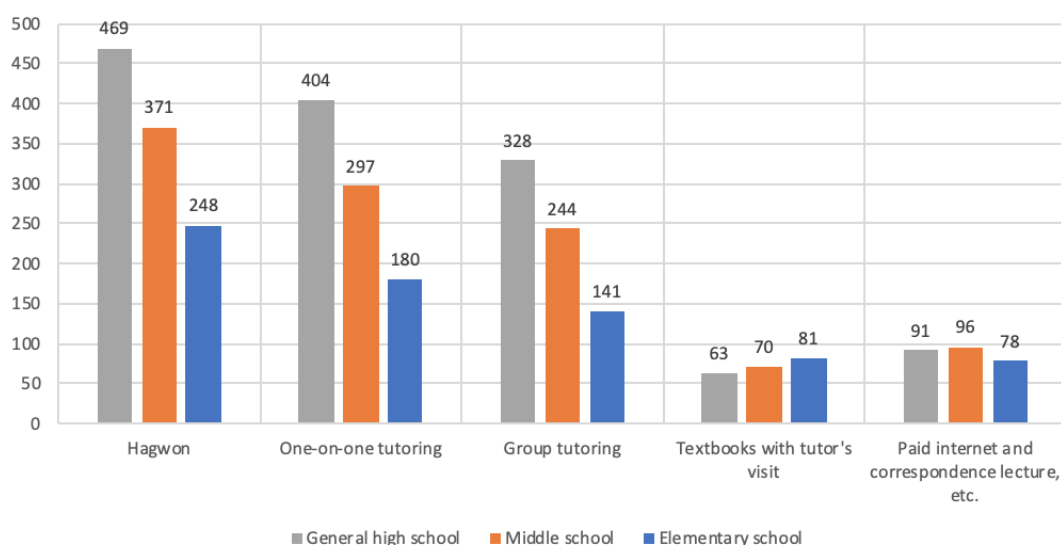


Figure 11. Average monthly expenditures on shadow education by school level and type of tutoring, USD, 2019, Korea.

Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 20, 2020.

According to Lee (2005), Korean students take about 2-3 private lessons simultaneously (using hagwon, another type of tutoring or combinations of various types) on different subjects, depending on the goals that they set and their weak spots (Lee 2005, 103). Furthermore, the nature of certain types of hagwon (preparatory hagwon), allows students to study multiple subjects in one institution (Kim 2016, 58).

Japan

Number of hours received

There was no accurate data identified in the existing research, concerning average hours that Japanese students spend for private tutoring. Roesgaard (2006) and Entrich (2018) provide some information on the length of tutoring lessons in certain types of *juku*, but using that data as a measure for an overall time that students spend for extra fee-based tutoring can be misleading.

Cost of tutoring and subjects

According to research made by Entrich (2018), average monthly expenses for *juku* are ~12.500 yen for elementary school (107USD), ~26.000 for a middle school *juku* (220USD) (Entrich 2018, 51-52). Also, on average, parents spend more on *juku* for middle school level in big cities (~220USD) than in smaller cities (~155USD) (Aurini et al. 2013, 6).

However, BERG (2017) reported lower monthly expenditures on *juku*: parents spent, on average, 7.200 yen per month (~62USD) on out-of-school academic shadow education. Average expenditures for the elementary school level is 6.200 (53USD), for middle school, it is more than doubled 13.700 (117USD) and is reduced for high school to 9.700. (83USD) The highest reported expenditures are for the final year of middle school when students prepare for high school entrance exams – 17.500 (150USD) (BERD 2017, 4).

MEXT (2014) has published average monthly prices for 2012 for elementary school *juku* (140USD), for middle school *juku* (~258USD) and (~305USD) for high school *juku*, what matches more closely to the estimation made by Entrich (MEXT 2012; in Entrich 2018, 66).

The data for 2007 suggest the middle school students seemed to show greater demand for the supplementary lessons in math (~90% (all types of shadow schooling)) and English (~85% (all types of shadow schooling)) (MEXT 2008; in Entrich 2018, 54).

Having studied key contextual aspects of Korean and Japanese educational systems and of its “shadows,” we move on the next part – the impact of supplementary education. We will not be able to show definite cause-effect relations between shadow schooling, economy, society and education system, nor it is a key goal of this part. What we endeavour is gathering the data to understand why the discussion about the impact of shadow schooling leads to the debate about its regulation?; and why do Korean and Japanese governments approach the issue of equality of educational opportunities and students’ well-being in their responses (or do they?). This “why?” question might explain the nature of these regulatory responses.

3.3. Impact of shadow education

3.3.1. Economy

Introduction

The literature suggests that shadow education business might have certain economic implications that can inspire policymakers if not to impose strict regulations, but at least to pay closer attention to its development.

Firstly, supplementary education practices offered in exchange for a fee is a type of entrepreneurial activity, for which (ideally) incomes have to be declared, and appropriate taxes paid (Bray 2009). Even if in many cases, it is hard to monitor tutoring activities that are practised by individuals, it is possible to strictly regulate those that are practised by companies (example of Korea) (Kim 2016, 60; Kim and Lee 2010, 265).

Secondly, it is a common goal for many governments to use the resources (human, financial, material, etc.) with maximum efficiency to achieve their goals (Bray 2009, 13; Bray and Lykins 2016, 60). High private expenditures in supplementary tutoring may highlight inefficiencies in the mainstream education system, and some part of household capital spent to the academic tutoring can be potentially allocated to other areas of the economy. The same logic applies to government expenditures in the education sector.

South Korea

Size of the market and household expenditures

Korea has a sizable market for shadow education services. According to KOSIS (2020) in 2019, total private expenditures for all types of tutoring were 18 billion USD, more than 70% of which is for tutoring, related to school subjects. That is about 20% more, compared to 2016 data (see Figure 12).

If we use the data published by KOSIS for 2018 and take national GDP of Korea (1,619 trillion USD in 2018 (World Bank 2018)), we could estimate that total household expenditures on shadow schooling (academic subjects only, non-tertiary) were about 1% of GDP. In comparison, in 2015, the Korean government spending on non-tertiary education was 3,47% of GDP (OECD 2020).

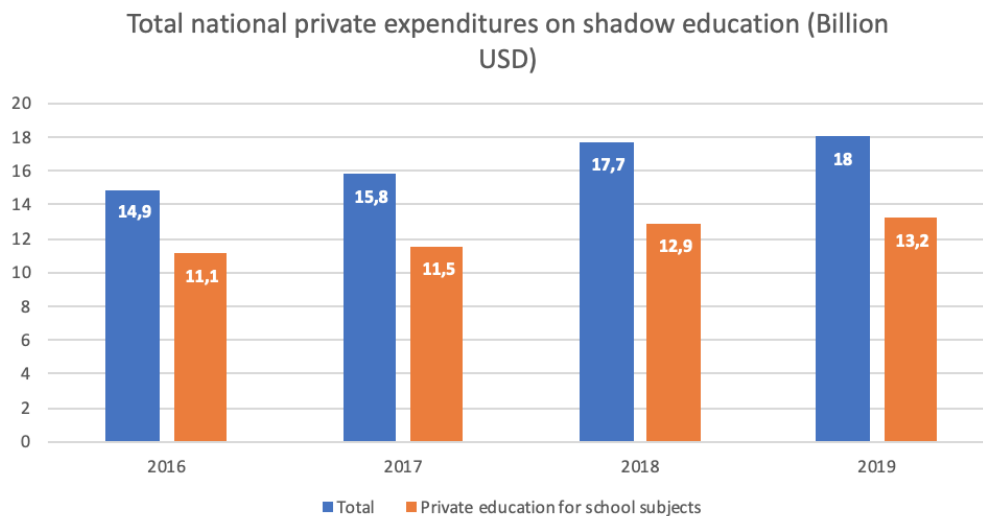


Figure 12. Average monthly expenditures on shadow education by school level and type of subject, 2019, Korea.

Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 23, 2020.

In 2010 OECD estimated the amount of total private expenditures on supplementary tutoring (all types) at about 17,3 billion USD or 1.8% of GDP. Furthermore, it is argued that the industry more than doubled since 1997 (OECD 2014a, 95). Also, according to OECD, in 2015, total private expenditures on primary, secondary and tertiary education were about 1,67% of GDP, 54,6% of which was spent on non-tertiary education. However, OECD does not specify what kind of tutoring subjects they include in their calculation. Therefore private spending on academic tutoring on the mainstream school level is most likely lower than the one stated above.

Average expenditures on private academic tutoring take a substantial share from the total household income in Korea. In the previous parts, we have mentioned that the total average monthly spending on academic tutoring for all school levels was about 362 USD in 2018 (KOSIS 2020). Using household disposable income for Korea for 2018 (25,530 USD), we can estimate that yearly expenditures on tutoring were on average 17% of household income. If we take a school year, where expenditures are the highest (general high school, 532 USD per month), the share goes up to 25%. The rate is comparable with the recent research on household expenditures in Korea (Kim 2016). These expenses add up to tuition fees that parents have to pay for their children for a high school (~1.400USD per year for public schools) and starting from ~12.000USD and per annum for international/private schools (The Korean Times 2019; Edarabia 2020). These also exclude other educational expenses (study materials, uniform, etc.).

Taking into account growing prices in private tutoring (see previously discussed *Cost of tutoring and subjects* for Korea) and rising demand for it (see *Enrollment rates* for Korea) since 2016, we can suggest that from year to year it gains higher importance not only as a sector of the economy but also as a vital part of an overall education system.

Shadow education and teachers' income

Bray (2009) suggested that one of the reasons for the growth of shadow education system for developing countries might be unsatisfactory economic conditions of teachers that seek for additional income sources, what he claims holds true for post-Soviet countries (Bray 2009, 24). However, this seems not to be the case for Korea, since teachers here are paid on average 56.000 USD (2018) what is above OECD average and GDP per capita in Korea. Besides that, private tutoring activities are strictly regulated concerning the participation of public school teachers in it (Kim and Lee 2010, 265).

Japan

Size of the market and household expenditures

According to the Yano Research Institute, in 2015, total private expenditures for all types of tutoring (*juku*, correspondence courses, e-learning and others) were about ~\$12 billion USD. Of this market, the biggest share (~7.8 billion USD) is held by various academic types of *juku* (Dawson 2010, 16; Entrich 2018, 50). The market is believed to remain stable from 2003 to 2013 (Mawer 2015, 131).

MEXT (2014) has published average prices for 2012 for elementary school *juku* (140USD), for middle school *juku* (~258USD) and (~305USD).

Using MEXT's 2012 data for average monthly prices for *juku* (see *Cost of tutoring and subjects*) and a yearly household income for 2012 –28.398 (USD) (OECD 2020), we can suggest that households spend around 6%, 11% and 13% of their budget for buying extra academic lessons for elementary, middle and higher school levels consequently (~10% on average for all levels). These expenses add up tuition fees that parents have to must for high school (~average 2200 USD per year for public schools (2011 prices)), excusing all other educational expenses such as on study materials, uniform etc. Tuition fees for private schools are usually way bigger (starting from 9800 USD per year) (The Japan Times 2011).

Shadow education and teachers' income

Similarly to Korea, the average income of teachers is around 51.300 USD (2018), what is also above the OECD average and GDP per capita in Japan. Therefore it is not likely that economic conditions of teachers force them to move to shadow education industry or to combine it with their regular duties in public schools.

3.3.2. Society

Cultural perception of supplementary education

Some studies suggest that proliferating shadow education industry in cases of Korea and Japan (and East Asia and South East Asia in general) is a phenomenon that is closely related to specific common cultural characteristics of these countries (Bray 2009, 24; Entrich 2018, 75, 159).

The legacy of Confucianism is believed to play a significant role in the attitudes that parents and students have towards educational attainment in Korea. As Kim (2016) mentioned, traditionally, in Korea, one of the most critical tasks for kids from middle and upper-class families was to study hard. He mentions that: *“in Confucianism and the old-people-oriented family culture, being admitted into prestigious and elite schools was one way of showing filial piety and also of stepping into the upper class”* (Kim 2016, 17). The nature of Confucianism involves respects for teachers, academy, credentialism meritocratic exams and a relatively mechanistic acquisition of canonized knowledge (Bray and Lykins 2012, 25; OECD 2014a, 90).

Concerning Japan, despite a significant cultural influence from the Asian mainland, the role of Confucianism has never been that strong on its education system as it was in Korea. Besides, Japan never had an examination system that gave access to all eligible candidates to enter the bureaucratic apparatus of the state (Dirkens 2010, 26). What seems to play a more critical role in the Japanese perception of education is a high level of credentialism of formal schooling, mentioned by Mori and Baker (2009) and Lee et al. (2010). (This aspect is also valid for a Korean case.) These authors see credentialism as a central social mechanism that leads to supplementary tutoring. In societies that put a value on credentialism, the fact of obtaining a high school diploma and a university degree is a mark of social status and a tool for social selection (Mori and Baker 2009, 37; Lee et al. 2010, 98). Furthermore, high-stake exams that play a pivotal role in the enrolment to prestigious Universities (such as CSAT in Korea and National Center Test in Japan) act as a stimulating driver to study extra. In the Japanese language, this is even a

term: “*ganbarism*”: the merit-based mindset the school system imbues within its students, [generating] the culture of competitiveness (Mawer 2015, 139).

Concerns about equity and wellbeing

The most significant part of the research dedicated to shadow education that was mentioned in the literature review of this study touches or primarily concerned the issue of educational equity and students’ wellbeing (Harnish 1994, 331; Bray 2009; Mori and Baker 2010, 38; Heyneman 2011, 185; Bray and Lykins 2012, 32; Matsuoka 2015, 271). Studies cover not only classical cases of East Asian countries – Korea and Japan, which have the most proliferating shadow schooling systems in the world, but also cases of Western countries, in which tutoring business shows fast growth (Bray 2009, 17-19; Lee et al. 2010, 97).

The main concern of scholars and international institutions (such as OECD) is the growing importance of shadow schooling and its impact on the learning process and student’s life. It is commonly suggested that supplementary education puts students from low-income families to disadvantage, since they might have fewer possibilities to succeed in examinations than students from more affluent families, despite possibly high academic abilities (Lee 2005, 100; Kim 2016, 169). The issue becomes even more significant in societies, in which high-stake examinations play a pivotal role in the academic lives of students (OECD 2014a, 94).

