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Educational Equity for Migrant Children: A Policy Comparison of Shenzhen and Hong Kong

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Abstract

This study examined how two contrasting governance systems—Shenzhen and Hong Kong—address educational equity for migrant and immigrant children within the context of China's Greater Bay Area. While both cities have expanded access to compulsory education, their institutional logics diverge sharply. Shenzhen operates a contribution-based model, linking school access to parental contribution to the city. In contrast, Hong Kong guarantees near-universal access under a rights-based regime grounded in legal entitlements. These differences raise fundamental questions about how equity is defined, prioritized, and implemented across jurisdictions. Drawing on Rawlsian principles of justice and Edgar's five-dimensional equity framework, a comparative policy analysis was conducted, using over 40 official documents, including legislative texts, admission guidelines, and statistical reports. Coding was used to trace how each system frames and operationalizes equity across access, input, process, output, and outcome dimensions. The findings show that, while both systems emphasize transparency and capacity expansion, they differ in how they identify target groups, allocate resources, and balance merit with need. Shenzhen's points-based system creates strong incentives for formalized urban integration, but disadvantages low-income migrants structurally. Hong Kong's legal universalism offers broader entitlement but struggles with linguistic exclusion and digital barriers. By linking normative theory with empirical analysis, this study offers a multidimensional understanding of how education systems interpret fairness in contexts of mobility and inequality. It also contributes to broader debates on policy transfer, urban governance, and the role of ethics in educational inclusion.

Keywords

educational equity; Hong Kong; migrant children; Shenzhen

1. Introduction

Ensuring equitable access to education is a global imperative. The UN's Sustainable Development Goals (SDGs) articulate the right of every child to inclusive and quality education, regardless of social origin, legal status, or migration background. Yet, despite this normative consensus, children from migrant and immigrant families continue to face systemic barriers to enrolment, particularly in urban regions where educational resources are scarce and governance systems are fragmented (UNESCO, 2019).

One region where this tension is especially acute is China's Greater Bay Area (GBA), a rapidly integrating zone comprising nine mainland cities and the Special Administrative Regions of Hong Kong and Macau. With over 87 million people and a GDP exceeding RMB 14.5 trillion (approximately US$2.0 trillion) in 2024 (Constitutional and Mainland Affairs Bureau, 2025), the GBA is an ambitious experiment in regional development across divergent institutional systems. However, its education systems remain siloed. Migrant and immigrant children—many of whom are internal migrants in Shenzhen or cross-border arrivals in Hong Kong—face sharply unequal opportunities for accessing compulsory education. In Shenzhen alone, nearly 70% of the population lacks local household registration, and over half the school-age population consists of migrant children from other parts of China (Shenzhen Statistics Bureau, 2024, Section 3–1). In Hong Kong, 14% of the population are new arrival families from mainland China, many of whom face challenges in navigating an unfamiliar education system (Jiang et al., 2021).

Institutional design plays a central role in structuring these educational opportunities. Shenzhen operates a points-based system that allocates school places according to household contributions such as employment history, housing type, and social insurance coverage (Shenzhen Municipal Education Bureau, 2018). This contribution-based model reflects a logic of selective inclusion. In contrast, Hong Kong adheres to a rights-based model rooted in the Education Ordinance and in the Bill of Rights, which guarantees near-universal access to free primary schooling regardless of parents' economic contributions or migration history (Hong Kong Legislative Council, 1971, 1991). While both cities aim to expand capacity and promote fairness, they do so via different normative pathways—raising important questions about what "equity" means.

Existing scholarship has documented how urban education systems reproduce inequality through admission rules, bureaucratic requirements, and linguistic expectations (Chan & Buckingham, 2008; Chen & Wang, 2015). However, most studies have examined these issues within single-city contexts, without comparing governance models across jurisdictions. Very few studies have evaluated how different systems conceptualize and operationalize equity when responding to the same policy challenge: how to provide fair and meaningful access to education for migrant and immigrant children.

This study addressed that question by comparing how Shenzhen and Hong Kong govern the educational inclusion of migrant-background students. Through a systematic analysis of policy and legal documents, the study explored how two distinct governance logics—rights-based and contribution-based—produce different interpretations and outcomes of educational equity in an increasingly interconnected region. To guide this comparison, the study drew on Rawlsian principles of justice (Rawls, 1999), with particular attention to how each system prioritizes the needs of the least advantaged, and Edgar's (2022) five-dimensional equity framework, which operationalizes fairness across access, input, process, output, and outcome. Together,

these normative and analytical lenses enabled a multidimensional evaluation of how equity is not only defined, but also enacted through institutional design. This study sought to illuminate how contrasting governance logics shape the interpretation and operationalization of educational equity. Evaluative insights and policy implications are discussed as secondary reflections.

2. Background and Literature Review

Understanding the divergent interpretations of educational equity in Shenzhen and Hong Kong requires attention to their respective legal foundations and governance logics. The contrast between China's civil law tradition and the British common law legacy inherited by Hong Kong has resulted in differing institutional understandings of the right to education, the obligations of the state, and the treatment of non-local or marginalized student populations.

