

Education Rights and Policies: A Cross-National Comparison*

Eğitim Hakları ve Politikaları: Ülkeler Arası Bir Karşılaştırma

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ABSTRACT

This study compares education rights across countries and regions, highlighting similarities and differences in policy approaches and outcomes. Singapore from Asia, Finland from Europe, South Korea from the Far East, and Türkiye were included in the study according to the OECD's education ranking. The right-to-education policies in countries with successful education systems were analyzed to determine their similarities and differences from Türkiye. By considering the laws of these countries, similar and different practices related to the right to education are compared. Within the scope of the research, an overview of the countries' right to education policies, national and regional differences, similarities, international conventions in the right to education policies, and cultural values in the right to education policies were examined and interpreted. The research was qualitative, and a case study, a qualitative research method, was used. Various sources concerning the educational policies of the countries were analyzed in depth. While structuring Turkish education policies, it is assumed that countries such as Singapore, South Korea, and Finland, which are successful in education, can guide the Turkish education policy system from different perspectives and provide new visionary ideas for reinterpreting Türkiye's right to education.

Keywords: Education rights, education policy, comparative education.

ÖZ

Bu çalışma, ülkeler ve bölgeler arasında eğitim haklarını karşılaştırmayı, politika yaklaşımlarındaki ve sonuçlarındaki benzerlikleri ve farklılıkları vurgulamayı amaçlamaktadır. Çalışmada, OECD'nin eğitim sıralamasına göre Asya'dan Singapur, Avrupa'dan Finlandiya, Uzak Doğu'dan Güney Kore ve Türkiye yer almıştır. Başarılı eğitim sistemlerine sahip ülkelerdeki eğitim hakkı politikaları, Türkiye'den benzerlik ve farklılıkları belirlemek amacıyla incelenmiştir. Bu ülkelerin yasaları göz önünde bulundurularak, eğitim hakkına ilişkin benzer ve farklı uygulamalar karşılaştırılmıştır. Araştırma kapsamında, ülkelerin eğitim hakkı politikalarına genel bir bakış, ulusal ve bölgesel farklılıklar ve benzerlikler, eğitim hakkı politikalarındaki uluslararası sözleşmeler ve kültürel değerler incelenmiş ve yorumlanmıştır. Araştırma nitel bir çalışmadır ve nitel araştırma yöntemlerinden biri olan durum çalışması kullanılmıştır. Ülkelerin eğitim politikalarına ilişkin çeşitli kaynaklar derinlemesine analiz edilmiştir. Türk eğitim politikalarının yapılandırılmasında, eğitimde başarılı olan Singapur, Güney Kore ve Finlandiya gibi ülkelerin politikalarının, Türkiye'nin eğitim hakkı politikasını farklı perspektiflerden yönlendirebileceği ve Türkiye'nin eğitim hakkını yeniden yorumlamak için yeni vizyoner fikirler sağlayabileceği varsayılmıştır.

Anahtar Kelimeler: Eğitim hakları, eğitim politikası, karşılaştırmalı eğitim.

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INTRODUCTION

Education is widely recognised as a fundamental human right and a cornerstone of human development and societal advancement (Asuncion et al., 2021; Nowak, 2001). Since its formal recognition in the 1948 Universal Declaration of Human Rights, the right to education has been reiterated in numerous international treaties, including the International Covenant on Economic, Social, and Cultural Rights (CESCR). The latter asserts that education should foster the full development of the human personality and strengthen respect for human rights and fundamental freedoms. Beyond its normative status in international law, education has become a strategic component of state policy, closely linked to economic growth, social inclusion, and national identity formation (Khushik & Diemer, 2020; Lipsey & Noonan, 2012).

However, while there is global consensus on the right to education, the ways in which this right is implemented differ significantly across national contexts. Legal frameworks, institutional arrangements, cultural traditions, and political priorities all influence how education is delivered, to whom, and with what outcomes (Chiovatto & Aidar, 2012; Tcheimegni, 2018). This divergence is particularly evident in comparative performance indicators such as the Programme for International Student Assessment (PISA), where countries such as Singapore, Finland, and South Korea consistently outperform others, including Türkiye, on measures of educational quality, equity, and student achievement (OECD, 2023a; 2023b).

Türkiye's educational system is historically rooted in the cultural and political legacy of nation-state formation, with a strong emphasis on national unity and identity preservation. Educational institutions have been central to this process, serving both as vehicles of modernization and as instruments of cultural reproduction (Şişman, 2013). National education policies have traditionally sought to balance the imperatives of modernization with the ideological function of fostering a cohesive national identity (Voicu, 2002). Yet, despite comprehensive efforts to reform its education system in line with international standards, Türkiye continues to face persistent challenges related to quality, equity, access, and inclusiveness.

The literature indicates that education not only serves individual development but also has profound implications for social cohesion and the democratic character of societies (Tazuddin, 2020). In this sense, education is both a right in itself and an enabling right—essential for the realization of other civil, economic, political, and cultural rights (Ndlovu & Makwavarara, 2023; Nowak, 2001). The inability to access quality education can therefore reinforce existing social inequalities, limit economic mobility, and undermine civic participation. Inclusive education, grounded in the principles of equity, diversity, and cultural responsiveness, is thus increasingly emphasized in contemporary policy discourse (Astuti & Sudrajat, 2020; Massouti et al., 2024; Sarumaha, 2020).

A key aspect of educational policy is its normative orientation—how it reflects the underlying values and priorities of a given society. These may include individual liberty, economic efficiency, social equality, or national unity (Fowler, 2013; Wirt, et al., 1988). Guttman (1990) highlights the dual role of education policy in promoting individual freedoms and fostering virtuous citizenship. The interplay of these values often shapes the structure and content of education systems. In societies such as Singapore, South Korea, and Finland, educational success is not merely the result of increased investment or technocratic reform, but the outcome of deliberate, long-term policy planning informed by cultural context and political consensus.

For instance, Singapore's education system emphasizes meritocracy, discipline, and centralized planning, closely tied to national development goals. South Korea, influenced by Confucian ideals, values educational attainment as a path to social mobility and national progress, often resulting in high academic pressure and rigorous schooling practices. Finland, on the other hand, offers a contrasting model rooted in egalitarian principles, trust in teachers, and student well-being, yielding high outcomes with low inequality (Öztürk, 2008; Wanih & Iqbal, 2020).

Each of these systems reflects a distinct understanding of the relationship between education, state priorities, and human rights. In contrast, Türkiye's policy landscape reflects tensions between centralized control and efforts toward democratization and inclusiveness. While reforms have sought to address disparities in access and quality, challenges remain in policy coherence, institutional accountability, and culturally responsive education (Adem, 1995; Karatsiori, 2023). Educational and political institutions in Türkiye are closely interconnected; schools are expected not only to produce skilled individuals for the labor market but also to cultivate loyal citizens aligned with dominant political ideologies (Bestari, 2020; Stohl, 1981). This dual function can constrain the transformative potential of education and limit its role in fostering democratic engagement and critical thinking.

Moreover, education is a site where the tensions between universal human rights norms and local cultural values become most visible. While global frameworks promote inclusivity, tolerance, and human rights education, their implementation is often mediated by national ideologies, religious beliefs, and political interests (Panditrao & Panditrao, 2020). This raises important questions about how education can be both a means of integrating into a global human rights culture and a mechanism for asserting national sovereignty and identity.

In developing effective education policies, it is essential to ensure they are informed by comprehensive, reliable, and context-sensitive data. Policy-making must be evidence-based, participatory, and reflective of the diverse needs of learners, especially marginalized groups (Paul et al., 2022). This requires an integrated approach that includes educational statistics, financial planning, personnel management, and systematic evaluation (Massouti et al., 2024). Inclusive and equitable education systems are not only more just but also more effective in achieving long-term national development goals.

Ultimately, understanding how different countries conceptualize and implement the right to education offers valuable insights into the broader relationship between education, human rights, national identity, and state development. By exploring the varied yet successful models of education in Singapore, South Korea, and Finland, and situating them alongside the challenges and potentials of Türkiye's system, it becomes possible to reflect more critically on how education policy can be reimagined to serve both national priorities and global human rights standards.

Despite international consensus on the right to education as a fundamental human right (Nowak, 2001), countries vary significantly in how they implement this right through national policies, legal frameworks, and educational practices. Türkiye, with its longstanding cultural, political, and linguistic traditions, represents a nation-state with a historically rooted education system that aims to preserve national identity while promoting modern competencies. However, Türkiye has consistently ranked below the OECD average in key international assessments such as PISA, pointing to persistent challenges in equity, quality, and access (OECD, 2023a). There is a critical need to explore how other high-performing countries, each shaped by different cultural and political legacies, operationalize the right to education. The research problem is therefore *"How do countries with differing historical, cultural, and political contexts construct and implement the right to education, and what lessons can Türkiye draw from these models to enhance its educational equity, quality, and policy effectiveness?"* This problem is addressed by comparing Türkiye's education system with that of Singapore, South Korea, and Finland—countries that exemplify varied but effective approaches to policy development, national identity formation, and educational success.

