



The Predicament and Countermeasures of Legal Supervision of Off-Campus Training under the “Double Reduction” Policy

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Abstract— Since the implementation of the “Double Reduction” policy in 2021, remarkable achievements have been made in the standardized management of off-campus training institutions in China. Law-based governance has become a key path to regulating the development of off-campus training institutions. However, at present, the legal supervision of off-campus training in our country still faces many difficulties. In specific governance, various difficulties in the legalized supervision of off-campus training can be overcome from four aspects: collaborative supervision between educational supervision and educational administrative law enforcement, establishing a “responsibility - interest - system” framework for the supervision and governance of off-campus training, improving the legal and regulatory system for off-campus training, and giving full play to the regulatory and guiding role of industry associations, to ensure the sound operation of off-campus training institutions.

Keywords— Off-Campus Education and Training, Rule of Law Supervision, Double Reduction



I. INTRODUCTION

In 2021, the “Double Reduction” policy was promulgated and implemented, effectively curbing the number of off-campus training institutions. However, some institutions have turned to more covert online training, especially in the case of subject-based training, where there are prominent issues of hidden and variant forms. In response to these issues, the Ministry of Education and other departments have issued a series of policy documents in recent years. In 2024, at the national “Double Reduction” work video scheduling meeting held in Beijing by the Ministry of Education, it was pointed out that the heat of off-campus training institutions has significantly decreased, and the level and quality of school services have continuously improved. However, there are still many problems.^[1]The main problems are that the total number of off-campus training institutions is still huge, the hidden and variant problems of off-campus training are still prominent, online non-compliant training still exists, and the situation controlled by capital is still obvious. This industry chaos

not only disrupts the normal educational ecology and triggers problems such as “reducing burden in school but increasing burden outside school,” but also, under the excessive intervention of capital, off-campus training will exacerbate the current unfair development of basic education in China and increase educational inequality.

Further strengthening the “promotion of the rule of law in the supervision of off-campus training” is an inevitable requirement for the supervision of off-campus education and training. ^[2]At present, in the literature related to the supervision of off-campus training institutions, some focus on sorting out the supervision history of off-campus training institutions,^[3]some focus on evaluating the effectiveness of off-campus training governance,^[4]and some focus on the significance of foreign governance experience to China.^[5]For research involving the rule of law in supervision, although many scholars have put forward many suggestions, they are only superficial and not comprehensive.^[6]Therefore, this paper combs the difficulties faced by the rule of law supervision of off-

campus training institutions in China, analyzes their deep-seated causes, and puts forward feasible suggestions for their governance, based on the definition and punishment of off-campus training institutions and combining existing cases.

II. DEFINITION OF OFF-CAMPUS TRAINING INSTITUTIONS

2.1 Legal Status of Off-Campus Training Institutions

There is no consensus in academia on the legal status of off-campus training institutions. Hu Tianyou (2013), based on the relevant provisions of the “Promotion Law of Private Education” (2016 revised edition), argues that such institutions are private schools of the nature of non-enterprise units. Luo Zeyi and Ning Fangyan (2022), on the other hand, argue from the perspective of market entities that off-campus training institutions are profit-oriented companies. The former positioning can provide a legal basis for the special governance of off-campus training, but it ignores the personalized characteristics of off-campus education, because off-campus education should be a supplement to school education. The “Opinions on Regulating the Development of Off-Campus Training Institutions” clearly pointed out that non-degree off-campus training for students in compulsory education should be a supplement to school education. Therefore, off-campus training institutions should be given certain autonomy to promote their healthy development under the premise of following reasonable teaching methods. The second view that the legal status of off-campus training institutions is that of a corporate legal person has certain limitations. On the one hand, off-campus training institutions have educational attributes and provide educational products with public welfare nature, so even if they have a profit nature, they cannot be simply identified as corporate legal persons. On the other hand, from the perspective of civil legal relations, the legal status of off-campus training institutions is diverse, and corporate legal person is only one of them. Yu Zhonggen (2017) believes that even if off-campus training institutions are included in the category of profit-making private schools, their legal status still has duality. They meet the requirements of corporate legal persons and at the same time have the characteristics of schools defined by the “Education Law.” This dual legal status does not conflict.

