

NATIONAL QUALIFICATIONS FRAMEWORKS AS A POLICY INSTRUMENT FOR LIFELONG LEARNING IN GHANA, MALAYSIA AND SERBIA

Borut Mikulec, Alex Howells, Dubravka Mihajlović, Punia Turiman, Nurun Najah Ellias, Miriam Douglas

ABSTRACT: The development of national qualifications frameworks (NQFs) around the globe has been influenced by Anglo-Saxon countries and a global policy of intergovernmental organisations. The main aim of this paper is to explore how recently developed NQFs in diverse global contexts – Ghana, Malaysia, and Serbia – fulfil two proclaimed objectives: recognition of prior learning (RPL) and support for lifelong learning. Based on a comparative analysis of official national and international policy documents relevant to the NQFs in these selected countries, conducted using the method of documentary analysis, our findings indicate that despite differences according to type, scope, and stage of development, all three NQFs are used as a policy instrument for lifelong learning on the one hand, while on the other hand, they reinforce a vocational perspective of RPL, lifelong learning, and adult education.

1. Introduction

As a result of globalisation processes, educational policy has internationalised and become a product of international intergovernmental organisations such as the Organisation for Economic Co-operation and Development (OECD), the United Nations Educational, Scientific and Cultural Organization (UNESCO), the European Union (EU), the World Bank, the International Labour Organisation (ILO), and international nongovernmental organisations (Németh, 2016). These organisations strive to promote precisely defined norms, values, and discourses in the field of (adult) education; they also seek to shape education policy and transform education systems around the globe in particular directions,

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albeit mainly through ‘soft power’, because their formal mechanisms are limited. Moreover, as many scholars argue (e.g. Biesta, 2015; Rizvi & Lingard, 2010), intergovernmental organisations in particular are shifting education policy towards market strategies and neoliberal values, which are reflected in a culture of performativity, accountability, measurement and the effectiveness of education, evidence-based educational practice, and outcome-based education.

The establishment of National Qualifications Frameworks (NQFs) around the globe can be seen as one of these influences of intergovernmental organisations, supporting a shift towards Lifelong Learning (LLL) and outcomes-based learning qualifications. Studies so far have shown that the development of NQFs has been influenced by Anglo-Saxon countries and the global neoliberal policies of intergovernmental organisations (Allais, 2014; Young & Allais, 2013), which position NQFs as a ‘magic bullet’ capable of resolving many educational problems: NQFs are designed to facilitate the transparency, comparability, quality, and efficiency of learning and qualifications; they supposedly promote second chances and a learner-centred approach to education, bridge the gap between education and the economy, and enable Recognition of Prior Learning (RPL)¹ (Raffe, 2013; Werquin, 2007). However, as shown by research evidence collected from the NQFs of ‘early starters’ and developing countries, which draw heavily on models developed in the United Kingdom, NQFs are in fact unable to fulfil the broader set of objectives and purposes they claim (Allais, 2014). Further research is needed around the globe on NQFs developed under the influence of intergovernmental organisations and their recommendations – that is, European Qualifications Framework for LLL (EQF) (European Parliament & Council, 2008; Council, 2017), ASEAN Qualifications Reference Framework (AQRf) (2017), and others (CEDEFOP, 2017; UNESCO, 2012). Furthermore, as NQFs are seen as ‘catalysts for LLL’, we are especially interested in how NQFs interact with mechanisms for RPL to achieve more open and flexible ‘lifelong-learning-oriented-pathways for learning’ (CEDEFOP, 2017:9).

The main aim of this paper is thus to explore whether newly developed NQFs found in diverse world contexts enable RPL and thereby support LLL. Therefore, the following research question was formulated to guide our research process: How are newly established NQFs in Ghana, Malaysia, and Serbia used as a policy instrument for LLL?

¹ In this paper we use the concept of RPL – that is, the idea of recognising prior learning (‘learning outcomes’) wherever (in various contexts) and whenever (through lifespan) learning took place – although other concepts known under the acronyms of APEL (used also in Malaysia), PLAR, VPL, RVA (used also in Ghana) emerged in different locations (see Andersson, Fejes, & Sandberg, 2013:405; UNESCO, 2012).

