

Comparing the English and Korean marketised childcare systems in the context of promoting maternal employment

Abstract

Governments in both England and Korea prioritise a comparable set of childcare policies and strategies to promote young children's development and wellbeing and maternal labour market participation. This paper compares the two marketised childcare systems and policies and their impact on family outcomes, in the context of public policy aims to increase maternal employment. Despite Korean financial support for its childcare system being proportionally much greater than England's, maternal employment rates in England far outstrip those in Korea. As our conceptual approach, we adopt Kagan's (Kagan et al., 2016; Kagan with Landsberg, 2019) application of systems theory to childcare systems. Important aspects of these two marketised systems and their infrastructure appear to be operating inefficiently, impeding equitable access to high quality, sustainable provision. This evidence fails to relate, though, to lower maternal employment levels in Korea, where a lack of active labour market policies coupled with socio-cultural factors form additional barriers. Both countries may be close to tipping points in childcare policy development. Extending childcare support beyond working families and curbing market operations may need considering in England, while in Korea expanding high-quality universal childcare support through public and not-for-profit providers and family friendly employment policies require addressing.

Key words: public childcare policy, marketised childcare systems; working families; maternal employment; policy tipping points

Introduction

In the last three decades, both the British and Republic of South Korea's¹ governments have developed a range of similar childcare² policies with dual aims. On the one hand, childcare is being officially supported to promote children's development, learning, and well-being before they enter compulsory schooling, while on the other, it is promoted to encourage parents to share working and caring equally. In practice, this means encouraging maternal labour market participation (Lee, 2017; Lloyd, 2018; Moon and

Landsberg, 2018). Such policies are being implemented within these two countries' marketised childcare systems, which feature public, private-for-profit and not-for-profit providers as delivery partners.

The present paper explores and compares the impact on family outcomes of England's and Korea's marketised childcare systems and policies, in the context of policy aims to increase maternal employment. Its rationale further derives from the fact that recently both England and Korea witnessed major government investment aimed at an expansion of their marketised childcare systems. The role of publicly supported childcare in relation to maternal employment is a global issue and has a considerable policy profile in the Asia Pacific region's highly industrialised nations, including Korea, Singapore and Japan, just as it does in Europe (Alajääskö and Fluchtmann, 2023). Maternal employment rates are related to a wide range of socio-economic, normative and institutional factors. However, governments in many industrialised nations, including in England³ and Korea, have been prioritising childcare policies and strategies among a range of measures targeted at promoting parental, notably maternal, employment.

The most recent OECD Family Database (OECD, no date) highlights some interesting contrasts between the UK⁴ and Korea in respect of levels of public expenditure on childcare and pre-primary education, and between patterns of maternal labour market participation among mothers of young children.

The overall expenditure on childcare and pre-primary education in Korea (0.9 per cent GDP) is almost twice that of the UK (0.5) and exceeds the EU (0.7) and OECD averages (0.8), while the UK overall rate is substantially below that of the OECD and EU. This difference comes mainly from the expenditure on childcare. In the UK, it registers almost zero, as this figure reflects lower spending on parental subsidies in contrast with the publicly funded childcare entitlements, while in Korea, it is more than half of the total public expenditure on childcare (0.5) and pre-primary education (0.4) (OECD Family Database indicator PF3.1). Similarly, public spending on childcare and pre-primary education per child aged 0-5 in USD purchasing power parity (PPP) in Korea is nearly twice as high as that in the UK, especially for children under two. It is also much higher than the EU average and that in the OECD.

The rise in differences between UK and Korean expenditures is reflected in the timeline of public spending on ECEC (See Figure 1). In Korea, as a percentage of GDP, it has increased substantially, from 0.08 per cent in 1998 to almost 1 per cent in 2020, whereas the UK expenditure only increased from 0.49 per cent to 0.52 per cent during the same period. Interestingly, around 2012, spending in both countries started to proceed in opposite directions. That is, Korea's ECEC expenditure soared upward, while the UK's dropped significantly.

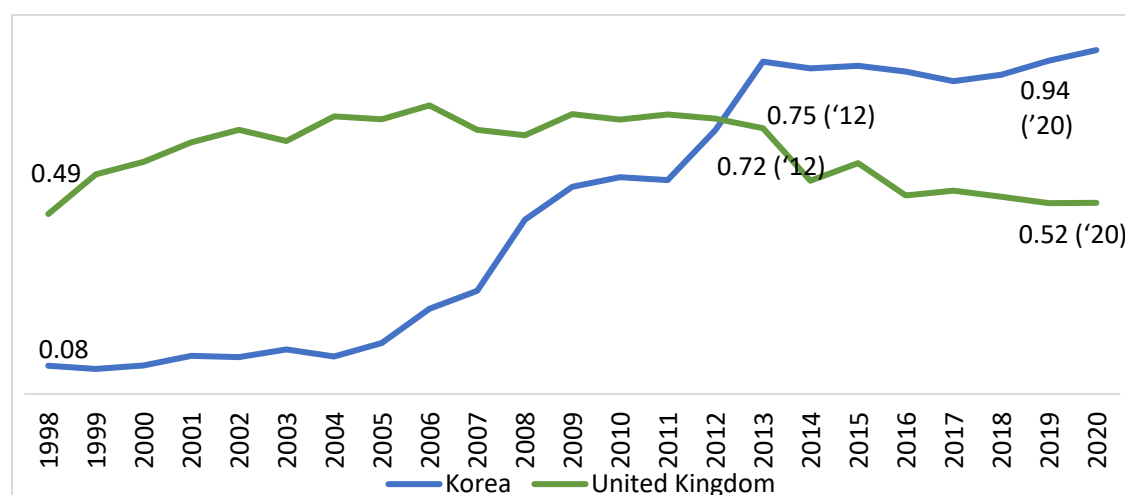


Figure 1 Time line public spending on early childhood education and care (per cent GDP)

Note: Authors' selection from the data source below.

Source: OECD Family Database, indicator PF3.1 Public spending on childcare and early education, in per cent of GDP, 1980-2019/20

Nevertheless, OECD data in Figures 2 and 3 below highlight that in 2019, UK maternal employment rates were equivalent to EU and OECD averages, despite lower government ECEC investment than that found in Korea. Maternal employment rates in Korea for 2019 were significantly lower, both by the age of mothers' youngest children and by the number of children. The only situation where the 2021 Korean maternal employment statistics approximate with the OECD and EU averages, is in the case of women with more than three children, but this was still the lowest compared to the UK, OECD and EU averages.

