

What Use a Qualifications Framework? The Impact of Qualifications Frameworks on Innovation for Online Learning in Australia and Malaysia

Stephen Abblitt, Keypath Education, Australia
Siti Mariam Muhammad Abdul Basar, Keypath Education, Malaysia

The Southeast Asian Conference on Education 2023
Official Conference Proceedings

Abstract

National qualifications frameworks (NQFs) have grown rapidly since the first generation of frameworks were established in the mid-1990s. They are designed for several purposes and uses, and are located amongst a set of other policy, socio-economic, and socio-material contexts, enmeshed in existing ideologies, systems, and practices, which shape what they can and cannot do. But what practical impact, if any, do such frameworks have on student learning? Drawing on recent work designing fully online postgraduate programs with several public and private universities in Australia and Malaysia, this paper explores the impact of their respective NQFs on innovation for online learning. We suggest that these frameworks are useful, and sometimes effective, to establish transparent standards, assure educational quality, and better align higher education to labour market and social needs. But they can also hinder innovation. This is exacerbated in the case of online learning, where new delivery models are disrupting the status quo and regulators are challenged to keep pace with best practices and innovations in both pedagogy and technology. This paper critically reflects on these challenges, exploring how the different characteristics and components of NQFs impact on student learning, and the online learning experience, in both positive and negative, and intended but also unexpected, ways.

Keywords: Australian Qualifications Framework (AQF), Higher Education, Impact, Innovation, Malaysian Qualifications Framework (MQF), National Qualifications Frameworks (NQFs), Online Learning, Quality

iafor

The International Academic Forum
www.iafor.org

Introduction

The quality of its higher education sector—and the qualifications it awards—is central to a nation's social and economic progress. With the rise of neoliberal ideologies and policies globally over the past four decades, alongside a burgeoning managerialism in higher education institutions, we have experienced an intensifying emphasis on issues and practices of quality assurance and enhancement in higher education, alongside demands for increased efficiency and decreased costs. However, quality is an elusive concept; it is instinctively understood yet difficult to articulate.

Discourses, policies, and practices focused on quality unfold against the backdrop of three defining trends in contemporary higher education: globalisation, massification, and marketisation (Komljenovic & Robertson, 2016; Lewis & Shore, 2019; Marginson, 2013; Robertson & Komljenovic, 2016; Tight, 2019). Marketisation has had an undeniable effect (Marginson, 2013) as many nations face either difficulties or a disinclination to finance the expanding enrolments that come with massification in 'high participation' systems (Marginson, 2016). Universities have turned to online learning as a panacea for issues of increased access, efficiency and scale, often looking to the private sector for support. This has led to the massive growth of public-private partnerships that enable universities to deliver quality online learning efficiently and at scale (Holon IQ, 2021; Morris et al., 2020), causing an incipient unbundling of higher education (Czerniewicz, 2018; McCowan 2017; Lewis & Shore, 2019; Swinnerton et al., 2020). 'Quality' thus becomes an increasingly complex phenomenon in higher education. Here, we conceptualise quality as a set of relational effects engendered between numerous stakeholders within and beyond the traditional boundaries of the university. It is characterised by a continuous re/negotiation and re/iteration of what quality actually *is* (particularly in online learning), who is responsible for defining, implementing, assuring, or enhancing quality, and how best it can be achieved.

National qualifications frameworks (NQFs) are one consequence of this hegemonic neoliberalism and managerialism and are inescapably implicated in these interrelated trends of globalisation, massification, and marketisation. They have grown rapidly since the first generation of frameworks were established in the mid-1990s. They are designed for several purposes and uses, and are located amongst a set of other policy, socio-economic and socio-material contexts, enmeshed in existing ideologies, systems, and practices, which shape what they can and cannot do, and how they are interpreted and used by institutions, faculty, learning designers, and other stakeholders. Drawing on our recent shared experience designing fully online postgraduate programs with several public and private universities across Australia and Malaysia, this paper explores the impact of their respective NQFs on innovation for online learning, as well as the broader discourses and practices of quality assurance and enhancement they engender.