2.1. Mainland China: Constitutional Commitment and Localized Implementation

In China, the right to education is enshrined in the highest levels of legal authority. Article 46 of the Constitution (2018 amendment; National People's Congress of the People's Republic of China, 2018) guarantees all citizens the right and obligation to receive education. The Education Law (2021 amendment; Ministry of Education of the People's Republic of China, 2021), Compulsory Education Law (2018 amendment; Ministry of Education of the People's Republic of China, 2018), and the Law on the Protection of Minors (2020 amendment; National People's Congress of the People's Republic of China, 2020) reiterate the state's responsibility to provide equitable education for all school-age children, regardless of gender, ethnicity, or socio-economic status.

China's pursuit of constitutionally guaranteed universal schooling has long collided with the enduring structure of the *hukou* system, the nationwide household registration system that legally ties an individual's place of registration to eligibility for public services, including compulsory education. Under this system, children without local *hukou* are often required to meet additional conditions—such as parental employment, housing, or social insurance records—before they can access public schooling in their city of residence (Chan & Buckingham, 2008; Zhou & Cheung, 2017). While national laws affirm that every child has the right to education, in reality this right is often geographically constrained. As of 2020, China had approximately 71.09 million migrant children, representing 23.9% of the national child population. Among them, 34.62 million were classified as urban migrant children—those who have migrated with their parents from rural to urban areas without transferring *hukou* registration (National Bureau of Statistics of China et al., 2023). The *hukou* system continues to limit many of these families' eligibility for publicly funded education in their city of residence.

This institutional tension is especially pronounced in China's mega-cities such as Beijing, Shanghai, Guangzhou, and Shenzhen, where local governments—tasked with providing education but operating under decentralized fiscal responsibilities—have developed mechanisms to prioritize access for registered residents (Deng & Gao, 2024; Kwong, 2011). In Beijing, for instance, public school enrolment for non-local children typically requires the so-called "five certificates" (*wu zheng*), including documents proving stable employment, legal housing, residence permits, and continuous social insurance—each linked to parental legal status and duration of stay (S. Liu et al., 2017; X. Zhang et al., 2021). Similarly, Shanghai operates a multi-tiered points-based admission

system, in which migrant families are scored and ranked based on indicators such as residence length, job type, education level, and tax contributions (Chen & Wang, 2015). These mechanisms reflect how *hukou* functions as a de facto gatekeeping tool, enabling city authorities to ration access to limited educational resources while managing local fiscal risk (Chan & Buckingham, 2008).

Among these cities, Shenzhen stands out not only for the scale of its migrant population but also for how starkly it illustrates this dilemma. At the provincial and municipal levels, Guangdong and Shenzhen have introduced specific policies aimed at promoting equity, such as the Measures for the Administration of Compulsory Education for Non-Hukou Children (see Shenzhen Municipal Government, 2018, document revised in 2024) and annual admission guidelines that emphasize transparency in school placement. These frameworks signal a strong local commitment to ensuring more equitable access while managing high levels of migrant inflows. As a city where almost 70% of residents lack local *hukou* (Shenzhen Statistics Bureau, 2024, Section 3–1), Shenzhen exemplifies the challenge of extending educational rights in a governance structure that still ties entitlements to household registration. Its policy responses, while innovative, remain shaped by this structural constraint—a dynamic explored further later in the article.

2.2. Hong Kong: Common Law Protections and Rights-Based Logic

In contrast, Hong Kong's legal framework is rooted in British common law, which prioritizes individual rights and judicial remedies. The Education Ordinance (Hong Kong Legislative Council, 1971) mandates school attendance for children aged 6 to 15 and positions the government as responsible for ensuring education for all residents with legal status. Drawing from the International Covenant on Civil and Political Rights, the Bill of Rights Ordinance (Hong Kong Legislative Council, 1991) further enshrines education as a protected right. This framework emphasizes equality before the law and non-discrimination, independent of income, race, or immigration background.

While Hong Kong does not operate a household registration system, access to public education is tied to lawful residence. Children of asylum seekers or undocumented migrants may face limitations, but the education system generally avoids linking school eligibility to parental tax contribution, housing ownership, or employment status. Instead, administrative mechanisms such as randomized school allocation and multilingual support services for non-Chinese-speaking students reflect a compensatory and inclusive approach.

2.3. Governance Logics and Their Implications for Equity

At a structural level, Shenzhen embodies a utilitarian and welfare-allocation logic that treats education as a scarce resource to be distributed based on merit and contribution. Educational equity is understood through the lens of "qualified inclusion"—rights are extended conditionally based on one's integration into the local socio-economic fabric. In contrast, Hong Kong adheres more closely to a rights-based logic in which education is a guaranteed service for all lawful residents, regardless of their families' socio-economic input.

This contrasting logic has deep implications. In Shenzhen, children of precarious or informally employed migrants may effectively be excluded from mainstream education, despite constitutional protections. In Hong Kong, the system strives to accommodate linguistic, ethnic, and geographic diversity through targeted policies, even though challenges such as the digital divide and residual socio-economic gaps remain.

Any comparison of educational equity in Shenzhen and Hong Kong must be contextualized within their distinct legal and institutional paradigms. These paradigms shape policy design, and access mechanisms and broader societal expectations about fairness, entitlement, and the state's role in inclusive development.

