

# Challenges and Collaborative Solutions in Off-Campus Training Governance: Addressing Hidden Risks and Market Regulation under the “Double Reduction” Policy

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## Abstract

**Pathways for Social Co-Governance in Off-Campus Training** This study investigates the evolving governance framework for off-campus training in China under the "Double Reduction" policy, emphasizing social co-governance as a solution to the current regulatory crisis. Given the complex interactions between market, state, and social actors, this research proposes a comprehensive governance model that leverages multi-stakeholder collaboration, democratic consultation, institutional safeguards, and technological tools. Utilizing insights from diverse governance approaches and international practices, we explore mechanisms to expand stakeholder participation, optimize regulatory feedback, and manage post-governance risks through a platform-based model that incorporates big data, AI, and blockchain. The proposed framework addresses structural imbalances and promotes long-term stability in off-campus training governance, aligning educational needs with sustainable public policy objectives. This approach aims to enhance accountability, transparency, and inclusivity in governance, contributing valuable insights into collaborative regulatory models in education.

## Keywords

Off-Campus Training Issues; Off-Campus Training Governance; Social Co-Governance.

## 1. Introduction

The implementation of the “Double Reduction” policy and targeted governance measures has led to a significant decline in the number of off-campus training institutions in China, effectively curbing trends of “capitalization” and “commercialization.” However, under the combined pressures of evolving new business models, diverse social education demands, and post-pandemic market disruptions, governance challenges persist. Covert academic tutoring and an expanding underground training market continue to complicate regulation and increase safety risks (Wu, 2022; Liu, 2022). Simultaneously, some quality-oriented training institutions are engaging in blind expansion, employing practices like selling extensive prepayment course packages and pushing students into competitions, creating a new wave of “involution” in arts and sports education (Liu, 2022). Moreover, persistent issues such as financial fraud, curriculum beyond standard requirements, and irregular fees remain, while the lack of adequate regulated academic training options has raised supplementary education costs (Wei et al., 2021) [22]. This situation reflects a dual dilemma of “government failure” and “market failure” in the governance of off-campus training.

In response, Chinese scholars have explored a variety of solutions, advocating for approaches that engage both supply and demand perspectives within a framework of composite governance. Suggestions include advancing education evaluation reforms, improving the quality of school education, constructing robust after-school service systems, and regulating

off-campus training activities to develop a governance system that balances students' "common" and "individual" needs (Wu, 2022) [1]. Furthermore, some scholars propose embedding multi-layered institutional logics and governance principles into off-campus training management to address current challenges (Lin et al., 2022) [2]. Across the literature, there is a shared understanding of the complexity and variability inherent in the off-campus training market, as well as the broad spectrum of stakeholders involved.

Chinese scholars are exploring solutions for off-campus training governance, recognizing its complexity and the diverse stakeholders involved. A singular focus on the education department's regulatory role is insufficient; democratic consultation and social participation are essential (Wu Zhihui, 2022; Lin Haifeng et al., 2022) [1] [2]. Current governance reflects a path dependency on administrative and market solutions, often neglecting social engagement, resulting in a framework dominated by strong government and market dynamics. While some advocate for higher standards and oversight of training institutions, these may not fit the sector's complexities. With over thirty years of development, China's off-campus training industry is the largest globally, and public expectations for education are rising. Effective governance must address issues across education, law, and politics and involve collaborators with "greater expertise and technology" (Wang Ming et al., 2014) [7] within a framework of trust and accountability. Social co-governance, featuring pluralistic cooperation and democratic consultation, can enhance integration among the state, market, and society, overcoming the limitations of single-entity governance (Li Xiaoxiang, 2022) [5].

Given the complexity and fluidity of the current environment, there is an urgent need to reassess the governance model for off-campus training and to establish a cohesive social governance community. By fostering a mechanism for shared interests and risk-bearing among diverse stakeholders, it is possible to enhance the action framework of social co-governance, paving the way for a truly collaborative governance pathway for the off-campus training sector.

## 2. Core Issues in Off-Campus Training Governance

### 2.1. Hidden Expansion Driven by Multi-Faceted Demand and Inadequate Market Regulations

The demand for off-campus training in China includes four main needs: academic excellence, remedial tutoring, quality enhancement, and childcare. The "Double Reduction" policy has restricted all academic tutoring institutions from providing "above-level" instruction, leaving students' demand for advanced tutoring unmet through legal channels. Additionally, many parents still view academic success, especially in college entrance exams, as the best path to social stability. This has led them to seek supplementary education, inadvertently supporting unregulated tutoring practices. Meanwhile, gaps in remedial support, rising costs for enrichment programs, and a lack of adequate childcare infrastructure have created unmet needs, further fueling the expansion of both regulated and underground off-campus training markets.