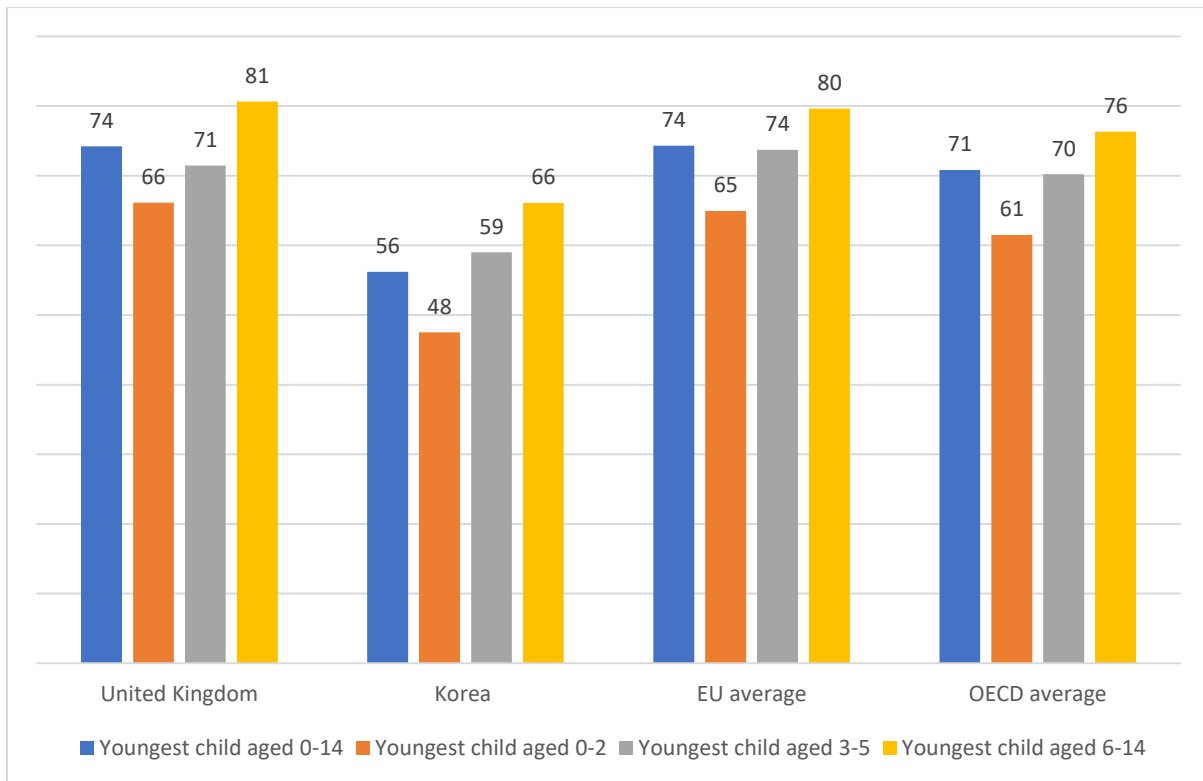


Figure 2 Maternal employment rate (per cent) with children aged 0-14, by age of youngest child, 2021

Note: Authors' selection from the data source below.

Source: OECD Family Database, indicator LMF1.2.C Maternal employment rates by age of youngest child, 2021, or latest available year

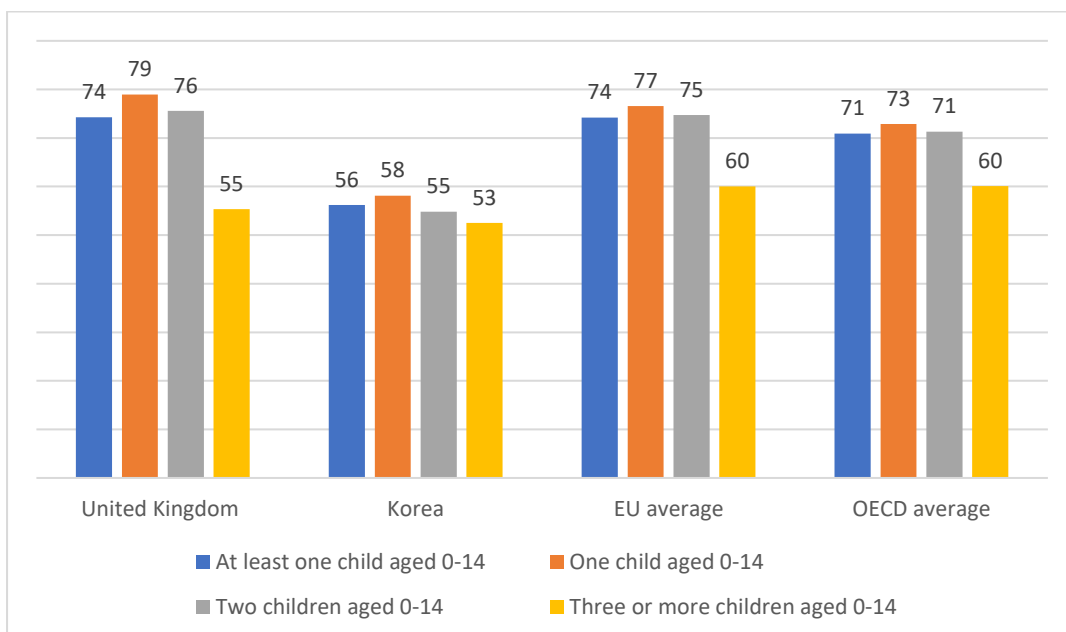


Figure 3 Maternal employment rates (per cent) by number of children, 2021 or latest available data

Note: Authors' selection from the data source below.

Source: OECD Family Database, indicator LMF1.2.D Maternal employment rates (per cent) by number of children, 2021, or latest available data

We employ Kagan's systems theory of change as an analytical framework (Kagan, 2018; Kagan with Landsberg, 2019) for our analysis of the two marketised childcare systems' impact on family outcomes and for our exploration of any potential relationship with maternal employment rates. Particularly, in light of the fact that despite Korea's financial support for its marketised childcare system being proportionally much greater than England's, maternal labour market participation rates in England far outstrip those in Korea.