Educational policy is a crucial tool for developing and improving a country. In structuring Turkish education policies, it was believed that studying the education policies of successful countries could provide new ideas and correct areas that need improvement. This study aimed to determine the success criteria by comparing the education policies of countries, to investigate the reasons why Türkiye is below average in the PISA exam (OECD, 2023b), to determine the

deficiencies, if any, in Turkish education policies, and to make suggestions for improvement in this direction. Singapore, Finland, and South Korea, which are among the countries with superior success in PISA (2015, 2018) exams, were included in the scope of the research, and a comparison with Türkiye's education policies was determined as the subject of the research. This study aims to uncover the disparities and similarities between the educational policies of Singapore, Finland, South Korea, and Türkiye. By examining these policies, information on the general overview of each country's education rights policies, national and regional differences, the role of international conventions, and cultural values was collected and analyzed, and the findings were reported.

METHODOLOGY

This study employed a qualitative research design, specifically a comparative case study approach (Creswell, 2007; Yin, 2014), to explore the similarities and differences in education rights and policies among Türkiye, Singapore, South Korea, and Finland. Qualitative methodology involves the presentation of data individually based on categorization and coding (Merriam, 2015). This methodology was chosen to provide an in-depth, context-specific analysis of each country's educational landscape, focusing on the legal, political, and cultural dimensions that shape the right to education.

2.1. Data Collection

The data were collected through document analysis, a widely accepted data collection technique in qualitative research (Merriam, 2009). National legislation, ministry reports, OECD and UNESCO publications, and country-specific education policy documents were systematically reviewed. Both primary sources (e.g., education acts and policy documents) and secondary sources (e.g., scholarly articles and institutional reports) were utilized.

2.2. Data Analysis

The collected data were subjected to descriptive and thematic analysis. Initially, the documents were coded into categories related to four major themes: (1) The legal framework of the right to education, (2) Education governance and policy implementation, (3) Equity and inclusivity measures, and (4) The role of cultural values and international agreements. Then, comparative matrices were used to identify cross-national similarities and differences. These patterns were interpreted to generate insights regarding how educational rights are constructed and operationalized within different sociopolitical and cultural contexts (Creswell, 2007).

To ensure trustworthiness, the study adhered to the criteria of credibility, transferability, dependability, and confirmability as proposed by Lincoln & Guba (1985). Data triangulation was achieved by comparing information from multiple sources. Researcher bias was minimized through systematic coding and peer debriefing. The methodology allowed for analytic generalization, rather than statistical generalization, consistent with qualitative inquiry.

2.3. Sample

This research includes Türkiye, Singapore, Finland, and South Korea as comparative cases to explore how education rights and policies are constructed and implemented in different cultural, political, and socio-economic contexts. The countries were selected through purposeful sampling, a method often employed in qualitative research to capture rich, context-specific insights (Patton, 2002). Each country exemplifies distinct educational traditions, levels of development, and approaches to the right to education, which allows for a holistic and meaningful cross-national comparison.

Türkiye was included as the reference country due to its unique status as a nation with a deep-rooted cultural heritage, a strong tradition of nation-building through education, and an

official national language. The Turkish education system is shaped by its republican legacy, constitutional guarantees for education, and ongoing reforms aimed at increasing equity and quality (MoET, 2023a; Şişman, 2013). However, despite its ambitious national vision, Türkiye continues to face challenges such as regional disparities, limited access for disadvantaged groups, and lower-than-average PISA performance (OECD, 2020a). This makes it a critical case for examining how historically grounded education systems respond to contemporary global education benchmarks. Singapore represents a high-performing, strategically constructed education system in a relatively young and multicultural nation-state. It has achieved remarkable success in global assessments like PISA through its meritocratic structure, strong emphasis on STEM education, bilingual policy, and 21st-century competencies (Koh, 2004; MoES, 2023b). Singapore's deliberate use of education as a tool for economic development and social cohesion offers an instructive model for countries like Türkiye. The country's capacity to align educational policy with future skills, national identity, and global competitiveness makes it an essential comparator in this study. Finland was selected for its status as a global benchmark in inclusive, equitable, and student-centered education. The Finnish model emphasizes equality, well-being, trust in teachers, and a low-stakes assessment culture, setting it apart from other systems (MoECF, 2023a; Sahlberg, 2011). Finland's decentralized yet coherent policy structure has consistently yielded top PISA results while maintaining high public trust and teacher autonomy. Including Finland enables the study to contrast competitive systems like South Korea and Singapore with more humanistic, welfare-oriented approaches. Moreover, Finland's model provides insights into how social equity and educational quality can be simultaneously pursued—a relevant consideration for Türkiye's current reform agenda. South Korea was included due to its reputation as a hyper-competitive yet high-achieving education system, deeply shaped by Confucian values and state-led modernization (MoEK, 2023a; NCEE, 2023a). Its focus on academic excellence, exam-oriented curricula, and rigorous teacher training offers a valuable case for understanding the trade-offs between performance pressure and student well-being. Recently, South Korea has also begun shifting its policies toward creativity, problem-solving, and balanced development, which parallels ongoing debates in Türkiye about curriculum reform and student-centered pedagogy. South Korea's experience offers instructive lessons on managing educational transitions in rapidly changing societies.

To sum up, each country was strategically selected to represent a distinct ideological and structural response to the right to education. Türkiye represents a historically grounded, culturally rich system undergoing reform. Singapore offers a case of rapid, top-down modernization focused on competitiveness and national unity. Finland provides a model of equity, well-being, and trust-based governance. South Korea illustrates the complexities of academic pressure and innovation in a centralized system. Together, these cases allow the research to address the core question of how different nations interpret and enact the right to education under diverse historical, political, and cultural circumstances. This selection enhances the validity of cross-national comparisons and deepens the theoretical and policy insights applicable to Türkiye and other middle-income countries seeking systemic educational improvement.

CONCEPTUAL FRAMEWORK

3.1. Overview of Education Rights Policies in Countries

In Türkiye, the constitution guarantees the right to education. Education is regarded as a fundamental right by all citizens. There is a 12-year compulsory education system. Türkiye has developed various policies to provide free and compulsory education on a nationwide base. The Minister of Education (MoE) is responsible for overseeing and implementing educational policies in the country (MoET, 2023a). Despite efforts to improve education, challenges such as regional inequalities, gender inequality, and insufficient resources are seen as current challenges in

education (OECD, 2020a). The Turkish education system aims to enhance the overall well-being and happiness of Turkish citizens and society by fostering economic, social, and cultural growth, while maintaining national unity and integrity. This goal is reflected in all educational policies and regulations (Şişman, 2013). The vision of the Turkish education system is to cultivate a society of citizens who embrace the principles of human rights, peaceful coexistence, and democratic values. Additionally, the education system aims to instill innovation, creativity, and the ability to adapt to a rapidly changing world. Furthermore, the educational system aims to ensure that all individuals are committed to Atatürk's principles. The Ministry of National Education is responsible for providing quality education and training to meet the economic, social, and cultural needs of society and individuals. (MoET, 2023a). Türkiye enshrines the right to education as a fundamental right in its constitution, aiming to provide free and compulsory education through a 12-year system. Despite concerted efforts, challenges persist, including regional and sex disparities and resource limitations. However, the Turkish education system remains steady in its commitment to enhancing the welfare and happiness of its citizens, fostering national unity, and preparing individuals to thrive in the modern world. Guided by a vision that prioritizes respect for human rights, peaceful coexistence, innovation, democratic principles, and adherence to Atatürk's ideals, educational policies are geared towards meeting societal and individual needs while upholding quality standards and fostering continuous improvement.

In Singapore, education policies emphasize meritocracy, bilingualism, and the cultivation of 21st-century competencies. Singapore prioritizes education as a part of its national development strategy. The government has implemented a comprehensive education system and policies to ensure quality education. The Ministry of Education (MoE) is responsible for the formulation and implementation of educational policies, including teaching, learning, programs, and policy development in government-funded schools. The MoE's institutional mission is to 'educate people for the society of the future,' aiming to develop students to their full potential and enable them to become responsible members of society, family, and the universe. Singapore has both public and private schools, and education is compulsory, universal, and funded by the government (MoES, 2023a). Singapore's education system is known for its merit-based approach, rigorous curriculum, and strong emphasis on science, technology, engineering, and mathematics (STEM) (MoES 2023b). Singapore ranks highly in terms of student performance on international measures in PISA, 2018. In 1997, Singapore implemented the Thinking Schools, Learning Nation (TSLN) blueprint for educational change, which introduced a new curriculum called National Education that emphasizes critical thinking, IT skills, and citizenship education. Additionally, the TSLN has prompted new initiatives in pedagogy, curriculum, assessment, higher education, and education policy restructuring. As the educational landscape evolves, it is crucial for systems to find innovative ways to adapt to these changes while fostering skills such as creativity, innovation, and adaptability. Singapore addresses this by implementing a global skills-oriented curriculum that promotes new ways of living, critical thinking, and IT skills for Singaporean students as well as a local national education that strengthens national and cultural identity (Koh, 2004). Singapore's education system is well-regarded, with the Desired Outcomes of Education providing a clear goal for educators and guiding policies and programs. The bilingual education policy focuses on holistic learning, quality of teachers, and integration of technology are key strengths. Additionally, support from parents was emphasized. (MoES, 2023c). Singapore's dedication to education as a key element of national development is exemplified by its strong educational system and comprehensive policies managed by the Ministry of Education (MoE). Focusing on cultivating future leaders and responsible citizens, Singapore's education aims to optimize students' potential and societal impact. Known for its merit-based approach, rigorous curriculum, and STEM emphasis, Singapore consistently ranks highly in international assessments. The TSLN initiative reflects Singapore's proactive approach to adapting education to changing societal needs, emphasizing critical thinking, IT skills, and citizenship education. With a focus on fostering essential skills, such as creativity, innovation, and adaptability, Singapore's education system ensures alignment with global and local needs. The student-centric

and values-driven approach seeks to provide tailored support for students to succeed (Wang, 2019).