2.2 Functional Positioning of Off-Campus Training Institutions

The concept of off-campus training was first proposed by foreign scholars Stevenson and Becker in a paper on after-school tutoring for Japanese high school students.^[7] In China, for a long time, off-campus training was called

“remedial education” and was divided into two categories: one aimed at improving students’ academic performance and the other aimed at cultivating students’ interests and hobbies. At the same time, as a form of off-campus education, off-campus training has clear teaching objectives, systematic teaching plans, and a standardized organizational system.^[8] Its functional positioning should be to play a complementary role to school education. In 2018, the General Office of the State Council first defined the nature of off-campus training institutions from a policy level, clearly pointing out that the core function of off-campus training institutions is to provide students with a variety of learning choices, promote the cultivation of their individual talents, and the comprehensive development of their quality. This policy definition provides an important basis for accurately grasping the functional positioning of off-campus training institutions.

III. CURRENT DILEMMAS IN THE SUPERVISION OF OFF-CAMPUS TRAINING IN CHINA

3.1 Inefficient Market Access Regulation Process

The administrative approval of the off-campus training market is the first link in the regulatory process. According to the relevant provisions of the “Administrative Licensing Law,” providers of off-campus training services should obtain administrative approval before conducting educational activities. At the same time, the “Promotion Law of Private Education” also clearly stipulates that the establishment of private schools at all levels should obtain the relevant administrative department’s school-running permit. In terms of training content, there are obvious differences between non-subject training and subject training in terms of functional positioning, training objectives,^[9] and educational concepts. This difference requires regulatory authorities to implement differentiated management strategies when formulating access standards. At present, the policies issued by the Ministry of Education and 12 other departments only put forward clear requirements for primary and secondary school students in terms of setting standards, approval procedures, and daily management, but there are no relevant opinions for high school students. Other policy documents and laws and regulations are mostly based on principled judgments, and the main targets of implementation are private schools.^[10] In the implementation process, most local governments lack detailed operational provisions. In this case, where specific provisions are not clear, it will cause ambiguity in regulatory behavior between the government and the regulated institutions, triggering a series of legal issues. For

example, in the case of Li vs. Qin and Tang for art training¹, Li believed that the art off-campus training held by Qin and Tang did not obtain a school-running permit and constituted consumer fraud. However, the defendants argued that when the contract was signed, there was no mandatory provision in the province that non-subject training institutions should obtain a school-running permit, and the training institution had a regular business license. Eventually, the court ruled that the plaintiff's evidence was insufficient and did not support Li's belief that the training institution had fraudulent behavior. This case is a dispute caused by the lack of local policy implementation and insufficient connection with central policy provisions.

3.2 Insufficient Supervision of Off-Campus Training Personnel

The supervision of the teaching staff of off-campus training institutions mainly involves two issues: whether teaching personnel need to obtain the corresponding qualification certificates in accordance with the provisions of the "Teachers Law" and how to define and regulate their rights and obligations. For example, in the case of Ruixiang Office vs². Sun and others, Deng was injured during an outdoor touch-feeling writing course. The office appealed that in addition to believing that Sun and others had gross negligence in the course of the course, Sun and others did not have teacher qualifications. However, Sun and others argued that obtaining teacher qualifications was not required for the involved course. This case involves the issue of qualification standards for non-subject off-campus training teachers. The current teacher qualification certification system is mainly based on school education subjects, which is difficult to fully cover a variety of subject areas. This contradiction between the current system's lack and real demand objectively creates a dilemma in the application of teacher qualification standards. Eventually, the court ruled that Sun and Gao should bear certain responsibilities because they had gross negligence in their work. At the same time, the recognition of teacher qualifications will also lead to issues of teacher ethics and conduct. The quality of off-campus training. The current teacher qualification certification system is mainly based on school education subjects, which makes it difficult to fully cover a variety of subject areas. This contradiction between the current system's lack and real demand objectively creates a dilemma in the application of teacher qualification standards. The court eventually ruled that Sun and Gao

should bear certain responsibilities because they had gross negligence in their work. At the same time, the recognition of teacher qualifications will also lead to issues of teacher ethics and conduct. The quality of off-campus training teachers is uneven, mostly because the threshold for teachers in training institutions is low. In the case of Lin³, who raped a minor girl by taking advantage of his position, Lin, taking advantage of his special responsibilities and work convenience as a part-time teacher in a training institution in a certain city, selected and approached girls under the age of 14, and forced sexual relations with the victims, Qin and Zhang, under the pretext of "biological testing" and "Mandarin testing." The court eventually sentenced Lin to 12 years in prison, deprived him of his political rights for two years, and banned him from engaging in any professions related to the education, training, and tutoring of minors for five years. This case is a criminal case caused by the weak supervision of the personnel of off-campus training institutions by the education authorities.