In the next sections, we describe the current format of English and Korean childcare and its funding model, followed by a literature review, and an introduction to Kagan's theory. We compare systemic challenges within the two childcare systems in the context of divergent maternal employment rates. Our discussion and conclusion suggest new policy directions for each country to address current risks to achieving both the childcare policy aim of improving maternal employment and boosting all young children's wellbeing, learning and development.

Main features of the current English and Korean childcare systems

This section provides a brief comparative overview of the two childcare systems, covering current policy aims, funding, governance, regulation, provision and the workforce.

England

In England, compulsory school starting age is five, while most four-year-olds start attending non-compulsory Reception classes in primary schools in September after their fourth birthday (DfE, 2023a). All three- and four-year-olds have been entitled to 15 hours of directly funded childcare since 2010, delivered weekly during term-time. Two-year-olds growing up with disadvantage have benefitted from the same - targeted - entitlement since 2013.

The provider split is roughly two-thirds private and one-third public, i.e. school-based, childcare in nursery classes in primary schools, in a dwindling number of children's centres (Lewing et al., 2020) and in freestanding nursery schools (DfE, 2023a). Among private providers, for-profits outnumber not-for-profits. Apart from maintained nursery schools and children's centres, childcare for under threes is virtually exclusively located in the private sector. School-based provision for two-, three- and four-year olds is term-time only (DfE, 2023a).

Since 2017 the 15-hour entitlement has been doubled to 30 hours for three- and four-year-old children whose parents meet certain employment criteria. From September 2025 the British Government is extending the 30 hours entitlement to all children from the age of nine months to five years in working families, after a phased roll-out of this expansion programme which started in April 2024 (Farquharson, 2024a).

Supply-side provider subsidies, that is the childcare entitlements, are distributed by local government on behalf of central government. Parents can also apply for central government help with the cost of additional childcare hours beyond the entitlements, through demand-side subsidies delivered via the tax and benefits systems.

The Department for Education has a wide remit in respect of early education and childcare provision in England, including for supply-side funding. The Department for Work and Pensions and the UK Tax Authority (His Majesty's Revenue and Customs - HMRC) are responsible for demand-side funding via the tax and benefits systems. Apart from distributing supply-side funding to childcare providers, local government is also responsible for securing enough daycare centres and other forms of early years provision. The private and public sector childcare workforces in England differ greatly. Graduate early years teachers are employed in state nursery schools and classes, although childcare practitioners with lesser qualifications can also work in publicly funded academies and free schools. The English private childcare sector employs far fewer graduates. Instead, it features mostly childcare practitioners with vocational qualifications. Up to 50% of the private sector childcare workforce can be unqualified provided such practitioners do not have a supervisory role (DfE, 2023b). No official wage scale applies beyond statutory minima.

Since 2006 all of England's childcare provision has been subject to the same curricular and regulatory framework, the Early Years Foundation Stage (EYFS), which extends

until the end of primary Reception class (DfE, 2023b). The Office for Standards in Education, Children's Services and Skills, Ofsted, (Ofsted, 2023) registers, regulates and inspects childcare providers against EYFS provisions.

Korea

In Korea, the compulsory school starting age is six, while most three- to five-year-old children make use of either childcare in daycare nurseries and/or non-compulsory early childhood education in kindergartens. In 2011, the Korean government confirmed the implementation of the '*Nuri* Curriculum' as a shared integrated programme for childcare and kindergarten services for children aged three- to five (Na and Park, 2013). It is designed to develop children's physical, emotional, cognitive and social skills as a national-level curriculum (MOE, 2019).

In 2012, the Korean government implemented universal free childcare services equivalent to 35 hours per week for all parents with children aged up to two years. In 2013, this universally funded childcare entitlement was extended to all families with children aged three- to five, qualifying them for provision equivalent to 7-hour universal childcare per day (09:00-16:00, Mondays to Fridays). Childcare centres operate continuously for at least 6 days a week, year-round. Extended childcare service hours (16:00-19:30, Mondays to Fridays) are also available along with overnight care (19:30-24:00), 24-hour care (07:30-07:30) and holiday/Sunday care, especially for those families who need extra childcare due to work or special circumstances. The extent of the need for extended childcare services is determined by local government officials reviewing the reasons for the request. However, these extended childcare hours may not always be available in the private childcare sector (MHW, 2023a).

There are seven different types of childcare centre ownership models in Korea. As of 2023, the public centres constituted approximately 21% of the total, not-for-profit entities made up about 11%, and the remaining 68% can be considered for-profit (MHW, 2023b).

There are also two sides to Korean government childcare subsidies: the supply-side, financing childcare centres' operating costs, and the demand-side subsidies supporting parents' childcare costs. Private sector fees are unregulated (Moon and Landsberg, 2019). Some providers, including publicly funded and provided childcare

centres, also receive subsidies for their staff salaries. Parents/families can apply for the government childcare subsidy, which is given to them in the form of vouchers.

The Korean public sector workforce is composed of three levels. For childcare centre teachers (teacher levels 1, 2 and 3), the minimum education level is a high school diploma and 1-year vocational training (teacher level 3). There are more promotion opportunities for levels 1 and 2. Wages in the public and private sectors differ in that public childcare teachers are paid on a salary scale not applicable to private sector teachers.

The central government's responsibilities for childcare used to be split between the Ministry of Health and Welfare and the Ministry of Education, for childcare and early education, respectively. Since January 2023, an integrated system has been promoted (called '*yubo tonghap*' in Korean); both ministries are currently discussing the ultimate responsibilities for financing and the central operation, while local governments are responsible for distributing the subsidies, taking into account the type of daycare centre and regional conditions.

In summary, while featuring similarities at system and infrastructure level, some pronounced contrasts exist between the Korean and English childcare systems. Not only does Korea offer far more publicly funded childcare hours, including atypical hours, but the evolution of the two countries' childcare funding models has also proceeded along a different timeline. Almost a decade before England, Korea substantially increased the number of funded childcare hours children aged zero to five are entitled to. Korea also operates a separate funding stream to support providers' staff costs. However, the Korean childcare system relies much more heavily on demand side funding income than the English system.

Korea has separate forms of both public and private provision for all age groups, whereas in England the number of public services accessible to children under three is very small. In both countries, though, childcare provision for all age groups is dominated by private-for-profit providers.