Finland is internationally recognized for its success in education, as shown by PISA in 2018. Finland's education system emphasizes equality and individual fulfillment through state-funded, compulsory, and free education. Special education and guidance services were provided to support students' individual needs. The MoECF is responsible for developing and implementing an education policy that emphasizes a student-centered approach, play-based learning, and highly qualified teachers. The system encourages students to explore and learn freely (MoECF, 2023a). Finland's commitment to providing equal opportunities for all students within an inclusive and egalitarian educational framework contributes to its success. This is achieved through state funding, compulsory attendance, and personalized support services. Finland's student-centered philosophy emphasizes equality, play-based learning, teacher professionalism, and a reduction in reliance on standardized testing. These principles uphold Finland's reputation for excellence in education, while fostering a culture of lifelong learning and equitable access to knowledge. The success of Finland's educational model has garnered global attention, prompting other countries to examine and adapt its practices to their unique contexts (Bin, 2016). Finland's curriculum design process is influenced by the need for 21st-century skills, and the core curriculum for basic education in Finland has been designed accordingly (Søby, 2015). However, when considering policy transfer, it is important to recognize that cultural and historical contexts can significantly affect the implementation and outcomes of educational reforms (Adiputri, 2021; Chung, 2010). Educational policies in Finland emphasize decentralization, school autonomy, and teacher professionalism. Educational success in Finland is attributed to inclusive policies, highly qualified teachers, and a culture of trust and collaboration between educators, students, and communities. Consistent top performance in secondary school students, coupled with equitable education for all students, is a hallmark of the Finnish system (Finland: Slow and Steady Reform for Consistently High Results, 2011).

South Korea is a high-performing country in terms of education (PISA, 2021). The South Korean education system is highly valued and seen as a key to success. It is known for its competitive exam-focused structure that lasts for 12 years. The Ministry of Education, Science, and Technology is responsible for formulating and implementing policies related to academic activities and public education. They aim to develop self-reliant citizens who contribute to a nation's democratic development and welfare. The Education Policy Advisory Council advises the minister on education policy, formulating basic education policies, improving education systems, and acting as an advisory body on education matters. The Ministry is responsible for the planning and coordination of education policies, the regulation of primary, secondary, and higher education institutions, the publication and approval of textbooks, and the provision of administrative and financial support at all levels of schooling. Additionally, they support local education offices, operate teacher training systems, monitor lifelong learning, and develop human resource policies. (MoEK, 2023a). The Korea Education Development Institute (KEDI) is an independent, government-funded organization. Since its establishment, the Research and Development Institute has played an important role in the development of Korea's education policies and programs with a focus on the Korean education system (MoEK, 2023b). In recent years, South Korea has decreased its focus on academic achievement and has focused on policies to develop students' creativity, critical thinking, and problem-solving skills (NCEE, 2023a). South Korea does not have a long-term vision for the future, as in other countries. There are annual or short-term plans set by governments and projects published by the last government (MoEK, 2023b). South Korea's education system, known for its exceptional performance, reflects a societal emphasis on the role of education in personal and national success. Guided by the educational ideology of "Hongik Ingan," which emphasizes self-reliant citizens contributing to democratic development and global welfare, the Ministry of Education, Science, and Technology leads the formulation and implementation of policies. Although exam preparation has historically

been the primary focus, recent initiatives have prioritized the development of creativity, critical thinking, and problem-solving skills. Although the system lacks a long-term vision, it remains adaptable to changing societal needs and aspirations through annual plans and government projects. The South Korean state demonstrated an inability to effectively align educational expansion with developmental needs, a failure that can be attributed to significant opposition from a segment of the population seeking to attain power, privilege, and prestige through higher education (Seth, 1997). The success of linking education to economic development in Korea depends on choosing educational policies relevant to the stage of industrialization (Kim, 2000). Despite transformations in educational goals, traditional values persist, but concerns have arisen regarding the emphasis on formal degrees as the sole measure of human value (Kim-Renaud, 1991). Education is viewed as an essential means of upward mobility and societal advancement, resulting in a phenomenon known as “education fever” (Seth, 2012). The prevailing tendency in the evolution of Korea's educational policymaking since the 1990s indicates a simultaneous occurrence of substantial transformation and preservation of the fundamental characteristics of the nation and its relationship with society (Park, 2010). The information on the comparative analyses of the countries is presented in Table 1.

Table 1

Comparison of Education Rights Policies by Country

Category	Turkiye	Singapore	Finland	South Korea
Constitutional Right to Education	Guaranteed in constitution; 12 years of free and compulsory education.	Education is compulsory, universal, and funded by government; part of national development.	Guaranteed; state-funded, compulsory, and free for all.	Not explicitly constitutional, but highly valued as a societal priority; compulsory education system.
Responsible Authority	Ministry of National Education (MoET)	Ministry of Education (MoE)	Ministry of Education and Culture of Finland (MoECF)	Ministry of Education, Science and Technology (MoEK)
Educational Vision/Goals	Enhance well-being, national unity, democratic values, innovation, and Atatürk's principles.	Meritocracy, bilingualism, global and local citizenship, 21st-century skills, values-driven education.	Equity, inclusion, individualized support, teacher professionalism, lifelong learning.	Develop self-reliant citizens, democratic participation, adapt to modern society, link education to development.
System Characteristics	12-year compulsory education; public and free; challenges include regional and gender inequality.	Merit-based, rigorous curriculum; STEM focus; bilingual; public and private schools coexist.	Student-centered, play-based learning, minimal standardized testing, inclusive and equitable access.	Highly competitive and exam-focused; “education fever” culture; recently shifting toward creativity and critical thinking.
Curriculum & Reform Initiatives	Policies reflect democratic values, national culture, global readiness.	Thinking Schools, Learning Nation (TSLN); emphasis on critical thinking, IT skills, citizenship.	Curriculum designed for 21st-century skills; student autonomy encouraged; reforms are slow and cautious.	Shift from exam-heavy to developing soft skills; lacks long-term vision but adapts with short-term policy changes.
Challenges	Regional disparities, gender inequality, resource limitations.	Balancing global relevance with national identity; maintaining high performance under change.	Maintaining equity and inclusivity during slow reforms; avoiding over-standardization.	Overemphasis on degrees, high stress from competition, short-term policy planning, societal pressure for upward mobility.
International Standing (e.g. PISA)	Mid-level performance with focus on national identity.	Top rankings; strong global reputation.	High performance with equity; globally admired model.	Very high rankings; recognized for academic excellence and rigorous standards.
Policy Approach	Centralized, with national cultural alignment.	Centralized yet responsive to change; promotes flexibility and innovation.	Decentralized, trust-based, and teacher-autonomous.	Centralized with advisory bodies (e.g., KEDI); historically exam-driven, now more balanced.
Key Strengths	Strong national values, constitutional backing, efforts toward inclusive policies.	Clear vision, strong state support, technological integration, high parental engagement.	Egalitarian philosophy, strong teacher training, minimal pressure, holistic support.	Strong academic results, policy adaptability, national commitment to education.

3.2. Analyzing Differences and Similarities Across National Contexts

Education in Türkiye is overseen by a centralized system across 81 provinces, although educational opportunities in rural areas may be limited compared to those in urban centers due to factors such as unequal resource distribution and teacher quality. Education is compulsory and universal in Türkiye with a 12-year system in place. The government has implemented supportive policies for disadvantaged groups, disabled students, and refugee children. Primary education is free and compulsory for all children between the ages of 6 and 14 years, but regional disparities exist, with rural and eastern regions facing challenges in accessing quality education. Türkiye's education system comprises three levels: primary, secondary, and higher. The Ministry of National Education has set the central curriculum, but efforts have been made to increase flexibility and adopt student-centered approaches. (MoET, 2023a). Türkiye is investing in teacher-training programs to improve the quality and professionalism of educators. However, challenges remain, such as inequalities in teacher qualifications and resources across regions (OECD, 2020a). Türkiye's education system strives for universality and equality, but regional disparities persist, particularly in the rural and eastern areas. Despite challenges such as unequal resource distribution and teacher quality, initiatives such as supportive policies for special-needs students and investments in teacher training demonstrate Türkiye's commitment to improving educational outcomes nationwide. Ongoing reforms aimed at enhancing flexibility and student-centered approaches underscore Türkiye's dedication to advancing its education system for the benefit of all learners. In recent years, there has been a growing emphasis on modernizing the curriculum and integrating technology into the education system in Türkiye. The critical issues that have been identified include the professional development of staff, the modernisation of teaching and curriculum, and the engagement with both employability and the sustainability agenda (Şeremet, 2016). Educational reforms have focused on decentralization, curriculum development, and teacher training to enhance the quality of education (OECD, 2023a). Following the establishment of the Turkish Republic, education was regarded as a pivotal element in the development of the country (Özdemir et al., 2019). Since then, various reforms have been implemented to improve the education system and increase access to education for all citizens. The Ministry of National Education prepared the 2023 Educational Vision document, which was examined in terms of teachers' and school administrators' views (Eryılmaz & Hamedoğlu, 2021; Sevimbay et al., 2020). The Turkish education system has undergone numerous reforms aimed at addressing issues related to quality, access, and equity (Çelikleş et al., 2021).