We first briefly introduce the theoretical framework. Next, we outline our methodological approach and provide argumentation for our selection of cases. In the comparative analysis section, we present cases in line with the comparative categories selected, discuss similarities and differences, and draw interpretations. We argue that, on the one hand, NQFs in Ghana, Malaysia, and Serbia are used as policy instruments for LLL, supporting RPL; on the other hand, they reinforce a vocational perspective on RPL, LLL, and adult education.

2. *Theoretical framework*

Efforts to establish NQFs have been supported by various international organisations such as the EU, the OECD, UNESCO, the World Bank, and the ILO, and have ‘spread through processes of cross-national policy borrowing’ (Raffe, 2013:144). One consequence of this is that more than 150 countries worldwide are now in the process of developing and implementing a NQF and that seven regional qualifications frameworks have been developed (e.g. the EQF in Europe, the AQR in Southeast Asia), which means that NQFs are becoming a global phenomenon (CE-DEFOP, 2017). In this way, the NQF has become one of the most important areas of interest of international education policy, despite a shortage of evidence showing that NQFs achieve their objectives and purposes (Allais, 2017; Raffe, 2013; Young & Allais, 2013).

One of the main characteristics of newly developed or ‘new-style frameworks’ (see Mikulec & Ermenc, 2016:4), formulated under the recommendations of international organisations, is the recognition of RPL as one of the main instruments of LLL (see Elken, 2015) and a means of connecting (a) formal, non-formal, and informal learning; (b) general, academic, and vocational education and training; (c) quality assurance, credit systems, and RPL; and (d) the needs of the labour market(s) and education and training system(s) (Bohlinger & Münchhausen, 2011).

Although NQFs have been developed to respond to the economic and social processes of globalisation by giving countries access to global/regional education and labour markets (Raffe, 2013), different types of NQFs, with different objectives and different change processes, have emerged worldwide:

- Some of the main objectives of the NQFs are to: (a) make education and training systems more transparent and understandable, as well more demand-focused; (b) increase coherence and coordination of this system; (c) promote LLL; (d) promote RPL; (e) establish parity of esteem between general and vocational education; (f) review standards; (g) promote the international mobility of learners and workers; (h) transform economy and society, and the like (Raffe, 2013:147).

- Some of the main types of the NQFs are: (a) ‘communications framework’, which is typically loose in design, voluntary, outcomes-referenced, and aimed at improving the transparency of an existing system; (b) ‘transformational framework’, which is typically tighter in design, outcomes-led, oriented towards a demand-led system, and aimed at defining qualifications in line with an imagined future system; (c) ‘reforming framework’, which is typically statutory with stronger requirements, and aimed at reforming the existing system (Raffe, 2013: 149). Other scholars have proposed other typologies (for an overview see Allais, 2017:771–773).
- Some of the main characteristics of NQFs are: frameworks of communication as opposed to frameworks of regulation; weak and strong frameworks: partial and comprehensive frameworks; unit-based and qualification-based frameworks; institutions-led as opposed to outcomes-led frameworks; descriptive frameworks as opposed to occupational frameworks and employer-led, outcome-based frameworks (Allais, 2017:771).
- Different stakeholders engaged in the coordination of NQFs are: international organisations; governments; central agencies; (public and private) educational providers; industry and employers or professional bodies (Raffe, 2013:151).

This diversity of NQFs has important consequences for the main concept upon which they are based: learning outcomes. It is worth remembering that the concept of embedding learning outcomes in an NQF has its roots in the competence-based approach to vocational education in England and is derived from the belief that all qualifications should be expressed independently of learning pathways and educational programmes. However, the concept of learning outcomes used in European/global education policy is an extremely loose concept, that is, a political construct without clear definition, mostly defined as ‘statements regarding what a learner knows, understands, and is able to do on completion of a learning process’, which can be interpreted in several ways. In some countries, learning outcomes are understood as learning objectives, in others as occupational standards or standards of competencies, and in others still as educational standards; learning outcomes can also be interpreted differently in different education subsystems within one country (see Mikulec, 2017:469–460; Mikulec & Ermenc, 2016:5–6). This means that in practice, learning outcomes play a rather modest role in NQFs, especially in communication (or loose, descriptive, or institution-led) frameworks and are mainly led by educational institutions and not employers or professional bodies.