Additionally, scholars suggest that supplementary schooling in contexts of Korea and Japan fuels up fierce competition for the top-performance among students, creating the “examination hell” problem – highly stressful cramming periods of students’ lives (Roesgaard 2006, 179; Bray 2009, 63; Kim and Lee 2010, 264; OECD 2012a, 199). Widely-spread cramming approaches that Japanese *jukus* and Korean *hagwons* facilitate are also blamed for the opportunity costs in students’ personal development that they cause. Students have fewer chances to realize their creative potential, engage themselves in personal interests, public service and collaborate with their peers (Lee 2005, 103; Kim 2016, 166).

Lee et al. (2010) reported that high stress and mental/health problems from which Korean students suffered because of the fierce academic competition (about 30% of students in 1970) were one of the main reasons for policy intervention (Lee et al. 2010, 100). Harmful effects of fervour for education on health were also mentioned by Choi and Choi (2016) (301). Similar considerations about the impact of shadow education on wellbeing also made the Japanese government to monitor shadow education more closely (Mori and Baker 2009, 44).

South Korea

Inequalities in consumption of shadow education

According to KOSIS (2020), 80% of students who belong within the top 10% performance group attended some sort of fee-based private tutoring to prepare for graduation exams in general high school. As the school performance goes lower, the per cent of participants decreases 76% for 11~30% performance group, 70% for 31~60% performance group, 64% for 61~80% performance group and 55% for the rest.

One can see a direct connection between the consumption of private tutoring to the level of household income (see Figure 13).

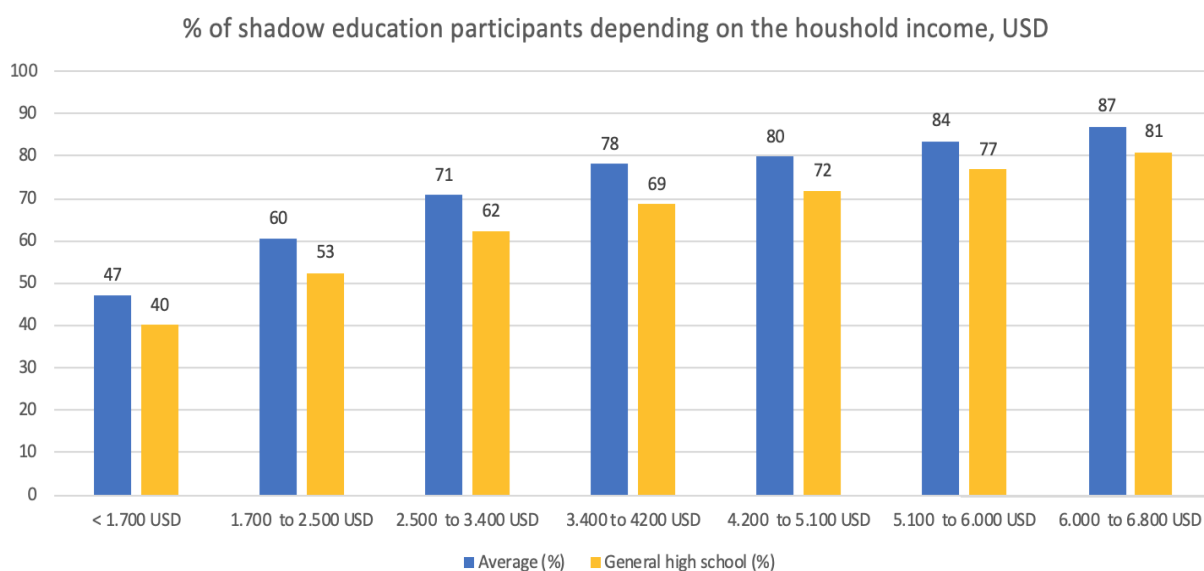


Figure 13. Participation in shadow education depending on monthly household income, 2019, Korea.
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on June 1, 2020

Additionally, the data suggests that children whose parents graduated from college or university or have achieved higher academic level tend to use supplementary education more often than those whose parents reached high school level only: ~84% vs 66%.

There is also a notable difference between the consumption of academic tutoring in large cities (especially in Seoul: 63% of students use it) and in small cities (with a population less than 500.000 citizens – 47,5%) (KOSIS 2020).

The data for 2019 suggests no significant gender differences in consumption of tutoring. Both female and male have roughly the same participation rates (KOSIS 2020).

The facts mentioned above indicate that SES of families can play a crucial role in the consumption of tutoring. Kim (2016) claims that parents pass their social and financial status to their kids and that the possibility to invest in education is a part of an economic fortune that they possess. Therefore it is highly possible that *hagwon* education, which is an integral part of students' academic life, can lead to inequitable distribution of educational opportunities through the reproduction of wealth. He further mentions that: "*Students not receiving hagwon education because of constraints on finances become the ones showing low achievement or underachievement, including multicultural children*" (Kim 2016, 169). Hyundai Economic Researcher (2012), cited by Kim, has reported that some Korean families (~14%) cut their daily expenses and take bank loans to finance their children's education. The author explains that by a high level of elderly poverty in the country and connection between wealth and the level of education that is embedded in Korean culture (Kim 2016, 165).

Japan

Inequalities in consumption of shadow education

There is a very limited amount of statistical data from the Japanese government concerning the consumption of shadow education services based on the SES of their citizens. There is also no official data regarding the participation of top-school performers in shadow education activities, nor any data concerning geographical distribution of its consumption.

BRET (2017) has shown that households from low-income group consume three times less extra tutoring lessons (all types of tutoring), compared to the high-income group (BRET 2017, 5).

Additionally, MEXT showed that in 2012 students that studied in private schools (that generally require high fees for participation) spent more on supplementary lessons compared to students from public schools. Private high school students spend twice as much for tutoring when their public school counterparts (MEXT 2012; in Entrich 2018, 66).

Many researchers see Japanese shadow education (especially *juku*) as a vital part of Japanese education and theorize that importance of *juku* in students' educational attainment might create educational inequality among those that have less privileged socio-economic backgrounds (Roesgaard 2006; Mawer 2015; Baker et al. 2010; Entrich 2018).

The research done by Stevenson and Baker (1992) showed that: *"the likelihood of participation [in shadow education] increases if the student is male, or has good grades in high school, or is from a higher SES family"* (Stevenson and Baker 1992, 1655).

Matsuoka would later add: *"even if lower SES students have [high academic abilities] and wish to take additional lessons in the shadow education industry [...], their family's economic capital would probably hinder them from being exposed to learning opportunities in the market"* (Matsuoka 2015, 286).

Entrich also mentioned that: *"shadow education somewhat contradicts the principle of equality of educational opportunities, if some students gain considerable advantages from investments in shadow education and others do not"* (Entrich 2008, 53). He argued that shadow education became a tool of social exclusion since wealthy families use it to secure their social status (Entrich 2008, 209).

3.3.3. Education system

Introduction

The analysis of the literature on Korean and Japanese cases showed that researchers emphasized similar positive and negative effects that shadow schooling might have on the education systems of both countries. Therefore, facts included in next sub-parts concern both country cases.

Instructional time and teachers performance

Motivation of school teachers

There is a shred of evidence that students that intensively use supplementary tutoring may prefer to ask their tutors to explain them material instead of their public teachers. On the one hand, this releases the workload for schoolteachers, but on the other, it distorts their professional role (OECD 2014a, 93; Bray and Lykins 2012, 14, 26).

According to TALIS (The Teaching and Learning International Survey of OECD) results for 2013, 20% of middle school Korean teachers have responded that they regret that they decided to be a teacher and 40% of them *"wonder whether it would have been better to choose another profession"*. These results are lower than the OECD average (6% and 33,5% accordingly). Also, only about 28% of Japanese teachers responded that they feel that their profession is valued in society. Besides that, around 30% of both Japanese and Korean teachers

mentioned that they would prefer to change to another school if they had this option (TALIS 2013).

We cannot state that the responses mentioned above have a definite connection with prosperous shadow education business in Korea and Japan. Nevertheless, it gives us food for thought if we look at the next pieces of evidence.

The possible adverse effect of hagwon business on teachers' motivation was mentioned by Kim (2016) and Choi et al. (2012). Previously, school teachers were the most significant sources of knowledge that were crucial for the future academic success of students. Heavy reliance on *hagwon* has changed that situation. One of the reasons why students in Korea use *hagwon* is to learn in advance and to prepare for exams. For those students, material that is taught during the class is a mere repetition of what was already learned with a tutor. Furthermore, Kim claims that students often neglect school homework in favour of *hagwon* homework and criticize methods of their public school teachers if they are different from those they got used to in *hagwon* (Choi et al. 2012, 301; Kim 2016 173). Research of Gyeonggi-do Institute for Education 2013, cited by Kim, showed that 24% of high school students sleep every day during their classes because they studied the previous night and new that they will catch up on the missed material with their tutor (Kim 2016, 173).

Entrich (2018) has mentioned that in Japan public school teachers advice parents to send their kids to *juku*, in addition to their public lessons, since they know that they are not fully able to prepare them for the entrance to a school or university of their desire (Entrich 2018, 132).

Student learning, achievements and classroom dynamics

Impact on academic performance

Higher academic achievements

One of the reasons why Korean and Japanese students attend *hagwon* and *juku* is to improve their academic results and prepare for entrance examinations. One of the positive characteristics of supplementary education is that it allows students to gain knowledge fast and efficiently in order to compete with their peers.

There is a body of research that supports this claim. For the case of Korea, Sohn et al. (2010) reported a positive relationship between the amount of time spent in tutoring and academic achievement (Sohn et al. 2010, 23). Choi et al. (2012) have shown a positive effect on math and reading (Choi et al. 2012, 315). Park and Lee (2005) and Kang (2007), cited in Choi et

al. (2012), have shown the positive effect of tutoring on PISA results of Korea and positive effect on national exam (CSAT) results (Choi et al. 2012, 304). The survey of 2002 showed that 71,6% of students that attended tutoring improved their test scores, and 90% of them replied that it influenced their college admission (Lee et al. 2002; in Kim 2016, 155). For a case of Japan, Stevenson and Baker (1992) and Baker et al. (2001) showed that participation in shadow education increases the likelihood of Japanese students to attend university (Stevenson and Baker 1992, 1652). Entrich (2014) also showed that the academic achievement of students in 2009 was increased because of the active participation in *juku* (Entrich 2014, 95).

Individual approach in learning

Another positive aspect of *hagwon* and in *juku* is that they fill in the gaps in demand, which public schools fail to satisfy (Entrich 2018, 11). Both types of courses offered classes depending on the special needs of students, be it cramming or remedial lessons; lessons to succeed in exams or to improve school grades. Classes that follow their own curriculum, which is tailored for specific goals (e.g. high school graduation exams) are separated by school level and gaps in students' knowledge. Besides, both *juku* and *hagwon* usually have fewer students in a class what allows tutors to use more personalized approaches in their teaching methods. However, that depends on the type of cramming school. Also, *hagwon* and *juku* have a capacity to develop their own tailored for specific goals study materials, that are different (often in a better way, since they are more systematic, practical and goal-oriented) to those that are used in public school. Finally, there are special types of *juku* and *hagwon*, which target talented and gifted children (Roesgaard 2006, 41; Kim 2016, 9).

Passive study attitude and constraint on creative and critical thinking

Cramming approaches that are most common in *hagwon* and *juku* are blamed for a passive study attitude, which they form among students. Heavy reliance on materials offered, pre-developed guidance and memorization methods are believed to worsen students' ability to study on their own (Entrich 2018, 10). Furthermore, *hagwon* and *juku* methods are believed to limit the creative and critical thinking abilities of students. They learn how to follow specific patterns and instructions that were prepared for them in advance since these are the most efficient to succeed in exams. However, such methods might limit the thinking ability of students when they face complex problems on their own (Kim 2016, 174).

Assessment and selection procedures

Hagwon and juku as a source of actual information

There is a piece of evidence that students that do not attend supplementary lessons suffer more from anxiety, compared to their peers (Kim 2016, 162; Entrich 2018, 216). *Hagwon* or *juku* are first of all types of business, and one of their aims is to maximize their profits by delivering high-quality services to the customer. The quality is an essential aspect since the competition among those institutions is quite high in both countries. Not only do they design their lessons based on the analysis of assessment and selection procedures of various high schools, universities and colleges, but they also consult students concerning their chances to pass these exams (Kim 2016, 31). That knowledge can be useful since students become confident concerning the latest selection requirements, which can be especially valuable if these requirements tend to change very often (e.g. the case of Korean CSAT) (Kim 2016, 172).

3.4. Regulations applied

2.4.1. Introduction

The previous part provided us with pieces of evidence concerning the potential effect of shadow education on the economy, society and education system of both countries. Having understood the *context* and the *content* of the issue, let us move to the last part of the framework - the *process*. Here we will gather the evidence to answer the question: "*How did Korean and Japanese governments regulate the shadow industry (directly or indirectly)?*"

3.4.2. The case of South Korea

Policies equalizing school allocation and resources

Abolition of middle school entrance examinations (1968)

As we have previously learned, in the 60s, the rising number of elementary school graduates, increasing incomes, and after-war baby boom created a strong demand for secondary education (Kim 2016, 19). Additionally, middle schools were limited in number and selected students through fiercely competitive examination procedures. Besides, these procedures were regularly changing, which brought anxiety and high stress to students preparing for them. Many elementary school graduates participated in shadow education in order to improve their chances of admission.

To normalize elementary school education, solve the "examination hell" problem, and reduce the financial burden on families due to the participation in extracurricular activities, MEST reacted by *abolishing middle school exams* and continued with the quantitative expansion of the secondary education (See Table 6) (Lee et al. 2010, 100; MEST 2020).

Table 6. Expansion of the secondary education, 1945-1990, Korea.

Source: MEST (2020).

High School					
Year	1945	1960	1970	1980	1990
Schools	307	640	889	1,353	1.683
Teachers	172	9.627	19.854	50.948	92.683
Students	40.271	273.434	590.382	1.696.792	2.283.806

Middle School					
Year	1945	1960	1970	1980	1990
Schools	166	1.053	1.608	2.121	2.470
Teachers	1.186	13.053	31.207	54.858	89.719
Students	80.828	528.593	1.318.808	2.471.997	2.275.751

High school equalization policy (1973)

Elimination of middle school entrance exams expanded educational opportunities and released financial burden on families for a while. Nevertheless, the next bottleneck appeared soon. The number of middle school graduates increased, and so did the competition for the limited number of places in high schools. The same problem of heavy reliance on private tutoring appeared again. According to Kim, around 90% of middle school students received private tutoring for four hours a day in the mid-1970s (Kim and Lee 2010, 265; Kim 2016, 20). It was estimated that approximately 27% suffered from mental and physical health problems due to stress on the high school entrance exams (Lee et al. 2010, 100). The competition was fierce to enter high schools with higher "informal ranking".