On one side, the market has adapted by rebranding academic tutoring as quality-oriented courses such as "critical thinking" or "English drama" and by creating individual tutoring studios and group classes that evade regulatory oversight. After the fragmentation of large tutoring institutions, individual teacher studios, often unregulated, have surged, with some operating in hidden locations that present significant safety risks. Additionally, pandemic conditions have highlighted health hazards in such unregulated spaces, as several outbreaks were traced back to clandestine tutoring sessions. On the other side, quality-oriented training institutions, motivated by supportive policies and profit potential, have rapidly expanded into fields like sports and arts. However, these entities have faced issues like high costs, excessive

charges for long-term packages, and even exploitative practices, leading to what has been called the "new intra-industry competition" in non-academic training.

## **2.2. Trust Crisis Between Training Institutions and Government Due to Stringent Regulations and Policy Escalation**

The stringent and rapidly changing regulatory environment following the "Double Reduction" policy has strained the relationship between off-campus training institutions and government, leading to mistrust and resistance. New rules have tightened operational hours and standards for academic institutions, limiting tutoring to specific hours during the week and effectively shrinking their revenue potential. Additionally, government-guided pricing policies intended to reduce tutoring costs have set unsustainably low prices, forcing institutions to use tactics like "shadow contracts" to circumvent them, thereby undermining policy enforcement.

Moreover, the classification between academic and non-academic institutions has become a focal point for institutions, with inconsistent standards across regions. Local governments often interpret national policies in varied ways, sometimes imposing additional or ambiguous rules. At the grassroots level, enforcement challenges arise as local regulators may lack the expertise to apply these standards effectively. Instances of local governments overstepping official policy guidance—for example, by requiring additional certifications or making rigid staffing requirements—have further eroded institutional trust and increased compliance costs.

## **2.3. Regulatory Gaps in Policy and Law for Off-Campus Training Activities**

Long-standing policy and regulatory gaps have left certain off-campus training activities outside the scope of effective oversight. Although China introduced a governance framework for off-campus training institutions starting in 2018, the regulatory system remains incomplete, with some areas lacking specific legal support. Presently, two main types of service providers exist: formal training institutions and independent tutors. Since the "Double Reduction" policy led to the dissolution of large institutions, many independent tutors now offer private lessons. However, without formal legal recognition, these tutors operate in a regulatory gray area that is difficult to monitor and manage effectively.

For academic institutions, current regulations are relatively well-defined, but non-academic institutions are much more diverse and challenging to categorize and regulate. Without established standards for market entry, employee requirements, or regulatory oversight, these institutions operate with considerable autonomy. More comprehensive frameworks for pricing, quality assurance, credit rating, and disciplinary action are needed to close these regulatory gaps.

## **2.4. Limitations of a Government-Led Governance Model and Underutilized Social Organizations**

China's governance approach for off-campus training has been primarily government-led, but the limitations of this single-actor model are becoming increasingly apparent. Although there has been progress toward a multi-stakeholder governance framework, doubts about the reliability of non-governmental participants often lead to a preference for centralized control, with the government using strict oversight and interventionist strategies. This has led to excessive burdens on local governments, which are already stretched thin and sometimes resort to extreme enforcement measures, such as unannounced inspections or confrontational actions against unauthorized tutoring.

Additionally, coordination challenges exist across different departments, such as education, market regulation, civil affairs, and planning commissions, which often operate independently. Each department has its priorities, leading to misalignment and inefficiencies in policy implementation. Other stakeholders, including industry associations, families, and schools, remain passive, with little ability to proactively contribute. Local off-campus training

associations are often directly affiliated with government education departments, limiting their autonomy. Similarly, the lack of well-developed social organizations with professional expertise has left areas like quality assessment and family education services without effective support, limiting the scope and sustainability of governance efforts.

In summary, China's current off-campus training governance framework faces numerous challenges, from hidden market expansion and regulatory gaps to trust issues and an overreliance on government-led approaches. Addressing these issues requires a recalibration of governance strategies, greater role clarity among stakeholders, and a more robust system for shared responsibility and risk. A collaborative, multi-stakeholder governance pathway is essential to create a sustainable and balanced off-campus training ecosystem.

