Theory-to-Practice

Hong Kong Qualifications Framework: A Catalyst to Lifelong Learning?

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Abstract

In response to the fierce competition resulting from globalization and the knowledge-based economy, the Hong Kong government launched massive education reform in 2000 as the central strategy to improve manpower quality. The ultimate goal of this reform was to facilitate lifelong learning for all. This education reform set a foundation for the establishment of its companion structure, Qualifications Framework (QF), which was launched on May 5, 2008. The QF is expected to be a catalyst for lifelong learning through its two mechanisms: Recognition of Prior Learning (RPL) and training programs based on Specification of Competency Standards (SCS). The purposes of this paper are 1) to examine the viability of the QF as a catalyst for lifelong learning and 2) to examine the current policies governing the RPL mechanism and SCS-based programs of the QF. Issues arising from the current policies and implications on policies and practices of the quality branding of QFs are central to the analyses and discussions.

Introduction

In the last two decades, the globalization of a knowledge-based economy has increased demand for up-to-date knowledge and competence which are fundamental to the maintenance of quality manpower. To fill the gap between the need for and access to new knowledge in the workplace, governments of various nations seek to maximize their human resources through increasing training opportunities for all. To achieve this, structures that provide frameworks for qualifications and learning pathways have been established in a number of countries. At present, approximately 20 nations have developed and adopted some

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kind of framework either to organize their vocational sector, their academic sector, or both. These frameworks typically aim at offering a unified system for standards and recognition of qualifications and, in turn, pathways for continuing education. Nations that have primarily adopted vocational qualifications frameworks include Malaysia (International Labor Organization, 2008), El Salvador, Finland, Jamaica, Mexico, Singapore, and Uruguay. Four nations, namely the United Kingdom (Qualifications and Curriculum Authority, 2006), Australia (Australian Qualifications Framework, 2008a), New Zealand (New Zealand Qualifications Framework, 2006), and South Africa (South African Qualifications Authority, 2007) have developed comprehensive qualifications frameworks embracing both vocational and academic sectors.

To improve manpower quality to face the challenges arising from the knowledge-based economy, the Hong Kong government launched in 2000 massive education reform as the central strategy to eventually overhaul the entire system from early childhood to university education through the promotion of lifelong learning. Reforms demand flexible curriculum design and student assessment mechanisms at all levels of education, the shortening of basic education from 13 years to 12 years with only one public examination at the end, the establishment of community colleges to offer another learning opportunity for those who hope for eventual university placements, the extension of university programs from 3 years to 4 years, the diversification of admission requirements to widen higher education participation, the implementation of a flexible higher education system through the "multiple entry and multiple exit" principle, the development of a unified credit transfer and accumulation system, and the development of the continuing education sector.

To develop the continuing education sector as the prime catalyst to promote lifelong learning, the Education Commission (2000) proposed the establishment of a comprehensive Qualifications Framework (QF), covering both vocational and academic sectors. The reform proposal also identified a few issues at that stage: (a) if and how continuing education should be regulated; (b) how to assist the elderly, those who have suspended their studies at Secondary 3 level or below, new immigrants, and those with special educational needs to pursue continuing learning; and (c) how to encourage working people to pursue further studies to enhance their knowledge and abilities. The Education Commission (2000) proposed two major governmental responsibilities for the establishment of the QF and addressing the above issues. First, the government should coordinate the efforts of all interested parties (e.g. providers of continu-

ing education, accreditation authorities, professional bodies, employers, etc.) to develop continuing education, encourage continuing learning by offering incentives, and facilitate opportunities for the under-privileged (e.g. learners with a low education level and financial difficulties) in pursuit of further learning. Second, the government should provide assistance to those learners without the financial means or abilities to pursue lifelong learning and find employment, including those who have become unemployable due to economic restructuring, to enhance their learning abilities and employability.