Childcare governance in both countries is shared between central and local government and to a limited extent regional government (Sylva et al., 2018; Moon and Landsberg, 2018). Although childcare uptake by children aged three to five is comparable, Korea is considerably more successful than England in encouraging the

uptake by children under three. In Korea: “In 2022, about two-thirds of children under the age of 3 were enrolled in early childhood education and care programmes, the highest rate across the OECD” (OECD, 2024a, p.1). In England, figures for the same year show enrolment rates of 57% of two-year-olds, 40% of one-year-olds and 7% of infants below one (DfE, 2023a).

Exploring maternal employment patterns in England and Korea: a literature review

Evidence from a range of studies suggests that in both countries the introduction of a raft of childcare policies initially improved maternal labour market access and boosted service availability for parents across the socio-economic gradient (Lloyd, 2020; Murphy et al., 2022; Lee, 2021). But the current situation is more complex.

The negative impact of motherhood on Korean maternal employment rates persists, irrespective of substantial public support for childcare provision. Despite the number of extended childcare hours having doubled over the past few years, among 51 out of 229 Korean municipalities, 22.3% were still lacking extended childcare provided (Lee, 2022). This may also be linked to other factors, including a lack of institutional support during pregnancy and post-childbirth in Korea and long working hours according to research (OECD, 2019c; Sung, 2019; Choi et al., 2021).

There is not only a high-intensity working culture (Yang et al., 2018) that may clash with the demands of motherhood (Oh and Mun, 2022), but also, little availability of workplace-based childcare centres (4%) or of adequate maternity leave (MHW 2022). Therefore, there are still gaps in childcare support and many Korean parents, in practice mothers, have to rely on additional or alternative informal care arrangements, thus discouraging their work participation (Park et al., 2020; Kim 2017).

Whereas OECD maternal employment data for the UK may, at first sight, suggest that ECEC policies are achieving their objectives as far as increasing maternal labour market participation is concerned, evidence from administrative UK data sets (Murphy et al., 2022) and cross-European surveys indicate that these figures may hide substantial socio-economic and regional variation (Neimanns, 2020). The ‘motherhood penalty’, that is the negative effect of childbirth on maternal employment patterns and progress, also applies to mothers in England. The effect is even stronger

for women with a disability or belonging to an ethnic minority (Harkness et al., 2019; de Henau et al., 2019).

Other social policy and economic research suggests that identifying drivers behind the anomalous maternal employment rate for Korea may be a complex endeavour. Sociocultural factors have been implicated in the lower Korean maternal employment rates, despite the presence of a comprehensive formal childcare and kindergarten system (OECD, 2019c).

An analytical study by Sung (2019) concludes that gendered patterns in women's paid and unpaid work have not so far proved susceptible to improved childcare policy implementation. Choi et al., (2022) trace the government's focus on encouraging gender-equal labour market participation among parents to its 2018 and 2020 Low Fertility – Aging Society strategic plans (Korean Government, 2019). Using quantitative data sources from surveys and panel studies, Choi explores the same factors identified by Sung, as well as labour market factors that may affect mothers' choice to participate in paid work.

An economic analysis of the impact of paid childcare leave on working mothers' fertility using data from the National Fertility and Family Health Survey from the years 2006, 2009, 2012, and 2015 – a nationally representative cross-sectional survey conducted triennially by the Korean Ministry of Health and Welfare and the Korea Institute for Health and Social Affairs (Kim and Parish, 2022), found that, while fertility increased, no definitive conclusions could be drawn regarding mothers' return to the labour market.

Reviewing studies of factors implicated in the country's steeply declining birth rate, the lowest among OECD member countries, revealed that while studies may touch on the pertinence of childcare policies, they do not explore the current childcare system's operations in depth (Song et al., 2018; Yun et al., 2022; Jeong et al., 2022).

Research into problems affecting UK, including English, mothers' access to the labour market yields evidence of childcare system barriers (McLean et al., 2017; Harkness et al., 2019; Hochlaf and Franklin, 2021). An economic analysis of the impact of the 15 funded childcare hours on parental labour market participation in England, failed to show any effect, in contrast with that of children entering compulsory education (Brewer et al., 2016). McClean and her colleagues highlighted the difficulties parents

face in accessing childcare in the UK and five other European countries, even where systems are considered comprehensive and affordable. Harkness' study focused on the 'motherhood penalty' affecting women's careers after childbirth.

Hochlaf and Franklin's (2021, p.3) representative survey of UK mothers provides further evidence of this impact. They found that 46% of respondents were unable to extend their working hours, 30% had to reduce their working hours, 34% were unable to take a potential job, while 15% had to leave work altogether, all due to childcare access and affordability problems. This equated to 4.5 million UK mothers facing employment barriers. Another representative survey of working parents with children under five reported 11% of partnered mothers and 13% of single mothers had left their job for these reasons (Fawcett Society, 2023).

An analysis of longitudinal data by Nieuwenhuis (2022, p. 808), examined the interplay of both active labour market policies and childcare in 30 OECD member states, including Korea and the UK, over 33 years. He cautiously concluded that large investments in both childcare and active labour market policies are not only associated with the highest rates of maternal labour market participation but also with diminishing returns in economic value.

The concept of active social policy was also employed by Bonoli (2013) in a comparative study of the application of an active labour market and new childcare policies across seven European countries between the mid-nineties of the 20th century and the first decade of the 21st. At this point, parental labour market participation became a key social policy objective (Bonoli, 2013), whereas overall this was a time of welfare state retrenchment. Bonoli's research focussed only on European case studies, but a similar dynamic may be at work in Korea according to a more recent study (Hwang et al., 2022).

This brief overview of pertinent literature suggests that the present paper's focus on the impact of childcare systems and policies in the context of maternal employment patterns in England and Korea may begin to fill a gap in the literature.

Analytical framework

The search for an appropriate analytical framework for this analysis initially targeted approaches dealing with factors and actors operating in a range of policy areas, which seemed applicable to the relationship between childcare systems and policies and maternal labour market participation.

Hall (1993) developed a typology of policy developments, including those that achieve paradigmatic change. Hall defines paradigmatic change as a change in policy aims, which he regards as a third order policy development among the ranking he developed. While his case studies focus on British economic policy development, this study is regularly cited in research on childcare system change (Lewis and West, 2017; Prentice and White, 2020). Korea and England have been pursuing childcare policies aimed at promoting maternal employment and children's wellbeing, learning and development since the mid-nineties. However, in the absence of clear policy change, we concluded that recent developments should therefore not be viewed as third order policy development. This rendered Hall's approach less well suited for our purposes.