The response of the government on these issues was quite radical: *the high school equalization policy*. According to the policy, students are allocated to high schools, depending on the district of residence by lottery, providing that they passed their graduation exams. The policy also standardized the curricula in public and private schools, the level of tuition fees and salaries of teachers (Kim 2016, 20-24). Private schools received funding from the government but were forced to take in all the students who were allocated to them randomly. The policy reduced financial burden from lower-income families, but at the same time, it moved the fierce educational competition to high school exams (Lee et al. 2010, 100). The standardization of college and university entrance examination, that aimed at normalization of middle and high school education, stimulated high school graduates to cram even more for final exams. Besides, further standardization of college and university entrance exams (the latest version of CSAT, introduced in 1995) intensified the battle for high scores. From the early 2000s the decision of the government to open “Special purpose high schools” and “Foreign language high schools”, aimed at students with high academic abilities (about 25 of them), intensified the demand for private tutoring since these schools are believed to provide higher chances for the college and university enrollment (Kim 2016, 29).

Fee-free high schools (2021)

The next measure to equalize school allocation is planned for the year 2021 – *fee-free high school policy*, which will release households from tuition fees (for regular public schools), helping them save about ~1,380 USD per year (pro-student) (The Korea Times 2019).

Policies limiting private tutoring

Ban on shadow education activities (1980)

The high school equalization policy moved the fierce competition to final graduation exams. Shadow education sector continued to grow. With the aim to improve the quality of education and address the proliferating shadow education sector, the administration of Chun Doo-Hwan enforced a measure, called: *7.30 Educational Reform* (Lee et al. 2010, 100). The reform increased entrance quota for universities, reducing the admission competition. National graduation exams became much more standardized, and the admission to tertiary education was mainly made based on these high-stake exams and high school records. Any kinds of private tutoring (one-on-one tutoring, correspondence courses, *hagwon*) were made illegal. To compensate for the absence of extra opportunities in education, the government established an educational broadcasting system to provide low-cost “private” tutoring. Despite increased higher education quota, the policy failed to eliminate shadow education, since most of the tutoring practices went into the real shadow. The prices for supplementary education rocketed due to high risks (Kim and Lee 2010, 265; Kim 2016, 22).

Since the ban was very hard to control, the curfew was substantially relaxed in the 1990s. Middle and high school *hagwons* were allowed again. In 2004, the Constitutional Court declared that the shadow education ban was unconstitutional and violated citizens’ rights to learn; therefore, regulations were changed to allow private tutoring (Kim 2016, 25).

Control of the private teaching institutes and tutoring activities (1997-2020)

In 1997 the first version of the *Act on the establishment and operation of private teaching institutes and extracurricular lessons* (hereinafter: the Act) was enforced in Korea after the ban on private tutoring was lifted. The latest revisited version of the law was enforced in 2020 (Korea 2020). The Act regulates the establishment of teaching institutes (*hagwon*) as well as tutoring activities of private individuals. Matters that are necessary for the enforcement of the Act are covered in the *Enforcement decree of the Act on the establishment and operation of private teaching institutes and extracurricular lessons* (hereinafter: the Presidential Decree) (Korea, 2019d).

The Act imposes strict control over various matters, related to tutoring activities. The law defines the duties of founders and operators of extracurricular institutes and procedures of its

registration and deregistration (e.g. Article 4, Article 6, Article 14, Article 19). It also imposes strict environmental and hygiene regulations for these activities (e.g. Article 5, Article 8).

According to the law, school teachers are not allowed to teach extracurricular lessons as private tutors, be it in *hagwon* or privately (Article 3). Furthermore, the founders of *hagwon* are obliged to report to superintendents the information concerning the academic background of tutors and tuitions fees charged. Even if private tutors determine the number of tuition fees on their own, the superintendent has the power to order a tutor/organization to change tuition fees if he/she finds them excessive (Article 16).

The Act also imposes administrative dispositions (up to 1-year suspension from tutoring), penalties (imprisonment with labour for not more than one year or a fine not exceeding ten million won (ca. 8.250 USD)) and administrative fines (fine not exceeding 3 million won (ca. 2.500 USD)) if individuals violate the rules of the Act. Students, receiving tutoring services, are also protected by the *Special Act on punishment, etc. of Child Abuse Crimes*, *Child Welfare Act* and *Act on the protection of children and youth against sex offences* (Korea, 2019b; 2019c; 2019d).

The only exception to the registration of private tutoring activities is granted to high school and university students (Korea 2020b).

Laws mentioned above do not provide specific standards concerning levels of tuition fees or operating hours of shadow education entities etc. Those are being regulated on municipal levels, therefore can slightly differ across the country.

Taxes

All teachers working in Korea on a freelance basis or at *hagwon* are required to pay income taxes. The requirement applies both to local and foreign teachers. Taxes are generally calculated by the progressive tax method, and usually, tutors pay about 3% to 5% of the gross salary, depending on its size. For teachers working in a *hagwon*, the employer is the one responsible for paying income taxes on behalf of employees (National Tax Service 2019).

Policies improving the quality of mainstream education

Policies increasing school autonomy and reducing shadow education spending (2000-2009)

After the ban for private tutoring in Korea was lifted, the government had a concern that that decision will stimulate the growth of the shadow education sector. In 2000 the government set up

the plan to prevent overheated private tutoring and to enhance public education. It was found that major reasons that caused the demand for private tutoring were:

- The hierarchical structure of the tertiary education system and high stake exams.
- Low quality of public schools.
- Students and parents anxiety about not using shadow education.

The plan proposed the following tasks:

- Continuous improvement in the public education system.
- Increase of school autonomy and introduction of a differentiated curriculum.
- The diversification of criteria for university/college admission.
- The expansion of financial support for students from low-income families and rural areas

(Lee et al. 2010, 102).

Afterwards (and up until now) government introduces policies based on the tasks outlined above.

In 2008, MEST introduced *Educational Policies for the Reduction of Shadow Education through the Enhancement of the Competitiveness of Public Education*. The idea is that the improvement of the quality of the public education system would improve citizens' confidence in it, consequently reducing the demand for shadow education. These initiatives can be summarized to 3 main points:

- Allowing more autonomy and diversification in the school system.
- Reforming the university admission system.
- Provision of after-school programs to reduce financial burdens from families (MEST 2008; Lee et. al. 2010, 102).

Concerning the first point, the Ministry gave schools more autonomy in teachers' recruitment and curriculum operation. Additionally, teacher assessment system and school information disclosure system were introduced to enhance school accountability. In respect to low-income families, the government offers support for those that cannot afford public high-school fees. Finally, with respect to special-purpose high schools and international high schools, the government promotes the use of principals' recommendations and middle school grades in combination with high-stake exams to diversify students selection process (MEST 2008).

Regarding the second point, the government stimulates colleges and universities to give more weight to students' school records rather than to standardized entrance exams.

Finally, in order to reduce financial burdens on families due to shadow education costs, the government promotes after-school programs, extra e-learning systems and considers the establishment of career counselling centres (Lee et. al. 2010, 101).

Policies broadening access to supplementary education

Educational broadcasting system and after-school programs (2000–2020)

One of the government's decisions to reduce the demand for shadow education was to offer its own version of it.

In 1980s Educational Broadcasting System (EBS) was first launched. Some scholars call this system “*National private tutoring*”. In the last 20 years, it experienced high growth in terms of the content and services which it offers. According to MEST, 70% of the CSAT content is offered by multiple channels of EBS (Kim 2016, 28).

In 2004 the government set a plan to provide additional forms of supplementary tutoring within the public school system and outside of it. The goals included:

- Building an e-Learning system in addition to EBS. This E-learning system includes a variety of internet and mobile services for the CSAT preparation, extra broadcasting for English and math education, software education etc. (EBS 2020).
- Offering after-school supplementary classes in all school levels, including a primary school (Lee et. al. 2010, 102; Choi and Cho 2016, 604).

Based on the data provided by Korea Statistics we can see that from 2007 to 2010 there was indeed growth in students' participation in after-school activities, what might be caused by the promotion campaign of those that happened in 2004 and 2008 (see Figure 14).

Participation rates reached their peak for secondary school students in 2010 (50% of middle and 79% of high school students). However, they went gradually down, reaching 27% and 59% in 2019 respectively. The rate for elementary school students is the only exception to the rule. It reached the level of 60% in 2014 and stayed roughly the same afterwards.

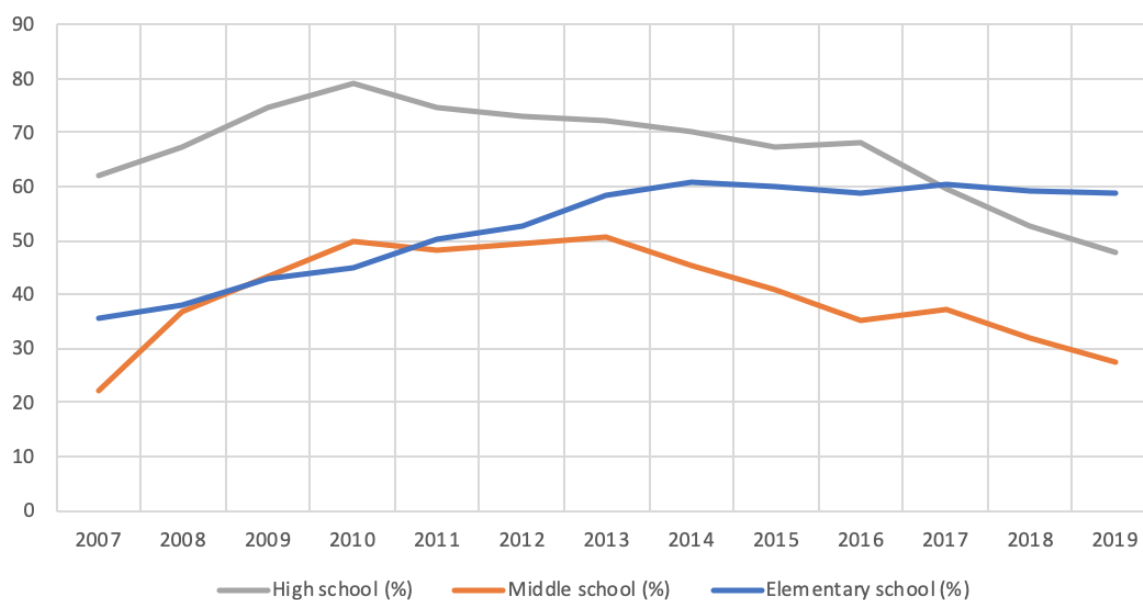


Figure 14. Participation in after-school programs (including free education), % of students, 2007-2019, Korea.

Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on June 1, 2020

3.4.3. The case of Japan

Introduction

In stark comparison to the Korean case, the Japanese government used a "*laissez-faire*" approach in relation to the supplementary education business. In contrast to the case of Korea, it is hard to distinguish direct policies that target private tutoring and to follow precisely the same criteria-pattern as it was done for the Korean case (Dawson 2010; Kim and Lee 2010, 266; Entrich 2018).

The only concrete step that the Japanese government ever made in direction to the regulation of supplementary education industry (*juku* business) was its recognition in 1987. The National Council on Education Reform that was set up by Prime Minister Nakasone as a reaction to problems of "*examination hell*" and degradation of public and university education mentioned shadow education in its final report. The Council advised the Ministry of Education to "[respond] to the private education industry, for example, *juku* (the new role for the private education industry; accurate estimation of the current situation and presentation of information; responding to excessive attendance by children at supplementary learning *juku*)" (JICA 2004, 37). However, no concrete regulations were initiated afterwards, except for the introduction of occasional monitoring of shadow education sector by the Ministry of Education. In 1999 the Ministry of education said that it intends to "tolerate/acknowledge" the existence of *juku* (Roesgaard 2006, 52).

Nevertheless, we will try to trace indirect regulations of the government that target not the shadow education industry specifically, but the potential problems that it might cause in relation to equality of educational opportunities and students wellbeing.

Policies improving the quality of mainstream education

Improving the status of teacher profession (the 1970s and 1980s)

Discussions about the regulation of shadow education started in the 1970s when the rapid massification of education, the fast growth of household income, switch from the traditional type of families to nuclear and introduction of standardized university entrance exam led to fierce competition among students to enter best-ranked schools, top colleges and universities. The “examination hell” problem became a national issue. Criticisms were made that the emphasis on memorization and cramming approaches ruin students’ creative and cognitive abilities. Discussions about the problem of “examination hell” were often connected with the issue of the moral degradation of students, school absences and juvenile delinquency (JICA 2004, 31). Besides, the social status of the teaching profession was low: the profession was underpaid, attracted fewer students, and there was *"the tendency for such [talented teachers] to concentrate in private companies"* (JICA 2004, 33).

In 1971, the Central Council for Education introduced *"The law concerning special measures for securing of capable educational personnel in compulsory education schools for the maintenance and enhancement of school education standards"*, the outcome of which was an increase of teachers’ salaries by more than 30% and systematization and clarification of professional duties of teachers and of their working conditions (JICA 2004, 33).

In 1987, the National Council on Education Reform suggested the reform of the teachers’ licensing and appointment systems that introduced obligatory in-service teacher training and systematized the process of teachers’ qualification improvement. The measures were introduced in 2008 by MEXT (MEXT 2009).

Policies equalizing school allocation and regulating resources

"Yutori kyouiku" or "pressure-free" reform (the 1990s)

The "examination hell" problem, as well as behavioural problems, were believed to be caused by the emphasis on the importance of credentials and achievement in the teaching philosophy in Japanese public schools, rather than by other factors. The government introduced a *"Yutori*

kyouiku" or "pressure-free" ideology in its reforms, aiming to ease those problems (Mawer 2015, 133). The idea was that the relaxation of public education should help children develop the "zest for living", cultivate morals, individuality, the rich sense of humanity, abilities to think critically and creatively and protect children's health. The second aspect of *Yutori* policy was internationalization (JICA 2004, 39; Entrich 2018, 281).

The "relaxation" content of *yutori* can be summarized by the following reforms:

- The overall compulsory curriculum was reduced by 30%, and the school week was changed from 6 days to 5 days. Additionally, the content of the curriculum became much more variable, since the number of elective courses increased.
- Teachers were strongly advised to refrain from physical punishment.
- The new type of seamless 6-year secondary schools was introduced to eliminate "examination hell partially".
- Universities were advised to consider personal achievements, high-school grades, letters of recommendation and other documents together with the results of high school graduation exams (Entrich 2018, 281).