What is the impact of the development and use of these frameworks? And how do they help or hinder innovation, especially for online learning? To begin, we provide some background on the development of NQFs globally and the AQF and MQF specifically. We then analyse the implementation and use of these frameworks in relation to issues of impact and innovation, particularly in the context of the growth of online learning and educational partnerships. To conclude, we offer some thoughts on the future of NQFs as they try to adapt to the changing nature of the higher education sector globally.

Background

A qualifications framework is a policy instrument designed to guide the development, classification, and recognition of the skills, knowledge, and competencies, along a continuum of agreed levels, required to award a qualification. In vocational and higher education, national qualifications frameworks (NQFs) have been expanding and evolving rapidly since the first frameworks were established in the mid-1990s in Scotland, England, Australia, New Zealand, and South Africa. NQFs may be comprehensive or partial in scope, more or less prescriptive, stronger or weaker in their implementation and enforcement, and some may have a legal basis whereas others may represent a more voluntary consensus view of the stakeholders involved. They share many common characteristics and components, but there is also considerable variety in terms of guiding principles, purposes, and implementation.

NQFs generally aim to standardise and create parity of qualifications across institutions, and the role of the regulating body is then to hold institutions accountable for implementing and assuring these standards. They intend to provide transparency of standards, improve access and accessibility, and should communicate meaningful information to institutions, employers, students, and the public about what these standards are and how to achieve them. Relatedly, they ensure portability of credit and qualifications across institutions; this is increasingly critical in a globalised world, where transferability between national jurisdictions is increasingly necessary and common. They also support workforce mobility, and generally ensure qualifications meet the needs of both graduates and employers, as well as servicing a nation's broader social and economic needs—however those are defined by policymakers, governments, industry and professional bodies, and other stakeholders.

But the broader aim is quality assurance and enhancement, and perhaps above all else risk management: minimising risk to students, to providers, and to the reputation of the higher education sector itself (Baird 2013; Edwards, 2011; Huber, 2009). But we argue that higher education is inherently 'risky'—and should be. The sector has greatly expanded and diversified as it adapts to these trends of globalisation, massification, and marketisation, as well as wider societal and technological changes, and must continue to do so. Institutions have had to innovate to survive, although the common risk-based regulatory approach often leaves us with lagging standards based on normative consensus views of minimum good practice. The question then is how we keep up, not fall behind, due to the inherently conservative nature of NQFs and the risk-averse regulatory regimes charged with their implementation, while assuring and enhancing academic quality and student learning.

Remarkably, there seems to be consensus on the broad characteristics and components of NQFs, regardless of national and local contexts, with multiple attempts made to synthesise these and establish taxonomies that might better to enable comparative research (Allais, 2017; Fernie & Pilcher, 2009; Raffe, 2009; Young, 2009). All frameworks comprise a single definition or set of criteria determining what count as a qualification, arranged in a hierarchy and expressed as a set of levels indicating increasing complexity, each with distinct level descriptors. For example, the Australian Qualifications Framework (AQF) has ten levels whereas the Malaysian Qualifications Framework (MQF) has eight, although both cover the same scope from foundational certificates to terminal doctoral degrees. They also all describe qualifications in terms of learning outcomes that are independent of the site, the form of provision, and the curriculum and pedagogy through which they may be achieved. The AQF consists of broad 'characteristics of learning outcomes' for each qualification level, describing the knowledge and skills a person has acquired and is able to demonstrate because

of learning, and these are applicable across all fields of study. On the other hand, the MQF provides a set of five clusters of learning outcomes which can be tailored specifically to the programme, covering: 1) knowledge and understanding; ii) cognitive skills; iii) functional work skills; iv) personal and entrepreneurial skills; and v) ethics and professionalism. But where the two frameworks diverge is in the level of detail and specificity provided by the MQF's accompanying Programme Standards: for each major discipline area, these standards prescribe bodies of knowledge, programme aims and objectives, and learning outcomes, and provide significant guidance on aspects of assessment methods, curriculum design, and teaching delivery. These types of prescriptive standards do not exist in the Australian context.