This backdrop played an important role in shaping the government's initial vision of the QF. The government envisioned that the vocational qualifications would be within QF Levels 1-4 while the academic qualifications would be within QF Levels 4-7 with the equivalence of a doctoral degree at Level 7. The QF was intended to serve as a bridge between the vocational and academic sector to enable qualification transfers and to recognize the qualifications attained through different channels and modes of study. Therefore, the government, in its initial effort of setting up the QF, concentrated on helping workers with little formal training to have educational opportunities through two mechanisms: Recognition of Prior Learning (RPL) and training programs with contents that were based on Specification of Competency Standards (SCS) for various industries. It was hoped that the mechanisms would provide pathways to improve employability and strengthen competitiveness, enhance flexibility in ever changing job environments, and offer choices for further learning.

The purposes of this paper are to examine the current policies governing the QF mechanisms and the viability of the QF as a catalyst to lifelong learning based on these policies. To this end, the paper will (a) use the policy-making framework devised by Cheng and Cheung (1995) and practiced by the Hong Kong government as the basis to illustrate and explain observations of the policy-making process; (b) further verify the process with reference to the current policies governing the RPL mechanism and SCS-based programs under the QF; and (c) discuss implications of the QF as a catalyst for lifelong learning.

Theoretical Framework for Analysis of Hong Kong Education Policy Making

One of the broadly-used theoretical paradigms in the analysis of public policy-making is legitimacy which is considered a matter of "cred-

ibility and acceptability on the part of the modern state in its relationship to its society and its citizens" (Weiler, 1985, p. 185). Stated simply, legitimacy is concerned with the justification of government authority before the public. To maintain its authority, a government seeks to secure legitimacy. Neither the colonial nor the post-colonial Hong Kong government has the necessary legitimacy typically provided by a universal election (Cheng, 1987) and they must therefore legitimize themselves in the course of policy-making.

The governmental process of securing legitimacy involves powerful players including relevant interest groups. These interest groups are generally perceived as having a right to be consulted on policy matters affecting the constituents they represent (Kogan, 1975; Truman, 1995). A legitimized interest group is one which is accepted by the government as part of the decision-making system (Yeung, 1994). These political actors seek to secure their legitimacy by maintaining their participation and influence in policy-making. In the process of achieving legitimacy, there are two levels of exchange between the government and interest groups (Yeung, 1994). The first level is simply the exchange of information and support. The second level pertains to the ultimate goal of exchange: interest groups legitimize both the government and its policies and are reciprocally legitimized by being recognized by the government in the policy-making process.

In addition to interest groups, governments often involve some individuals who have good knowledge of all aspects of the issue in question. The participation of these individuals in policy-making means the utilization of technical, objective and scientific methods and techniques (Cheng, 1992). However, full legitimacy is not attained until consultation, a typical form of citizen participation in policy-making in Hong Kong, is completed (Yeung, 1994). Expertise and consultation are indispensable in Hong Kong's policy-making process (Cheng, 1992). The injection of these two elements into the policy-making process is expected to convince the public that the resulting policy is made in good faith, capable of tackling relevant issues, and considerate of public views. Consequently, the government's legitimacy is secured. Expertise and consultation are normally employed via the establishment of advisory and/or consultative committees which are expected to be a kind of public representation. In addition to committees, the government also conducts public consultation, generally for a period of 3-9 months. All views and factors are taken into consideration to finalize the policies.

Based on legitimacy theory, Cheng and Cheung (1995) devised a framework to analyze the making of education policies in Hong Kong. This framework analyzes four aspects of the policy formulation process: the characteristics of the policy-makers, the decision-making process, the perspectives and technology employed, and the quality of the finalized policy specifically for the education field. First, education policy-makers are characterized as legitimizing their policies through the representation of interest groups and individuals with relevant expertise. Second, the decision-making process is characterized as one of consultation, participation, and consensus-building among various interest groups. Third is a process of economic analysis (resources allocation, estimate of supply and demand, economic outcomes, and cost benefit analysis) and rationality building (research, experiment, pilot study, etc.). Lastly, the overall quality of the resulting education policy includes suitability (scope, use of resources, and benefits), feasibility (feasible within known constraints, meeting essential requirements), and acceptability (accepted by majority of interest groups). This study has utilized this framework to analyze the policy-making process and explain consequent decisions.