The internationalization aspect of *yutori* policy included:

- Higher emphasis on individuality and "international sensitivity". Teachers were advised to encourage students to follow their own interests. Integrated study periods were introduced specifically for this purpose. Furthermore, universities were advised to tailor their curriculums to "better serve students according to their demands" (Entrich 2018, 281).
- Life-long learning society, information technology and liberalizations became key directions for the development of the education system.

The most notable aspect of the new Course of Studies that was introduced via *Yutori kyouiku* was a significant reduction of teaching hours: 70 hours less for elementary school and the same amount for the middle school. The content was cut by around 30% to "essential minimum", and from 2002 the lessons on Saturdays were cancelled (JICA 2004, 40).

However, it is largely seen that these measures did not help to fix the "examination hell" problem and had a negative effect on the academic performance of students. Additionally, some scholars report the increased demand in shadow education, since students started to seek options to close gaps in their knowledge required for final examinations (Mawer 2015, 133; Entrich 2018, 37).

Presumably, as a reaction to the drop of academic achievement caused by Yutori policy, in 2004 MEXT introduced a balanced version of Course of Studies with a slogan "Japan! Rise again!", in which teaching hours were increased again (by 10%). The government made a revision with an aim to cultivate the "spirit of challenge" among children and to encourages best-performers (MEXT 2004; Entrich 2018, 290).

6-year secondary schools and high school examinations (1999)

One of the parts of “*Yutori kyouiku*” was the introduction of a new 6-year secondary school type to remove competitive entrance examinations between middle and high school levels. However, not all schools were restructured to follow that pattern. Besides, universities and colleges were strongly advised to use school grades and records and letters of recommendation in addition to the National Center Test in the process of student selection (Entrich 2018, 281).

Policies limiting private tutoring

Taxes

The research did not indicate any kinds of special regulation for *juku* and freelance tutoring. As it was said earlier, the Japanese government treats *juku* as any other kind of business. Therefore all usual regulations concerning health, safety, environment etc. apply to *juku* as well. Perhaps the only aspect that should be mentioned is taxation. All individuals that provide tutoring, be it in *juku* or on an individual basis must pay taxes. The amount of tax is calculated based on the progressing rate. Usually, it is about 5% - 10%, depending on the taxable income of a tutor (National Tax Agency 2019).

Policies broadening access to supplementary education

Chiiki Mirai Juku Program (2015)

Aiming to reduce the financial burden on low-income families and to support low-achievers or children with poor learning habits, in 2015 MEXT launched a free of charge *Chiiki Mirai Juku* program (Community Tutoring School for the Future). The program is implemented in cooperation with retired school teachers, university students, public schools, private tutoring business and non-profit organizations. Depending on the local needs, it is implemented flexibly across the country, but the main target audience is middle school children. The budget of the program is about \$1.9 million (JFS 2016). The program supports the provision of free tutoring,

using facilities of public schools, colleges and universities as well as information and communication technologies (ICT). According to MEXT, in 2019, regular tutoring classes were established in 2,995 schools and universities (MEXT 2019b).

4. Analytical part

4.1. Introduction

Based on the empirical analysis, we can see that the education systems of Korea and Japan bear close similarities between each other in terms of their structure and administration. Moreover, we can see that shadow education systems have significant importance, not only in quantitative terms – as a significant business industry – but also as a vital part of students' learning routine. In the literature, we keep seeing the evidence, that both education systems of Korea and Japan would not be able to deliver similar outstanding results if students did not acquire additional learning services. The reflection of these outstanding results we see in global academic ratings.

Constitutions of both states protect "an equal right to receive free of charge education, corresponding to one's abilities." Furthermore, the current policy directions of both countries place a special emphasis on inclusion, health and wellbeing of students. In Korea, these policy directions are "Happy education for all" and "Education that Leaves No Child Behind". In Japan, concepts of educational equity and "zest for life" are an integral part of the Basic Act of education as well as of "Yutori kyouiku" ("pressure-free") and the "Japan! Rise again!" policies.

Nevertheless, having said so, we can see that regulatory responses to shadow education differ in these countries. In Korea, the influence of the shadow education industry (not only of *hagwon* business but overall) has been connected to problems of socioeconomic equality and "examination hell", which it is believed to exacerbate. Policymakers saw it as a threat to the equity of educational opportunities and argued that it contributes to social reproduction. Even though the benefits of the system are acknowledged nowadays, the government chose to actively monitor and regulate the system to ensure the quality of the delivered educational services and that it does not diminish the quality of the public system. In Japan, quite the opposite, the government never publicly connected shadow education business to the issue of equity and wellbeing, applying a "*laissez-faire*" approach to its regulation. Despite regulating the education system in response to "examination hell" problems and child poverty, the government never attempted to regulate shadow education. We can see that in the example of *Chiiki Mirai Juku Program*, the government even officially cooperates with *juku* business to deliver fee-free education support to middle school kids with disadvantageous backgrounds.

How are these responses so different? Does the difference come from unique content and context characteristics of shadow education in these countries? Let us compare and contrast shadow education systems in both cases in detail and try to elaborate on possible reasons behind it.

4.2. Comparison of shadow education systems

4.2.1. The emergence of modern shadow education systems

There are specific characteristics that unite Korea and Japan if we talk about the reasons behind the growth of their shadow education systems.

First, rapid massification of educational opportunities and standardization of education systems allowed more people to acquire elementary, middle and high school degrees. Singletrack 6-3-3-4 system allowed more people to gain access to public education. The competition between students to get into more prestigious educational institutions created the demand for shadow education.

Second, the hierarchical structure of the education system, multiple stages of high-stake exams between school levels and the difficulty of these exams often incomparable to the level of knowledge taught in public schools further stimulated its growth. The standardization of high school graduation exams required for the university admission in the 1970s further intensified the competition.

Third, cultural emphasis on educational attainment in both countries (credentialism), rapid economic growth, growth of households' incomes and the expansion of nuclear families played a significant role in the demand development.

However, there are certain characteristics that make the development of these systems unique. The research suggests that the concept of *hagwon* and the "education fever" as its primary demand mechanism are not new for Korean society. The strive for educational success and its connection to social status dates back to the Joseon Kingdom era (1392-1910) when national civil service examinations were flourishing. These examinations were accessible for all free men (not slaves) and included literary, military and miscellaneous examinations (on multiple academic topics). Based on the results of these examinations, the candidates could become a part of the upper class (The Korea Times 2014). As a result, the combination of Confucian values and hierarchical social system separated citizens based on their knowledge. The era of civil service examinations is long gone, but probably we can still feel its presence reflected in the societal attitude towards educational attainment. In which way?

If we look at the case of Japan, the "*juku*-boom" goes back to 1970s – the era of rapid economic growth. Scholars suggest that *juku* did not exist before and started to flourish only when household income in Japan became much higher, the size of families smaller and education was massified. Providing that credentialism is strong in Japan, more families that had a budget

surplus were ready to invest in the education of their children. However, the case of Korea is a bit different. Not long after the Japanese occupation regime ended, the devastating Korean war was over, and education sector started to recover, families began to invest into supplementary education of their kids, despite their poor economic conditions. In the 1960s, hagwon started to multiply, and the “examination hell” problem became an issue. The government tried to regulate the demand, but the supplementary education industry continued to grow. If we look at the situation with shadow education today, we can find evidence that the demand for private tutoring services in Japan has not changed much over the last ten years. Some sources suggest that the industry even starts to shrink slowly due to economic stagnation, decreased household income and young population. In the case of Korea, the tendency is different. Even if the fertility rate is the lowest among OECD countries and the number of students decreases every year, the demand for hagwon and supplementary tutoring rises.

Possibly, the value that society allocates to educational attainment might be one of the reasons why the demand for supplementary education services in Korea is increasing. That might also explain why government saw (and sees) shadow education as an essential subject for the regulation, especially keeping in mind that educational equity and students' wellbeing is an essential part of its current policy direction.

4.2.2. Scale, mode, intensity

Total average participation rate in shadow education (all types) in 2019 in Korea was 83,5% for elementary, 71,4% for middle and 67,9% for high school students (see Table 7). Participation in shadow education, specifically related to academic subjects was 57,9%, 61,8% and 57,8% (for same school levels, respectively) (KOSIS 2020). The data for Japan suggests that 49,1% of elementary, 57% of middle school and 36,3% of high school students used some kind of extra tutoring for school subjects in 2017 (BRET 2017). The data for the total usage (81,6% elementary and 75,9% middle school levels) of tutoring should be perceived with caution since MEXT included *naraigoto* (after-school student clubs) into its calculation. *Naraigoto* can also be practised on a fee-free basis and by nature is slightly different to private tutoring business, such as *juku* or one-on-one tutoring, since it is often organized by students for students (MEST 2007)

We can see that the participation rate in tutoring for academic subjects is generally higher in Korea than in Japan: almost 10% more for elementary and 20% more for high school students. Participation of middle school pupils is roughly the same – only about 4% more students take

private lessons in Korea. Besides, the number of tutoring organizations in Korea is higher than in Japan (69.678 vs 50.000) (MEXT 2007; Kim 2016, 186).

That is an interesting observation. Even though the school equalization policy is active in Korea, and the majority of students do not have any high-stake transitional exams, the participation in shadow education is still higher than in Japan for all school levels. In Japan, students have an ability to choose among private and public schools, and many of them, especially those that are considered “elite”, have non-standardized entrance examinations. For that reason, we can suggest that the public education system in Japan is more hierarchical than the Korean due to multiple reforms that happened in the education system of the latter country. Based on that, we may theorize that shadow education should have more demand in Japan than in Korea, but the facts tell us the opposite. That indicates that the combinations of factors that drive the demand for shadow schooling might be different in these two country-cases.

Concerning the mode of usage, the data from KOSIS (2020) shows that in 2019 in Korea, about 85% of all students that participate in shadow education do it for remedial reasons. However, 56% of high school students said that they used it for the exam preparation, and 46% of middle school students stated “study in advance” among the main reasons. In the case of Japan, the latest survey showed that only about 13% of middle and high school children attended *juku* to achieve higher grades. The main reasons stated are remedial and socialization (~50% for each type) (MEXT 2007). According to BRET (2017), 32% of middle and 20% of high school students used *juku* for exam preparation.

We can see that socialization plays a significant role in *juku* participation in Japan. Unfortunately, KOSIS did not include this element in its survey. Therefore we cannot say for sure if this aspect is important for Korean students or not. What we can see is that more students in Korea seem to receive more tutoring for competition purposes than students in Japan. If enrollment rates in supplementary education schools are generally high, the information about “modes” of usage might indicate quality problems that exist in the mainstream school system or problems of anxiety and insecurity that people might have in relation to the public school system. Potentially, the current school quality improvement policy of the Korean government might be the reaction to the high rate of shadow education usage for remedial reasons.

The supply of shadow education services is similar in Korea and Japan: there are cram schools that offer customized services, traditional home tutoring and correspondence/internet courses. In both cases, cram schools (*hagwon* and *juku*) attract the largest audience. On average,

41% of students who use extra lessons use *hagwon* in Korea. These rates increase in high school – 51% (KOSIS 2020). In Japan the rate is even higher: 49,7% of elementary and 60% of middle school students that used shadow education chose *juku* in 2013 (MEXT 2013). Such high rates explain why Korean government put special attention on the regulation of *hagwon* business.

In 2012, according to MEXT (2014), Japanese spent monthly about 140 USD, ~258 USD and ~305 USD per month for *juku* (for elementary, middle and high school levels respectively). Expenditures on *hagwon* were reported higher for 2019: 294 USD, 402 USD and 531 USD per month. High average prices on extra learning opportunities might have acted as an incentive for governments to provide an alternative to those students who cannot afford such privilege. For the Korean case, these are after-school classes, introduced by the initiative of the government, and the Educational Broadcasting System. In Japan – the introduction of *Chiiki Mirai Juku* as a free alternative of a classical *juku*.

Table 7. Summary of the scale, mode and intensity of shadow education in Korea and Japan.
Source: MEXT (2007); BRET (2017); KOSIS (2020); World Bank (2020). Abbreviations: es. – elementary school; ms. – middle school; hs. – high school.

Indicators	South Korea	Japan
Number of pupils total	9.213.546 (2017)	10.165.150 (2017)
Participation rates (all types)	83,5% (es); 71,4% (ms); 67,9% (hs) (2019)	81,6% (es); 75,9% (ms); xx% (hs) (2007)
Participation rates (academic subjects)	57,9% (es); 61,8% (ms); 57,8% (hs) (2019)	49,1% (es); 57% (ms); 36,3% (hs) (2017)
Participation rates (<i>hagwon</i> and <i>juku</i>)	~41% (all levels) (2019)	49,7% (es); 60% (ms); xx% (hs) (2013)
Size (total)	~69.678 <i>hagwon</i> (2014)	~50.000 <i>juku</i> (2007)
Reasons for usage (mode)	Mixed, emphasis on competition	Mainly remedial
Reasons for usage (by reason)	Remedial: ~85% (all levels) Study in advance: 43% (es); 46% (ms); 29% (hs); Exam preparation: 13% (es); 32% (ms); 56% (hs); (2019)	Remedial:~55% (es) and (ms); Socialization:~50% (es) and (ms); Better grades:~13% (es) and (ms); Exam preparation: xx% (es); 32% (ms); 20% (hs); (2007)
Expenditures <i>hagwon/juku</i>	294 USD (es); 402 USD (ms); and 531 USD (hs); (2019)	140 USD (es); ~258 USD (ms); and ~305 USD (hs); (2012)

4.2.3. Reflection on the economy and society

The research showed that shadow education business has a significant market size in both country-cases. In Japan, it is estimated that in 2015 total private expenditures for all types of tutoring (*juku*, correspondence courses, e-learning and others) were about ~12 billion USD. The share of *juku* is ~7.8 billion USD (Dawson 2010, 16; Entrich 2018, 50). In Korea, total private expenditures were about 18 billion USD. The share of *hagwon* is ~9 billion USD (KOSIS 2020) (see Table 8). We can see that an overall shadow education sector is 6 billion USD larger in Korea than in Japan. Moreover, we have seen that since 2016 it experienced 20% growth: participation rates increased as well as average monthly expenditures on tutoring. The literature suggests that Japanese shadow education market experienced high growth only in the 1970s and 1990s (after the introduction of *Yutori kyouiku reform*), but during the last ten years was stable (BRET 2017; Entrich 2018, 193).