Room (2011) applied complexity theory to social policy development, offering a different approach to the conceptualisation and measurement of dynamic processes of socio-economic change within what he called 'a complex and turbulent world' (2011, p. 1). Key to Room's argument is the recognition that these are two-way processes, involving interactions between agents, in our case employed mothers in dual or single earner families, and institutions, in our case central and local government departments, as well as childcare regulations and systems. This conceptualisation seemed possibly more complex than required for the analysis and interpretation of our findings.

Instead, we opted for the application of systems theory to childcare systems developed by Kagan and colleagues (Kagan et al., 2016; Kagan, 2018; Kagan with Landsberg, 2019). Kagan's definition of systems is that of services plus infrastructure. This approach is more suited to our research question centred on comparing the impact on family outcomes of Korea's and England's marketised childcare systems in the context of maternal employment rates. However, Kagan's framework does also take account of many contextual factors, as illustrated in Figure 4 below.

Kagan's systems theory of change framework aims 'to untangle complex, highly interactive systems' (Kagan, 2018, p. 51) to explain how they contribute to the achievement of child and family wellbeing in different societies. This wellbeing is defined as including both childcare's developmental impact on children and its impact on family economic wellbeing by enabling parental employment.

The framework encompasses childcare related inputs, outputs and outcomes at the microlevel. Inputs at this level include boundary spanning mechanisms and programmes across education, health, and welfare, which integrate childcare programmes and services delivered by different government departments or agencies.

At this level, infrastructure subsystems form another essential input. These include governance, finance, pedagogical quality, transitions, workforce development, data-driven improvement, plus engagement and support strategies. Importantly, these inputs, outputs and outcomes, are embedded within a temporal context, reflecting econo-political factors such as demographics, social thinking/movements, government leadership, and funding, alongside a sociocultural context, reflecting factors such as values, beliefs, heritages and religions (Kagan, 2018). In Figure 4 below the latter can be found under G and H.

Within this conceptual framework, effective childcare systems are an output entirely dependent on the positive interplay between seven input factors and boundary-spanning mechanisms. In combination these generate effective childcare systems, which are characterised by four system outputs: quality, equity, sustainability and efficiency, alongside family supports. When working well, these systems deliver the intended outcome of child and family wellbeing.

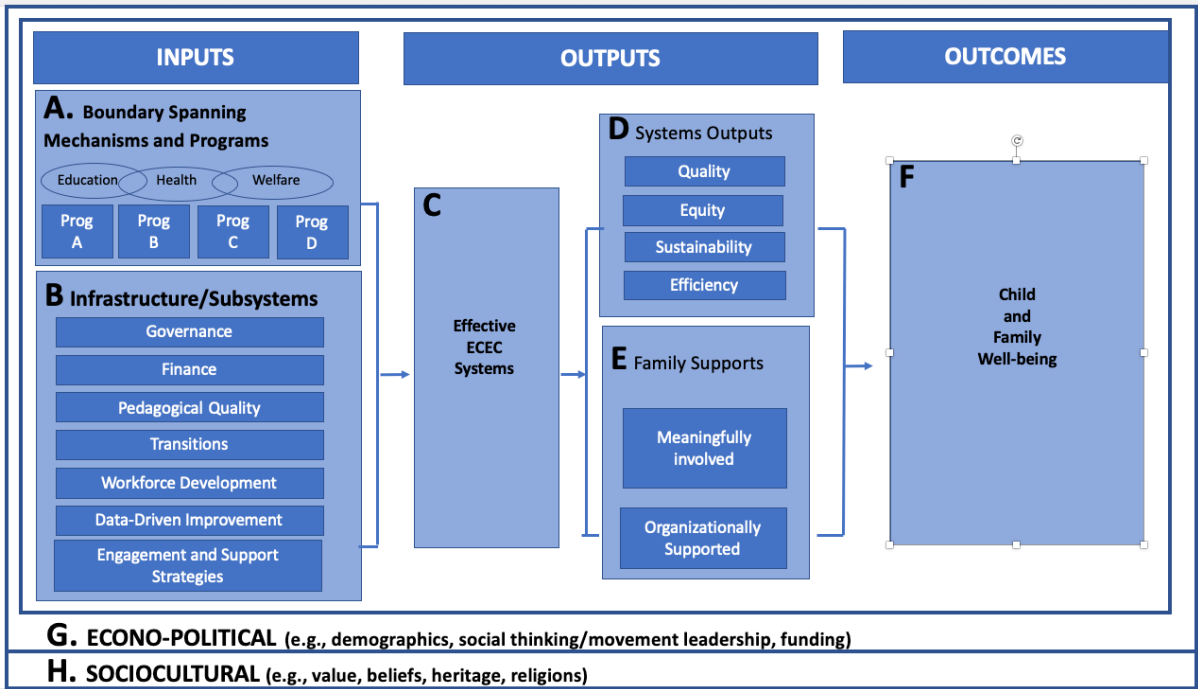


Figure 4 Kagan's systems theory of change

Source: Kagan, 2018, p. 65, fig. 1.1

Next, we applied Kagan's framework to the English and Korean marketised childcare systems in order to identify similar and different issues that might hamper the achievement of policy aims relating to maternal employment. In doing so, we chose to focus mainly on the set of four system outputs found under D in Figure 4 above. In the next section, the impact of each output is analysed by comparing system challenges, which could be associated with varying levels of maternal employment. We do this by utilising relevant policy measures for each output, including governance, regulations, operations, finance, quality and quality assurance, and workforce development.

Comparing system challenges

We start our analysis, with 'equity', in contrast to Kagan's ordering, which puts 'quality' first, because reaching all children equitably is a foundational policy aim for public investment in the English and Korean childcare systems (Sylva et al., 2018; Moon and Landsman, 2018). Arguably, true quality can only be achieved and maintained in the context of equity (Lloyd, 2020).

Equity

Current childcare financing patterns in England reflect a prioritisation of access for children with employed parents rather than for children living with disadvantage (Farquharson, 2024a; National Audit Office, 2020). The level of demand-side subsidies delivered via the tax and benefits systems now lags far behind the level of supply-side subsidies for the childcare entitlements (Lewis and West, 2017; Farquharson and Olorenshaw, 2022).