Policy-Making Process and Current
Policies of the QF Mechanisms

The four aspects of the selected framework are easily identified throughout the birth of the QF. In 2009, the government first presented a proposal for consultation on the establishment of the QF and its associated quality assurance mechanism to both the Legislative Council Manpower Panel and the public. (Education Bureau, 2007a). Upon conclusion of the 3-month consultation, the government proceeded to involve crucial players and partners such as employers' associations, trade unions, professional bodies, the Hong Kong Council for Academic Accreditation (HKCAA), and sub-degree education/training providers through a pilot study during which these players were given seminars to understand the government's proposal and the structure of the QF. Every stage of development witnessed interest group and public consultation. A pilot study or scheme was conducted for the development of each mechanism. For example, the HKCAA was commissioned to conduct a pilot accreditation exercise of the first assessment agency for RPL assessment and SCS-based courses. Overseas consultants from the United Kingdom and Australia were employed to write up concept papers and guidelines throughout the process. The elements of the policy-making process, as

identified by Cheng and Cheung (1995), such as interest groups, consultation, and rationality-building, are obvious.

Upon the endorsement of the Executive Council for the establishment of the QF and its associated quality assurance mechanism, in 2004 (Education Bureau, 2007a), the government began the prolonged process of finalizing policies to govern the two QF mechanisms that serve as key partners in the education reform, attempting to achieve the goal of lifelong learning outside the school system and to address issues the Education Commission (2000) identified earlier. To ensure the legitimacy of the policies of the RPL mechanism and SCS-based programs, the government first established an Industry Training Advisory Committee (ITAC) for each participating industry. Membership for each ITAC is comprised of trade and labor union representatives, employers, employees, industry organization representatives, industry educators, and professional organization representatives where appropriate. The members of the ITACs are officially charged with the responsibilities of (a) developing, maintaining, and updating SCSs for their respective industries with the assistance of commissioned professional writers; (b) determining the QF level for each unit of competency; and (c) formulating the RPL mechanism (Education Bureau, 2007b).

Members of the ITACs are appointed on a personal basis to encourage exchange of their expertise and experience and to avoid acting in the interests of the organizations they represented (Education Bureau, 2007b). Notwithstanding this official position, the government had no doubt that ITAC members would stand for their constituents' interests. Throughout their participation in various ITACs, labor union representatives even affirmed their need to fulfill such roles. Because of their voting power in the bill passage to establish the QF, addressing their concerns was non-negotiable. Quite differently from other stakeholders, labor union representatives perceived the RPL as a mechanism to facilitate workers' job security, wage level, and employment opportunities, not further learning. Such an attitude has largely resulted from the typical long-hour workdays with relatively low wages, leaving workers exhausted with little time and resources for further training or education. The government's original idea of assessing all skills by appointed assessment agencies prior to recognition was simply not acceptable to them. They demanded that workers be given recognition of their skills with or without proof of work experience in an industry. The policies resulting from the interplays among the stakeholders deviate significantly from the original proposal.

Current Policies Governing the RPL Mechanism

Because of the government's original intent to confine all vocational skills within QF Levels 1-4, ITAC members and the professional writers from industry participating in the early stage of developing sets of SCS to support the establishment of the QF placed all skills within those four levels, which became the center of negotiations on policies governing the RPL mechanism. The tug of war between the government, employers, and the representatives of various labor unions persisted until the 5-year transitional arrangement for each participating industry was reached. While this compromise did not fully satisfy the employers or the labor unions, all stakeholders reluctantly accepted. The transitional period is defined as the first five years after the first authorized assessment agency has started the operation of the RPL mechanism for an industry. Workers may obtain skill recognition through the RPL mechanism solely based on their work experience up to QF Level 3 during this grace period. The years of working experience are defined as the cumulative total number of years. The minimum years of working experience in an industry required for recognition of QF qualifications from Levels 1 to 4 are 1 year, 3 years, 5 years and 6 years respectively. The time requirements for experiences relevant to particular competencies are determined by respective ITACs. While employer verifications of such experiences are normally required, other supporting evidence (e.g. tax demand notes, payroll slips, and/or endorsements of labor unions) may be submitted if the applicant is unable to provide employment evidence. The RPL mechanism has become the de facto mechanism for recognition of work experiences alone, verifiable or not. This temporary peace offering is still under negotiations with labor unions wanting it to become permanent while employers fight to confine it to 5 years with no extension.