Table 8. Reflection of shadow education on the economy of Korea and Japan.

Source: Dawson 2010, 16; Entrich 2018, 50; MEXT 2012; KOSIS 2020. Abbreviations: es. – elementary school; ms. – middle school; hs. – high school.

Indicators	South Korea	Japan
Total private expenditures	~18 billion USD (2019)	~12 billion USD (2015)
Total private expenditures on <i>hagwon</i> and <i>juku</i>	~9 billion USD (2019)	~7.8 billion USD (2015)
Yearly household expenditures (% of average household income)	~17% (~25% for hs. year) (2018)	~10% (6% (es); 11% (ms); 13% (hs); (2011)
Average high-school tuition fees	~1.400 USD (2019)	~2.200 USD (2011)

Estimated household expenditures for shadow education are also higher in Korea than in Japan (~17% and ~10% on average on all school levels respectively). The level of expenditures is the highest in both cases for high schools (~25% in Korea and ~13% in Japan). Taking into consideration that in both countries, households are obliged to pay yearly tuition fees for high schools, private expenditures on education can become a burden for low-income families. For the reference, school tuition fees are about 1.400 USD in Korea and 2.200 USD in Japan for ordinary public schools (The Japan Times 2011; The Korean Times 2019). Furthermore, empirical evidence for Korea shows that families of higher income group spend twice as much on shadow education services than families of less fortunate backgrounds. Significant consumption differences are also shown for Japan. Many scholars argue that shadow education systems in

Korea and Japan became inseparable from public education systems. In other words, without supplementary lessons, students have a risk not to be able to show adequate academic results in comparison to their peers. If that is really true, the issue of educational equity becomes actual.

We can see the efforts of both governments to make educational opportunities equitable, especially when it comes down to the less-advantageous part of the population. In both countries, governments subsidize high school tuition fees of low-income families. However, only the Korean government addressed specifically shadow education services by making a substantial investment and promotion of Educational Broadcasting System as a sort of "public shadow education service".

The issue of students' wellbeing has been addressed by both the Korean and the Japanese governments. However, only the former connects the "examination hell" problem to the proliferation of shadow education. The Japanese government looked for the cause of this phenomenon inside its public system only. Based on its vision, excessive competition for academic attainment emerged due to the great difficulty of graduation exams and an overloaded school curriculum, which made students regularly cram to achieve the best performance. *Yutori* policy as a relaxation of the curriculum was believed to solve the "examination hell" problem.

4.3. Comparison of government responses

4.3.1. Regulations applied

Introduction

We can see a completely different response pattern when we talk about shadow education regulation in Korea and Japan. Shadow education industry has always been a matter of concern for a Korean government, which connected it to the issues of social inequality and to an "examination hell" problem. In contrast, the Japanese government treated supplementary education just as an ordinary business (see Table 9).

Table 9. Summary of shadow education regulations in Korea and Japan based on governments' response patterns.

Patterns	South Korea	Japan
Policies equalizing school allocation and regulating resources	- Abolition of middle school entrance examinations (1968) - High school equalization policy (1973) - Fee-free high schools (2021) - Standardization of high school graduation exam (1995)	- "Yutori kyouiku" or "pressure-free" reform (the 1990s) - 6-year secondary schools (1999) - Standardization of high school graduation exam (1999)
Policies limiting private tutoring	- Ban on shadow education activities (1980) - Control of the private teaching institutes and tutoring activities (1997-2020) - Income tax	- Income tax
Policies improving the quality of mainstream education	- Policies increasing school autonomy and reducing shadow education spending (2000-2009)	- Improving the status of teacher profession (the 1970s and the 1980s)
Policies broadening access to supplementary education	- Educational broadcasting system and after-school programs (2000–2020)	- <i>Chiiki Mirai Juku</i> Program (2015)

However, we can identify specific "indirect" regulations of the Japanese government, which might have affected the shadow education industry as well. Let us look at each regulatory pattern more closely and see how the responses of both governments are different from one to another.

Policies equalizing school allocation and regulating resources

First, we can see that both governments at some extent applied equalizing policies to eliminate excessive competition between school levels what should have decreased the demand for supplementary education (at least at earlier school stages), release fierce competition and give students equal enrollment opportunities. The policies implemented in Korea removed extra examinations between all school levels, with the exception of a few foreign languages high schools and special purpose high schools, for which competition is still quite intense. Furthermore, the Korean government introduced a school equalization policy, according to which students cannot freely choose middle and high schools and are allocated to one by the lottery, based on the place of their residence. What is unique, private high schools are forced to take in all children allocated to them, since the government compensates the tuition fee difference. This decision eliminated an "informal" ranking of schools placed by parents and students. Additionally, it fixed the problem of corruption inside the school, since wealthy parents could previously "buy" their place in better-ranked schools. Recently, the Korean government announced that by 2021 all public high schools would be made fee-free to further release the economic burden on low-income families.

In comparison to the Korean regulatory case, Japanese regulatory attempts look quite modest. In 1999 the Japanese government introduced "seamless" 6-year schools by merging some middle and high schools together. However, only a limited number of such schools were designed like that. The system still has separate elementary, middle and high schools. Nevertheless, this measure was believed to reduce "examination hell" that existed between middle and high school levels. Additionally, both Korea and Japan implemented standardized high school graduation exams in the late 1990s with an aim to normalize high school education. Also, both increased enrollment quotas and advised universities to use school grades and headmasters' recommendation letters in addition to standardized exams, since that increased fierce competition for admission and caused high demand for shadow education services.

At this point, similarities to the Korean case come to an end. The education system in Japan consists of public and private schools. Private schools exist for all school stages: elementary, middle and high. The choice between schools is not limited by the place of residence. Moreover, schools of different levels (both private and public) have the power to set their own entrance examinations. Tuition fees for private schools are regulated by the market forces and literature suggests that "informal rating" of schools plays a significant role in students' choices.

Unique, in comparison to Korea, was an attempt by the Japanese government to regulate school recourses to fight the "examination hell" problem by the relaxation policy. The idea of the government was that demanding and challenging curriculum, and university entrance examinations were key reasons why students had to cram for their lessons. As a result, the content was cut by around 30% to the "essential minimum", and from 2002 the lessons on Saturdays were cancelled. (Entrich, 2018, p.290) The Korean government did not do any kind of similar dramatic curriculum simplification reforms.

Policies limiting private tutoring

As we have seen, the Korean government has made multiple attempts to limit shadow education since the demand for it is outstanding. These reforms range from the total ban of tutoring in the 1980s to specific laws that regulate the sector. Based on the research, the Japanese government has never issued any specific regulations that target the tutoring business. Japanese shadow education functions (and is regulated) just like any other similar type of business (services) and *jukus* are officially not seen as schools. Even though shadow education is also not seen as a part of the education system in Korea, the *Act on the establishment and operation of private teaching institutes and extracurricular lessons* provides strict guidelines concerning the environmental and hygiene regulations which match those that are used in public schools. Moreover, since Korean government has always connected shadow schooling to the issue of equality of educational opportunities, according to the law it has the power to monitor curriculum taught in a *hagwon*, profiles of tutors, including their education, career records etc. as well as the level of tuition fees that are set for the lessons. Superintendents have the power to order hagwons that are under their jurisdiction to lower their fees if they find that those are too high.

What is interesting concerning the Japanese case is that the research did not show that there is any kind of limitations that forbid school teachers from giving tutoring and be simultaneously employed in *jukus*. However, it is possible that those can be set by each public school individually.

The aspect that unifies the regulation in Korea and Japan is taxation. In both countries, freelance teachers are obliged to declare their incomes and pay income taxes. According to the data gathered, in Japan, every individual, who provides tutoring, is obliged to do that. In Korea, students that are enrolled in high schools and tertiary education are exempted from taxes if they offer private classes.

Policies improving the quality of mainstream education

We can see some efforts to improve the quality of education from sides of both Korean and Japanese governments.

Poor professionalism of public teachers is considered to be one of the primary demands for extra education. The similar element that both countries have in their policies is the improvement of teachers' quality. In Korea, since 2008, the efforts were made to introduce teachers' assessment system and information disclosure system to enhance schools' accountability. In Japan, in the 1970s, the government issued "*the law concerning special measures for securing of capable educational personnel in compulsory education schools for the maintenance and enhancement of school education standards*", with the help of which teachers' economic status was raised significantly and job status secured. From 2009 the government introduced obligatory in-service teachers' training and systematized the process of teachers' qualification improvement.

Compared to Japan, we can see that Korean government has made more efforts to organize free after-school programs to reduce financial burdens from families that cannot afford private tutoring or to support low achievers and stimulate high-achievers.

Policies broadening access to supplementary education

Finally, we can see that both Korea and Japan have introduced state-supported alternatives to shadow schooling. In the case of Korea, it has developed an Educational Broadcasting System (EBS) together and the e-learning system. EBS offers a range of channels that target elementary, middle and high-school children. The content offered is on general topics as well as specifically for exam preparation. The government claims that 70% of the content of CSAT is provided through EBS (Kim 2016, 28). As we have mentioned before, the Japanese government has never seen shadow education as an issue. Therefore *Chiiki Mirai Juku Program* is officially not a shadow education alternative but the initiative to support low-income families and low achievers with extra education. What is remarkable in this program, is that the government is forming partnerships with *juku* business to provide free supplementary education to the masses, rather than seeing it as a threat to the education system.

4.3.2. Implications for education planners

Introduction

Traditionally, the primary focus of policymakers and education planners has been on mainstream education systems. These systems consume considerable resources and have an important intrinsic and economic value for individuals and for societies as a whole (Shields et al. 2017). However, scholars have shown that since education became increasingly massified, shadow education systems have experienced considerable growth worldwide. Furthermore, the patterns of their growth, as well as features, differ from one case to another (Bray 2006). It is also shown that rather than being a discrete activity, shadow education started to emerge as systems, forming a large business (Bray 2009).

East Asian countries, including Korea and Japan, are the "classical" cases to study shadow education. As we have discovered, shadow systems became a major phenomenon in both countries and too large to be wholly ignored by authorities. In other countries the shadow industry is smaller than in Korea and Japan but is growing continuously (Bray and Lykins 2012). In some countries, policy planners and educators have been highly critical of the role that shadow schooling plays in society. They argue that the system creates socioeconomic inequalities, causes "examination hell" and changes the attitude of the society towards public schooling systems (Bray and Silova 2006; Kobakhidze 2015; Buchmann et al. 2010; Entrich 2018). On the other hand, it is seen mainly that supplementary schooling increases the quality of social capital, allows individuals to realize their potential and supports lifelong learning ideology (Heyneman 2011).

Despite all the issues mentioned above, shadow education systems have been largely ignored by policymakers worldwide. The study of the content and context of shadow education in Korea and Japan and the comparison of government policies of these countries provides some important lessons to education planners.

Monitoring of shadow education

The case of Korea is perhaps very unique since the Korean government has been closely monitoring the demand and supply of its education system since 2007. As we have seen, the statistics published by the government also provides some granular data on private tutoring industry: enrollment rates by school grades, by region, by the type of tutoring, by the type of subjects etc. Besides, it includes the data concerning the participation in shadow schooling based on SES of

students. However, this is an exemption to the rule. Much of the information, presented in this study for Japan was gathered by individual researchers, small teams of researchers or by private research institutions. Even though since 1980s MEXT has been monitoring shadow education to some extent, the data provided by the Ministry is not robust. Furthermore, it is hard to work with in order to trace some trends. In countries where shadow education was never considered as an issue, its statistical monitoring might be even weaker or even non-existent.

Policymakers who want to regulate shadow education have a variety of options. These can be: increasing teachers' salaries, reforming university entrance examinations, providing "public shadow education" to low-income students etc. However, it is necessary to have timely and relevant information about the shadow sector before choosing the policy direction, since, as it was shown in this study, the reasons for the demand for extra tutoring can vary significantly from country to country.

There are plenty of ways of how the data can be gathered. It can be received via surveys on household expenditures. By adding the category "educational expenditures", we can trace connections between SES of households and the consumption of private tutoring. Additionally, more granular data can be gathered via surveys conducted in schools. Here we might find out what kind of tutoring and at which extent is used by students, depending on a certain grade. Besides, surveys implemented during the final high school examinations can indicate the difference in educational outcomes of students who received private tutoring and those who did not. Finally, if the aim of policymakers is to monitor shadow education business more closely (tutoring schools), the government can order schools to disclose information regarding tuition fees and teachers' profiles. However, there can be a lot of legal obstacles for the implementation of the last point, which depend on the specific country case.

Studying the context and content

Based on the comparative study of the Japanese and Korean shadow education, we can see that the fact of getting accurate statistical data would create an illustrative but not yet a holistic picture. The shadow education is quite prominent and well-established in both country-cases. However, the behaviour of the industry and possibly the nature of the demand are different. It is essential for education planners to carefully examine their specific country cases in terms of the context of shadow education and its content. As an example, it is important to give an answer to the following questions:

- What is the historical background of shadow education, and how did the current demand for it develop?
- What is so unique in shadow education supply that parents and students acquire it in addition to public service?
- Can public schools adapt to fulfil the gaps in the demand for educational services?
- What are the main types and methods of shadow education provision, and who provides them?
- Can public schools adapt their personnel, teaching methods and use modern technology to satisfy the demand?

Learning from the comparative analysis like this and from experiences of other countries can help education planners to identify similarities and differences of their shadow education systems to those in other countries and to see the range of policy options available.

Reforming allocation systems

Both cases of Korea and Japan (especially the example of the former) showed us that the reform of the allocation system might affect the demand for private tutoring. It was shown that examination hell problem and excessive cramming could be caused by high-stake exams that exist between school levels. Policymakers can consider reforming the system of allocation by abolishing these exams (just as it was done in Korea between elementary, middle and high school levels and in Japan between elementary and middle school levels for some schools). The less hierarchical one-track system is likely to lower the demand for shadow education and change its form and role.

The standardization of the final university exam can be a way to normalize higher education and equalize the allocation process, strictly based on a principle of meritocracy. Nevertheless, such single high-stake exams create strong pressure on students and stimulate the growth of shadow education. Education planners can stimulate universities to broaden the assessment criteria, using not only the results of these high-stake exams but also high school grades and letters of recommendation.

Finally, "informal ranking" of ordinary public schools can stimulate students to cram for entrance examinations. Student allocation based on the place of residence or even by the random method (like it was done in Korea) could eliminate this ranking. However, it is important to

remember that schools should have reliable systems of monitoring and accountability in order to put such reforms into action and avoid corruption.