3.3 The safeguard mechanism of off-campus training institutions is not sound.

The business operations of off-campus training institutions mainly include aspects such as student recruitment, fee collection and payment, and fund-raising. The main cause of the current judicial disputes is the lack of complete and supporting emergency measures at the national level and within off-campus training institutions. This has led to a series of problems regarding student fee refunds and staff placement when the institutions suddenly shut down and are unable to continue providing educational services. At present, the public welfare assistance implemented through the peer mutual aid mechanism in various regions across the country has certain limitations in practical effects. This traditional assistance model can no longer effectively deal with the series of problems caused by the sudden exit of training institutions from the market. Specifically, regarding the placement of students, the "Promotion Law of Private Education" only generally requires that students in school be properly placed when a private school is terminated. Local implementation details also mostly adopt this general expression without establishing an operable safeguard mechanism. In terms of training fee supervision, although China's policy clearly stipulates that the prepayment period for off-campus training institutions shall not exceed three months at a time, the phenomenon of

¹ Li v. Qin and Tang for Educational Contract Dispute, Civil Judgment No. 2270 of 2024, Hunan Provincial Changsha Intermediate People's Court (2024) Xiang 01 Min Zhong 2270.

² Ruixiang Office v. Sun Ying and Gao Haiyan for Labor Contract Dispute, Civil Judgment No. 51232 of 2021, Haidian

District People's Court of Beijing Municipality (2021) Jing 0108 Min Chu 51232.

³ Lin's rape case, a typical case of protection of minors' rights and interests by the Jiangxi Provincial Higher People's Court (2023).

collecting long-term training fees in advance is still widespread in practice. This means that when an off-campus training institution suddenly goes bankrupt and closes down, students who have prepaid cannot enjoy educational services or get their prepaid fees back. This has even given rise to new scams related to off-campus training fee refunds. For example, Liang claimed that he could assist in course withdrawal and fee refunds, taking advantage of students' and parents' worries about being unable to withdraw from courses or get refunds. After gaining the trust of the victims, he asked them for money on the pretext of needing to pay a difference or a deposit for the refund. The court eventually found Liang guilty of fraud and sentenced him to eight months in prison⁴. While giving rise to new crimes, the failure to promptly deal with the situation of large amounts of tuition fees that cannot be refunded also causes dissatisfaction among students and parents, posing a threat to social stability.

3.4 Inappropriate Content Settings in the Off-Campus Training System

In order to cater to parents' psychological needs of “alleviating anxiety” and “comparing academic achievements,” some off-campus training institutions have set up, implemented, evaluated, and managed their programs in a way that contradicts national educational standards, severely disrupting the normal educational ecosystem. In terms of textbook selection, the majority of training institutions lack a systematic quality assessment of their self-compiled materials, leading to frequent issues such as knowledge errors and content deviations in teaching aids. Alternatively, the textbooks selected by subject-based off-campus training institutions may have problems such as low quality and poor connection with the school curriculum, and in severe cases, even pirated books may appear. For example, in the copyright infringement case involving Yang and others⁵, the suspects profited from the illegal printing of legitimate books. They printed a large number of textbooks without authorization, including about 1 million copies of pirated children's reading materials, which were widely distributed to off-campus training institutions. These publications not only have content errors, poor print quality, and infringe upon the legitimate rights and interests of copyright holders, but also mislead the young people who use these textbooks, and the negative social impact they generate cannot be ignored. Regarding specific training

content, the 2021 “Opinion” pointed out that capital is not allowed to participate in the operation of subject-based training institutions.^[11] Some training institutions either attempt to transform into specialized characteristics or choose to deregister. However, some have evaded administrative supervision, continued to conduct training in violation of regulations, and persisted in operating under the guise of “high-end domestic services” or “educational study tours.” In judicial practice, the legal characterization of specific training programs directly affects their regulatory requirements. For example, in the case of Lv v. Jining Mengyuan Education Consulting Co., Ltd.⁶, the court held that the “Children's Concentration Training Course” organized by the company does not fall within the category of academic education or cultural education training that requires approval as stipulated by law, and therefore, no school-running permit is required. In fact, there is controversy over this point because Article 12 of the Promotion Law of Private Education does not explicitly specify which “cultural education” schools need to obtain a school-running permit. This has led to divergences in local administrative approval standards and is reflected in judicial cases as inconsistent rulings in similar cases.