Singapore's centralized education system sets national standards and values for education. However, their multicultural nature can lead to linguistic and cultural differences among students from various ethnic backgrounds. The education system focuses on maximizing academic performance and individual potential, with both public and private schools following the national curriculum and providing equal access to educational opportunities. The government ensures equal access to education through policies that reduce barriers and provide financial assistance to disadvantaged students. Singapore's centralized education system is characterized by a meritocratic approach, with a focus on high academic standards and strong STEM education (MoETS, 2023c). Singapore places strong emphasis on teacher quality and professional development. The country has a rigorous teacher selection process, provides continuous professional development, and offers competitive salaries to attract and retain high-quality educators (NCEE, 2023b). Singapore's education system prioritizes excellence and equity with a centralized management approach and high academic standards. Despite its multicultural nature, the system aims to provide equal access to education while acknowledging diversity. A meritocratic approach prioritizes maximizing academic performance and individual potential, supported by a strong infrastructure and policies that reduce barriers to education. Singapore values teacher quality and professional development, ensuring that educators are well-equipped to deliver high-quality education and reinforce its reputation as a country that prioritizes education for national success and social cohesion. The government has recently announced a vision for

Singapore to become a global leader in science and technology, while also achieving outstanding accomplishments in the arts and sports (Neihart & Teo, 2013). The establishment of a culture of trust is regarded as a pivotal necessity to mitigate the deleterious consequences of excessive reliance on accountability mechanisms within the pervasive neoliberal framework of the Singaporean education system (Teng et al., 2020). In the Singaporean context, the provision of preschool education encompasses both full-day and half-day care and education programmes for children between the ages of two and six within childcare centres, as well as two-to-four-hour educational programmes for children between the ages of four and six in kindergartens (Sharpe, 1998). Most preschool centers in Singapore adhere to government regulations regarding structure and environment (Sharpe, 1996). Singapore's education system stands out as a benchmark of excellence, characterized by its unwavering commitment to quality, equity, and innovation (Lim & Nam, 2000).

Finland strives to reduce the regional disparities in education. The equal distribution of resources and qualified teachers aims to equalize educational opportunities. However, schools in some rural areas may have more limited resources than those in urban centers (MoECF, 2023b). Finland has an inclusive and equitable educational system. It provides free and compulsory education for all pupils. A student-centered approach was adopted, and supportive policies were in place to address the individual needs of students. Finland places a great emphasis on equal access to education. The country has a comprehensive and inclusive education system that provides free education to all students regardless of their socioeconomic background. Finland strives to reduce the educational inequalities between regions. Finland has a decentralized education system with an emphasis on local autonomy and trust in teachers. The country promotes a holistic approach to education, encouraging students' well-being, creativity, and critical thinking skills. The curriculum is flexible and promotes interdisciplinary learning centers (MoECF, 2023a). Finland is known for having highly qualified professional teachers. The country has rigorous teacher-training programs and a selective teacher recruitment process. Teachers in Finland have a high degree of autonomy in the classroom and are trusted to make decisions about curriculum implementation and assessment centers (MoECF, 2023b). Finland's dedication to reducing educational disparities and fostering inclusivity is evident in its student-centered education system. Although rural areas present challenges, Finland prioritizes equal access to education and provides comprehensive support for students' needs. By emphasizing local autonomy and teacher professionalism, Finland's holistic approach to education promotes well-being, creativity, and critical thinking. Finland maintains its reputation for excellence and dedication to equitable learning opportunities by investing in teacher training and fostering a culture of trust in educators. Finland has become a more multicultural society over the last 20 years (Sinkkonen & Kyttälä, 2014). The focus is on outdoor education in general in Finland (Sjöblom et al., 2021). The emphasis on lifelong learning has further led to the development of online learning platforms and resources that cater to various learning styles and needs. A recent initiative in Finland's higher education policy focuses on continuous learning, with governmental support structures and practices being developed (Korhonen & Portaankorva-Koivisto, 2021). The Finnish educational system emphasizes integrating multilingual perspectives into the curriculum (Paulsrud et al., 2020). The Finnish National Core Curriculum emphasizes the importance of interfaith education, religious literacy, and appreciating diverse worldviews as essential for understanding societal diversity (Lipiäinen et al., 2020). The Finnish education system is evolving to manage increasing diversity in schools, particularly with the growing number of students from various cultural and linguistic backgrounds (Sinkkonen & Kyttälä, 2014).

The educational system in South Korea may differ between urban and rural areas. Schools in urban centers may have more resources and better educational opportunities, whereas schools in rural areas may have more limited resources. Education in South Korea is based on a competitive approach that encourages high academic achievement (OECD, 2016). South Korea's

compulsory education, encompassing primary and secondary education, follows the national curriculum, with a strong emphasis on exam preparation. The country has achieved nearly universal access to education, with high enrollment rates. However, intense competition and academic pressure pose challenges to the overall quality of educational systems. The highly centralized system is governed by the Ministry of Education and has a significant influence. Known for its rigorous academic curriculum and standardized testing, the system aims to provide quality education (MoEK, 2023a). South Korea values the role of teachers and emphasizes the importance of professionalism. The country offers extensive teacher-training programs, ongoing professional development opportunities, and competitive remuneration packages (MoEK, 2023b). South Korea's education system is characterized by disparities between urban and rural areas, with urban schools usually having better resources. Despite its near-universal access to education, South Korea grapples with intense competition and academic pressure. The highly centralized system, which emphasizes standardized testing and rigorous academic standards, emphasizes teacher professionalism through extensive training and support. Equitable access to quality education remains a key priority for South Korean education policymakers as they address these challenges. The government is actively working to create inclusive curricula and teaching methods that honor and integrate the diverse linguistic and cultural backgrounds of all students (Kwon, 2005). South Korea's economic advancement has been significantly influenced by the country's emphasis on education (Seth, 1997). South Korean schools' industriousness has been lauded (Ko, 2017). South Korea has a strong emphasis on vocational education and training (Education at a Glance 2023, 2023). The information on the comparative analyses of the countries is presented in Table 2.

Table 2

Comparative Table of National Education Systems

Category	Turkiye	Singapore	Finland	South Korea
Governance	Centralized across 81 provinces; some efforts to decentralize.	Centralized with national standards; multicultural challenges acknowledged.	Decentralized with local autonomy and trust in teachers.	Highly centralized, governed by the Ministry of Education.
Access and Equity	Free and compulsory education; regional disparities exist, especially in rural/eastern areas.	Equal access through national curriculum and financial aid.	Free and compulsory education for all; aims to reduce regional inequalities.	Near-universal access; urban-rural disparities remain.
Curriculum and Pedagogy	Central curriculum with reforms toward student-centered approaches.	Meritocratic approach with strong focus on STEM; emphasis on high academic performance.	Flexible curriculum emphasizing holistic and interdisciplinary learning.	National curriculum focused on exam prep and academic excellence.
Teacher Training and Quality	Investments in teacher training; inequalities in qualifications and resources.	Rigorous teacher selection, ongoing professional development, competitive pay.	Highly qualified teachers; autonomy in classroom decision-making.	Extensive training and professional development; competitive salaries.
Challenges	Inequalities in teacher quality and resources; regional access issues.	Balancing multicultural diversity; overreliance on accountability.	Rural resource gaps; managing increasing diversity.	High academic pressure; disparities between rural and urban schools.
Innovations and Reforms	2023 Educational Vision; technology integration; emphasis on modernization.	Vision of leadership in science, arts, and sports; emphasis on trust and innovation.	Emphasis on outdoor learning, lifelong learning, multicultural integration.	Focus on inclusive curricula and vocational education.
Preschool Education	Mentioned as compulsory in 12-year system; fewer details provided.	Structured programs for children aged 2–6; regulated centers.	Emphasizes child-centered approaches; less formal than other systems.	Preschool is part of national agenda but less detailed in the comparison.
Multiculturalism and Inclusion	Supportive policies for refugees, disabled students, disadvantaged groups.	Acknowledges multicultural nature; promotes diversity.	Focus on integrating multilingual, interfaith, and multicultural perspectives.	Government efforts to include diverse linguistic and cultural backgrounds.