2.4. Evolving Concepts of Educational Equity

The notion of educational equity has undergone important transformations in recent decades. Earlier frameworks often equated equity with equality of opportunity, where all individuals, regardless of background, should have the same chances to succeed (Jencks et al., 1972; Rawls, 1999). However, as critics have pointed out, equal opportunities at the starting line rarely compensate for structural inequalities accumulated over time. Consequently, more recent theories have shifted toward a capability-based understanding of equity—what learners are actually able to achieve in real-world contexts given their contexts and constraints (Gale & Molla, 2015; Walker, 2006).

Among the most policy-relevant models, Edgar's (2022) five-dimensional framework has been adopted widely in both academic and international policy circles (e.g., OECD Education Policy Outlooks). It disaggregates educational equity into five interlinked components: (a) access and opportunity, (b) needs-based input, (c) process fairness, (d) minimum performance standards, and (e) outcome distribution. These dimensions move the equity conversation beyond simple access or funding toward a more comprehensive assessment of what education systems actually deliver for different learners.

In parallel, Rawls' (1999) theory of justice continues to serve as a normative benchmark for assessing whether institutions are ethically justifiable. His equal-liberty principle requires that everyone has equal rights to basic freedoms—including access to education—while the difference principle allows for inequalities only if they benefit the least advantaged. Rawls' framework, when considered alongside Edgar's dimensions, offers a promising normative lens to examine whether equity policies not only exist, but also attend to the needs of the most disadvantaged. This study drew on both Edgar and Rawls to systematically evaluate the policy architectures of Shenzhen and Hong Kong.

2.5. Immigrant and Migrant Children: Definitions and Challenges

Across jurisdictions, the category of "immigrant children" or "migrant students" is far from uniform. Legal and administrative systems define these groups differently, which in turn shapes what support they are entitled to receive. In Sweden, for instance, "newly arrived migrant students" are defined as those entering after age seven and are tracked as such for up to four years (Tajic & Bunar, 2023). In Italy, "immigrant children" includes both first-generation (foreign-born) and second-generation (born in Italy to non-citizens), with a focus on guiding high-performing students into academic tracks (Carlana et al., 2022). These varying definitions illustrate how social and legal contexts shape who is seen as "at risk" and what kind of support is deemed necessary. In this article, we use "migrant children" as an umbrella term, while recognizing that in Shenzhen it refers mainly to non-*hukou* internal migrants, and in Hong Kong it encompasses New Immigrant Students (NIS), Cross-Boundary Students (CBS), and Non-Chinese-Speaking (NCS) students.

In mainland China, the dominant term is "migrant children" (*liudong ertong* or *suiqian zinv*), referring to children of rural parents who move to cities for work. Due to the *hukou* system, these children are often denied access to public schools in their new urban homes. Many studies (T. Liu et al., 2018; S. Zhang, 2025; Zhou & Cheung, 2017) have documented how exclusion from public education pushes many migrant children into under-resourced private schools, often with unqualified teachers and inadequate facilities. Although national policy has gradually shifted from promoting "equal opportunity" to ensuring "equal quality" (Guo et al., 2019), in reality many urban school districts still use points-based admission systems that effectively tie access to parental employment, housing, or social insurance status. Moreover, beyond the classroom, migrant children also face barriers to social integration, mental health support, and extracurricular participation—areas rarely captured by conventional equity metrics (Qi et al., 2022; Yuen, 2010; Zhu & Shek, 2020).

In Hong Kong, the classification of immigrant children is uniquely shaped by the city's postcolonial identity and proximity to mainland China. Recent studies have distinguished between NIS from the Mainland, CBS who live in Shenzhen and commute daily, and NCS students, largely from South and Southeast Asian backgrounds. These groups face distinct but overlapping challenges. Wu et al. (2021) highlight the academic and psychological stress that NIS and CBS face when adapting to a new curriculum, often with weak Cantonese proficiency. Jiang et al. (2021) noted that NIS youth comprised 12.36% of Hong Kong's 0–14 population by 2018—far from marginal. Meanwhile, Karim and Hue (2023) drew attention to NCS students' systematic underperformance in public exams, language exclusion in a Cantonese-dominant system, and limited social integration despite official trilingual policies. These studies together paint a picture of deep-rooted structural barriers in Hong Kong's education system, particularly for linguistic and cultural minorities.

These challenges are not just logistical or administrative—they are fundamentally ethical, in Rawlsian terms. By denying access or under-providing support to children based on their legal status, birthplace, or language backgrounds, education systems may violate both the equal-liberty and difference principles. As Gabrielli and Impicciatore (2022) argued, immigrant children often exist between two cultures and two legal identities, and this in-betweenness magnifies their vulnerability. Thus, equity for migrant and immigrant children must be understood as both a structural and a moral imperative.

2.6. Equity Reforms in Shenzhen and Hong Kong: A Comparative Research Gap

Both Shenzhen and Hong Kong have taken active steps to address educational equity—but through very different governance logics. In Shenzhen, recent policy efforts have focused on expanding access through supply-side reforms: building new schools, increasing public-school seats, and refining the points-based admission system that governs entry for non-*hukou* children (Bo & Wang, 2025; Trémon et al., 2025). Although these reforms have increased public-school enrolment rates among migrant children, critics point out that complex documentation requirements continue to exclude the most precarious families (T. Liu et al., 2018; Zhou & Cheung, 2017).