IV. AN ANALYSIS OF THE DILEMMA OF LEGALIZED SUPERVISION OF OFF-CAMPUS TRAINING IN CHINA

To establish a long-term governance mechanism for off-campus training institutions, it is necessary to consolidate existing governance achievements and conduct an in-depth analysis of the causes of the current regulatory dilemmas. Since the implementation of the “Double Reduction” policy, the central government and local governments have issued a series of regulatory documents, which fully reflect the policy orientation of strengthening the supervision of the off-campus training market by educational administrative departments and local governments. However, practice has shown that the legalization of supervision and governance of off-campus training institutions faces multiple challenges, and the reasons are as follows.

4.1 The legal basis for the supervision of off-campus training is not sufficient

By sorting out the existing legal system, it can be found that there is still a clear lack of legal norms specifically targeting

⁴ Liang's fraud case, a typical case of telecommunications and internet fraud by the Guangzhou Intermediate People's Court of Guangdong Province (2022).

⁵ The fraud case of Liang (a certain individual), a typical case of telecommunications and internet fraud by the Guangzhou Intermediate People's Court of Guangdong Province (2022).

⁶ Lv v. Jining Mengyuan Company, Civil Judgment No. 13338 of 2018, Renscheng District People's Court of Jining City, Shandong Province (2018) Lu 0811 Min Chu 13338.

the supervision of off-campus training institutions. The main legal documents currently involved are the “Promotion Law of Private Education,” the “Regulations for the Implementation of the Promotion Law of Private Education,” and relevant provisions in the “Law on the Protection of Minors.” Existing regulations define the targets of regulation as private schools implementing academic education, early childhood education, and other cultural education, which objectively excludes off-campus training institutions from the scope of application. Moreover, current laws do not implement differentiated supervision based on the type of training institution but uniformly manage them according to the standards of private schools, a method that is apparently contradictory to the particularity of off-campus training institutions. Laws such as the “Education Law” and the “Compulsory Education Law” mainly regulate school education. Although the former has expanded its regulatory targets to “schools and other educational institutions,” the specific definition of “other educational institutions” is extremely limited. After the implementation of the “Double Reduction” policy, although the “Law on the Protection of Minors” and the “Law on Promoting Family Education” have been further revised to add principled provisions for the supervision of off-campus training, they still lack specific details and are difficult to meet the regulatory needs in practice. Provisions related to off-campus training institutions can also be found in the “Price Law” and the “Advertising Law,” but they cannot form a complete legal system. Due to subject limitations, the supervision of off-campus training mostly remains at the policy level. Scholars such as Zhang Haipeng have pointed out that the regulatory activities of off-campus training institutions in China mainly rely on administrative regulatory documents for implementation, showing a distinct “policy-oriented” feature.^[12] Scholar Zhu Jun also believes that only through legalized supervision can the limitations of the traditional regulatory path of off-campus training be broken to ensure the sound operation of off-campus training institutions.^[13]

4.2 The policies regarding the supervision of off-campus training are not clear

Although China has established a relatively comprehensive policy system for the supervision of off-campus training, there is inevitably some ambiguity in the content, which to a certain extent affects the regulatory effect on off-campus training institutions. There is currently no clear answer to what the regulatory target of off-campus training is and how to distinguish between subject-based and non-subject-based training. Although the Office of the Ministry of Education has issued relevant policies to define the scope of subject-based and non-subject-based training, there are still disputes in the academic circle about the classification

attributes of some projects such as “Chinese traditional studies courses,” “English drama performance,” and “picture-book reading.” In practice, off-campus training institutions tend to classify these as non-subject-based training, but regulatory authorities may consider that these courses have certain characteristics of subject-based teaching, especially when it comes to training in subjects such as Chinese and English.^[14]

As for the regulatory body of off-campus training, it is still unclear whether the education department is the regulatory body of off-campus training institutions and whether it has the right to law enforcement. In the actual regulatory process, several departments, including education, civil affairs, and industry and commerce, are involved in the supervision of the operation, premises, and personnel of off-campus training institutions for primary and secondary schools. This ambiguity leads to vague regulatory authority and weakens the regulatory strength. Moreover, the current regulatory policies still have the problem of vague standards in the specific implementation. For example, although the “Double Reduction” policy requires the management of subject-based training institutions for ordinary high schools to follow relevant policy requirements, it does not clearly define the specific standards and scope of implementation. These principled provisions make it difficult for regulatory bodies at all levels to grasp the specific measures in the law enforcement process, directly affecting the consistency and effectiveness of policy implementation. Scholars such as Chong Qi and Wu Peng have pointed out that law enforcement methods that do not take into account the differences between subject-based and non-subject-based supervision in terms of legal basis, main body, and content are not feasible.^[15]