Modifying the curriculum

The reform of the curriculum is another lever to pull in order to affect the shape and size of shadow education. The experience of Japan showed us that the reduction of teaching hours and the simplification of graduation exams could influence the “examination hell” problem removing the necessity to cram too much for exams. Policymakers may consider such reform with caution since there is a high risk that such actions can reduce academic results of students. Besides, such measures might cause an even higher demand for extra tutoring for aspects that were not sufficiently covered during classes.

Another policy option is the introduction of after school programs, just like it was done in Korea. Even though such initiative is costly and requires recruiting teachers inside or outside the school, after-school programs can provide opportunities for students who cannot afford extra tutoring or live in rural areas to study more after their lessons.

Improving the quality of teaching staff and school accountability

Low teachers' professionalism and low socioeconomic status of teachers can increase both demand for shadow education and its supply.

Based on the experience of Korea and Japan, policymakers might consider reforming teachers' assessment and accountability systems that are present in schools. Additionally, they can introduce obligatory in-service teacher training and systematize the process of teachers' qualification improvement, like it was done in Japan in 2008. Furthermore, in some cases, low level of teachers' salaries might be a driver for the demand for shadow education and its supply. The experience of Japan in the 1970s showed that the increase in the payment made teachers' profession attractive again. Legally forbidding teachers to offer additional classes outside public school, like it was done in Korea through the *Act on the establishment and operation of private teaching institutes and extracurricular lessons* might lower the supply of shadow education services significantly.

Utilizing technology

Education planners can use modern technology to reduce fee-based tutoring by offering free learning opportunities to the masses. The case of Korea, the Educational Broadcasting System and e-learning platform are the most remarkable illustrations of that. The e-learning platform includes customizable material for CSAT preparation suitable for all levels, taught by most renowned teachers. It has dedicated blocks of content for learning math, English, foreign languages and software development. Besides, the Korean government issues special supplementary material for these courses.

Such practices require a significant effort and financial investment from the government, but it might decrease the demand for shadow education and/or allow low-income students to get equitable learning opportunities to their peers who have private tutors.

Forming partnerships

The study and comparison of Korean and Japanese cases showed us that policymakers could regulate shadow education through the cooperation with the local community, public schools and shadow education industry itself.

In case of Korea, superintendents collaborate locally with parents and other relevant organizations in order to assess if levels of tuition fees, advertising content, the content of the curriculum and opening hours of *hagwons* are set on the adequate level. Furthermore, such collaborations help to identify issues of child abuse and other illegal practices that might occur in cramming schools.

However, not all partnerships can be formed in order to restrain and control shadow education business. Both examples of Korea and Japan show us that mutually beneficial partnerships with tutoring institutions are possible. One example from the Korean case is the government cooperation with “star-tutors” (very famous tutors that are well-known among high school students and parents in Korea) and with big *hagwon* networks. The Educational Broadcasting System and e-learning platform of Korea provides a broad range of courses part of which is taught by those “star-tutors”. Another illustrative example is from Japan, where the government does not see shadow education as a necessary evil. Through the cooperation with tutoring organizations, private tutors, public schools, universities and the local community Japanese government was able to implement free “public shadow education” in schools (*Chiiki Mirai Juku* Program) aimed especially at low-income students and low achievers.

Implications for equality of educational opportunities and students' wellbeing

One of the major reasons why policymakers may consider to regulate (or at least monitor) private tutoring is the evidence of its close connection to the issue of equality of educational opportunities and students' wellbeing.

Based on the statistical data gathered and on the evidence from the secondary sources, it was shown that the proliferation of shadow education might cause socioeconomic inequalities through the reproduction of wealth. The goal of public education is to produce outstanding social capital based on the learning abilities of each individual regardless of the financial background. However, it is self-evident that families with better socioeconomic backgrounds can afford more private tutoring with better quality than low-income families. Educational expenditures can be seen as one of many economic and social fortunes of wealthy families. The expansion of supplementary tutoring and its growing importance might have certain implications for social cohesion. If the participation in shadow education significantly increases the chances for better educational outcomes, official statements such as "all people shall have the right to receive an equal education correspondent to their ability..." (The Constitution of Japan), which are typical for constitutions of many democratic countries are undermined.

With reference to Korea, it is commonly suggested that shadow education puts families from lower SES to disadvantage, since their children might have fewer possibilities to succeed in academia than students from more affluent families, despite possibly high academic abilities. Results of the research show exceptionally high levels of household expenditures on shadow education in this country and highlight substantial differences in consumption depending on SES of families. Similar evidence was gathered for Japan. It was shown that shadow education became a tool of social exclusion since wealthy families use it to secure their social status.

Not only the fact that shadow education is consumed by families of higher SES might have implications for educational equity. The research showed that proliferating shadow education might have a negative impact on the quality of mainstream schooling, what puts families that cannot afford private tutoring to disadvantage again.

The experience of Korea and Japan showed that teachers could become demotivated to carry out their duties properly since they know that the majority of students have access to supplementary learning. The case of Japan even showed that some teachers advise their students to use supplementary services since they know that the material that is taught in school will be not sufficient for getting high exam scores.

Finally, education planners should pay attention to students' wellbeing issues. For cases of Korea and Japan, it was shown that fierce competition, excessive cramming approaches and limited freedom for self-expression might hurt students both mentally and physically in such sensitive and unstable periods of their lives. Both Korean and Japanese governments connected "examination hell" problem to mental and health problems as well as to the problem of juvenile delinquency. Based on the essence of the business, shadow education industry can encourage fierce competition, rivalry and anxiety.

The facts mentioned above support the significance of shadow education monitoring and regulation. In some countries, such as Korea and Japan, shadow education is already too large to be completely ignored by authorities. In others, the industry is still small but developing. Effective prevention of the problem is often better than its cure. The attention of education planners is particularly important in those countries where shadow education has not yet gained such power as it has in Korea and Japan. In these case governments have more opportunities to regulate supplementary education industry, supporting its positive features and mitigating undesirable outcomes of it. These efforts are particularly important not only for the reason of social and educational equity but also to increase the efficiency of education systems.

4.3.3. Potential for future research

Scholars have shown that in recent decades shadow education has become a major phenomenon all around the world. This research contributes to existing studies on shadow education in East Asian region, more specifically to the literature that explores shadow education regulation and educational equity in Japan (e.g. Stevenson and Baker 1992; Baker et al. 2001; Roesgaard 2006; Heyneman 2011; Bray and Lykins 2012; Bray and Kwo 2013; Matsuoka 2015; Entrich 2018), and in South Korea (e.g. Mori and Bake, 2009; Kim and Lee 2010; Lee et al. 2010; Choi and Cho 2015; Kim 2016). It also adds to existing studies of supplementary education around the world (e.g. Aurini and Scott 2004; Bray and Silova 2006; Popa and Acedo 2006; Buchmann et al. 2010; Sobhy 2014). Much more attention is necessary to study the scale, intensity and mode of shadow education in other countries, its nature of demand and supply and implications for mainstream education systems.

Many of the studies mentioned above concentrate on some specific features of shadow education and its relationship with mainstream schooling in specific country cases. Some of them create a high-level illustration of the development of shadow education around the world by

gathering facts and figures from various countries (e.g. Bray 2006; Bray and Lykins 2012). Others theorize on methods, how to regulate shadow schooling (Bray 2009). Some systemize and describe the most common shadow education providers in South Korea and Japan – *juku* and *hagwon* since they are the biggest shadow education providers in South Korea and Japan (e.g. Roesgaard 2006; Kim 2016). The value of this specific study tried to give the reader a holistic view of the current state of the shadow education development in both countries, which are the leaders in terms of the size of shadow education industry. It endeavoured to connect the context of shadow education, its scale, intensity and mode to possible economic, social and educational outcomes and, finally, to connect those outcomes to government responses (if there were any). The comparative analysis of regulations in Korea and Japan showed us how shadow education is related to issues of educational equity and students' wellbeing and how they were handled by both countries.

The research faced some obstacles which can be seen as opportunities for future research. The meaning of the metaphor – "shadow education" – implies that this industry not only imitates the "body" that casts this shadow but also that a part of its activities is hidden. If the government itself does not provide sufficient data on the consumption of private tutoring, that means that the collection of the data falls on the shoulders of the independent research. As it was previously mentioned, the case of Korea as a unique exception. With reference to the case of Japan, most data presented in this study was gathered by individual researchers, small teams of researchers or by private research institutions. MEXT conducts a survey on shadow education. However, the design of this survey does not allow to construct a clear picture of the shadow education consumption, especially in relation to issues of educational equity and "examination hell" problems. Here are the aspects that still need to be explored by scholars for a Japanese case:

- Enrollment rates in shadow education among high school students. This indicator is absent in MEXT surveys but is crucial because high school is a significant transition period in academic student lives when they take the National Central Test for the university admission.
- Consumption of shadow education, depending on the level of household income for all school levels. Additionally, its consumption depending on SES of parents, including their age, occupation and the highest level education completed.
- Consumption of shadow education depending on the number of children in the family.
- Consumption of shadow education depending on the place of residence (rural vs urban).

- Hours spent for out of school supplementary education. Accurate data is completely missing for this aspect. However, it is particularly important in its connection to the “examination hell” problem.
- Previous research indicated gender differences in the consumption of private tutoring (Stevenson and Baker 1992). More actual data is necessary to investigate if it is still the case in 30 years.
- A clear distinction in surveys between fee-based private tutoring that is consumed outside public schools, to *naraigoto*, which can include all kinds of fee-based and free supplementary lessons. A similar distinction has to be made in regard to private tutoring used for school subjects and for hobby and leisure. Increasing numbers of the first type can indicate problems in the mainstream system and can have serious implications for children that cannot afford supplementary lessons.

This study advises forming a research group in order to gather missing and more robust data, based on the points mentioned above. These indicators can have a high significance to education planners and policymakers in Japan because they can shed light on the most actual status of private tutoring industry and its connection to educational equality and “examination hell” problem.

With reference to the Korean case, we can see that the survey presented by KOSIS (2020) can be slightly enlarged to improve the assessment of the reason why students consume more private tutoring. The current survey mainly measures whether the mode of shadow education usage is “remedial” or “enrichment”, but such important reasons as “socialization”, “enjoyment of learning” or “quality of teaching personnel” are missing. Adding these parameters can help education planners discover possible gaps in the mainstream system that shadow education fulfils, which can significantly influence the content of current quality improvement policies.

Finally, this study uncovered a significant gap in the recent quantitative research that studies the effect that shadow education might have on the educational outcomes of students, especially for the case of Japan. Referring to the case of Korea, Choi et al. (2012) have shown a positive effect of shadow schooling on academic achievement in math and reading (Choi et al. 2012, 315). Kang (2007) and Park and Lee (2005), cited in Choi et al. (2012), have shown a positive effect of tutoring on PISA results of Korea and positive effect on national exam (CSAT) results. The research made by Sohn et al. (2010) indicated a positive correlation between the time spent on private lessons and academic achievement. Even though more actual data is still

necessary for the Korean case, we can see that there were some efforts made in the search for cause-effect relationships. For the Japanese case, this study identified the research of Stevenson and Baker (1992) and Baker et al. (2001), which showed that participation in shadow education increases the likelihood of Japanese students to attend university. Entrich (2018) showed that shadow education generally increases the chances of achieving a higher education level. He showed that students from the higher socioeconomic background who attend academic *jukus* had gained significant advantages for the transition to high school and tertiary education (Entrich 2018, 179). Nevertheless, we can see that the number of these kinds of studies is significantly limited. The effect of the introduction of the *Yutori kyouiku*” reform and of *Chiiki Mirai Juku* Program on the consumption of academic shadow education is of particular interest for this study. Even though the cause-effect research has its own limitations and should be taken cautiously, it might help education planners to make more informed decisions on the regulation of shadow education business.

5. Conclusion

The purpose of this master thesis was to give a detailed description of the supplementary education industry in South Korea and Japan and examine government policies that regulate it. The research question of the paper was: *"What are the similarities and differences of South Korea's and Japan's government policies targeting equality of educational opportunities and student wellbeing (with the focus on shadow education system)?"* In order to provide an answer to this question, an eclectic "Context – Content – Process" framework was constructed based on the literature review.

South Korea and Japan proved to be exceptionally curious cases for the study of the shadow education industry and its regulation. It was reported that shadow education business has been growing since the beginning of 21st century and in some countries, the industry got so big that in its' is hardly possible for regulators to completely ignore its existence anymore (Bray and Kwo 2014, 12-21). East and Southeast Asian countries have been in the spotlight of attention during the last decades. Especially cases of South Korea and Japan, where shadow education and its biggest institutions – *hagwon* and *juku* are reported to be one of the most systematized and sophisticatedly developed in the world (Bray and Lykins 2012, 4-7). Some scholars believe that mainstream education systems of these two countries could not even produce the same outstanding results, which we can see in international ratings, without students regularly attending cram schools (Choi et al. 2012, 315).

What is so curious about the cases of South Korea and Japan that this research discovered? If we look briefly on the way education systems are structured and how shadow education functions in these two countries and on its consumptions rates we may think that the way shadow education functions and its regulation should be similar, however, it is not confirmed.

Korean government historically has connected shadow schooling to unequal distribution of educational opportunities and to the "examination hell problem". Authorities have seen it as a threat to equity of educational opportunities and to the quality of public schools. Different patterns of regulations were applied to Korean shadow education system: from its complete ban in the 1980s to strict control of shadow education system and simultaneous improvement of the quality of public schooling in 2000s. The case of Japan is completely the opposite. The Japanese government has applied a "*laissez-faire*" approach in the regulation of shadow education system.

The problem of growing shadow education was addressed once by the administration of Prime Minister Nakasone in the early 1980s, but their concerns never resulted in any specific regulations. The Japanese government and the Ministry of education have taken a position to tolerate shadow education industry and to see it as service that gives its citizens more opportunities for self-realization rather than a sector that possess a threat to mainstream education. We can even see the cases of government – *juku* cooperation. Nevertheless, the research identified several policies that might indirectly affect the size and the intensity of shadow education, among which “*Yutori kyouiku*” (relaxation) reform and *Chiiki Mirai Juku* Program.