Nevertheless, the concept of learning outcomes plays a crucial role in linking NQFs with systems of RPL (European Council, 2012; UN-

ESCO, 2012; UIL 2018); if qualifications are defined by learning outcomes, we can use level descriptors and standards to place them at the appropriate NQF level and also assess them independently of the route by which they were obtained. Moreover, if the learning outcomes to be acquired through RPL or formal education are the same, then NQFs and systems of RPL are closely linked (Bohlinger & Münchhausen, 2011:12). The NQF and RPL should thus be working towards a common goal; they enable individuals to progress in their learning careers on the basis of learning outcomes, acquired in formal, non-formal, or informal settings, which are independent of duration and specific educational programmes (CEDEFOP, 2018). Therefore, NQFs and RPL are seen as main elements for realising LLL policy (CEDEFOP, 2017: 74-75) or as crucial elements of national LLL strategies (Bohlinger & Münchhausen, 2011:8).

However, as global education policy models reinforced by international organisations do not have a direct causal impact on national education policy but are rather re-interpreted in the national context and have intended and unintended effects, it is necessary to study NQFs that might look very similar on paper in different economic, social, and institutional settings, as well as their purposes and how they work (Allais, 2017; Mikulec, 2017; Raffe, 2013). Having said that, in what follows, we will explore how NQFs adopted by three developing countries on three different continents (a) promote LLL and (b) interact with RPL.

3. Methodology

For this paper, we adopted a comparative perspective in researching the field of adult education (Egetenmeyer, 2016; Reischmann & Bron, 2008). Inspired by the 'Relationship Model for Comparative Research in Adult Education' (Egetenmeyer, 2016:85), which enables an analysis of mutually interrelated contexts such as (trans)national contexts, (non) participants and learners, provisions and effects, as well as different sectors (state, market, civil society) and time dimensions (past, current, future) in adult education, we took into account different aspects of the model. Therefore, in the transnational context, we focused on international organisations and countries. For provisions and effects, we focused on policies, while for (non)participants and learners, we focused on relevant stakeholders. Regarding sector and time, we mainly addressed the state level and current time perspective. From the vertical perspective of analysing macro, meso, and micro levels, we primarily focused on macro (international organisations) and meso (states) levels of analysis. In this way, it is possible to better understand the relations surrounding NQFs in different countries.

The NQFs included in this analysis are found in three different countries on three different continents: Ghana, Malaysia, and Serbia. There were three main reasons why we chose these NQFs. Firstly, we wanted to include NQFs from developing countries that were formulated under the influence of (different) international organisations. Secondly, the researchers either were natives of these countries or had a special interest, knowledge, and language skills necessary for the countries selected. Thirdly, these three country cases all endeavour to link their NQFs with mechanisms for RPL and to open new LLL pathways for learning (CE-DEFOP, 2017) – a claim critically investigated in our research. For these reasons, three different comparative categories were developed to guide our comparison: (a) national policies on NQFs; (b) structure of NQFs; and (c) relationship between NQFs and RPL.

The method of documentary analysis, a content-based approach to analysing documents, is used because it allows for investigating central concepts referred to by policy documents (see Field & Schemmann, 2017). Regarding the selection of sources, we chose official national policy documents, regulations, policy documents from international organisations and their reports, and official data on websites, as well as journal articles and reports on NQFs in Ghana, Malaysia, and Serbia to improve the reliability and objectivity of comparison.

4. Comparative analysis

In this section, country data are presented in line with the three comparative categories, followed by an identification of similarities and differences and their interpretation.

4.1 National policies on NQFs

Ghana has an NQF for its technical and vocational education and training (TVET) sector, which is overseen by the Council for TVET (COTVET). COTVET was set up ‘to co-ordinate and oversee all aspects of technical and vocational education and training in the country’; its «major objective is to formulate policies for skills development across the [...] formal, informal and non-formal sectors» (COTVET, 2019). Although the NQF as a policy instrument may complement or even help to operationalise a national LLL policy or strategy, there is currently no LLL policy in Ghana. However, a new Education Sector Plan was approved for the period 2018–2030. According to the UNESCO Institute for Lifelong Learning (UIL, 2019), this document commits to increasing «equitable access to quality non-formal education by promoting key components of the *Belém Framework for Action*» and reaffirms that «adult

and non-formal education is a central theme in Ghana's newly endorsed Education Sector Plan». This means that, despite the absence of a national LLL policy in Ghana, UIL is eager to highlight any seemingly shared priorities.