4.3 The nature of the regulatory actions in off-campus training is ambiguous

The “Interim Regulations on the Implementation of Educational Administrative Penalties” is an important basis for the administrative penalties imposed on off-campus training and is formulated by the Ministry of Education. However, precisely because the formulating body of these regulations is the education department, its binding force on other administrative law enforcement departments is relatively weak. As a result, in administrative practice, some administrative agencies, in order to evade the constraints of the “Administrative Penalties Law,” have resorted to using the guise of regulation as a substitute for the application of the administrative penalty system.^[16] Moreover, it has been observed in practice that, due to the absence of relevant local policies, certain principal departments only possess the power to conduct administrative inspections but lack the authority to impose

administrative penalties. Additionally, since its implementation in 1998, these regulations have not been revised and have revealed several issues in both institutional design and practical application. These include the lag of regulatory content behind actual needs, gaps in the scope of regulation, and insufficient coordination with other legal norms.^[17] At present, some local education administrative authorities have adopted the regulatory measure of listing non-compliant off-campus training institutions on a “blacklist” and publicly exposing them. The legal nature of this practice is yet to be examined. Furthermore, it is necessary to clarify from the perspective of administrative law the legal differences between this regulatory measure and the “reputational penalty” of public censure stipulated in the “Administrative Penalties Law”.^[18] This ambiguity not only reduces the efficiency of supervision over off-campus training but also, against the backdrop of educational administrative penalties becoming a major trend, has an adverse impact on the delegation of powers and the allocation of functions among departments.

V. COUNTERMEASURES FOR THE LEGALIZED SUPERVISION OF OFF-CAMPUS TRAINING

5.1 Collaborative Supervision between Educational Oversight and Educational Administrative Law Enforcement

In the modern educational governance system, the collaborative operation of educational supervision and educational administrative law enforcement forms a complete regulatory closed loop, jointly ensuring the implementation of educational laws, regulations, and policy documents.^[19] In China, the focus of educational supervision has traditionally been on national education, with little involvement in other educational training institutions. However, with the increase in the number of off-campus training institutions in China, the administrative law enforcement of education has become overwhelmed due to the lack of staff and external policy constraints. At this time, the advantages of the educational supervision system, such as abundant human resources and a more complete professional structure, can be fully utilized to establish a linkage mechanism between supervisors and administrative law enforcement officers to improve the overall regulatory efficiency. At present, Huangpu District of Shanghai Municipality has innovatively established a three-stage collaborative regulatory mechanism of “inspection - investigation and punishment - reporting.” The core of this system is that educational supervision institutions first conduct supervision and inspection of off-campus training institutions and promptly report any

violations found to the education administrative departments. Based on the transferred materials, the education administrative departments initiate administrative law enforcement procedures against the non-compliant operation of the training institutions. On this basis, Shanghai has also formulated the “Directory List of Overlapping and Connecting Matters between Educational Supervision and Educational Administrative Law Enforcement”,^[20] which systematically combs the boundaries of responsibilities and points of cooperation between the two types of regulatory bodies. This practice provides a template for localities to establish standardized and normalized joint regulatory systems. Localities can follow the principle of simplicity, clarify the joint inspection procedures and discretionary standards, and achieve comprehensive coverage of the supervision of off-campus training institutions.

5.2 Constructing a “Responsibility-Interest-Institution” Framework for the Supervision and Governance of Off-Campus Training

According to the governance theory of Kooiman and Van Vliet, governance relies on the interaction and cooperation among multiple entities. These entities jointly construct a kind of order or structure through their interactions. Such order or structure cannot be imposed from the outside, but is naturally generated through inter-entity process consultation, equal dialogue, and interest coordination.^[21] Specifically, off-campus training institutions need to fulfill their social responsibilities as providers of educational services. At the same time, as market entities, they will also pursue their own interests. When such profit-seeking behavior becomes excessively inflated, the government must intervene through institutional means, such as administrative supervision, to correct market failures.

Modern public governance emphasizes the core concept of multi-party co-governance, that is, the management of public affairs should be jointly undertaken by multiple decision-making entities.^[22] This concept has also become a new requirement for the governance practice of off-campus training in China. For “responsibility,” government departments should fully play the role of value guidance. While cultivating a scientific sense of educational responsibility through policy guidance, they should also clarify the responsibilities of off-campus training and other related entities through legislation. For “interests,” if off-campus training is to achieve long-term effective governance, it must form a self-governing network when coordinating various interest conflicts. It is necessary to pay attention to the demands of different social entities in off-

campus training and provide a stable environment for long-term regulatory governance.^[23]

For “institutions,” the construction of institutions should revolve around the interest demands of all parties. It is necessary to systematically define the specific content and implementation methods of regulatory matters, set clear identification standards for improper behavior of all parties, and provide corresponding incentive and restraint measures.