3.3. Examining the Role of International Agreements in Education Rights Policies

International agreements serve as a guiding framework for education rights policies in these countries, emphasizing the importance of access, quality, inclusion, and lifelong learning opportunities (OECD, 2023b). Türkiye, Singapore, South Korea, and Finland are parties to various international conventions to guarantee the right to education and follow international standards. The treaties to which countries are parties are given by each country. The Universal Declaration of Human Rights is a cornerstone of international human rights law, asserting that everyone has the right to education (Beamish et al., 2024). The International Covenant on Economic, Social, and Cultural Rights recognizes the right of everyone to education and outlines specific dimensions of this right, including its progressive realization, availability, accessibility, acceptability, and adaptability. States are obligated to ensure that education is available and accessible at all levels, with progressive realization at the tertiary level (Mbajiorgu & Mafumo, 2014). The Convention on the Rights of the Child focuses on the rights of children, including the right to education, and emphasizes the importance of ensuring that education is directed to the development of the child's personality, talents, and mental and physical abilities to their fullest potential.

The United Nations Convention on the Rights of the Child (UNCRC) was ratified by Türkiye with the aim of guaranteeing the right to education in a non-discriminatory and equitable manner. Furthermore, by ratifying the UN Convention on the Rights of Persons with Disabilities (UNCRPD), Türkiye has undertaken the obligation to guarantee access to education for disabled students. Türkiye's membership of the United Nations, in conjunction with its ratification of the Universal Declaration of Human Rights (UDHR), serves to recognise the right to education as a fundamental human right. The Convention on the Rights of the Child (CRC), of which Türkiye is a signatory, places a particular emphasis on the right to education and calls for the implementation of free and compulsory primary education for all children. Türkiye is committed to the Education for All (EFA) goals set by UNESCO, which aim to ensure quality education for all, including equal access and gender equality (MoET, 2023b). It is evident that Türkiye has made considerable endeavours to ensure the provision of education to its citizens, in accordance with the principles and standards of international human rights. This commitment is further substantiated by the ratification of various treaties and the establishment of commitments, which serve as indicators of Türkiye's endeavours to guarantee the right to education for its population.

Singapore joined the United Nations Convention on the Rights of the Child (UNCRC), aiming to ensure equal access to education without discrimination. The nation is also a party to various human rights treaties, including the International Covenant on Economic, Social, and Cultural Rights (ICESCR), which guarantees the right to education. Additionally, Singapore has signed the Convention on the Rights of the Child (CRC), which promotes child-friendly education systems. The country is committed to the Education 2030 Agenda, a global initiative that focuses on inclusive, equitable, and quality education, as well as lifelong learning opportunities (MoFAS, 2023). Through ratifying international accords and implementing national policies, Singapore has worked to promote educational rights and provide its people with educational possibilities. Singapore's dedication to international frameworks shows its dedication to promoting education rights and providing opportunities for its population through education.

Finland has ratified the United Nations Convention on the Rights of the Child (UNCRC), which upholds the right to education without discrimination. Finland has ratified the European Convention on Human Rights, thereby ensuring the rights to education and freedom of education. As a member of the United Nations, Finland acknowledges the principles of the Universal Declaration of Human Rights (UDHR), including the right to education. Finland is also a party to the Convention on the Rights of the Child (CRC), which prioritises the right to education and the

establishment of education systems that are child-centred. Finland has committed to the Education 2030 Agenda, aligning its education policies with the objective of inclusive and equitable quality education (MoECF, 2023d). Finland's commitment to these international agreements is indicative of its dedication to upholding education as a fundamental right and providing quality education for all its citizens.

South Korea ratified the United Nations Convention on the Rights of the Child (UNCRC), which emphasizes the right to education without discrimination. The country is also a signatory to various human rights treaties that guarantee the right to education, such as the International Covenant on Economic, Social, and Cultural Rights (ICESCR). South Korea ratified the Convention on the Rights of the Child (CRC), acknowledging education as a fundamental right for every child. Additionally, the country is working towards aligning its education policies with the Education 2030 Agenda, which focuses on quality education, inclusive practices, and lifelong learning opportunities (MoFA, 2023). By adhering to international agreements and adopting national policies, South Korea demonstrates its commitment to promoting education rights and offering educational opportunities to its citizens. The information on the comparative analyses of the countries is presented in Table 3.

Table 3

Role of International Agreements in Education Rights Policies

International Agreements	Turkiye	Singapore	Finland	South Korea
Universal Declaration of Human Rights (UDHR)	Ratified; recognizes education as a fundamental right	Recognizes the right to education through UN membership	Acknowledges the right to education as a UN member	Acknowledges the right to education as a UN member
International Covenant on Economic, Social, and Cultural Rights (ICESCR)	Ratified; ensures progressive realization of education rights	Party to ICESCR; guarantees the right to education	Supports principles; aims for equitable education access	Ratified; guarantees the right to education
Convention on the Rights of the Child (CRC)	Ratified; emphasizes free and compulsory education for all children	Ratified; promotes child-friendly education systems	Ratified; emphasizes child-centered education systems	Ratified; affirms education as a fundamental right for all children
Convention on the Rights of Persons with Disabilities (CRPD)	Ratified; ensures access to education for disabled students	Ratified; guarantees equal access to education for persons with disabilities	Ratified; ensures inclusion and accessibility in education	Ratified; promotes educational rights for persons with disabilities
Education 2030 Agenda (SDG4)	Committed to Education for All (EFA) goals by UNESCO	Committed; focuses on inclusive, equitable, quality education	Supports and aligns education policies with Education 2030	Aligning policies with Education 2030 Agenda
European Convention on Human Rights (ECHR)	Ratified; guarantees the right to education and freedom of education	Not applicable (non-member of the Council of Europe)	Ratified; guarantees the right and freedom of education	Not applicable (non-member of the Council of Europe)

3.4. The Role of Cultural Values in Shaping Education Rights Policies and Outcomes

It is important to recognize that cultural values interact with other factors, such as historical context, socioeconomic conditions, and political considerations, in shaping education rights policies and outcomes in these countries. The interaction between cultural values and education policies is complex and evolving (OECD, 2023a). Education policies are crucial for providing every child with the right to education (Maratovna, 2014). These policies determine how resources are allocated, how teachers are trained, and how curricula are designed (Muyaka, 2018). When global indicators are introduced, they can raise problem awareness and lead to policy changes (Baek, 2019). It is important to note that many people are denied the opportunity to

develop their full potential because of violations of their human rights (Wisdom & Thompson, 2018).

In Türkiye, cultural values have a significant impact on educational policies and outcomes. Society prioritizes education for personal and social development. Cultural elements, such as respect for elders, family importance, and collectivism, influence education policies. However, gender equality and regional inequalities are challenging due to cultural factors. Efforts are necessary to promote inclusive education, address cultural barriers, and enhance the rights to education. Türkiye's right-to-education policies emphasize cultural values, and its multicultural nature promotes diversity and inclusion in the education system (OECD, 2020a). Türkiye's national curriculum aims to preserve national identity by emphasizing Turkish culture, history, language, and values (MoET, 2023a). Cultural diversity is fostered in dynamic classrooms where students can recognize and respect their own cultural backgrounds. Cultural values significantly shape educational policies and outcomes in Türkiye, emphasizing education as a means of personal and societal growth. Although traditional values underscore the importance of education, gender equality, and regional disparities stemming from cultural factors remain persistent. It is crucial to promote inclusive education and address cultural barriers to ensure access to education in Türkiye. The emphasis of the education system on multiculturalism highlights Türkiye's dedication to nurturing diversity, preserving national identity, and fostering cultural understanding and appreciation among students. The Turkish government has made progress in promoting its culture internationally through higher education scholarships, but reforms are needed to enhance the competitiveness of the Türkiye Bursları program (Aras & Mohammed, 2018).

Cultural values in Singapore have a strong influence on educational rights policies and outcomes. Singaporean society places a high value on education as a key driver of economic progress and national development (MoES, 2023d). Cultural values such as meritocracy, discipline, and hard work shape policies that prioritize academic achievement, rigorous curricula, and a competitive education system. However, there is growing recognition of the need to balance academic pressure with holistic development, well-being, and creativity. Singapore's right-to-education policy reflects its multicultural nature. Singapore is a society with diverse ethnic groups and cultures (NCEE, 2023b). The education system promotes diversity and cultural understanding and provides opportunities for students to preserve and celebrate their own culture, language, and values. In Singapore, the curriculum supports multicultural education that addresses different cultural values and perspectives in an inclusive manner (MoES, 2023d). Cultural values greatly influence educational policies and outcomes in Singapore, prioritizing academic excellence, meritocracy, and hard work. However, the importance of balancing academic rigor with holistic development and well-being is being increasingly recognized. Singapore's educational policies reflect the country's multicultural society, emphasizing diversity, cultural understanding, and inclusivity. The curriculum supports multicultural education, fostering opportunities for students to celebrate their cultural identities while appreciating diverse perspectives. As a result, Singapore's education system continues to evolve, ensuring its responsiveness to the needs and aspirations of diverse populations. The government has been broadening its conceptions of giftedness and diversifying its talent development efforts in recent years (Neihart & Teo, 2013). The meritocratic ethos is deeply ingrained in the Singaporean psyche, as evidenced by global values surveys (Cheang & Choy, 2023). The state hopes to instill specific values by studying the CSR movement in Singapore (Tan, 2012). A critical thinking program has been implemented in Singapore to cultivate a thinking workforce to sustain the competitive edge of the economy (Koh, 2002). The family structure is key to promoting self-sufficiency in Singapore (Hwang, 2018).