Ghana's TVET NQF aims to establish connections and equivalencies between all occupational qualifications beyond a basic level while pushing a series of wider reforms by increasing access for TVET employees to further education and training, improving the quality of products and services provided by Ghana's workers, and facilitating LLL opportunities for individuals in informal professions (UIL, ETF, & CEDEFOP, 2017: 221). In light of this final objective, Ghana's NQF acknowledges informal learning, and it is argued here that this reflects UNESCO's discourse on the RPL (UNESCO, 2012) within the context of LLL. Furthermore, UNESCO, including the UNESCO-UNEVOC International Centre for TVET, is active in TVET internationally and, therefore, attempting to shape developments and bolster its authority-legitimation link in the sector. Specifically, the UNESCO-UNEVOC International Centre aims at «promoting UNESCO normative instruments and standards' and 'promoting good and innovative practices in TVET» (UNESCO-UNEVOC, 2019). In 2016, UNESCO published its recommendation concerning TVET, which argues that «well-articulated outcome-based qualifications frameworks [...] should be established» and that «Member States should promote the mutual recognition of qualifications at national, regional and international levels, in relation to the mobility of learners and workers» (UNESCO, 2016:6-7). Such support for NQFs in TVET is also reflected in UNESCO's strategy for TVET, which promises ongoing support for policy development in accordance with the recommendation's priorities, including the promotion of NQFs (UNESCO, 2016b: 7). By addressing TVET and differentiating qualifications according to formal or informal/non-formal status, Ghana's NQF fits well within UNESCO's policy discourse, despite the absence of a national LLL strategy.

For Malaysia to become a developed nation in the near future, LLL is seen as a necessary investment in a knowledge-based economy in the era of information, communication, and technology. As a starting point to promote LLL, the Prime Minister established a new Ministry of Higher Education in 2004 to promote, support, and empower higher education as well as LLL in Malaysia. As one of its initiatives, the ministry launched the Malaysian Qualifications Framework (MQF) in 2007. It was implemented in 2011 and revised in 2017. The MQF is an instrument that creates and classifies qualifications based on a set of nationally agreed criteria, is benchmarked against global practices, and reforms academic levels, learning outcomes, and the existing credit system (MQA, 2017: 6). These criteria are accepted and used for all qualifications awarded by recognised higher education providers. Hence, the MQF integrates and

links all national qualifications. It also provides educational pathways to link qualifications systematically. These pathways will enable the individual to progress through credit transfers and RPL in the context of LLL (MQA, 2017:9). The MQF also supports quality, with the Malaysian Qualifications Agency (MQA) as its gatekeeper.

The purpose of the MQF is to support the *National Education Philosophy* and the multiple policy goals described in *Malaysia Education Blueprint 2015-2025* (MQA, 2017:10). The MQF has nine objectives: to secure standards of qualifications and reinforce policies on quality assurance; to promote the consistency of nomenclature of qualifications; to provide mechanisms for the progression or interrelation between qualifications; to encourage collaboration between public and private higher education providers and skills training providers; to encourage parity of esteem among academic, professional, technical, vocational, and skill training providers; to establish a functional credit system; to provide accessible public information on programmes or qualifications in higher education; to promote the presentation of qualifications in understandable form; and to articulate links with qualifications from outside Malaysia (MQA, 2017:6-7).

The MQF links most clearly to UNESCO's policy discourse by adopting its definition of TVET (MQA, 2017:17). As a major subsector of the LLL system, TVET is found at secondary, post-secondary, and tertiary levels, incorporates work-based learning and promotes proficiency advancement, which may lead to a qualification. It also includes literacy and numeracy, as well as transversal and citizenship skills. Consequently, the MQF gives special attention to TVET from levels 1 to 5 of the framework.

By setting Serbia's NQF in the context of national policies, we can see that, for almost a decade, its establishment has been one of the main strategic measures related to the development of LLL (Education Development Strategy in Serbia 2020, 2012; Law on Adult Education in Serbia, 2013). The NQF is perceived as an instrument for promoting LLL. Leading strategic documents in Serbia regarding LLL include the *Education Development Strategy in Serbia in 2020* (2012), in which the NQF occupies an important position as «an instrument for ensuring the quality of education»; it is designed to provide «support for the development of a modern, relevant and flexible education system» (Education Development Strategy in Serbia in 2020, 2012:77). Furthermore, the NQF is intended to facilitate the «development of qualifications standards based on the labour market demands and the society requirements as a whole» and to ensure that «the entire education system is oriented towards the learning outcomes» (Report on AP Strategy 2020, 2018:8).