By contrast, Hong Kong operates under a rights-based legal framework that guarantees education for all legal residents. Rather than building more schools, its equity efforts have centered on process-oriented reforms, such as random-number-based school placement (Education Bureau [EDB], 2025), trilingual curriculum development, and targeted subsidies for NCS and CBS (Hong Kong Special Administrative Region

Government, 2025). These interventions aim to level the playing field without filtering access through socio-economic credentials. However, persistent outcome gaps—especially in Chinese language attainment—suggest that rights alone do not eliminate inequality (Karim & Hue, 2023).

Despite the richness of city-specific studies, few comparative analyses directly assess how these two governance approaches perform across the full range of equity dimensions. Existing research often focuses on single aspects—access, language support, or admissions—but does not offer an integrated evaluation grounded in shared theory. No study, to our knowledge, has applied Edgar's five-dimensional framework in tandem with Rawlsian ethics to compare the two systems. This absence limits both the theoretical generalisability and policy transferability of current findings—particularly as Shenzhen and Hong Kong move toward deeper integration under the GBA development framework. Moreover, while a growing body of literature affirms the multidimensionality of educational equity and the disproportionate barriers faced by immigrant and migrant children, few studies have examined how different governance logics mediate these challenges in operational terms. Comparative evaluations across distinct legal-institutional regimes—especially between cities like Shenzhen and Hong Kong—remain rare.

By bridging normative theory with empirical policy analysis, this study addressed that gap. It asked not only what policies exist, but also for whom they work, and whether they fulfill the ethical promise of education as a right for all. This rationale provides the conceptual foundation for the theoretical framework discussed in the next section, which in turn informs the study's research questions.

2.7. Theoretical Framework

To interpret these contrasting governance logics, this study drew on two complementary theoretical lenses. First, Edgar's five-dimensional model of educational equity provides a structured, policy-relevant lens to assess fairness in terms of access, input, process, output, and outcomes. This model enables the breakdown of policy mechanisms across Shenzhen and Hong Kong into analytically comparable components. Second, Rawls' theory of justice offers a normative framework to evaluate whether education systems prioritize the needs of the least advantaged. The principles of equal liberty and of difference allow for a philosophical interrogation of whether policies in each city meet the threshold of ethical fairness, especially for marginalized populations such as migrant children and ethnic or linguistic minorities. By combining these two frameworks, the study balanced empirical policy comparison with ethical evaluation. This approach enhanced the explanatory depth of the analysis, ensuring that the cross-regional comparisons were not only descriptive but also normatively meaningful.

2.8. Comparative Value and Research Questions

Comparing Shenzhen and Hong Kong provides both theoretical and practical value. It highlights how contrasting governance logics—contribution-based in Shenzhen versus rights-based in Hong Kong—interpret and institutionalize fairness, and how both systems respond to common challenges such as migrant integration, special educational needs, and socio-economic inequality. This comparative perspective is particularly relevant to the GBA, where cross-border educational mobility underscores the need for policy coordination and mutual understanding of governance logics. Building on this rationale, the study addressed the following research questions:

RQ1: In what ways do Shenzhen and Hong Kong differ in ensuring equitable access to compulsory education?

RQ2: How do the two systems respond to the specific needs of disadvantaged groups, particularly migrant and immigrant children?

RQ3: How do these divergent policy approaches reflect different dimensions of educational equity, and what does this reveal about the influence of contrasting governance systems within the GBA?

3. Methodology

A structured policy document analysis was employed in this study to examine how Shenzhen and Hong Kong interpret and implement educational equity. The research design followed four sequential components: (a) document corpus construction, (b) retrieval and screening procedures, (c) analytical framework and coding scheme, and (d) validation and reliability checks.

3.1. Document Corpus Construction (2018–2025)

Documents were selected according to three criteria: (a) they regulate compulsory education, (b) they explicitly or implicitly reference equity-related concepts (e.g., fairness, inclusion, non-discrimination), and (c) they are officially issued by a governmental or statutory authority.

3.2. Retrieval and Screening Procedure

Policy documents were retrieved through systematic searches and manual download from official portals: Hong Kong's EDB, the Legislative Council archives, the Shenzhen Government Gazette, and district-level education websites. Metadata (title, year, issuer, URL, revision status) were logged into a registry. Duplicates and expired versions were excluded. A time filter (2018–2025) was applied to focus on the most recent phase of enrolment reforms and digitization. Two researchers independently screened summaries and tables of contents, resolving disputes through consensus. The final corpus is listed in Table 1.

3.3. Analytical Framework and Coding Scheme

The analysis integrated three layers of theoretical insight to guide the coding and interpretation process. First, the context–text–consequence model proposed by Cardno (2018) was employed to situate each policy document within its broader macro-environment, examine its discursive framing, and assess its anticipated or actual policy impacts. Second, Rawlsian principles of justice were applied to evaluate whether the policies in question upheld equal liberty and prioritized the needs of the least advantaged. Third, Edgar's five-dimensional model of educational equity was used to operationalize fairness across five interconnected domains: access, input, process, output, and outcome.

To implement this analytical framework, an initial set of 12 coding nodes was developed, corresponding to the two Rawlsian principles, five Edgar dimensions, three components of the Cardno framework, as well as two additional nodes representing policy tool types and target populations. The coding structure allowed for

Table 1. Policy documents list.