Cultural values, particularly Confucianism, have long shaped the South Korean education system's focus on academic success and a competitive environment. However, recent efforts aim

to promote a more balanced and holistic approach to education while preserving traditional values and the Korean language in the education system. South Korea's right-to-education policy emphasizes the importance of cultural heritage in shaping educational policy and outcomes (NCEE, 2023a). In South Korea, the curriculum includes important elements of culture and history. Cultural factors, including Confucian values, such as respect for authority, discipline, and diligence, influence the intense focus on academic achievement and the highly competitive education system (MoEK, 2023a). Cultural values greatly affect educational rights policies and outcomes in South Korea, with a strong emphasis on education as a means of personal and national success. Despite this, there is growing awareness of the negative consequences of excessive academic pressure. South Korea's right-to-education policy aims to preserve traditional values and the Korean language by incorporating elements of the country's culture and history into its curriculum. In order to ensure the well-being and success of its students, South Korea needs to find an equilibrium between cultural values and education. As Ahn and Baek (2012) argue, the most significant objective for Korean youth is to enhance their academic achievements. Consequently, other dimensions of their development are frequently disregarded, which can have substantial repercussions on the overall quality of their lives. South Korea has maintained its unique culture and traditions while embracing globalization (Aziz et al., 2017). South Korea has developed rapidly technologically and economically, but its fundamental values have largely remained intact (Buja, 2016). South Korea is a major hub of education, technology, and culture. Confucianism, collectivism, and hierarchical social structures were some of the cultural values that influenced the country's educational system. However, with an increasing number of foreigners residing in Korean society, the country is undergoing a rapid transformation into a multicultural society (Ryu & Kim, 2018). Koreans are proud of their long history, unique culture, and traditions (Lee, 2001). The construction of national identity remains a key function of education in South Korea due to uncertainties over including North Korea within its definition of Koreans (Kim & Kim, 2019). The dramatic shift in socio-political values in South Korea since World War II is largely attributed to intergenerational changes and increased levels of education (Lee, 2003). Educational development has been critical for South Korea's rapid economic growth (Jeong & Armer, 1994). South Korea's embrace of neo-developmentalism has also profoundly influenced its approach to education, integrating construction and progress into every facet of life. Neo-developmentalism, with its orientation towards comprehensive construction, has become a cornerstone ideology in South Korea, permeating daily politics, society, economy, and culture (Mulyaman et al., 2021).

Cultural values in Finland strongly influence educational rights policies and outcomes. Finnish society places a high value on equality, trust, and the general well-being of the individual. Cultural values such as a child-centered approach, playfulness, cooperation, and an emphasis on social equality have shaped the Finnish education system (MoECF, 2023a). Policies prioritize equal access to quality education, less emphasis on standardized testing, and holistic development (NCEE, 2023c). Finnish education values highly qualified teachers, classroom autonomy, and a supportive learning environment. Finland is a country in which cultural values play an important role in education policy. Respect for cultural diversity and language rights are core values of the education system (MoECF, 2023c). The education system is based on preserving Finnish culture and values while enabling students to understand and appreciate other cultural values. Cultural values in education ensure that the curriculum reflects diversity and supports different cultures and languages (OECD, 2023b). Cultural values significantly shape Finland's educational rights policies and outcomes. Strong emphasis is placed on equality, trust, and holistic well-being. Finnish education policies prioritize equal access to quality education and promote a child-centered approach, playfulness, and cooperation. Highly qualified teachers and classroom autonomy are essential to fostering a supportive learning environment. Respect for cultural diversity and language rights is integral to Finland's education system, which seeks to preserve Finnish culture while promoting understanding and appreciation of other cultural values. Finland's inclusive and equitable education system upholds cultural values through a diverse and supportive

curriculum that reflects various cultures and languages. In Finland, liberal multiculturalism reinforces national boundaries, conceptualizing Finnishness within the discipline and order of daily life (Lappalainen, 2006). The robust societal and political status of Swedish and monolingual school institutions in Finland facilitates the recognition of language as a right and a resource. However, it may present linguistic diversity as an issue (From & Holm, 2018). In Finland, multilingual education has a clear discourse aimed at integrating multilingual perspectives into the whole curriculum (Paulsrud et al., 2020). The information on the comparative analyses of the countries is presented in Table 4.

Table 4

The Role of Cultural Values in Shaping Education Rights Policies and Outcomes

Dimension	Turkiye	Singapore	South Korea	Finland
Core Cultural Values	Family importance, collectivism, respect for elders, multiculturalism, national identity preservation	Meritocracy, discipline, hard work, multiculturalism, academic achievement	Confucianism, respect for authority, diligence, competitiveness, preservation of Korean language and heritage	Equality, trust, child-centeredness, playfulness, cooperation, cultural and linguistic diversity
Education Policy Focus	Inclusive education, multicultural values, addressing regional and gender disparities, preserving Turkish identity	Academic excellence, holistic development, talent development, CSR values, critical thinking	Academic success, cultural heritage, competitiveness, language and history integration, balanced development	Equal access, holistic development, qualified teachers, autonomy, cultural and language rights
Curriculum Design	Emphasis on Turkish culture, values, and history; supports diversity in dynamic classrooms	Rigorous and competitive; includes multicultural education supporting cultural identities	Curriculum reflects traditional values, Confucian principles, and national identity construction	Curriculum reflects diversity, supports multilingualism, and promotes understanding of other cultures
Educational Challenges	Gender inequality, regional disparities, traditional barriers to inclusion	High academic pressure, need for emotional and creative balance	Excessive academic stress, lack of focus on well-being, multicultural integration	Tension between monolingual institutions and linguistic diversity
Multiculturalism & Diversity	Promoted through dynamic classrooms and inclusive national policies	Multicultural society supported by curriculum and education policies	Increasingly multicultural society; education aims to integrate diverse identities	Liberal multiculturalism, strong language rights, inclusive curriculum
Gifted/Talent Education	Science high schools and guidance for gifted students	Broadening definitions of giftedness and diversified talent programs	Focus on academic excellence; holistic policies emerging	Inclusive approach with equal opportunity and teacher support
Global Influence & Development	Turkiye Scholarships promote cultural exchange; reforms needed for competitiveness	Literacy and economic success tied to educational rigor; global competitiveness	Education crucial to economic growth and technological advancement	Known for equity, well-being, and educational quality; global model

RESULTS

In structuring Türkiye's education policy, comparing the education policies of countries such as Finland, Singapore, and South Korea, which are successful in international examinations, can contribute significantly to policy development in terms of innovative and visionary ideas. This study aimed to identify the differences and similarities by comparing the education policies of Singapore, Finland, South Korea, and Türkiye. To make this comparison, information was collected and analyzed using a general overview of the countries' education rights policies, national and regional differences and similarities, the role of international conventions in education rights policies, and the impact of cultural values. Comparative education policy

analysis, particularly with a focus on countries known for their successful educational outcomes, offers valuable insights for policy development in Türkiye. This approach facilitates the identification of innovative and visionary ideas by examining the educational systems of Finland, Singapore, and South Korea. The study focuses on key areas such as education rights policies, national and regional differences, the influence of international conventions, and the impact of cultural values, enabling a thorough and multifaceted comparison. Examining the differences and similarities in these countries' approaches can inform Türkiye's efforts to improve its education system (Adiputri, 2021).

Comparing education policies across different countries provides an important framework for identifying best practices and areas for improvement. Countries like Finland and South Korea, which have seen notable success in international assessments, provide valuable models for informing and enhancing education rights policies in Türkiye. A comparative study involves an analysis of various aspects of education systems, including educational rights policies, national and regional differences, the impact of international conventions, and the influence of cultural values. This methodology facilitates the identification of both strengths and weaknesses in Türkiye's current educational strategies.

Understanding the goals and purposes of inclusive education, along with the policy and governance structures of different countries, is crucial for comparative work (Walker, 2016). Countries differ significantly in their policy approaches, educational cultures, and governance structures, affecting the implementation and effectiveness of inclusive education (Jeong et al., 2014). Comparing education systems necessitates an examination of education rights policies to ensure equitable access and opportunities for all students. This comparison involves evaluating how each country addresses disparities and promotes inclusivity through policy measures. The cultural values embedded in a society significantly influence its education system, shaping pedagogical approaches and learning environments (Niu et al., 2024). Therefore, analyzing these cultural influences provides insights into the unique characteristics of each educational context. International conventions and agreements on education rights play a crucial role in shaping national policies and practices. It's important to consider the relationships between education and society (Hebert, 2021).

Cross-cultural comparison is a powerful tool for revealing unnoticed but ubiquitous practices, as it allows researchers to identify elements of teaching that are taken for granted within their own cultures (Cai et al., 2017). The study of education across different countries necessitates an understanding of culturally determined needs, objectives, and conditions (Raivola, 1985). By examining these aspects, educators and policymakers can gain insights into the unique challenges and opportunities within diverse educational contexts. Comparative research is situated at the intersection of the institutional and intellectual frameworks. It is predicated on the necessity for institutions to engage in comparative analysis in order to develop and improve themselves through the utilisation of a more efficacious model of other institutions (Milošević & Maksimović, 2020). The comparative approach underscores the complexities inherent in educational processes and argues against the uncritical borrowing of policies and practices (Grant, 2000).