The main goals of the NQF (Report on AP Strategy 2020, 2018:8) are: to link the world of work and education; to link different elements of education in a coherent framework (standards, competences, and learning outcomes with the processes of planning, monitoring, and evaluation); to

reform different elements of education (i.e. based on qualification standards, learning outcomes, modern curricula); to provide relevant qualifications for the development of LLL; and to provide learners with easier progression through the education and training systems. As the education system in Serbia is often characterised as ‘ruthless’ towards those who leave it, the supportive role of the NQF for learners is also enabled through the setting up of career guidance and counselling subsystems. Furthermore, the NQF defines different ways to gain qualifications, through formal and non-formal education and RPL, and has the character of a comprehensive framework.

NQF development and implementation in Serbia is strongly influenced by the EU and its EQF recommendations, as the adoption of the NQF is an integral part of the European integration process. In April 2018, the Law on NQF in Serbia was adopted, which has paved the way towards the development of the entire system of qualifications and has referenced the NQF to the EQF. In addition, during the process of NQF development, the European Training Foundation (ETF) played a major role by providing professional and financial assistance (ETF Final Report, 2018:2).

4.2 Structure of NQF

Ghana’s NQF, which only addresses TVET, has eight levels. Level descriptors indicate the qualification(s) ascribed to each level: the first two are dedicated to informal apprenticeships (‘Proficiency I’ and ‘Proficiency II’), whereas subsequent levels proceed through a hierarchy of formal qualifications, finishing with ‘Doctor of Technology’ at the eighth and final level (UIL, ETF, & CEDEFOP, 2017:222). The level descriptors also denote learning outcomes, which are divided into ‘knowledge’ and ‘skills and attitudes’. Across the eight levels, learning outcomes categorised as ‘knowledge’ generally refer to the learner’s development of a ‘knowledge base’, as well as theoretical and conceptual knowledge that provides a foundation for practical skills. As the levels advance, emphasis is placed on applying knowledge when conducting professional tasks, as well as knowing how to manage resources and conduct research (UIL, ETF, & CEDEFOP, 2017:223–224). In terms of skills and attitudes, learning outcomes range from ‘the ability to perform routine and predictable tasks’ and competence with tools and machinery at the first two levels (informal apprenticeships), to ‘transferable skills’, ‘self-direction’, and ‘decision-making’ at the more advanced levels (UIL, ETF, & CEDEFOP, 2017:223–224).

Stakeholder engagement in working towards the successful implementation of the TVET NQF is an ongoing challenge in Ghana, particularly with regard to the complications of RPL. Steenekamp and Singh (2012:55) summarise the situation by finding that «stakeholders do not recognise their shared responsibility to ensure that *Recognition* happens»; however, the same study found that industry is already

contributing to the development of competency-based training (CBT) programmes within the TVET sector.

In Malaysia, the revised MQF maintains eight levels benchmarked to a regional framework: the AQR. Certificates are at Levels 1 to 3, Diploma at Level 4, Advanced Diploma at Level 5, Bachelor's Degree at Level 6, Masters' Degree at Level 7, and Doctoral Degree at Level 8 (MQA, 2017:30). Levels 1 to 5 are specifically meant for TVET. Furthermore, the levels in the MQF are differentiated by learning outcomes, credit hours, and student learning time, and are described according to the expected students' capabilities in the following aspects: depth, complexity, and comprehension of knowledge; application of knowledge and skills; scope of communication/interpersonal skills, information and technologies skills and numeracy skills; degree of autonomy and responsibility; breadth and sophistication of practices; and scope and complexity of application (MQA, 2017:18). In the revised MQF, learning outcomes are redesigned to give clarity in differentiating the demands of learning by each qualification level and also by professional context and situation. There are now five clustered domains: knowledge and understanding; practical/work skills; interpersonal/communication, ICT and numeracy skills/entrepreneurial skills; leadership, autonomy and responsibility; personal skills and ethical skills (MQA, 2017:18).