Jurisdiction	Policy Document	Issuing Authority	Year
Shenzhen	Measures for the Administration of Compulsory Education for Non-*Hukou* Children	Shenzhen Municipal Government	2018, revised 2024
	Notice on Carrying Out the Admission Work for General Primary and Secondary Schools	Shenzhen Municipal Education Bureau	2018–2025
	District-Level Points-Based Admission Guidelines (e.g., Nanshan, Guangming, Longhua)	District Education Bureaus, Shenzhen	2018–2025
Hong Kong	Primary One Admission Guides	EDB	2018–2025
	Education Ordinance (Cap. 279)	Hong Kong Legislative Council	1971
	Hong Kong Bill of Rights Ordinance (Cap. 383)	Hong Kong Legislative Council	1991
	Support Measures for NCS Students (2024 Circular)	EDB	2024

the emergence of new categories where appropriate. Coding consistency was checked through independent double coding and consensus discussions. Comparative analyses across cities and target groups were conducted through cross-tabulations and matrix queries to identify patterns and divergences in policy orientation and emphasis.

3.4. Validity and Reliability

To ensure analytic robustness, a multi-pronged strategy was adopted. First, triangulation was employed to enhance the credibility of findings: Policy interpretations were cross-validated against statistical yearbooks, school enrolment datasets, and public government reports. Second, a comprehensive audit trail was maintained throughout the research process. All source documents, coding logs, and analytical scripts were archived internally to ensure traceability. This multi-step approach helped ensure that the selected policy documents directly addressed the research questions, that the analytical frameworks meaningfully integrated both normative and operational dimensions, and that the resulting interpretations were both traceable and verifiable.

4. Findings

4.1. The Improved Equitable Access to Compulsory-School Places

4.1.1. Shenzhen: Expand First, Fine-Tune Later

At the beginning of the study period (2018), Shenzhen faced the GBA's most pronounced seat shortage, reflecting sustained pressure from migrant inflows. Between 2019 and 2020, Shenzhen's non-*hukou* population grew by more than 340,000, reaching over 1.24 million (Shenzhen Statistics Bureau, 2024,

Section 3–1). In response, the city expanded public-school quotas, banned selective entrance exams, and implemented a unified registration portal (Shenzhen Municipal Education Bureau, 2020). Local districts were required to prepare multi-year enrolment forecasts (Shenzhen Municipal Education Bureau, 2018), and a district-supervised lottery system was introduced for oversubscribed schools to absorb residual applicants (Shenzhen Municipal Education Bureau, 2020). By the end of 2024, Shenzhen had added a cumulative 825,000 basic education seats, and in that year alone added 180,000 new places (Shenzhen Municipal Education Bureau, 2025b). More than one-third of the public-school seats at the compulsory level were allocated to children of migrant families, indicating progress in equitable provision despite persistent competition for limited spots. Despite these expansions, the most precarious migrant children—whose parents lack access to stable housing or to formal employment that provides social-insurance coverage, typically requiring higher educational or professional credentials—remain categorically excluded from public provision under the Measures for the Administration of Compulsory Education for Non-*Hukou* Children (Shenzhen Municipal Government, 2018, revised 2024).

4.1.2. Hong Kong: Redistribute What Exists, Keep the Process Clean

Hong Kong faces a different constraint: land, not immigration. Total pupil numbers have been stable, but seats are spread unevenly between dense urban areas and the fast-growing Northern New Territories. Because large-scale school construction is slow, the EDB has relied on procedural tools to dilute place-based advantage.

Hong Kong, constrained by limited land, has followed a process-dominant path. Half of the Primary One places are allocated through computer-generated random central allocation, reducing discretionary influence in admissions (EDB, 2025). The introduction of the iAM Smart+ portal since 2020 has shifted nearly all applications online, streamlining access while preserving paper-submission options to accommodate digitally excluded families (Digital Policy Office, 2024). Without significantly expanding physical capacity, this process-dominant model has narrowed socio-economic disparities in elite-school entry and reduced travel times for pupils in underserved border districts. For students living further from school—typically beyond 10 minutes' walking distance—the Student Travel Subsidy Scheme provides means-tested transport support to ensure affordable access to education across school nets (Working Family and Student Financial Assistance Agency, 2025).

4.1.3. Comparative Insight

Shenzhen's strength lies in volume—a rapid build-out of public supply—and in the steady relaxation of contribution-based hurdles. Its weakness is that eligibility remains tied to parental insurance and housing credentials, leaving the poorest migrants vulnerable. Hong Kong excels at procedure—transparent, data-driven allocation rules that curb middle-class advantage even when bricks-and-mortar capacity is hard to add. Its shortcoming is an absolute seat gap in land-constrained districts, a problem algorithms cannot fix. Taken together, the two cities illustrate complementary pathways to the same equity goal: one prioritizes more seats first, the other fairer rules first. A future GBA strategy that pairs Shenzhen-style capacity expansion with Hong Kong-style procedural safeguards would come closer to universal, proximity-based access for every child.