The trend is now towards prioritising childcare for working families over ensuring generous access to early education and childcare for all children, particularly children from low-income families (NAO, 2024a), among whom at least 50% have a parent in employment (DWP, 2024). Among low-income families, children from Black and ethnic minority communities are disproportionately represented and they use proportionally more informal care (Bordone et al., 2020). Currently, 47% of UK Black and minority ethnic children are growing up in poverty (DWP, 2024).

Access to childcare provision by children with SEND, i.e. special educational needs or disabilities, or both, is particularly problematic. In 2022 only 5% of two-year-olds with SEND were registered for the 15 funded childcare hours per week they were entitled to (DfE, 2023a). This impedes their mothers' access to the labour market. There is strong evidence that the private-for-profit childcare sector discourages access by children growing up with SEND, socioeconomic, and other kinds of disadvantage, in a variety of ways (NAO, 2024b; La Valle et al., 2024).

The value of childcare entitlements has not kept pace with inflation and cost of living increases, disadvantaging providers (Drayton and Farquharson, 2023). As a result, they may raise fees and charge 'top-up' fees even for the publicly funded hours (La Valle et al., 2024). Parental fees for a part-time day nursery place for under twos grew by 60% between 2010 and 2021, at a rate twice as fast as the rise in average earnings and three times as fast as the overall growth in consumer prices during that period (Farquharson and Olorenshaw, 2022), putting formal childcare increasingly out of reach of even middle-class parents (House of Commons Education Committee, 2023). In Korea, the current childcare financing model embodies 'universal childcare', supporting childcare for all children aged nought to five regardless of parental income, employment status, number of children or region. Yet, the parents' childcare costs burden can be different for those who use public centres and those who use private ones. This is because public childcare centres receive government support for staff salaries, whereas the latter do not. Parents may also receive different levels of childcare subsidy, depending on the upper limit of regional childcare costs. For example, among private daycare centres, the highest 2021 cost for three-year-olds was KRW430,000 (approx. equivalent to \$310) in Seoul, while the lowest was KRW323,000 (\$233) in Sejong. For four- to five-year-olds, the highest was KRW411,000 (\$296) in Seoul and the lowest KRW310,000 (\$223) in Sejong. Moreover, some cities and provinces set different standards for admission fees, special activity costs, and event costs, depending on whether providers are public or private (MHW & KICCE, 2021b).

The universal childcare funding model also covers daycare services for children with special needs. They can attend either specialised childcare centres or integrated ones. However, the latest national household survey shows that nearly 50% of disabled children attended regular daycare centres, followed by those who did not attend any

institutions (23%), specialised daycare centres for the disabled (13%), general kindergarten classes (9%), integrated centres for the disabled (3%), and special kindergarten classes (3%). Notably, the most common reason given for not using a centre was there being no suitable childcare centres for these children (MHW & KICCE, 2021a).

Current childcare financing also attempts to cover extended childcare hours (16:00-19:30). However, the gap between public and private childcare centres continues due to a lack of available teachers for those extra hours. Moreover, among some of the private childcare centres as well as some of the childcare centres in rural areas, children's numbers are insufficient to make running extended hours viable (MHW & KICCE, 2021b).

Quality

The issue of quality is closely associated with equity. Arguably, true quality childcare cannot be achieved unless the system offers accessible and affordable services equitably to all children and families within their communities (Lloyd, 2020).

In England, important quality-related aspects of private provision are not inspected by Ofsted, including staff pay and employment conditions and provider financial viability (Simon *et al.*, 2022). Parents may be reluctant to use provision whose quality they do not trust, affecting maternal employment choices (DfE, 2023c). Other factors also militate against England's childcare system offering enough high-quality provision.

The unfettered growth over the last two decades of large for-profit childcare corporations, some with shareholder business models and some supported by private equity firms, has not led to an increase in ECEC places (Simon *et al.*, 2022). In fact, nearly 50% of under-fives are now living in childcare 'deserts', i.e. areas with three or more children for every place (Pollard *et al.*, 2023; Hurley *et al.*, 2024). Alongside quantity, provision quality is also unevenly distributed across regions (Ofsted, 2024). Even where private provision is available, in the absence of a parental fee cap, fees charged for hours additional to the publicly funded childcare entitlements for two-, three- and four-year-olds and younger children, have been deterring low-income families' access (Garcia and Topping, 2023).

The quality and qualifications of the childcare workforce are pivotal to service quality. In England, the childcare workforce is split between teachers and practitioners working

in the school sector, *i.e.* in state nursery classes and nursery schools, where remuneration and employment conditions are better, and those employed in the private sector. In 2022, only 9% of the childcare workforce had accredited graduate status, while the number of graduates registering for university-based Early Years Initial Teacher Training has decreased by 77% cent since 2013. Among the rest of the private childcare workforce, 70% of practitioners have a level 2 or level 3 vocational qualification, while 21% have no formal early years qualification at all (Orso et al., 2023). “This disparity in the level of qualifications between the maintained and private and voluntary sector has implications for the quality of provision and outcomes for children” (Archer and Oppenheim, 2021, p. 24.)

The expansion of large for-profit childcare corporations has negatively affected staff conditions in the private sector, where salaries were on average 14 per cent lower than in not-for-profits (Simon et al., 2022). Whereas the workforce is the key factor determining provision quality, particularly for children growing up with disadvantage (OECD 2019c), the childcare system is suffering a major recruitment and retention crisis (Hardy et al., 2023). This may affect parental employment decisions (DfE, 2023c).

In Korea, nearly 80% of childcare centres are operated by private-for-profit providers (MHW, 2023b), while the proportion of private kindergartens is also quite dominant at 46% (MOE, 2023). One of the reasons why the dominance of private childcare is concerning in Korea is that there is relatively higher engagement with service monitoring in public childcare centres. Parents also report a better childcare services experience in the public sector (MHW & KICCE, 2021a). The evidence also suggests that parents prefer the not-for-profit private centres, because they trust them more, while also being able to pay relatively lower fees.

The higher satisfaction rates among those public users may be explained by teaching quality. Both kindergarten teachers and daycare centre teachers in the public sector require higher qualifications than those in the private sector. These qualification gaps are also associated with significant wage differences. While standards for public salary grades are annually announced by the MHW and MOE, most private childcare centres and kindergartens are exempt from implementing the standardised salary grades (MHW, 2023a; MOE: 2023). Considering approximately 64% of kindergarten teachers and about 82% of childcare teachers work in the private sector (KICCE, 2023), the

gap in conditions and qualifications between the public and the private sectors is concerning.