The core structure and basic elements of the NQF in Serbia are regulated by the Law on the NQF in the Republic of Serbia (2018). Qualification is defined as «a formal recognition of acquired competences». The core elements of the NQF are its levels, described in categories of knowledge, skills, abilities and attitudes, and types of qualifications. Qualifications in the NQF are classified into eight levels and four sub-levels (6/1 and 6/2, 7/1 and 7/2), while four major types of qualifications are recognised: general-basic education and upper-secondary education (levels 1, 4); vocational education and adult education (levels 2, 3, 4, 5); academic-higher education (levels 6, 7, 8); vocational-higher education (levels 6, 7). Furthermore, the NQF features learning outcomes, which are defined as «clear statements about what an individual is expected to know, understand, and be able to demonstrate, or perform after the completion of the learning process» (MQA, 2017:1). Learning outcomes are used to evaluate competences and place qualifications at different levels.

4.3 Relationship between NQFs and RPL

The first two levels of Ghana's NQF are titled 'Proficiency I' and 'Proficiency II' and are both presented with the status 'Informal/Non-Formal', suggesting that they were devised to capture and recognise informal and non-formal TVET learning. In practice, the first two levels target informal apprenticeships in particular, with an estimated

82 per cent of Ghana's economic activity and 80 per cent of basic skills in the country located in the informal sector (UIL, ETF, & CEDEFOP 2017:226). These two levels help to shine a light on a huge area in need of attention in Ghana. In the *Global Inventory of Regional and National Qualifications Frameworks*, Ghana's NQF is referred to as a case in which there is RPL (UIL, ETF, & CEDEFOP, 2015:29); in the context of UNESCO's promotion of LLL and, with it, the extension of RPL practices for non-formal and informal learning, Ghana's TVET NQF is a 'good practice' example. It promotes «access to lifelong learning for all, especially those working in the informal economy» (UIL, ETF, & CEDEFOP, 2017:224) and facilitates the «validation of informal and non-formal learning» as a 'key component of Ghana's lifelong learning strategy» (UIL, ETF, & CEDEFOP, 2017:225). At the regional level, the TVET NQF was identified as accommodating non-formal and informal learning «to address progression pathways for the TVET learners» (Steenekamp & Singh, 2012:35).

Informal apprenticeships are still, in most cases, disparate programmes implemented by an indeterminate number of providers in the private sector. To understand how the TVET NQF can recognise informal learning of apprenticeships, it is necessary to assess the qualifications available to learners who participate in informal apprenticeships. One option is the National Vocational Training Institute (NVTI) proficiency examination, which does indeed feature a competency-based model by assessing skills through both oral and practical tests, thus providing informal apprentices (including those who are illiterate) with the opportunity to acquire a nationally recognised certificate (Palmer, 2009:70). Still, most informal apprentices do not take the NVTI proficiency examination, with possible barriers including cost, perceptions of the qualification's usefulness, and a lack of awareness that it even exists (Palmer, 2009:71). The NVTI examinations available to informal apprentices, referred to by the institute as 'Trade Tests/Proficiency Tests', are available for more than 80 different areas of skills and result in the 'Proficiency I' grade, which can then advance to 'Proficiency II' (NVTI, 2019). These qualifications correlate with the first two levels of Ghana's TVET NQF, meaning that, if an apprentice works in one of the skilled areas covered by the NVTI trade/proficiency tests, opts to take a test and is successful, their learning is recognised; however, apprentices may not commit to an examination for various reasons, and so the challenge is how the TVET NQF might apply to these individuals and their learning. Another significant issue for analysis is the capacity of the TVET NQF to RPL of informal apprentices who received a trade-association certificate, or a certificate provided by an apprenticeship manager. The challenges posed by such a diversity of certification methods are sig-

nificant in the region of West Africa, to which Ghana belongs. This was acknowledged in a recent UIL (2018:24) publication on RPL: «The informal sector represents between 80 per cent and 95 per cent of all jobs in West African economies. Education and training systems are very fragmented, adding to the difficulty of engaging people through credentialism». Accreditation and certification are problematic in a sector as fragmented as Ghana's informal apprenticeships.

The Malaysian NQF is particularly designed for individuals and social groups who have missed formal educational opportunities when they were younger. It provides flexible pathways for all learners in a more systematic way by linking qualifications from three different sectors. Additionally, the NQF supports credit accounts and credit transfers that allow learners to progress both vertically and horizontally, with their prior learning recognised whether acquired formally, non-formally, or informally (CEDEFOP, 2017:340).