4.2. Differentiated Support for Migrant and Immigrant Students

4.2.1. Shenzhen: Conditional Entry Through Governance-Linked Differentiation

Over half of compulsory-age pupils were migrant children in Shenzhen (Shenzhen Statistics Bureau, 2024, Section 3–1). To manage this pressure, the city embedded differentiation within a single points-based system that governed both ordinary and migrant admissions. From 2018 to 2020, families living in low-rent public housing (e.g., public rental housing, low-rent housing, transitional housing) received extra points (Nanshan District Education Bureau, 2020), indirectly reflecting economic need, while uninterrupted social-insurance records were rewarded as markers of parental contribution and long-term stability in Shenzhen.

Beginning in 2020, district-level rules recalibrated the formula in ways that explicitly tied education access to broader governance goals. Rather than lowering the weight of home ownership, several districts (e.g., Guangming) elevated its relative status by differentiating homeowners from renters in baseline scoring, reinforcing housing as a pathway to educational advantage. At the same time, child-related criteria were reshaped: Once-generous bonuses for only children were sharply reduced or eliminated by 2022 (Guangming District Education Bureau, 2019, 2020, 2022), reflecting China's demographic shift from birth control to fertility encouragement. These adjustments demonstrate how differentiated admission rules functioned less as targeted educational support and more as extensions of macro-regulation in housing, employment, and population policy.

4.2.2. Hong Kong: Universal Entry With Rights-Based Adjustments

Because lawful residence, not parental contribution, decides eligibility, Hong Kong must fine-tune support after pupils are inside the system. The EDB therefore layers categorical grants on top of its uniform funding formula. Since 2019, the Chinese as a Second Language grant has allocated approximately HK$160,000 to HK$1.6 million per school per year, based on NCS student enrolment, to support additional teachers, bilingual materials, and interpretation services (EDB, 2020; Hong Kong Special Administrative Region Government, 2025). Preliminary reviews suggest that schools receiving the highest tier of Chinese as a Second Language grant support have demonstrated notable progress in NCS students' Chinese language outcomes, even though gaps remain (Gao et al., 2019; Tse et al., 2021).

Economic targeting is subtler. Instead of differential admission points, Hong Kong uses the Student Finance Office to route textbook, lunch-fee, and transport subsidies (Working Family and Student Financial Assistance Agency, 2025) to the lowest two income deciles. From April 2024, the Working Family Allowance Scheme increased household and child allowances by 15%, raising the maximum monthly benefit for a four-person (two-child) family from HK$4,200 to HK$4,830. In 2022–2023, over 66,000 households (approximately 220,000 individuals, including more than 86,000 children) received support, and total child allowance payments exceeded HK$1.10 billion (Hong Kong Special Administrative Region Government, 2023, 2024; Working Family and Student Financial Assistance Agency, 2024). One gap remains in digital equity: At the scheme's launch in 2018, only about 8% of households used online applications (Hong Kong Special Administrative Region Government, 2023). Although this figure rose to 50% by 2023 (Hong Kong Special Administrative Region Government, 2023), the remaining half continue to rely on paper submissions, suggesting that while uptake has improved, equitable digital access is still uneven.

4.2.3. Comparative insight

Shenzhen's differentiation logic is embedded in its admission algorithm and capital spending: Once a pupil gains admission, services are largely standardized. Hong Kong's logic is superimposed: The gate is open to all lawful residents, and tailored resources are layered afterwards through earmarked grants and statutory entitlements. Shenzhen scores high on progressively lowering economic entry barriers, but it offers little systematic support for linguistic or cultural minorities. Hong Kong shines in language-of-instruction accommodation, yet still relies on household means-testing schemes that parents say are administratively heavy and have not fully solved the digital gap.

Taken together, the two systems represent contrasting equity sequences: Shenzhen places conditions upon entry but standardizes services thereafter, while Hong Kong guarantees entry upfront and differentiates support post-admission. A hybrid GBA model—combining Shenzhen's structural investment with Hong Kong's multilingual and income-responsive subsidies—would meet the needs of migrant and immigrant students more comprehensively (see Figure 1).

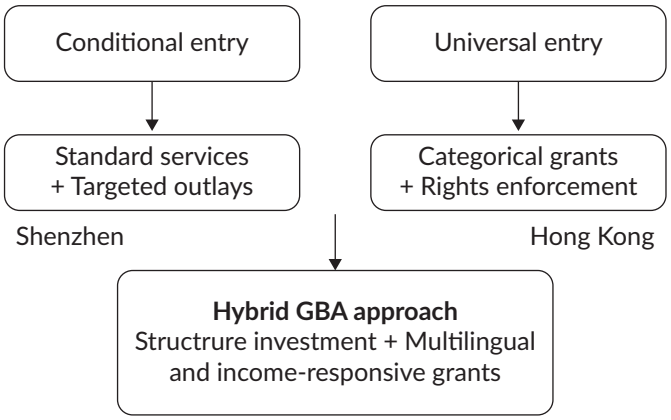

Figure 1. Governance sequences for educational equity in Shenzhen and Hong Kong.

4.3. Strengths and Persistent Challenges

Shenzhen and Hong Kong present two contrasting—but potentially complementary—models of fairness. Shenzhen's approach is resource-led: Between 2019 and 2024, the number of public schools more than doubled from 637 to 1,746, while the total number of students enrolled in ordinary primary and secondary schools rose by over 420,000 to 1.97 million (Shenzhen Municipal Education Bureau, 2025a). This rapid infrastructure expansion reflects the city's strong fiscal commitment and central coordination, aimed at accommodating a large non-*hukou* student population. Although official data on class size remain limited, the increase in capacity indicates a policy effort to alleviate school crowding in high-demand districts.