Efficiency

Among features of childcare governance in England, complexity appears to be a dominant characteristic. Complexity is shown to interfere with efficiency as regards access and affordability. Governance is also highly centralised.

This complexity affects parents. They are particularly confused about eligibility for childcare subsidies through the tax and benefit systems, while the application process for working families whose children are eligible for directly funded places is also problematic (Farquharson et al., 2023). This system has been described as 'dysfunctional' (Archer and Oppenheim, 2021). It is particularly affecting mothers combining paid work and caring (Fawcett Society, 2023).

As for staff training and qualifications, development and oversight of vocational workforce qualifications and the agencies issuing them is the remit of the Department for Education, while the Office for Students, an arms-length agency of the DfE, oversees pertinent university degrees. The latest workforce development plan was issued in 2017 and has made little difference to the workforce crisis (Foley and Roberts, 2024).

In Korea, the efficiency of the current childcare system was questioned by Lee (2021). The universal free childcare initiative fails to have a major impact due to the continuing predominance of the private childcare sector. Indeed, the household national survey (MHW & KICCE 2021a) reveals that, especially among employed mothers, only 60% of them said there were some childcare centres they could trust. Moreover, many of these mothers expressed the view that the expansion of public childcare centres should be the government's main policy priority. Despite the universal childcare support policies, parents eagerly called for expanded government support, to help reduce childcare expenses for families with young children as well as for service quality improvements.

Sustainability

System efficiency is directly related to system sustainability, since factors limiting efficiency may pose risks to sustainability. A steady decrease in childcare settings hampers maternal employment.

The 2006 and 2016 Childcare Acts in England and Wales reduced the strategic governance role of local government in respect of its oversight of local childcare markets and quality support. It retained only a 'sufficiency duty', (DfE, 2023b, p. 27). This restricted its powers to intervene if market operations exclude certain children's access to affordable childcare, with potential consequences for maternal employment.

The impact of local government's reduced strategic planning role has been compounded since 2000 by the introduction of publicly funded academies and free schools alongside state schools. Although they must implement the EYFS framework, any childcare such schools deliver is outside local government control, since they report directly to central government (West and Wolfe, 2018). This contrasts with childcare delivered within state, i.e. local government-controlled, nursery schools and classes.

In England, childcare provider numbers are decreasing; the number of family-based settings has halved over the last decade (Ofsted, 2024). Providers increasingly report being unable to cover their costs, as public per-child funding rates have not kept up with inflation, whereas the cost of living and the minimum wage have risen (Farquharson *et al.*, 2023). The English childcare market is also changing shape. The major for-profit childcare corporations have been engaged in a spate of acquisitions and mergers while taking on unsustainable debt (Davies, 2024). Such take-overs pose a real risk to not-for-profit providers, which are more likely to offer high-quality places to children growing up with disadvantage (Simon *et al.*, 2022).

Between 2018 and 2022, one third of non-profits in disadvantaged areas in England closed or were taken over by private companies, including private equity firms (Garcia and Topping, 2023). This represents an increasing threat to childcare access for children growing up with disadvantage, whether in working or unemployed families.

Aware of these market dynamics, the Labour government now offers funding to convert empty primary school classrooms into childcare facilities, but this initiative is still in its infancy and its success is not guaranteed (Farquharson, 2024b).

When in September 2025 the childcare expansion programme for children aged from 9 months in working families is fully rolled out, the government will be paying some 80% of childcare costs. Getting the subsidy levels right then becomes a crucial issue for sector sustainability (Drayton *et al.*, 2023).

The use of public money to pay shareholder dividends and interest to private equity firms in the expanding corporate part of the private-for-profit sector is another sustainability risk in need of mitigation (Jitendra, 2024). The National Audit Office (2024a) feared the childcare sector might prove incapable of implementing the government's 2024/25 childcare expansion programme and remain financially sustainable. An official inquiry into childcare policy (House of Commons Education Committee, 2023) reached similar conclusions.

A lack of strategic planning potentially affecting sustainability has also become problematic in Korea, especially since 2013, when universal free childcare was extended to all children aged up to five, regardless of parents' employment status and income level. While this policy initiative should be considered a critical juncture in reforming childcare policy in Korea, the policy objectives have been rather inconsistent and uncertain, especially in terms of how to implement universal childcare and to what extent central or local government should be responsible for the budgetary allocation of childcare costs (Bae & Park, 2012; Joo, 2013).

In Korea, the total number of childcare centres has fallen by 27% since 2012, with the majority of childcare centres continuing to be run by private for-profit childcare providers (MHW 2022). As of 2022, despite the portion of publicly funded and provided childcare centres having increased from 5% to 19%. Of all children attending childcare more than 60% were attending private centre-based and home-based centres (MHW 2022), and even more in rural areas. As mentioned earlier in relation to quality, lesser quality in private childcare centres may influence sustainability.

Furthermore, the lack of access to extended childcare, especially among private childcare users, impacts childcare service sustainability. For example, most working parents still have to spend more on additional private childcare services, such as babysitters or *hakwon*⁵ (MHW & KICCE (2021), due to the mismatch between childcare centre opening hours and parental, in reality maternal, working hours (Lee and Kwon, 2017).

Discussion

By applying Kagan's systems theory of change, our comparative analysis produced evidence that the four output elements from her theoretical framework are not fully achieved in either country. The childcare system's marketised nature and complexity

appears to interfere with parents' ability to make optimal use of childcare for their children. This evidence can be construed as a barrier to increased maternal employment and hence to the two governments' ability to fully realise their pertinent policy aim but does not shed light on Korea's proportionally lower maternal employment rates.

When the comparison is looked at in more detail, Korea and England appear to face similar systemic childcare challenges affecting family outcomes, with the exception of a couple of policy differences. For example, Korea features a predominantly demand side funding model versus a mixed model in England, where supply-side subsidies have grown exponentially. The Korean system recognises the need for childcare provision during hours that would be considered 'atypical' in the English context, although the reach of those policies remains limited as regards improving maternal employment rates. Finally, whereas most financial childcare support in England is now restricted to working families, Korea offers universal childcare support irrespective of parental employment status and income. But is that universal offer sufficient to meet the needs of Korea's working families and the policy aim of increasing maternal employment?