The Blueprint on Enculturation of Lifelong Learning for Malaysia (2011–2020) emphasised that Malaysia was committed to enculturating LLL as an important agenda for the education sector (Fadzil, 2014: 370; Ministry of Education Malaysia, 2015). The MQF promotes LLL in Malaysia as it provides pathways that enable the individual to progress through credit transfers and RPL across the skills, vocational and technical (TVET), and academic sectors. In 2011, the MQA introduced RPL: a systematic procedure that includes the identification, documentation, and assessment of prior experiential learning to decide the extent to which an individual has achieved the learning outcomes necessary to access a programme of study and receive credits (MQA, 2016: 1). RPL provides an opportunity for individuals with working experience but lacking formal academic qualifications to pursue their studies in higher education institutions (HEIs). Generally, learning acquired through formal training and work experience will be evaluated in the assessment of RPL. Currently, RPL in Malaysia is accepted as an entry requirement to HEIs for Level 3 (Certificate), Level 4 (Diploma), Level 6 (Bachelor's Degree), and Level 7 (Master's Degree) (MQA, 2017:38).

The assessment for credit transfer is carried out by learners who choose to undertake either a challenge test or portfolio submission, depending on the nature of the course and the advice given by the appointed RPL advisor. A challenge test can be in the form of a written test, oral examination, or performance assessment. Meanwhile, a portfolio is a formal document containing a compilation of evidence listing the learner's prior learning over a period of time. Assessors must evaluate whether the content and evidence written in the portfolio shows the achievement of learning outcomes. Learners must achieve 50 per cent of each course's learning outcomes in the challenge test or portfolio assessment (MQA, 2016:8).

RPL is still a novelty in Serbia. It remains in its establishment phase and is seen as an activity of adult education. RPL is conceptualised as ‘assessing the knowledge, skills and abilities acquired through education, life or work experience’ (Law on National Qualification Framework in the Republic of Serbia, 2018:1) with the aim of enabling further learning and increasing competitiveness in the labour market. Furthermore, RPL in Serbia is presented in accordance with European recommendations. By RPL, vocational qualifications are acquired at Publicly Recognized Organizers of Adult Education Activities (PROAEA) through a special procedure in which (in accordance with the standard of qualification) knowledge, skills, and attitudes gained based on work or life experience are being assessed, and after which an appropriate public document or certificate is issued in accordance with the Law on adult education (Law on National Qualification Framework in the Republic of Serbia, 2018:6). Although the Law states that the qualifications can be acquired through RPL at PROAEA, in practice, these activities are still at the beginning, and at the moment, policymakers work on the regulations and rulebooks of the RPL and its connection with NQF, which will further define all procedures.

5. Comparison and interpretation

Looking across the three country cases of Ghana, Malaysia, and Serbia, a number of similarities and differences emerge. This section will highlight examples of both, but given the paper’s theoretical framework, similarities will receive more attention: identifying those aspects that three different countries on three different continents have in common will reveal some trends in global NQF development.

Mirroring the policy discourses of international organisations such as UNESCO and the EU, in all three contexts the NQF is conceived as an instrument for the promotion of LLL. In Ghana and Malaysia, commitment to RPL strengthens this correlation. Ghana’s NQF facilitates RPL as a ‘key component of Ghana’s LLL strategy’ (UIL, ETF, & CE-DEFOP, 2017:225) and, similarly, the MQF categorical support for RPL is presented in the context of LLL. In Serbia, the NQF is also regarded as a means to advance LLL, though the contribution of RPL is not signalled quite so explicitly.

In terms of purposes and objectives, the NQFs in all three countries attempt in some way to connect education with the world of work, though in Ghana there is a particularly explicit focus on occupational qualifications, whereas Malaysia concentrates on higher education. In both cases, a narrower scope is attributable to a non-comprehensive NQF model, which targets individual sub-sectors; Serbia’s NQF, on the other hand, is comprehensive and covers the whole education system.

Furthermore, all three countries are similar in that they recognise the role of NQFs in promoting LLL opportunities. Objectives differ, yet all three expect their NQFs to lead to some improvement in ‘quality’. Indeed, an NQF’s purposes and objectives indicate its type and, with stated aims of improvement, all three go beyond the communications framework towards more reforming framework model in line with Raffe’s (2013) NQFs typology. Malaysia’s NQF sits somewhere between the *communications* and *reforming* models, as it aims to provide accessible information on existing higher education qualifications (communication) while improving the system for learners to accumulate and transfer credits (reform). Serbia’s NQF aligns more with the *reforming* model by seeking to prompt positive system-wide developments in terms of standards, learning outcomes, and curricula. Ghana goes slightly further by at least in part positioning its NQF as a means of extending qualification control into the informal economy; the framework thus moves towards the *transformational* model.