Current Policies Governing SCS-Based Programs.

The SCS-based programs refer to educational or training courses or programs that adopt the Specification of Competency Standards (SCS) approved by the respective ITACs as the main basis for curriculum design (Education Bureau, 2008). There has been a great deal of criticism from training providers of the tremendous difficulty of designing SCS-based programs, reflecting a total lack of understanding of curriculum design on the part of policymakers. The criticisms and prolonged consultations caused severe delay in finalizing these policies. It became urgent to finalize such policies when the QF was officially launched on May 5, 2008. Eventually, the government hurriedly published the policies despite the

fact that two major issues under severe criticism are not yet resolved: (a) while one QF credit is determined to be equal to 10 notional learning hours, there is still no policy on how self-learning, workplace experience, and so on are calculated into notional learning hours; and (b) there is no policy on how to calculate SCS-based content within a course to meet the requirement of 60% of total credits to be at the exit level so that the QF level of a course or program can be determined. In addition, the policies stipulate that only certificates and diplomas are used for qualification titles of all levels (Education Bureau, 2008). One issue arising from this is that academic qualification titles such as degrees of undergraduate and graduate levels are not included. However, some of the participating industries, such as Information and Communication Technology, are already part of the higher education system offering terminal qualifications at the doctoral level. Solutions that would avoid having two parallel qualifications frameworks have yet to be sorted out.

Added to these policy issues, the government has also violated its own policy of requiring accreditation status by recognizing a number of courses as SCS-based even though they are not accredited. This action, in and of itself, jeopardizes confidence in the rhetoric of making the QF a quality assurance tool for qualifications.

The government, however, did not lose the entire battle. Their insistence in using "economic analysis" (Cheng and Cheung, 1995) to tie to further learning through incentives paid off. At present, RPL assessment fees, which have been significantly lowered by only requiring employment proof or endorsement of work experiences by labor unions, can be reimbursed but workers must have completed at least one QF-recognized course before any reimbursement is possible. This policy is certainly disappointing to labor unions but the government did not backpedal. To encourage training operators to have their study programs accredited by the QF, the government will reimburse 100% of the accreditation fee charged by the government-authorized accreditation agency for initial evaluation of the operators' capability to run programs, 75% for SCS-based programs, and 50% for non-SCS-based programs with a maximum amount of HK$2,000,000 per operator. Because there is a fee to upload the accredited programs onto the Qualifications Register, the government also pays 50% of registration and hosting fees. These incentives should provide a degree of motivation for training operators to go through the accreditation process and upload their programs onto the Qualifications Register.

A Catalyst to Lifelong Learning?

The Organization for Economic Cooperation and Development (OECD) (2007) identifies 20 mechanisms/tools that can potentially support lifelong learning. Qualifications frameworks, recognizing non-formal and informal learning, expressing qualifications as learning outcomes, and optimizing quality assurance are among the most important mechanisms. In an attempt to move from rhetoric to reality in providing lifelong learning opportunities for all, the Hong Kong government has established the QF (Werquin, 2007) and built the above mentioned mechanisms. Together, they are meant to serve as a catalyst for lifelong learning.