The financial burden on Korean parents still requiring extra childcare over and above the universal publicly financed element, remains considerable. Our analysis also highlighted that increasing the number of public centres could have been prioritised within the major programme of policy reform to ensure that funding goes towards improving service quality and working conditions for childcare teachers, as well as increasing the availability of extended childcare hours. Lower quality in private-for-profit provision is associated with Korea stimulating demand and supply expansion by providing childcare subsidies, while prioritising public childcare infrastructure less.

The Korean private-for-profit market has now grown significantly, benefitting from generous public subsidies, while parental access has suffered. Korean women's organisations and progressive civil society organisations regularly insist that at least 30% of centres should be public so as to control market quality, but such growth has not been realised (Kim 2017; Lee 2021).

As for England, successive conservative governments came to view their role as supplying families, defined as consumers, with market choices. There has been a

general acceptance of the marketised system, without a strong demand, comparable to that in Korea, for public provision.

Returning to Kagan's analytical framework, we identified a clear need for more family friendly employment policies, which are not explicitly recognised within Kagan's framework. Under 'inputs, it only recognises, among so-called 'boundary spanning mechanisms and programs', specific policy roles in the areas of health, education and social welfare, but not in that of the labour market.

In contrast, the temporal and socio-cultural contexts within which Kagan's whole framework is embedded, now take on a new prominence, notably, the socio-cultural context. (See H in figure 4 above.) These complement the systemic barriers we identified to the realisation of increased maternal employment in Korea or making maternal labour market access in England easier than at present. The lack of work-life balance within Korean families is acknowledged in the literature (Choi et al., 2022; Sung, 2019; Lee, 2021), as is the disproportionate burden shouldered by mothers within both single and dual parent working families (Choi et al., 2021).

Gender equality in the national workforce remains in need of reform (OECD, 2021). The high intensity working culture for both mothers and fathers in Korea (Yang et al., 2018; Choi et al., 2022) makes demands that working mothers struggle to meet (Oh and Mun, 2022), particularly in light of socio-cultural norms regarding maternal roles within the family (OECD, 2019c). The latter report's authors explicitly address this issue, recommending Korea consider a process of 'cultural rejuvenation'. They also note income inequalities are wider than across the OECD on average, with about one in six Koreans living in poverty, partly as a result of deficient labour market policies, and they recommend change across a range of policies, not just childcare.

While acknowledging the importance of the investments made in childcare support in Korea, Choi and colleagues (Choi et al., 2022) conclude that flexible labour market policies for both genders are needed in order to achieve both a rising birth rate and an increased maternal employment rate. In England a falling birth rate is as yet less critical, but labour market and childcare issues are implicated in the degree to which mothers of young children prefer part-time to full-time work (DfE, 2023c) or leave the labour market altogether (Hochlaf and Franklin, 2021).

The case of Korea appears to support the first part of the conclusion by Nieuwenhuis (2020) that the combination of large investments in both childcare and active labour market policies are associated with the highest rate of maternal labour market participation. Korean investments in the former are indeed large but without corresponding active labour market policies, which limits the economic value of such high public investment. Socio-cultural change can be sensitively promoted by economic change but must be complemented by improvements to both labour market operations and the Korean childcare system, is the message emerging from our findings and the research literature.

Conclusion

Our adoption of Kagan's framework was useful to explain how family outcomes are affected by the nature of the Korean and English marketised childcare systems. The evidence presented here strongly suggests that systemic challenges do impede equity, quality, effectiveness and sustainability. This stands in the way of realising the two countries' policy aims regarding maternal employment. However, the context and impact of these challenges appear to be different.

Based on this evidence, both countries would appear to be close to 'tipping points' in childcare policy development as identified by Room (2011), since systemic barriers to achieving childcare policy aims remain largely unaddressed. Room's (2011, p.315) complexity theory offers pertinent suggestions for the agile public policy making that may be required at 'tipping points' in the journey of a particular policy. For Room, agile policy making means interpreting the signals, statistical and other indicators that flag the imminence of a tipping point and highlight a need for intervention.

There are no grounds for regarding the planned childcare expansion in England as an instance of 'third order change' as conceptualised by Hall (1993). This is because it constitutes an intensification of state support by means of one particular policy tool, not a change in policy aims. Its initial impact reflects parental fee being replaced with government subsidies for parents already using the system (Farquharson, 2024b), while mothers not yet in paid work but wanting to join the labour market may continue to experience barriers to participation (NAO, 2024a).

The two governments should reconsider whether their childcare policies are well-targeted in line with their dual policy aims and are achieving the intended benefits for

families, society and the economy. Could both countries be ready for a childcare policy change equivalent to Hall's (1972) third order policy change?

Korea has been investing a great deal of public money in its childcare system, employing universal subsidies, without a commensurate increase in maternal labour market participation till now. There appears to be a need for implementing equitable fiscal governance models (Docherty and Morabito, 2023) to counter territorial gaps and lack of provision for children in low-income families, as evidenced above.

By comparison, in 2025 England is set to double its childcare budget within one year from 4 to 8-billion-pound sterling., Yet there is an uncertain prospect of the expansion's impact on working families, its primary focus, coupled with a well-evidenced risk to the life chances of children growing up with disadvantage (NAO, 2024a). Transforming the childcare system alone is unlikely to provide a sufficient response to present dilemmas. If third order policy change were to be countenanced by either government, which direction should it take?

Priority setting in England may require reversing the decision to boost childcare support only for working families, reducing the complexity of demand-side subsidies and substantially increasing support for the childcare workforce. In short, by addressing equity, quality, efficiency and sustainability within the childcare market, e.g. through increased regulation. In Korea, priority setting may require enforcing family friendly labour market policies, e.g. by capping working hours, at the same time as consolidating high quality universal childcare support and initiating a sensitive campaign to address prevailing notions of mothers' roles as they affect families' work-life balance and the birth rate.

Notes.

1. From this point in the text onwards, we will refer to the Republic of South Korea as Korea.

2. In this paper the term childcare is used to refer to Early Childhood Education and Care (ECEC) provision for children from infancy until they start school, except where referring to documents featuring the term ECEC

3. From this point we will only refer to the UK when data are provided for the four jurisdictions making up the UK.

4. These OECD statistics are not disaggregated for the four UK jurisdictions. Since these UK figures largely reflect the situation in England, the largest of the four UK nations (Moss and Lloyd, 2013), they are used here for illustrative purposes. This paper's discussion of the impact of recent ECEC policy developments focuses on England.

5. This is a Korean term for a for-profit private educational institution.

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