There are certain contextual differences that make shadow education systems unique in both countries. Firstly, the results of the research show that the participation rate in supplementary lessons for school subjects is generally higher in Korea than in Japan. Moreover, since 2016 it has shown significant growth. It is an interesting observation since the Korean government for decades has been regulating the growth and demand for private tutoring and tried to improve the quality of public schooling in order to decrease this demand. In contrast, the Japanese government has not done anything to limit the growth of private tutoring, but the industry has been stagnating during the last decade. There are even some pieces of evidence that due to decreasing household income, the size of the shadow education sector also slightly decreased. Not only the scale of shadow education is different in these two countries but also its mode of usage. The research indicates that students in Korea more actively use supplementary tutoring for competition purposes than those in Japan. We can also see the difference in the supply of shadow education (types of *juku* and *hagwon*) in both countries and in the cost of private tutoring (costs that are reported in Korea are significantly higher than in Japan).

Why are regulations and shadow education systems so different in South Korea and Japan? This issue is yet to be investigated, but one of the possible reasons might lie in the cultural heritage of South Korea. There are of course particular characteristics of these two East Asian countries which unite them and which probably served as the impetus for the growth of shadow education. First, for societies where the role of credentials is high (like South Korea and Japan) the fact of getting high school diploma and a university degree is a mark of social status which can be a tool for social selection (Lee et al. 2010, 98; Mori and Baker 2009, 37). Second, education systems of both countries have certain breaking points where high-stake exams play a pivotal role in future academic lives of students. (e.g. CSAT in South Korea and National Center Test in Japan) However, if we look at the history of demand development in South Korea and in Japan,

we can see several curious facts. In Japan, the "*juku*-boom" goes back to 1970s – the era of rapid economic growth. There is a piece of evidence that these kind of institutions were not common in Japan and that they started to flourish only when household income in Japan became much higher, size of families smaller and education was massified. The case of Korea is different. We can see that the demand for shadow education (and for hagwon specifically) emerged and started to increase right after the education sector started to recover from the Japanese occupation regime and the Korean war. Many families, despite poor economic conditions, invested mainly into the education of their children. Even though the government put heavy regulations on private tutoring, educational fervour did not disappear. Possibly the legacy of Confucianism and the special value that society allocates to educational attainment (and the connection of educational attainment to the "social elevator") might be one of the reasons why the demand for supplementary education services in Korea is increasing. The special cultural value of education might also explain why the government sees it necessary to protect it from negative outcomes of shadow education.

The research highlighted the two-fold nature of shadow education. On the one hand it gives citizens more learning opportunities. It can help low-achievers improve their academic performance and high achievers to realize their talents. Furthermore, shadow education offers students more individual services and helps them to choose their future career paths. However, the research also emphasized the negative features of shadow education. Overuse of supplementary education is blamed for disrupting the learning process, demotivating teachers, stimulating a passive study attitude and placing constraint on critical thinking abilities of students. The connection of shadow education to educational equity and students' wellbeing is the most commonly mentioned issues in the academic literature. In this study, we have seen that both South Korean and Japanese governments (the latter indirectly) tried to regulate shadow education in order to protect the right of students from low-income families to receive high-quality education correspondent to their abilities. Additionally, both governments have endeavoured to reduce the "examination hell" problem, which is closely connected to the flourishing shadow education industry.

The comparative analysis of government regulations in Korea and Japan provides several important implications for education planners. Based on the experience of these two countries policymakers can consider policy options as a modification of curriculum, improvement of the quality of teaching staff and school accountability, utilizing technology to provide alternatives to

shadow education and working together with local communities (and even together with shadow education institutions) in order to protect the quality and assure accessibility of education to the masses.

The results of this study have identified several gaps and opportunities for future research. More robust data is necessary for the case of Japanese shadow education and especially the data that connects shadow education to socioeconomic inequalities and “examination hell problem”. Furthermore, more quantitative studies are required for both Japanese and Korean cases, specifically those that explore the correlation between the students’ participation in shadow education and their academic achievement. This research can be highly important not only for education planners in South Korea and Japan but also for policymakers from other countries. The efforts to monitor and regulate the shadow education sector are necessary not only for the reason of social equity and education equality but also to increase the efficiency of education systems.

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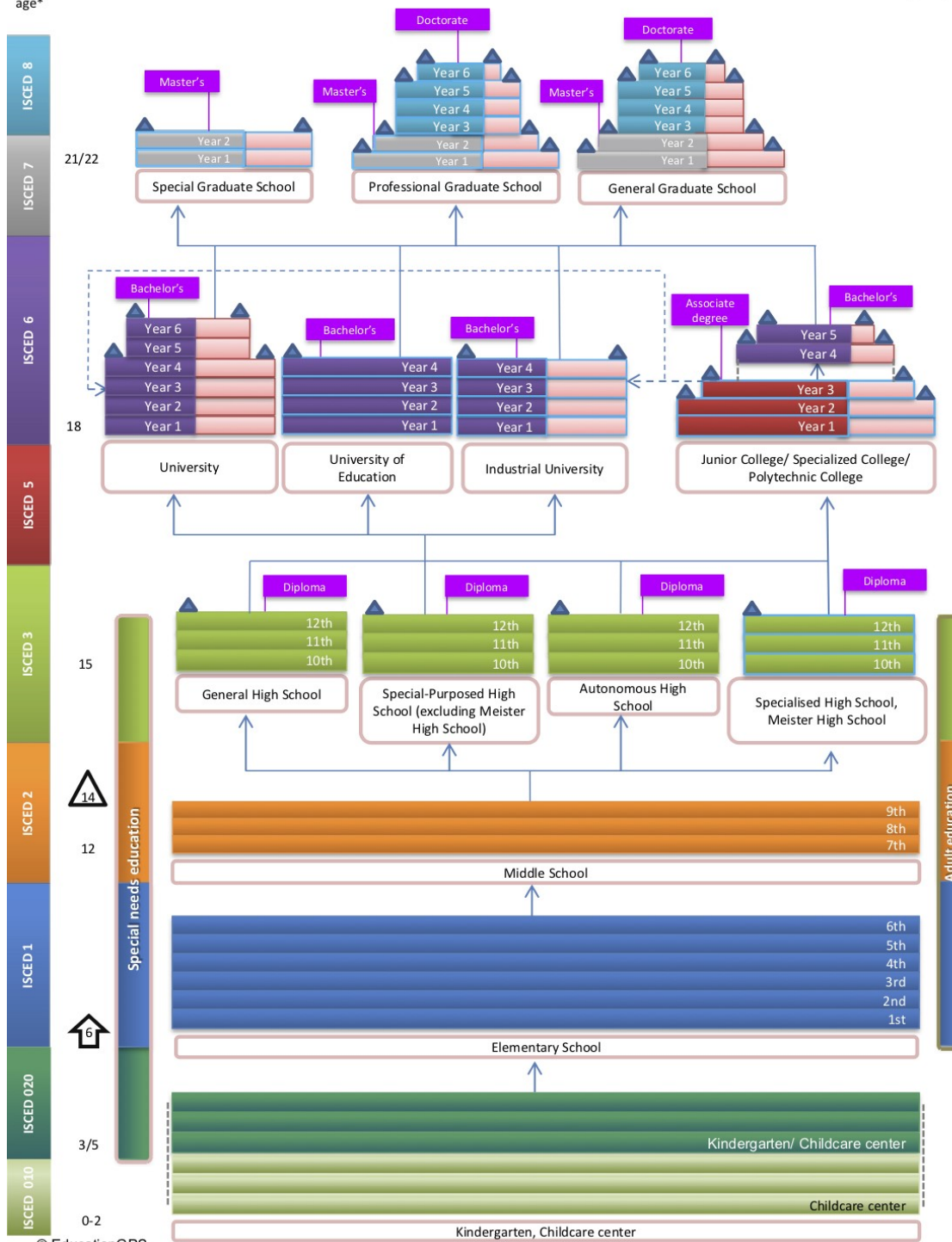
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Appendix 1

Theoretical
starting
age*

Korea

2018



Key

	Starting/ending age of compulsory education
	Recognized exit point of the education system
	Typical student flow
	Transfer from a programme to another
	Programme designed for part-time attendance
	Vocational/Professional orientation (according to national definition at the tertiary level)
	Single structure education (integrated ISCED levels)
	May be provided within one school structure
	Transfer at crossing lines is not possible
	Name of diploma, degree or certificate
2018	Reference year (school year 2017/2018 in the northern hemisphere)

* **Theoretical starting ages** refer to the ages as established by law and regulation for the entry to a programme, actual starting ages may vary depending on the programme.

Figure 15. Structure of Korea's Education System, 2018.

Source: OECD. 2018. "Korea: Overview of the education system", OECD Education GPS, https://gpseducation.oecd.org/Content/MapOfEducationSystem/KOR/KOR_2011_EN.pdf.

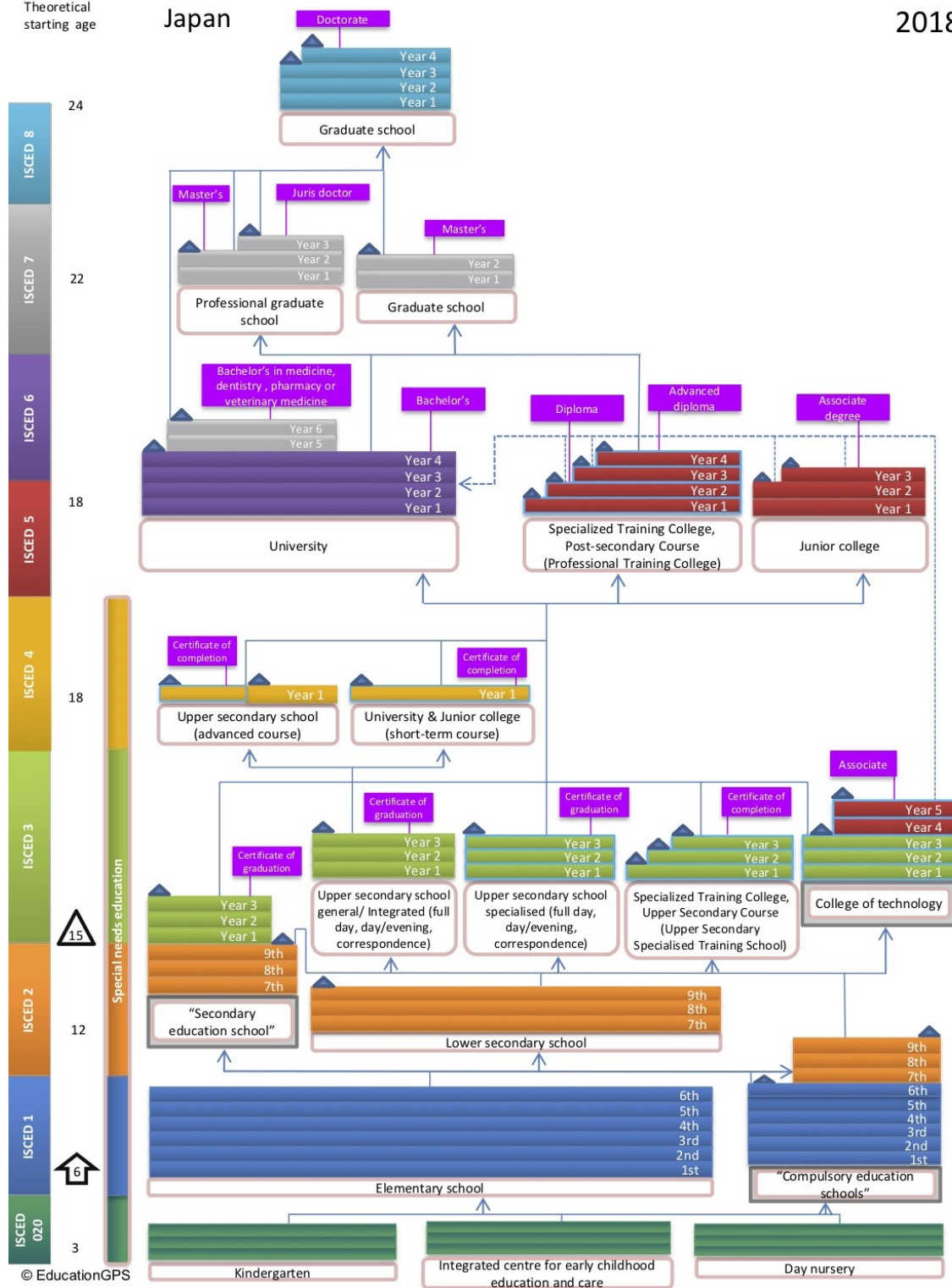


Figure 16. Structure of Japan's Education System, 2018.

Source: OECD. 2018. "Japan: Overview of the education system", OECD Education GPS, https://gpseducation.oecd.org/Content/MapOfEducationSystem/JPN/JPN_2011_EN.pdf.

TOTAL PARTICIPATION IN PRIVATE TUTORING 2007-2019, % OF ELEMENTARY SCHOOL STUDENTS

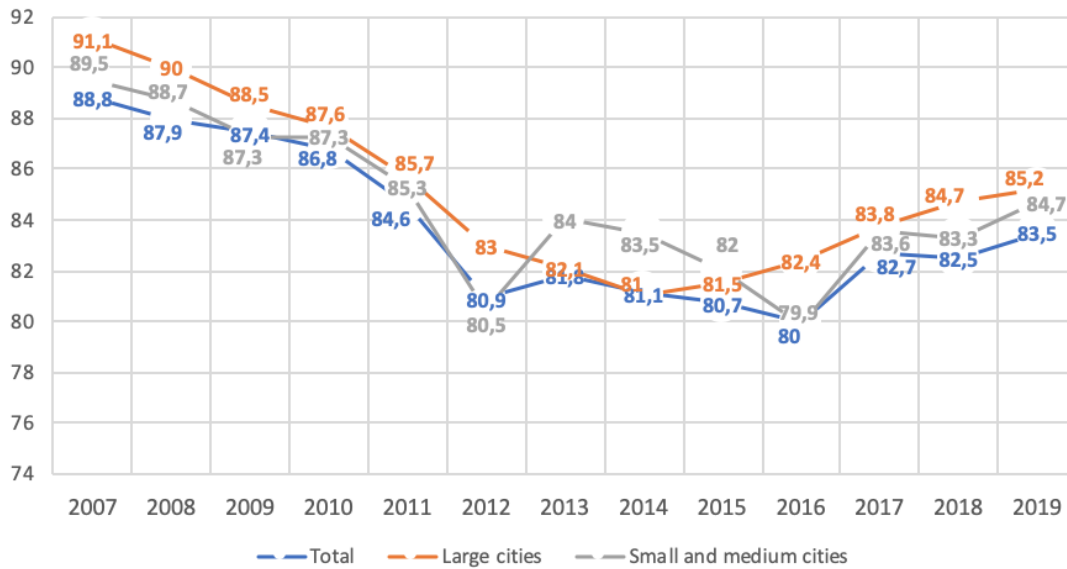


Figure 17. Total average participation rates in Korea from 2007 to 2019 (elementary school level).
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 14, 2020.