Examining the successful elements of various countries' education policies provides valuable insights for the development of Turkish education policies. For instance, Türkiye could adopt Singapore's merit-based education approach and emphasize STEM subjects to improve the quality and competitiveness of its educational system. Implementing a dual-language education policy similar to Singapore's could enhance language proficiency and global competitiveness among Turkish students. Furthermore, adapting to new educational trends and challenges, as Singapore has done, can help Türkiye address its evolving educational needs. Singapore's commitment to quality education and its merit-based system could significantly enhance the overall quality of Turkish education. Türkiye can also draw inspiration from Finland's emphasis on teacher training, curriculum design, and inclusive education (Beamish et al., 2024). The study

of education across different countries is greatly influenced by the cultural values of those nations. These values affect teaching styles, the curriculum, and how students learn (Raivola, 1985). Educational discussions and debates at the national level are often enhanced through an international perspective provided by comparative education (Altbach, 1991). This international perspective enables educators and policymakers to understand different approaches and solutions to common educational challenges.

Finland's inclusive education policies could serve as a model for Türkiye to address regional disparities and gender inequality. Implementing policies that prioritize equal opportunities for all students can help bridge existing gaps. Investing in teacher training programs and prioritizing teacher quality, while giving teachers more autonomy to adapt to student needs, are essential steps. Learning from Finland's inclusive education system, Türkiye can work towards reducing disparities and ensuring equal access to education for all students, regardless of their background or abilities. Adopting a child-centered approach, as seen in Finland and Singapore, can foster a supportive learning environment in Turkish schools, prioritizing the individual needs and rights of students. Additionally, promoting inclusivity and cultural understanding can ensure that students appreciate and celebrate their own and others' cultures. These methods collectively contribute to inclusive and equitable educational practices. Inclusive education is a fundamental right for every child, not a privilege (Mag et al., 2017). Teachers must be equipped with teaching methods that cater to all students, understanding the mechanisms that might lead to exclusion and discrimination (Sánchez et al., 2023). Inclusive education is seen as a way to reform education and emphasizes anti-discrimination efforts, ensuring equal rights and justice for all, while also expanding access to education and improving its quality (Wulan & Aedi, 2020). The objective of these measures is to establish learning environments in which all students, irrespective of their distinctive characteristics or requirements, are able to participate fully, engage effectively, and achieve success (Kumari, 2024). The fundamental principle of inclusive education is predicated on the notion of maintaining special education students within the general educational stream, with the concomitant provision of support services to the learner. This approach eschews the conventional practice of referring learners to external sources for support (Farooq, 2019).

When analyzing South Korean education policies, Türkiye can adopt aspects of its rigorous academic environment while maintaining a balanced approach that fosters creativity and critical thinking alongside exam preparation. Emphasizing lifelong learning, as South Korea does, can help create a dynamic and adaptable education system that equips individuals with the necessary skills to succeed in a rapidly changing global landscape. Learning from South Korea's centralized approach to teacher professionalism and ongoing development, Türkiye can also benefit from implementing policies that support the educational rights of disabled students, in alignment with the CRPD. Striking a balance between academic rigor and holistic development can promote well-being and creativity among Turkish students. This approach could potentially reduce the high levels of stress and competition often associated with South Korea's education system (Kim, 2012). Inclusive education is defined as an educational system where all learners are accepted and fully included, both educationally and socially (Mpu & Adu, 2021). It is a philosophy that has become a key point in international discussions and is vital in educational policies across developed and developing countries (Braude & Dwarika, 2020; Mpu & Adu, 2021). Inclusive education ensures that all students, regardless of their abilities or differences, have equal opportunities to participate, learn, and succeed within the educational system (Singh, 2024). Inclusive education acknowledges that children possess diverse abilities in terms of intellectual, physical, and social skills (Kabwos & Bitok, 2022). Embracing diversity and promoting cohesion are essential goals within the framework of inclusive education (Shaeffer, 2019).

Each country demonstrates a unique approach to education, reflecting its cultural values, social priorities, and economic strategies. Singapore's merit-based education system and strong focus on STEM subjects can serve as a model for Türkiye to improve the quality and competitiveness of its educational system. Implementing a dual-language education policy similar

to Singapore's could enhance language proficiency and global competitiveness among Turkish students. Furthermore, adapting to new educational trends and challenges, as Singapore has done, can help Türkiye address its evolving educational needs.

Türkiye has the potential to further improve its educational system by drawing inspiration from successful models in other countries, such as Singapore, Finland, and South Korea. This comparative analysis highlights the unique characteristics and commonalities of these nations' educational policies. By integrating elements from these international agreements and successful models, Türkiye can enhance its educational policies, ensure equal access to quality education, and contribute to the broader advancement of society. Aligning with international agendas, such as the Education 2030 Agenda, can guide Türkiye in creating policies that promote inclusive, quality education and lifelong learning opportunities. Recognizing the importance of preserving cultural identity, Türkiye can draw on the experiences of these countries to integrate cultural values into its educational policies. Encouraging interactive classroom environments that allow students to learn about and appreciate their own culture and that of others can further enrich the Turkish education system.

It is evident that by adopting successful elements from international models and aligning them with international agendas, Türkiye can enhance its education policies, promote societal well-being, and contribute to the nation's progress. This study's comparative analysis of the education policies and systems of Türkiye, Singapore, Finland, and South Korea provides valuable insights that can inform innovative and visionary education policies in Türkiye. It is submitted that the key to a more inclusive and effective education system in Türkiye is to ensure equal access to quality education for all students.

CONCLUSION AND SUGGESTIONS

The findings of this comparative study reveal that education rights and policies are deeply embedded in the cultural, political, and historical fabric of each nation. While all four countries—Türkiye, Singapore, Finland, and South Korea—recognize education as a fundamental right, their interpretations, implementations, and policy outcomes vary considerably. These differences reflect not only governance models and resource allocations but also the value systems and philosophical underpinnings of each society. Education in Türkiye, for instance, is strongly tied to national identity and cultural heritage, whereas in Singapore, it is closely linked to economic development and meritocratic ideals.

Finland's education system illustrates the success of a decentralized, student-centered approach that prioritizes equality, trust, and well-being. Conversely, South Korea has historically emphasized academic excellence through a highly centralized and exam-oriented structure, although recent reforms have aimed to reduce pressure and promote holistic development. Singapore, with its forward-looking curriculum and globalized vision, balances rigorous academic expectations with bilingualism and 21st-century competencies. These distinctive approaches provide critical insight into how the right to education can be interpreted to suit different national objectives and social contexts.

For Türkiye, the comparative lens sheds light on areas that require attention and improvement—particularly regional disparities, access for marginalized groups, teacher quality, and curriculum flexibility. By learning from the strengths and challenges of the comparator countries, Türkiye can enhance its education policy framework to better fulfill its constitutional commitment to education as a human right. Ultimately, the research confirms that while global benchmarks and agreements offer valuable guidance, meaningful educational reform must be rooted in the local cultural, political, and social context.

4.1. Suggestions

Drawing upon the comparative findings of this study, several policy directions can be suggested for Türkiye to enhance the effectiveness and equity of its education system. One significant insight is the value of contextually adapted policy borrowing. Rather than attempting to replicate foreign models wholesale, Türkiye should selectively integrate elements from the education systems of Finland, Singapore, and South Korea in ways that align with its cultural, social, and institutional realities. For instance, the meritocratic and STEM-focused approach in Singapore can inspire curriculum reforms that prepare students for a globalized economy, provided it is supported by adequate teacher capacity and infrastructure. Similarly, Finland's decentralized governance and student-centered philosophy offer a compelling model for reducing regional disparities and promoting inclusive education in Türkiye. Increasing school-level autonomy and local decision-making power may lead to more responsive and culturally relevant educational practices, particularly in underserved rural and eastern regions.

Moreover, the study highlights the urgent need to invest in teacher quality. Finland and South Korea demonstrate how rigorous teacher education, professional development, and classroom autonomy contribute directly to system-wide success. Türkiye could strengthen its teacher preparation programs, offer ongoing training, and empower educators with greater pedagogical freedom to meet diverse learner needs. Inclusive education also emerges as a vital area for improvement. Ensuring that students with disabilities, refugee children, and those from socioeconomically disadvantaged backgrounds have equitable access to quality education is not only a legal obligation under international agreements but also a moral imperative. Policies must go beyond access and address curricular flexibility, individualized support, and culturally sensitive pedagogy to foster full participation.

In addition, embedding human rights education and civic values into the national curriculum can cultivate socially responsible, tolerant, and critically engaged citizens. Singapore's National Education model and Finland's intercultural curriculum provide concrete examples of how educational systems can promote democratic values while respecting diversity. Furthermore, Türkiye should actively engage with international education frameworks such as the Education 2030 Agenda and regularly evaluate progress using global benchmarks like PISA. This would enhance policy accountability and provide clear metrics for improvement. Finally, a balanced approach between academic rigor and student well-being should be pursued. The South Korean case illustrates both the potential and pitfalls of a high-pressure system; Türkiye must ensure that educational achievement does not come at the expense of students' mental health or creativity. Establishing a national education research institute could support these reform efforts by generating evidence-based insights and facilitating ongoing comparative analyses. Through these multidimensional strategies, Türkiye can build a more equitable, responsive, and future-ready education system.