5.3 Improve the legal and regulatory system for off-campus training supervision.

According to the “Key Points of Work for the Ministry of Education in 2022,” the construction of legalized supervision of off-campus education and training should follow the principles of legality and optimality. In specific work, the work objectives are achieved through the logical framework of “basis - behavior - procedure”.^[24] On one hand, the formulation of a unified national special regulation for off-campus training should be accelerated. This regulation should be based on the “Education Law” and be coordinated with existing laws such as the “Promotion Law of Private Education” and the “Law on the Protection of Minors.” In terms of classified legislation, off-campus training institutions should be categorized by training content into subject-based and non-subject-based, distinguished by service targets into different academic stages, and regulated differentially according to the size of the institutions. On the other hand, based on the latest provisions of the “Administrative Penalties Law,” a systematic revision of the “Interim Measures for Educational Administrative Penalties” should be carried out, focusing on improving the penalty procedures and refining the standards of discretion to provide a sufficient legal basis for educational administrative law enforcement. Local governments should also be encouraged to develop local regulations for the supervision of off-campus training in accordance with local realities, and to establish routine law enforcement mechanisms such as regular inspections and special checks.^[25] By building a collaborative mechanism led by the central government and supported by localities, the needs of local governance can be met while ensuring the unity of the legal system. At present, China’s legislative

work on the supervision of off-campus training has entered a stage of substantive advancement. Marked by the document jointly issued by multiple departments of the Zhejiang Provincial Department of Education at the beginning of 2023, China’s process of legalizing the supervision of off-campus training is showing characteristics of local pilot implementation. Local legislative practices are accumulating important experience for national legislation.

5.4 Give full play to the regulatory and guiding role of industry associations.

The “Notice on Issuing the Plan for Deepening the Reform of Standardization Work” released by the State Council explicitly proposes that, in order to meet the demands of market innovation and development, social organizations such as social groups and industry associations with corresponding qualifications and capabilities should be actively guided to play a collaborative role. These organizations should mobilize relevant market entities to jointly participate in the formulation of standards that meet market demands, and such standards should be available for voluntary adoption by market participants. Therefore, in the governance of the private education and training industry, promoting self-discipline of industry associations and establishing industry standards is a crucial step. In improving the teacher qualification access for off-campus training institutions in China, international and regional practical experience can be drawn upon to establish a third-party teacher qualification certification system through social organizations. Japan⁷ and Taiwan⁸ region have developed relatively comprehensive certification models, which have certain reference value. At present, domestic relevant industry organizations, such as the China Education Association and the China Association of Private Education, have launched pilot projects. Regarding the quality of off-campus training, a third-party professional evaluation mechanism can be introduced. Qualified education industry organizations can establish a unified certification standard system and conduct periodic quality assessments of training institutions. To address the unclear boundaries between subject-based and non-subject-based

⁷ The Japan National Association of Learning Tutors has established a “Learning Tutor Certification System,” which divides the qualification certification of learning tutors into “group instruction” and “individual instruction.” “Group instruction” refers to classroom teaching and is divided from low to high into “Group Instruction Level Three,” “Group Instruction Level Two,” and “Group Instruction Level One,” which have become the industry-wide teacher certification standards that are jointly followed and recognized.

⁸ The “National Institute for Education Research” in Taiwan region released a report titled “Feasibility Study on the Tutoring

Teacher Certification System: Taking Tutoring Classes for Students Below High School as an Example,” which began to recommend the certification of qualifications for tutoring education teachers. The “Education and Culture Committee” of Taiwan’s Legislative Yuan also urged the education administrative department to conduct unified certification of teaching staff in the tutoring education market, expecting to establish a tutoring education teacher certification system and a regular evaluation system. Currently, Taipei City has already started the certification of qualifications for tutoring education teachers.

training, industry associations can be relied upon to develop methods for classification and identification, and to coordinate the difficulties encountered during the transformation of training institutions. Self-discipline management of training institutions should be encouraged, and a gradual shift towards an integrated management model should be made, with the participation of industry associations, training institutions, parents, and students, under the leadership of the government and in collaboration with industry associations.

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