At the outset, the government intended for the QF's quality to align with other countries. Recognized skills and competencies through the RPL mechanism were meant to be carefully assessed, providing employers confidence when making hiring decisions. It appeared that the government overestimated workers' desires, at least as presented by labor union representatives, to further education and underestimated their insistence of using the QF for job security and wage levels. In the process of negotiations, the government also lacked foresight to anticipate employers' strong opposition to the use of potentially unverified work experience rather than assessed skills and competencies. The resulting 5-year transitional arrangement to present a compromise and appease all parties has great potential to jeopardize long-term confidence in the QF. Moreover, the government's concession to training operators' complaints over the accreditation fee has resulted in the setting of maximum accreditation fees that the authorized accreditation agency can charge, and the demand for simplified accreditation procedures and lower standards to gain accreditation status. The detrimental effects of all these policies and actions are inescapable. Employers are certain to have serious doubts about potential employees' competencies recognized by the QF, knowing that no assessment has been done to ascertain those skills. Once confidence in the quality of QF competencies is recognized, branding the QF as a quality trademark will be an uphill battle.

In sum, after intense negotiations with labor unions, employers, and industry activists during the policy-making process, the significant shift from the original intention of one framework for all is apparent. The current policies may turn the RPL mechanism into a rubber-stamping process and create two parallel 7-level qualification ladders, one for vocational and another for academic qualifications. Together with minimized

quality assurance mechanisms, the QF is likely to face a tough challenge to fulfill its role as a catalyst for lifelong learning.

Lessons and Implications from
the Hong Kong Experience

Countries have been trying for some time to reform their qualifications systems to make lifelong learning possible. To date, qualifications frameworks have been both criticized (Blackmur, 2004) and praised (Coles, 2007; Gunning, 2000; National Qualifications Authority of Ireland, 2003). Nevertheless, qualifications frameworks are still frequently regarded as essential tools for quality assurance by allowing a close monitoring of all qualifications and by providing a basis for comparison due to their transparency (South African Qualifications Framework, 2007; Werquin, 2007). The QFs are to bring trust and confidence in qualifications for all users.

Adapting the Australian model after examining various models around the world, the Hong Kong government included mechanisms that were effective in Australia and widely recognized as tools to translate policies into practice (Organization for Economic Cooperation and Development, 2003; Organization for Economic Cooperation and Development, 2007). Yet, the prevailing low confidence in the Hong Kong QF as a consequence of the lack of quality monitoring of its mechanisms is testimony to the significance of protecting the branding of QFs if governments want their QFs to serve the intended purpose. While it is undeniable that public and education policies are political in nature, sacrificing quality to launch a mechanism that does not benefit the long-term development needs of industries and education only results in a waste of resources.

The Hong Kong QF departs from the Australian Qualifications Framework (AQF) in some essential features that may shed light on using the QF to promote lifelong learning. First, the Australian government has included nationally accredited vocational training as part of the vocational education and training (VET) in school programs in senior secondary education. Second, a credit transfer system to facilitate the recognition of credits earned through the RPL mechanism, vocational education, and academic programs is in operation. The higher education and vocational education sectors have joined hands to produce programs to offer an increasing number of dual sector award titles, combining qualifications from both vocational and academic studies. Third, for

those who wish to utilize the RPL mechanism for skills acquired through non-formal and informal learning, their skills and knowledge must be assessed (Australian Qualifications Framework, 2008b). This requirement has not stopped individuals from acquiring credits for further studies. According to the Organization for Economic Cooperation and Development (2003), large numbers of students currently benefit from RPL in Australia. Fourth, the AQF strives to link its qualifications with international communities and professional qualifications. The Australian and Hong Kong scenarios demonstrate the significance of critical features that may determine how successful QFs may be in serving the role of promoting lifelong learning.

Another important lesson from the Hong Kong experience is that governments need to be much better connected with industry employees at the early stage of developing the QF. The Hong Kong government attempted to bridge the learning needs of low-level workers in designing the QF but lacked adequate understanding of their needs and concerns. This gap of understanding has eventually resulted in numerous negotiations with the stakeholders as well as policies and practices that have forfeited the very quality that will bring long-term benefits to all stakeholders. A collaboration among policymakers, training providers, industries, and employers is fundamental to the success of adult and continuing education. Policy-makers must see that qualifications recognized by a trusted framework benefit both the labor market and the lifelong learning system (Werquin, 2007).

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