### **3. Social Governance as an Effective Solution to the Crisis in Off-Campus Training Governance**

Social governance, characterized by multi-stakeholder collaboration, democratic consultation, institutional safeguards, and modern governance tools, offers a robust alternative to traditional, government-led hierarchical structures (Li Xiaoxiang, 2022) [5]. By facilitating the cooperation of government, market, and societal actors, social governance addresses the limitations of single-entity approaches and provides a coordinated framework for public issues. In the context of off-campus training governance, where issues have evolved beyond solely educational challenges, social governance emerges as an optimal strategy. This approach relies on partnerships across various sectors to establish mutual understanding, trust, and cooperation. Supported by clear institutional structures and modern governance tools, social governance helps meet public educational needs and promotes the healthy development of the off-campus training industry.

#### **3.1. Multi-Stakeholder Collaboration: Leveraging Social Resources to Meet Diverse Educational Needs and Restrain Public Power and Capital Monopolies**

Multi-stakeholder collaboration optimizes social resources to address the varied educational demands of citizens, limiting both the expansion of public authority and monopolistic capital tendencies. In Western governance frameworks, multi-stakeholder models include public, private, and non-profit entities (Beck, 2018) [6]. In China, these stakeholders encompass government, market players, and social organizations. With the increasing complexity and uncertainties of modern society, decision-making processes require the collaboration of entities with diverse expertise, knowledge, and resources.

In the governance of off-campus training, four primary layers of stakeholders exist: government agencies, market entities, societal groups, and hybrid organizations. Government entities include central and local levels, while market entities consist of service providers, students, parents, and associations representing organizational interests. Social actors include non-profit organizations, citizen groups, and associations for public interests. Lastly, hybrid groups combine government, market, and societal actors to form cross-sector partnerships. Effective off-campus training governance requires leveraging these diverse actors and their unique resources to provide comprehensive and responsive public services. These entities play distinct roles in social affairs based on their organizational resource characteristics, technical expertise, and functional scopes. Through division of labor and collaborative communication among organizations, they form a multidimensional and interconnected network for social governance (Ding, 2009) [8]. Collaborative governance also mitigates administrative burdens on the government and encourages proactive engagement from market and social actors.

### **3.2. Democratic Consultation: Building Trust, Reducing Decision-Making Risks, and Promoting Consensus**

Democratic consultation fosters trust among stakeholders by enabling open dialogue, where different groups can express concerns and contribute to decision-making. By promoting balanced exchanges, this process enhances the scientific rigor and effectiveness of governance decisions while reducing the risks associated with policy implementation. In the context of off-campus training, democratic consultation integrates voices from service providers, consumers, professional organizations, and government agencies, allowing them to rationally present their perspectives and assess policies collectively.

Democratic consultation allows diverse stakeholders to engage in equal exchanges, enabling off-campus training service providers, consumers, professional organizations, and government entities to express their viewpoints and conduct careful assessments based on equitable communication. This process enhances the scientific rigor of decision-making while reducing risks. Additionally, stakeholders not only articulate their interests but also listen to others, fostering an understanding of public interest considerations that encourages individuals to transcend personal interests for the sake of broader societal and long-term benefits. This inclusive approach deepens mutual understanding and eliminates misunderstandings, ultimately creating "a lasting foundation of trust and public support that stabilizes democracy" (Marc, 2004, p. 92) [9]. By mitigating adversarial relationships among institutions, the public, and government, democratic consultation effectively helps prevent and resolve potential conflicts and risks in off-campus training governance (Peng Yingying, 2021) [10].

### **3.3. Institutional Safeguards: Ensuring Effective Allocation of Power, Resources, and Responsibility**

Social co-governance involves multiple power entities, and the ambiguity of responsibilities and boundaries among diverse stakeholders, along with ineffective resource allocation, are key factors constraining social governance. Without the protection of a scientifically just institutional system, collective actions among diverse entities cannot be realized. In social governance theory, the institutional system comprises four levels: first, the constitutional order, which refers to "a set of fundamental political, social, and legal rules that establish the foundations for production, exchange, and distribution" (Davis, 1970) [11], essentially the rules for making rules. Second, the operational rules in public governance, which include laws, regulations, and contracts. Third, normative codes of conduct. Fourth, informal institutions, which encompass traditional customs and virtues (Zhou Xiaoli, 2013) [15].

In off-campus training governance, these institutional structures serve three key purposes: they establish a clear distribution of powers among government departments and other actors, preventing jurisdictional conflicts; they regulate resource allocation methods to ensure equitable distribution across regions and organizations; and they define the responsibilities of each stakeholder to prevent the shifting of tasks. With clear boundaries for authority and resource allocation, stakeholders can effectively contribute to the governance process, promoting the collective action necessary for addressing educational demands and fostering the sustainable development of the off-campus training industry.