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GENİŞLETİLMİŞ ÖZET

Giriş

Bu çalışma, eğitim haklarını ve politikalarını karşılaştırmalı bir perspektifle ele alarak, Türkiye ile uluslararası düzeyde başarılı eğitim sistemlerine sahip ülkeler olan Singapur, Finlandiya ve Güney Kore arasındaki benzerlikleri ve farklılıkları incelemeyi amaçlamaktadır. Araştırma kapsamında, bu ülkelerin eğitim hakkı politikaları, ulusal ve bölgesel farklılıklar, uluslararası sözleşmelerin etkisi ve kültürel değerlerin eğitim politikalarına yansımaları detaylı bir şekilde analiz edilmiştir. Çalışma, Türkiye'nin eğitim politikalarının geliştirilmesi için yenilikçi ve vizyoner fikirler sunmayı hedeflemiştir. Eğitim, hem bireysel hem de toplumsal gelişimin temel taşlarından biri olarak insan haklarının ayrılmaz bir parçasıdır. Eğitim hakkı, bireylerin diğer medeni, siyasi, ekonomik ve kültürel haklardan faydalanabilmesinin ön koşulu olarak kabul edilmektedir. Bu nedenle, hükümetlerin eğitim sistemlerine yön veren politikaları, yalnızca eğitim sistemlerini değil, aynı zamanda toplumun genel kalkınma sürecini de şekillendirmektedir.

Araştırmanın temel dayanağı, eğitim politikalarının, bir ülkenin kültürel ve sosyoekonomik değerleri ile uyumlu bir şekilde tasarlanması gerektiği anlayışıdır. Eğitimde başarılı ülkelerin politikalarının, Türkiye'nin eğitim sistemi için bir yol gösterici olabileceği varsayımı bu çalışmanın temelini oluşturmuştur.

Yöntem

Araştırma, nitel bir yöntemle gerçekleştirilmiş olup, durum çalışması yöntemi kullanılmıştır. Durum çalışması, belirli bir bağlamda belirli bir konuya derinlemesine odaklanmayı sağlayan bir nitel araştırma yaklaşımıdır. Bu bağlamda, Singapur, Finlandiya, Güney Kore ve Türkiye'nin eğitim politikalarına ilişkin belgeler ve veriler detaylı bir şekilde incelenmiştir. Veriler, betimsel bir analiz yöntemiyle ele alınmış, eğitim politikalarına ilişkin benzerlikler ve farklılıklar kategorilere ayrılarak yorumlanmıştır.

Kavramsal Çerçeve

3.1. Ülkelerin Eğitim Haklarına Genel Bakış

Türkiye’de eğitim hakkı, anayasal bir güvence altında olup, her bireyin eşit ve ücretsiz eğitim alma hakkını garanti etmektedir. Türkiye’de 12 yıllık zorunlu eğitim sistemi uygulanmakta ve bu kapsamda dezavantajlı gruplara, engelli bireylere ve mültecilere yönelik destekleyici politikalar geliştirilmektedir. Ancak, bölgeler arası eşitsizlikler, öğretmen kalitesi ve kaynak yetersizlikleri gibi sorunlar eğitim sisteminin temel zorlukları arasında yer almaktadır.

Singapur’da eğitim, ulusal kalkınma stratejisinin bir parçası olarak ele alınmaktadır. Ülkenin eğitim sistemi, akademik başarıya ve bireysel potansiyelin en üst düzeye çıkarılmasına odaklanmaktadır. Bireylerin hem ulusal hem de küresel düzeyde rekabet edebilmesi için çift dilli eğitim politikaları ve STEM (Fen, Teknoloji, Mühendislik ve Matematik) alanlarına öncelik verilmiştir.

Finlandiya’da ise eğitim sistemi, eşitlik ve bireysel tatmin ilkelerine dayanmaktadır. Eğitim, devlet tarafından finanse edilmekte olup, her bireye ücretsiz ve zorunlu olarak sunulmaktadır. Öğretmenlerin mesleki yetkinliği ve sınıf içi özerkliği Finlandiya’nın başarısının temel unsurlarından biridir.

Güney Kore’de eğitim, toplumsal başarıya ulaşmanın bir yolu olarak görülmektedir. Ülkenin merkezîyetçi eğitim sistemi, akademik başarıyı ön planda tutan yoğun bir müfredatla desteklenmektedir. Ancak son yıllarda, eleştirel düşünme ve problem çözme gibi yaratıcı becerilerin geliştirilmesine yönelik politikalar benimsenmiştir.

3.2. Uluslararası Sözleşmelerin Eğitim Hakkı Politikalarındaki Rolü

Çalışma kapsamında incelenen dört ülke de uluslararası insan hakları sözleşmelerine taraf olarak, eğitim hakkını temel bir insan hakkı olarak kabul etmektedir. Türkiye, Çocuk Hakları Sözleşmesi (CRC) ve Engelli Bireylerin Haklarına İlişkin Sözleşme (CRPD) gibi uluslararası belgelerle eğitimde eşitliği sağlamayı taahhüt etmiştir. Benzer şekilde, Singapur, Finlandiya ve Güney Kore, Eğitim 2030 Gündemi gibi uluslararası girişimlerle uyumlu politikalar benimseyerek eğitimde kapsayıcılığı ve kaliteli öğrenim olanaklarını desteklemektedir.

3.3. Ulusal Bağlamlar Arasındaki Farklılıkların ve Benzerliklerin Analizi

Her ülkenin eğitim politikası, kendi ulusal bağlamına göre şekillenmiştir. Singapur, eğitimde meritokrasiyi ve bireysel başarıyı ön plana çıkaran bir sisteme sahiptir. STEM alanlarına özel bir vurgu yapılırken, çift dilli eğitimin önemi vurgulanmaktadır. Finlandiya, sosyal eşitlik ve bireysel ihtiyaçlara göre şekillenen bir eğitim sistemiyle dünya çapında dikkat çekmektedir. Öğrencilere kişiselleştirilmiş öğrenim fırsatları sunulurken, öğretmenlerin özerkliği ön plandadır.

Güney Kore, merkeziyetçi bir eğitim sistemi ile akademik başarıyı önceleyen ancak son yıllarda yaratıcı düşüncüyü teşvik eden bir yaklaşıma yönelmiştir.

Türkiye, diğer ülkelerle karşılaştırıldığında, eğitim politikalarında bölgesel eşitsizlikler ve kaynak dağılımı açısından çeşitli zorluklarla karşı karşıya kalmaktadır. Bu bağlamda, diğer ülkelerin başarılı uygulamaları, Türkiye'nin politikalarını yeniden şekillendirmek için önemli bir rehber olarak değerlendirilebilir.

3.4. Kültürel Değerlerin Eğitim Hakkı Politikalarını Şekillendirmede Rolü

Kültürel değerler, eğitim politikalarının şekillenmesinde önemli bir rol oynamaktadır. Türkiye'de eğitim politikaları, ulusal kimliğin korunması ve çeşitliliğin desteklenmesi arasında bir denge kurmayı amaçlamaktadır. Singapur'da ise eğitim sisteminde, disiplin, çalışkanlık ve meritokrasi gibi değerler ön plandadır. Finlandiya, sosyal eşitlik ve bireysel refahı merkeze alan bir yaklaşım benimserken, Güney Kore'de Konfüçyüsçü değerler, akademik başarı ve rekabetçi bir eğitim sistemini desteklemektedir. Her bir ülkenin kültürel değerleri, eğitim politikalarının temel felsefesini oluşturmakta ve bu politikaların sonuçlarına yansımaktadır.

Sonuç ve Öneriler

Bu çalışma, Singapur, Finlandiya ve Güney Kore gibi başarılı eğitim sistemlerine sahip ülkelerin politikalarının, Türkiye'nin eğitim politikalarının yeniden yapılandırılması için önemli bir ilham kaynağı olabileceğini göstermektedir. Örneğin, Türkiye, Singapur'un STEM alanlarına verdiği önceliği ve çift dilli eğitim modelini benimseyerek öğrencilerin küresel rekabet gücünü artırabilir. Finlandiya'nın eşitlikçi yaklaşımı, Türkiye'nin bölgesel eşitsizlikleri ve toplumsal cinsiyet eşitsizliklerini azaltmasına yönelik bir rehber olabilir. Güney Kore'nin akademik başarı odaklı ancak yaratıcı düşüncüyü teşvik eden yaklaşımı, Türkiye'nin müfredat reformları için örnek teşkil edebilir.

Sonuç olarak, Türkiye'nin eğitim politikalarının geliştirilmesi için uluslararası başarılı modellerin incelenmesi ve bu modellerin yerel ihtiyaçlarla uyumlu şekilde uyarlanması gerekmektedir. Bu çalışma, eğitim politikalarının sadece bireysel başarıyı değil, toplumsal kalkınmayı ve kültürel çeşitliliği destekleyen bir araç olduğunu vurgulamaktadır. Eğitimde eşitlik, kalite ve kapsayıcılığı sağlayacak politikaların hayata geçirilmesi, Türkiye'nin eğitim sisteminin daha etkili ve kapsayıcı bir yapıya kavuşmasını sağlayacaktır.