With the evidence provided, it is possible to conclude that, in all three countries, NQF development has been influenced by the policies of international organisations. On a global level, Ghana, Malaysia, and Serbia are all members of UNESCO. On a national, more country-specific level, Ghana is in the Association for the Development of Education in Africa (ADEA), Malaysia is a member of the ASEAN, and Serbia is actively seeking to join the EU. As has been argued, the way in which the first two levels of Ghana’s NQF explicitly target non-formal and informal learning reflects UNESCO’s well-established discourse on RPL. The influence of international organisations is even more discernible in the cases of Malaysia and Serbia. Both ASEAN and the EU have produced regional reference frameworks to aid learner and worker mobility – the AQRF and the EQF, respectively – and Malaysia and Serbia have deliberately sought to correlate their own NQFs and these regional policies. As explained at the start of the theoretical framework, a number of international organisations have advocated for the development of NQFs; such advocacy has had an impact on all three countries this research is focusing on.

Moving from the purposes and influences that shape the three NQFs to their structures, an obvious similarity is that they all have eight levels, ranging from basic to advanced qualifications. As is the norm, the NQFs also feature level descriptors, and ‘knowledge’ is a descriptor found across all three. Regarding the remaining descriptors, Ghana and Serbia take a similar approach by covering ‘skills’ and ‘attitude(s)’ (with ‘ability’ a fourth category for Serbia). Malaysia instead refers to ‘capabilities’ and/or ‘competencies’ alongside knowledge. In all three countries, learning outcomes are specified according to level descriptor and qualification level. In Ghana’s, Malaysia’s, and Serbia’s NQFs, knowledge includes acquisition as well as application, while skills range from the more technical

(e.g. using tools, machinery, and other technology) to the more abstract (e.g. decision-making, autonomy, and responsibility).

In recommending that countries develop NQFs, international organisations have often noted how this policy tool can facilitate RPL. UNESCO, for example, has made this point by encouraging the integration of non-formal and informal learning outcomes into NQFs. Accordingly, the NQFs developed by Ghana, Malaysia, and Serbia all, to varying extents, support RPL. In Ghana's case, the first two levels are dedicated to non-formal/informal learning, and Serbia's NQF was designed to accommodate RPL at some qualification levels. Malaysia's NQF, meanwhile, links to the country's RPL system, and the credit system it seeks to reform is designed to enable learners to transfer vertically and horizontally between formal, non-formal, and informal learning opportunities. There is some dissimilarity when it comes to why: Ghana and Serbia promote RPL for the acquisition of vocational qualifications, whereas Malaysia focuses on RPL to widen access to higher education. However, in conclusion, all three countries' attempts to use NQFs to support RPL and create pathways between learning modalities are symptomatic of a LLL policy discourse. The more problematic step is not just making it work in theory but also in practice, as success depends on widespread collaboration.

6. Lessons learned

In conclusion, we would like to point out some lessons learned. Firstly, we found strong evidence that NQFs in Ghana, Malaysia, and Serbia were developed under the influence and recommendations of international organisations through the process of cross-national policy borrowing, largely because of the socio-economic pressures of globalisation faced by developing countries (Raffe, 2013). Secondly, in policy terms, we found evidence that all three NQFs are designed, to varying extents, with the aim of promoting and realising LLL, as well as to support RPL. However, it must be noted that, with the aims of enhancing national competitiveness, human capital, mobility, and access to regional markets, NQFs reinforce a vocational, utilitarian, and instrumental perspective of LLL and RPL (Andersson, Fejes & Sandberg, 2013), as well as adult education. Thirdly, our findings are limited; all three NQFs were developed quite recently, meaning that their long-term impact remains to be seen and, from a policy perspective alone, we cannot make conclusions about the real impacts of NQFs on LLL and RPL in practice. Therefore, different economic, social, and institutional settings in which NQFs are embedded (Allais, 2017), as well as learners' experiences of NQFs, should form foci of future comparative research.

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