### **3.4. Modern Governance Tools: Responding to Diverse Public Needs and Enhancing Governance Efficiency**

As modern society becomes increasingly complex and flexible, the government's reliance on authority and administrative measures to regulate and manage social affairs has become insufficient. There is a need for the government to employ new tools and technologies to guide and support governance, ensuring that the governance system has long-term vitality and can evolve, learn, and adapt (Stoker, 1999) [12]. The development of modern information

technologies, such as big data, cloud computing, artificial intelligence, and blockchain, which leverage data and algorithms, has restructured existing social operation mechanisms (Yao Song, 2016) [13], infusing the governance system with vitality and producing lasting and profound effects.

For example, the development of 5G and online conferencing reduces communication barriers, facilitating seamless, cross-regional exchanges. AI-driven solutions enhance decision-making by gathering data from diverse stakeholders, identifying trends, and predicting educational needs (Hou, 2019) [14]. Through expert systems and machine learning, AI supports optimized policy recommendations, enabling more precise and efficient governance responses. Additionally, data integration enables extensive coverage of quality educational resources and personalized services based on "full-sample" data analysis.

#### **4. Conclusion: Action Framework for Social Co-Governance in Off-Campus Training**

Effective governance goes beyond merely addressing isolated issues; it prioritizes long-term impacts and interconnected effects. The current approach to off-campus training governance should aim to establish a universal and enduring problem-solving mechanism. Developing an action framework for social co-governance in off-campus training is crucial to achieving comprehensive, lasting governance outcomes.

Following social governance principles, this framework consists of a complete governance process with three main phases: pre-governance (interest expression and institutional safeguards), in-governance (collaborative management), and post-governance (risk control and feedback mechanisms). This structure adheres to core principles of multi-stakeholder collaboration, democratic consultation, institutional safeguards, and support from intelligent governance tools.

##### **4.1. Strengthening Mechanisms for Interest Integration and Legal Framework Development**

First, broadening the range of stakeholders involved in off-campus training governance decision-making is essential to effectively incorporate diverse interests. On one hand, this expansion involves including more relevant stakeholders, such as large, medium, and small-scale off-campus training service providers, individual educators, service users (students and parents), government representatives (especially local enforcement officials), school teachers, and experts from related fields. On the other hand, it calls for enhancing democratic channels for dialogue and consultation in decision-making. Traditional communication methods, including in-person consultations, on-site interviews, and public opinion surveys, should be supplemented by digital platforms like government service apps, WeChat official accounts, and government Weibo channels. These tools help streamline the expression of stakeholders' interests and concerns within the governance process.

By fostering open, equitable, and collaborative exchanges, stakeholders can better understand and trust one another, thereby creating a supportive environment for governance. This approach encourages stakeholders to actively participate in governance, helping to defuse potential conflicts at their source. During democratic consultations, the public can fully express their educational needs, and stakeholders can reaffirm the value and purpose of off-campus training. Addressing misconceptions related to regional "zero-tolerance" policies, for instance, is vital, as evidenced by South Korea's experience showing that overly strict policies may lead to resistance from both the public and market participants. China's stringent "Double Reduction" policy has similarly contributed to the growth of an "underground tutoring market." Hence, it is crucial to discuss industry standards based on scientific principles to ensure student

rights and the healthy development of the industry. By defining the boundaries of rights and responsibilities, stakeholders can reach a shared understanding, easing future governance efforts.

Developing a robust legal system for off-campus education governance is fundamental to providing institutional support for social co-governance. This involves constructing an integrated legal framework that includes education law, market regulations, and social organization law. First, drawing on Russia's experience in regulating off-campus education (Li, 2021) [16], legislative efforts should establish off-campus training as part of the broader educational support system, thereby legally recognizing its public and supplementary functions. Second, market regulations must be refined to set clear conditions for the establishment, entry, and exit of different types of training providers, while also establishing standards for service quality and provider conduct.

Third, enhancing legal frameworks for social organizations will allow these entities to play a more central role in governance. Granting social organizations legal standing and status will encourage their development at different levels, enabling them to guide, manage, and coordinate off-campus training providers effectively. Their broad public support and professional expertise can further contribute to a formalized, institutionalized policy consultation mechanism with the government, helping shape decision-making. This collaboration can promote the values and interests of various stakeholders, and social organizations can serve as a check on public authority, limiting its expansion in governance.