The same growth strategy, however, carries three liabilities. First, conditionality: Even after some adjustments, entrance points still reward stable housing and long social-insurance records, showing how access to education has become an instrument for broader governance goals and disadvantaging the most precarious migrants. Second, intra-urban disparity: Wealthier districts convert fiscal transfers into "smart campuses" (Shenzhen Municipal Education Bureau, 2019) and trilingual staff more quickly than do outer

industrial zones, inviting allegations that the city is reproducing, not erasing, spatial privilege. Third, thin cultural accommodation: Shenzhen provides limited and largely unsystematic language or cultural support for non-Mandarin-speaking migrant families, despite its increasingly diverse population.

Hong Kong epitomizes a process-led pathway. With little room to build, the EDB focuses on neutralizing positional advantage once places exist. Re-engineering of the Primary One allocation algorithm—in which a random number now decides almost half of all places—the policy aims to reduce the historic correlation between parental income and elite primary entry. Categorical grants for NCS, pegged to audited headcounts, authorize schools to hire specialist teachers and require the publication of outcome metrics, creating a feedback loop that civil-society groups can monitor. In short, Hong Kong's chief strength is procedural transparency backed by rights-based entitlements, a design that cushions immigrant families from both linguistic and geographic disadvantage without asking them to prove economic worth.

Yet the territory's rights-based model is bounded by absolute capacity: Land scarcity and falling birth cohorts have led to school closures in urban districts even as border towns experience rising demand. Where classrooms cannot be conjured, students face longer commutes despite transport subsidies. A second weakness is digital stratification. Online portals such as iAM Smart+ accelerate application processing for the median family, but 8–10% of the lowest-income households still rely on manual counters (EDB, 2025), widening an information gap that the EDB acknowledges but has yet to close. Finally, Hong Kong's anti-poverty instruments remain heavily means-tested and paperwork-intensive, deterring some eligible families from claiming textbook or lunch allowances (Working Family and Student Financial Assistance Agency, 2024).

Juxtaposing the two trajectories shows a complementary ledger of capabilities. Shenzhen demonstrates that rapid expansion and algorithmic admissions can raise the floor of provision, but contribution-based filters persist when embedded in local regulations. Hong Kong shows that legal entitlements, randomized allocation, and earmarked grants can compress socio-economic gradients without new construction, though gains plateau when seats or broadband access are lacking.

Seen through Rawls's difference principle, both systems intend to deliver tangible benefits to many least-advantaged children—one through quantity, the other through procedure—yet both leave identifiable minorities underserved. A future GBA agenda that pairs Shenzhen's build-out capacity with Hong Kong's rights-centered safeguards could move the region closer to equity in both opportunity and process, translating each city's comparative advantage into a more integrated, inclusive educational landscape.

5. Discussion

5.1. Advancing Equity Along Two Distinct Pathways

Taken together, the Shenzhen and Hong Kong cases show that educational equity can be pursued either by scaling physical capacity or by refining procedural allocation, yet neither pathway by itself reaches the least-advantaged learners without complementary supports. Framing the findings through Edgar's (2022) policy-oriented dimensions of equity and Rawls's (1999) normative principles clarifies where each city excels, where blind spots persist, and how a hybrid strategy could better satisfy both equal-liberty- and difference-principle requirements in the GBA.

5.2. Access, Equal Liberty, and Process Quality

Shenzhen's supply-dominant approach—more than double the number of schools, unified public–private lotteries, and a progressively relaxed point formula—has expanded access for migrant students. As of 2024, approximately 48% of all compulsory education places and 31% of public-school seats were allocated to children of non-*hukou* families—the highest share among China's major cities (Education Bureau of Guangdong Province, 2024). Formally, this approach aspires to reflect Rawls's equal-liberty principle by giving every resident child a legal route into compulsory schooling. Yet the continuing need to upload housing deeds and year-long social-insurance records imposes a procedural burden that collides with Edgar's process dimension: The poorest and most mobile families still enter at the back of the queue.

Hong Kong, constrained by limited land, has followed a process-dominant path. Approximately half of Primary One places are now assigned through computer-generated random allocation, reducing the discretionary grip in admissions (EDB, 2025). In parallel, this digital turn (i.e., iAM Smart+ portal) streamlines applications and benefits the majority of families. Yet some low-income households still rely on manual paper submissions, exposing an information gap acknowledged—but not yet resolved—by the EDB (2025). This digital stratification is difficult to justify within a Rawlsian framework, which only benefits the least advantaged after allowing for inequalities.

5.3. Differentiated Provision and the Difference Principle

Shenzhen embeds selective incentives in its admissions algorithm and capital budget, rewarding long-term residence and formal employment rather than migrant status itself. These provisions ensure basic access but fall short of Edgar's needs-based dimension, as they prioritize contribution over disadvantage. The absence of systematic language or cultural support for ethnic-minority pupils further reveals a blind spot in responsiveness.

Hong Kong layers ex-post grants on top of universal entry. The Chinese as a Second Language subsidy and cross-boundary transport allowances channel resources to the linguistically and geographically marginalized, exemplifying the Rawlsian difference principle. However, the Student Finance Office's means-tested textbook and lunch schemes remain paperwork-heavy, deterring some eligible low-income families.