TOTAL PARTICIPATION IN PRIVATE TUTORING 2007-2019, % OF MIDDLE SCHOOL STUDENTS

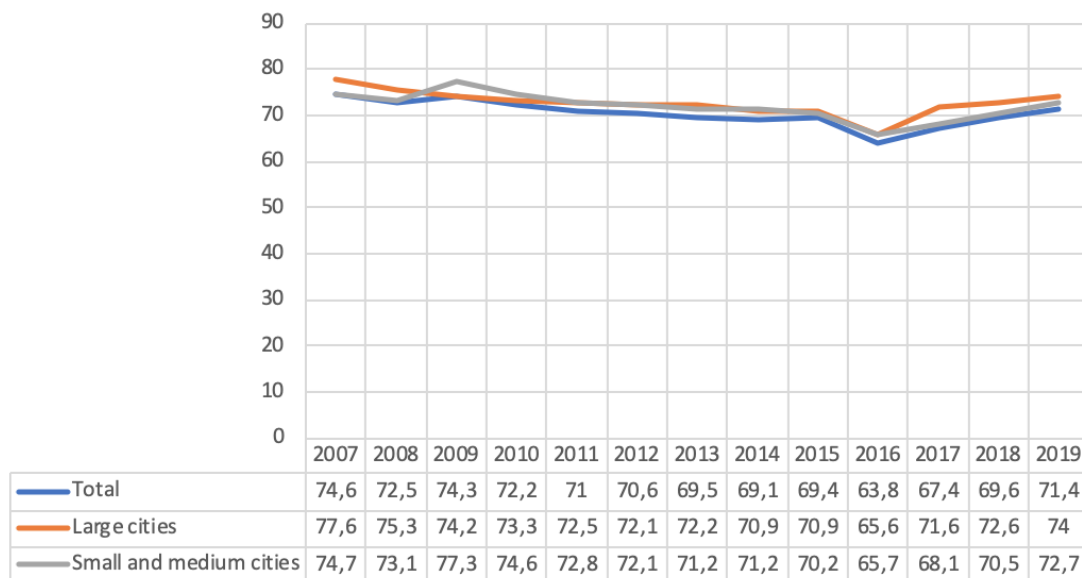


Figure 18. Total average participation rates in Korea from 2007 to 2019 (middle school level).
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 14, 2020.

TOTAL PARTICIPATION IN PRIVATE TUTORING 2007-2019, % OF GENERAL HIGH SCHOOL STUDENTS

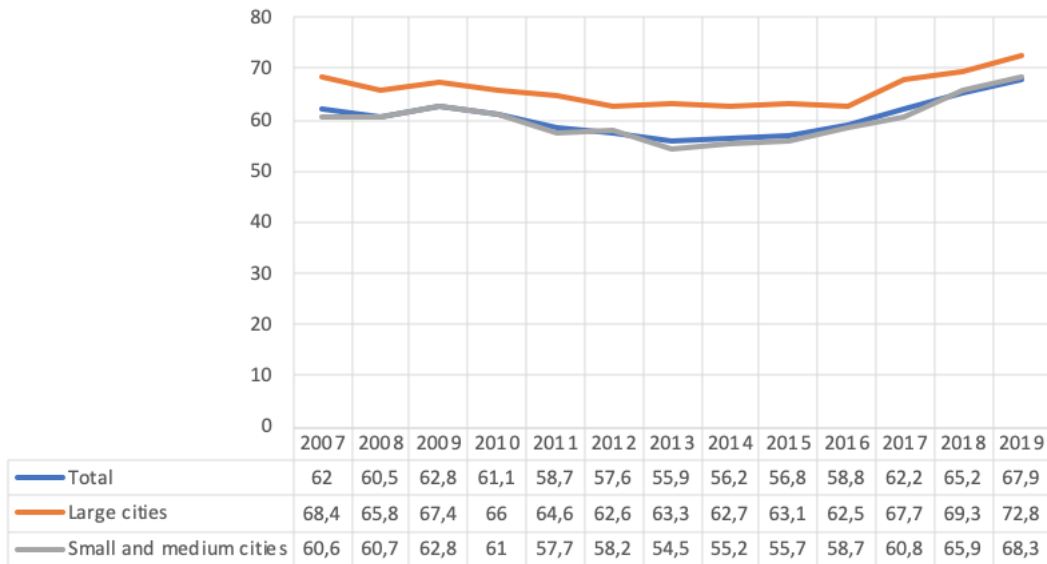


Figure 19. Total average participation rates in Korea from 2007 to 2019 (general high school level).
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 14, 2020.

Weekly average time spent on private lessons, hours, elementary school

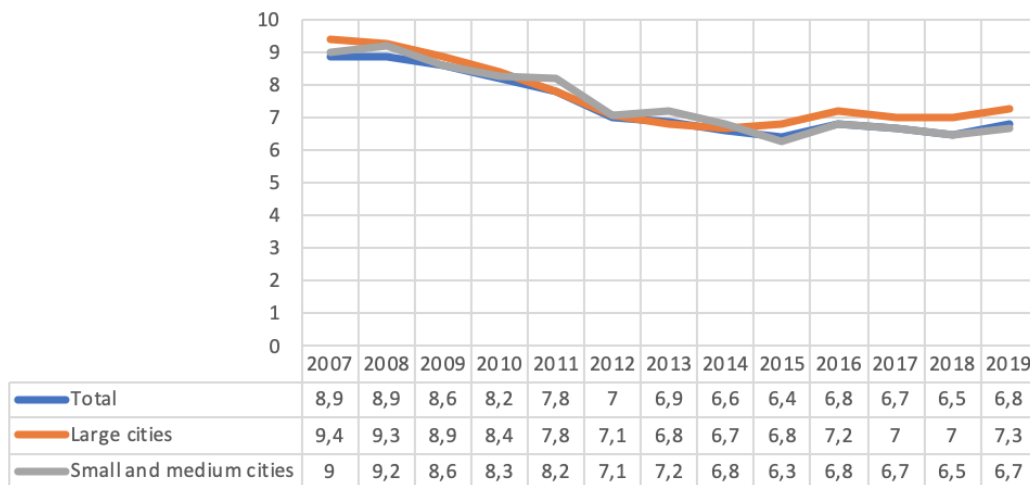


Figure 20. Weekly average time spent in private lessons 2007 to 2019 (elementary school level).
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 14, 2020.

Weekly average time spent on private lessons, hours, middle school

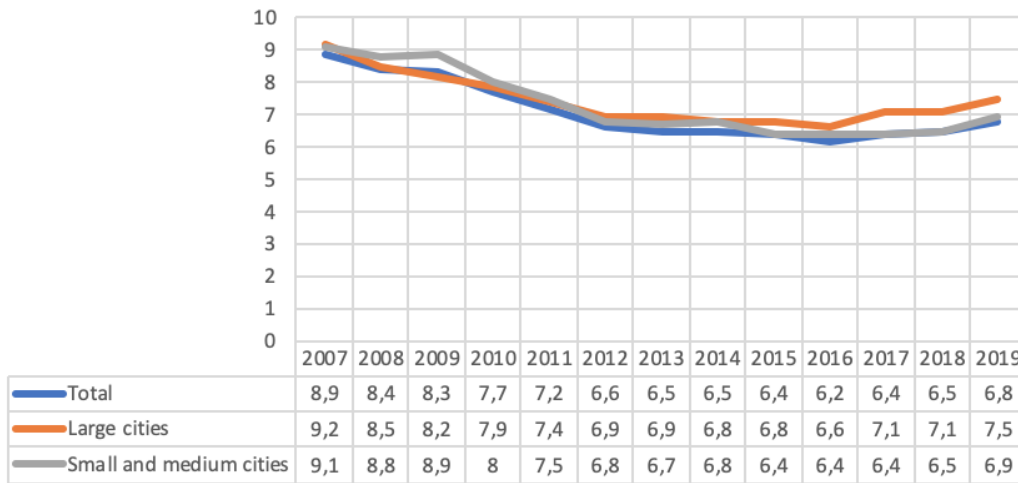


Figure 21. Weekly average time spent in private lessons 2007 to 2019 (middle school level).
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 14, 2020.

Weekly average time spent on private lessons, hours, general high school

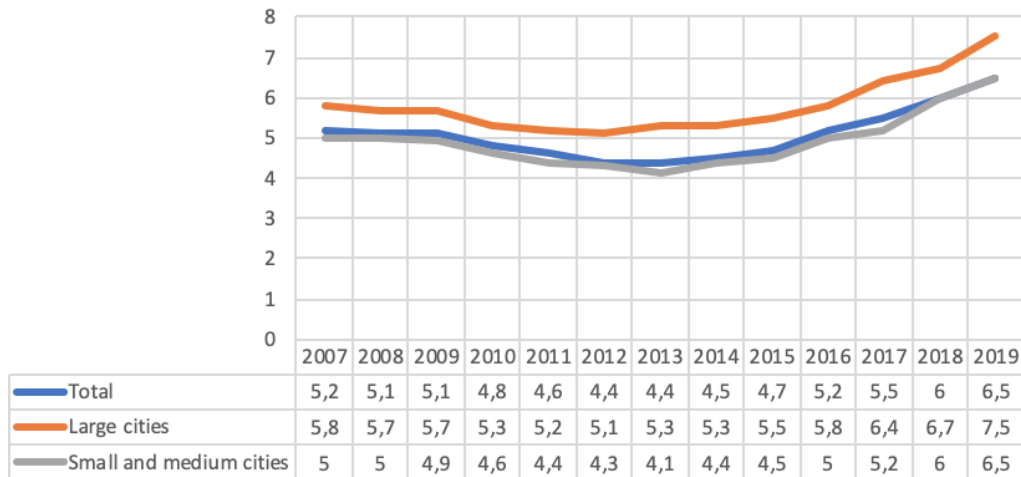


Figure 22. Weekly average time spent in private lessons 2007 to 2019 (general high school level).
Source: Statistics Korea, Private Education Expenditures Survey. Data retrieved on May 14, 2020.

Appendix 2

Japan

1. Extract from The Constitution of Japan:

Article 26. All people shall have the right to receive an equal education correspondent to their ability, as provided by law.

All people shall be obligated to have all boys and girls under their protection receive ordinary education as provided for by law. Such compulsory education shall be free. (Source: The Constitution of Japan; The text highlighted by the author.)

2. Extract from the Basic Act on Education (Act No. 120 of December 22, 2006):

Article 4. The people must be given equal opportunities to receive an education suited to their abilities, and must not be subjected to discrimination in education on account of race, creed, sex, social status, economic position, or family origin.

...

(3) The national and local governments shall take measures to provide financial assistance to those who, in spite of their abilities, encounter difficulties in receiving education for economic reasons.

Article 16. ...

... (2) The national government shall comprehensively formulate and implement educational measures in order to provide for equal opportunities in education and to maintain and increase educational standards throughout the country. (Source: Basic Act on Education; The text highlighted by the author.)

Korea

1. Extract from The Constitution of the Republic Korea:

Article 31 [Education]

(1) All citizens have an equal right to receive an education corresponding to their abilities.

...

(3) Compulsory education is free of charge.

... (Source: Constitution of the Republic Korea; The text highlighted by the author.)

Abstract

Over the last decades, scholars have been reporting a global expansion of so-called shadow education system. The cases of South Korea and Japan have been at the spotlight of attention due to pervasiveness of supplementary tutoring practices and their strong ties to the mainstream education system. Shadow education has positive and negative implications for the development of social capital. It provides extra learning opportunities, supports self-realization and stimulates lifelong learning. However, shadow schooling is often viewed to be an indispensable component of educational success. It is increasingly connected to the issues of educational equality and students' wellbeing since it puts low-income families to disadvantage due to high costs of participation and is blamed for fueling up an “examination hell” problem.

By applying a “Context-Content-Process” framework, this paper presents key contextual aspects of shadow education systems in South Korea and Japan and discusses its economic, social and educational implications. It further provides a comparative analysis of Korean and Japanese shadow education systems and discusses respective policy responses. The result of the analysis showed a significant difference between the regulations of supplementary education practices in both countries. The paper sheds light on the reason why shadow schooling exists and gives an insight into what can be done in the mainstream education system to mitigate its undesirable outcomes.

Keywords: *shadow education; private tutoring; educational equality; education policy.*

Zusammenfassung

In den letzten Jahren haben Forscher eine globale Expansion der sogenannten “Shadow Education” festgestellt. Im Zentrum der Aufmerksamkeit stehen dabei besonders Südkorea und Japan, da sich diese Länder durch eine durchgängige Praxis supplementärer Lernangebote auszeichnen, die stark an das staatliche Bildungssystem gebunden sind. Shadow Education hat positive und negative Auswirkungen auf die Entwicklung sozialen Kapitals. Es bietet zusätzliche Lernchancen, unterstützt Selbstverwirklichung und fördert lebenslanges Lernen. Auf der anderen Seite wird “Shadow Schooling” oft als unverzichtbarer Bestandteil schulischen Erfolgs gesehen. In diesem Zusammenhang stehen Fragen nach Chancengleichheit und dem Wohlbefinden der Lernenden, da Shadow Education durch hohe Teilnahmegebühren Familien mit geringem Einkommen einen Nachteil verschafft und es dafür verantwortlich gemacht wird, das Problem einer “Prüfungshölle” zu befeuern.

Durch Anwendung eines “Context-Content-Process” Frameworks werden in dieser Arbeit kontextuelle Schlüsselaspekte von “Shadow Education” Systemen in Südkorea und Japan präsentiert und deren wirtschaftliche, soziale und schulische Auswirkungen besprochen. Koreanische und japanische Shadow Education und damit zusammenhängende politische Steuerprozesse werden vergleichend analysiert. Die Analyse hat einen signifikanten Unterschied in der Regulierung von außerschulischen supplementären Lernangebote in beiden Ländern aufgezeigt. Die Arbeit liefert Antworten auf die Frage warum “Shadow Schooling” existiert und gibt Anhaltspunkte, was im staatlichen Bildungssystem getan werden kann, um die unerwünschten Effekte von “Shadow Education” zu vermindern.

Schlagwörter: *Shadow education; Nachhilfe; Bildungsgerechtigkeit; Bildungspolitik.*