#### **4.2. Promoting Collaborative Governance Among Multiple Stakeholders in Off-Campus Training**

To establish effective collaborative governance, the government must first clarify internal responsibility lists, reinforcing a system where central directives are implemented at the provincial level and coordinated across departments (Chen Song et al., 2020; Li Youmei, 2021; Zhang Laiming, 2022) [17] [18] [19]. This approach requires precise accountability, with vigilance against excessive "one-size-fits-all" enforcement and rigid rule extensions that may impede effective governance. The government's role should focus on two primary aspects: first, as a guiding force in promoting educational values that prioritize student welfare, restoring the public-oriented nature of education through policy and public opinion to counteract profit-driven motives. Second, recognizing its limits, the government should adopt a "limited government" approach by delegating authority and empowering other stakeholders. By providing institutional support and sharing information and resources, the government can coordinate between families, schools, market actors, and civil organizations, fostering a governance mechanism driven by long-term shared interests.

The market can be a powerful tool for advancing quality and efficiency in off-campus training if appropriately regulated. Drawing from Singapore's experience, simplified registration and regulatory procedures for training providers can encourage them to operate within the law, reducing unregulated "underground" entities. The market's principle of maximizing incentives can motivate off-campus training providers to improve service quality and reduce costs, making education accessible at a lower price. However, a cautious approach is necessary to avoid the pitfalls of excessive competition and profit-chasing. Establishing a fair and transparent market environment that upholds educational values can help prevent the dominance of capital interests and protect smaller training providers from unfair practices, supporting a more balanced market landscape.

Industry associations and social organizations play a critical role in self-regulating and standardizing off-campus training services. A strengthened framework of industry associations can help create industry standards, certify qualified institutions, and advocate for the legal rights of educators. For example, Japan's "National Association of Learning Centers" unites over

100 associations to set self-regulatory standards, certify institutions, protect instructors' rights, and facilitate cooperation in areas like curriculum development and operational management(Gao,2018) [20]. Similar association models in the U.S. and Germany have contributed to higher service quality and self-discipline in the training sector.

Additionally, promoting partnerships across government-community, government-family, government-association, family-community, and association-community boundaries can help address short-term educational resource gaps. Inspired by Singapore's "School-Family-Community" education model, these partnerships offer structured support for diverse educational needs. For instance, schools establish Parent Support Groups (PSGs) where parents assist with school projects, organize social activities, and provide resources to support child development, fostering parental engagement in education. Community initiatives, like the "Community of Pathfinders in Action (COMPACT)" model, bring together experts from various fields to share industry knowledge, offer skill workshops, and provide internships, giving students access to enriched educational resources.

### 4.3. Enhancing Post-Governance Risk Control and Feedback Mechanisms

First, establishing a coordinated risk control platform for the safe operation of off-campus training providers is essential, requiring collaboration among central and local authorities, the Ministry of Education, and relevant departments. This platform should facilitate risk assessment, rapid response, and ongoing monitoring. It begins by registering all education service providers and consumers. Through the use of big data, cloud computing, blockchain, and artificial intelligence, the platform can strengthen data collection on consumer needs, helping to identify the characteristics, influencing factors, and trends in public demand for education. Incorporating service providers within the regulatory framework enables the creation of risk warning indicators, methods, and models. The platform should monitor various factors—such as teaching content, financial management, campus operations, and institutional credibility—creating a "green-yellow-red" alert system to track and publish risk levels, identify vulnerabilities, and monitor public sentiment in real-time.

Breaking down information silos is also essential, ensuring that all stakeholders involved in off-campus training governance share access to information. Using shared risk data, stakeholders can collaboratively develop response plans that align with defined roles and responsibilities, supporting swift responses to emerging risks. Oversight from government departments and industry associations ensures that risk response measures are implemented with students' and parents' interests as a priority. In the event of sudden bankruptcy or closures, funds from liquidation and prepaid accounts should prioritize tuition reimbursements. If these funds are insufficient, training associations could coordinate with similar institutions, with students' and families' consent, to continue educational services.

Second, improving feedback mechanisms in off-campus training governance is crucial for identifying any deviations in governance actions promptly(Swan,2015) [21]. Establishing a multi-stakeholder feedback mechanism allows training providers, consumers, social organizations, and related parties to share their insights. Blockchain's decentralized, transparent, immutable, and traceable features can further support data reliability.

Strengthening inter-stakeholder feedback allows each governance cycle to incorporate prior insights, creating a sustainable and iterative feedback loop to help mitigate risks in future governance actions. Incorporating evaluation mechanisms by independent third-party organizations also provides objective assessments of government actions and governance effectiveness, ensuring fairness, professionalism, and transparency in governance processes.

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