5.4. Comparative Strengths and Policy Learning

To further illuminate how Shenzhen and Hong Kong operationalize different aspects of educational equity, Table 2 compares the relative strengths of each system across three dimensions outlined in Edgar's framework: minimum access, procedural fairness, and differentiated support for student needs. Rather than providing a comprehensive audit, the table highlights selected institutional features that reflect each city's strategic priorities and normative assumptions. Together, these contrasts illustrate how different governance logics can produce complementary responses to similar equity challenges.

A GBA strategy that couples Shenzhen's large-scale seat expansion and procedural transparency with Hong Kong's targeted language and income-responsive grants could reconcile quantity with fairness, more closely aligning practice with Rawls's twin principles and Edgar's full equity spectrum.

Table 2. Comparative strengths between Shenzhen and Hong Kong.

Equity dimension (Edgar)	Shenzhen strength	Hong Kong strength
Access & Minimum	Massive seat expansion; class-size caps; conditional entry via point system	Randomized allocation; low-cost cross-district transport; universal entry guarantee
Process	"Three-open" transparency in point ranking (open policy, open criteria, open results)	One-stop digital portal; procedural safeguards against discretion
Need/Gap	Limited direct needs-based support; entry rules prioritize housing, employment, and social insurance rather than compensating vulnerable groups	Targeted grants for CBS and NCS students; means-tested textbook, lunch-fee, and transport subsidies

6. Conclusion

This comparative study set out to explain how two cities operating under markedly different legal regimes and governance logics—Shenzhen under China's civil law system and Hong Kong under the British common law tradition—pursue the shared policy goal of educational equity. Drawing on Edgar's five-dimensional model and Rawls' twin principles of justice, we analyzed more than 40 core policy documents issued between 2018 and 2025 and addressed three research questions concerning access, differentiated provision, and overall system strengths.

Specifically, this study compared how Shenzhen and Hong Kong address the challenge of providing equitable compulsory education for migrant and immigrant children. Despite shared pressures under the GBA framework, the two cities embody contrasting governance logics: Shenzhen relies on a contribution-based admission system with access conditional upon parental employment, housing, and social insurance, whereas Hong Kong operates under a rights-based legal framework that guarantees education to all lawful residents. Each approach carries distinct strengths and weaknesses. Shenzhen's rapid expansion of public-school capacity has broadened access but continues to filter entry through socio-economic criteria. Hong Kong ensures broad legal access and procedural transparency, yet faces persistent outcome disparities and capacity constraints. From a policy perspective, these findings suggest that future GBA coordination could benefit from combining the strengths of both approaches: Shenzhen's capacity-expansion model with Hong Kong's procedural safeguards and categorical grants. Such a hybrid strategy would provide a more comprehensive response to the educational needs of migrant-background students in the region.

Beyond these policy implications, the comparative analysis also contributes to academic debates. Theoretically, it demonstrates how contrasting governance systems—contribution-based versus rights-based—shape the operationalization of Rawls' principles of justice and Edgar's multidimensional framework of equity. This underscores that "equity" is not a fixed universal norm but is interpreted and enacted differently across institutional contexts. Empirically, it offers rare cross-jurisdictional evidence within the GBA, showing how similar challenges—such as migrant integration and support for linguistic minorities—are mediated through divergent institutional logic, admission rules, and resource-allocation mechanisms. Taken together, these contributions clarify that the significance of the comparison lies not only

in practical policy design but also in advancing broader scholarly understanding of how governance systems condition the meaning and practice of educational equity.

7. Limitations and Implications

This study had several limitations. First, it relied primarily on official policy and government documents, which limited the ability to capture how faithfully schools implement written rules or how families experience them in practice. Second, the analysis was based on document comparison and did not establish causal mechanisms or measure the effectiveness of specific interventions. Third, the scope was confined to Shenzhen and Hong Kong, without incorporating other GBA cities such as Guangzhou or Macau, which narrowed the breadth of regional comparison.

These limitations also point to future directions. Interview-based and ethnographic research could illuminate the lived experiences of migrant and immigrant students and their families. Mixed-methods and longitudinal approaches would allow for better assessment of how policy reforms affect educational outcomes over time. Expanding the comparative scope to include additional GBA cities would also enhance the generalisability of the findings and clarify how different governance logics interact within the region. Finally, while this article is primarily explanatory, the comparison suggests a broader implication for policy and practice: Shenzhen's capacity-driven model and Hong Kong's process-driven model represent complementary approaches to educational equity, and a balanced combination may provide useful reference for ongoing debates on regional integration.

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Conflict of Interests

The authors declare no conflict of interests.

Data Availability

All data used in this study were obtained from publicly accessible sources, including the websites of the Shenzhen Municipal Education Bureau, Hong Kong Education Bureau, Shenzhen Statistics Bureau, Census and Statistics Department of Hong Kong, and the Legislative Council of Hong Kong.

LLMs Disclosure

The authors used ChatGPT to assist with checking the clarity and fluency of the manuscript's language.

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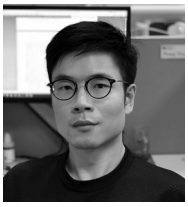

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