Crucially, NQFs define all qualifications in terms of elements (or units) and ascribe a volume in terms of notional learning hours expressed as quantifiable credit. Effectively, a student must achieve a given number of credits to gain a qualification. The MQF is quite clear on this, mandating a direct correspondence between credit points and notional learning hours (i.e., 1 credit point should equal 40 hours of student learning time), as well as prescribing 'graduating credit' for all programme levels. For example, a Master's Degree by Coursework requires 40 credit points, which equates to 1600 hours notional learning time across the programme of study. Programme standards also often mandate a percentage range of credit points be allocated to core, elective, specialisation, and dissertation subjects. But the AQF is a lot less specific, or more flexible. It uses the concept of 'volume of learning', considered as a dimension of the complexity of a qualification used to determine the depth and breadth of the learning outcomes of a qualification. Volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes specified for a particular AQF qualification type, expressed in equivalent full-time study load (EFTSL), which for one academic year equals 1200 hours. However, the volume of learning for a Master's Degree by Coursework varies greatly, between 1200 and 2400 hours, or 1 to 2 full-time academic years, depending on students' prior qualifications. There is also no direct correspondence between credit points and volume of learning, and so our public universities can interpret these requirements in very different ways.

Implementation

Although with varying degrees of strength and prescriptiveness, qualifications frameworks are always underpinned by a regulatory approach, audit procedures, and assessment criteria for accrediting, registering, and reviewing qualifications. They provide some basis for assuring and improving the quality, transparency, and accessibility of qualifications.

The relative autonomy of higher education institutions has been a defining theme of the Australian qualifications system. The first-generation AQF was introduced in 1995, and a revised second edition adopted in 2013; this is currently undergoing review, so a third edition is likely in coming years. Its initial purpose was to provide "a comprehensive, nationally consistent yet flexible framework for all qualifications in post-compulsory education and training" covering both vocational and higher education. The AQF is supported by the Higher Education Standards Framework (Threshold Standards) 2021 used by the regulatory body, the Tertiary Education Quality and Standards Agency (TEQSA), to accredit higher education providers. Although it does not determine the content of the AQF, TEQSA is responsible for assuring its implementation, ensuring all higher education providers and the courses they deliver meet, and continue to meet, the standards described in the HESF and the AQF, registering and re-registering both public and private providers, and accrediting courses where a provider does not have authority to self-accredit.

TEQSA does not have a direct role in accrediting qualifications or in quality assurance for courses offered by public universities in Australia, although it does accredit and maintain a register of courses offered by private providers. In this sense, when it comes to public universities, the AQF is notoriously weak and “essentially an expression of the dominant tradition of sectoral and institutional autonomy in education and training in Australia” (Keating, 2003, 282). Its impact depends mostly on the willingness of powerful providers to use it as a framework to assure and enhance quality and advance educational reforms. Its primary purpose then seems focused on description and communication, making the existing education and training system more transparent and easier to understand, and making the relationships between existing qualifications explicit, but not really driving quality enhancements or innovation to the existing system.

In contrast, the Malaysian Qualifications Agency (MQA) plays an increasingly significant role in driving strategic change in higher education cultures in Malaysia, in both public and private universities (Bajunid, 2011; Keating, 2011), and particularly regarding online and distance learning (ODL) programmes. The MQA published the first edition of the MQF in 2007, with their quality assurance system fully implemented by 2011. They introduced the second edition of the MQF in 2017 to stay current with changing practices in the sector. The MQF is supported by a range of other quality assurance documents issued by MQA, such as Code of Practice, Programme Standards, and Guidelines to Good Practices. Collectively, the aim of this suite of documents and guidelines is to monitor standards and ensure processes for quality assurance are implemented and maintained by institutions. But its purpose also extends beyond quality assurance and risk management to proactive educational reform: it aims to improve the existing system in specific ways, enhancing quality, increasing consistency, and increasing accountability. So, the MQF is quite comprehensive, strong, and tight in its prescriptiveness. As described above, it adopts a strong outcomes-based approach, where outcomes are defined and prescribed separately from institutions, which then design programmes based on the provided outcomes, and must meet specific requirements regarding bodies of knowledge, assessment, curriculum design, and teaching delivery.

In Malaysia, all programmes are accredited by MQA until universities earn self-accrediting status. Institutions with self-accrediting status are no longer required to undertake programme accreditation by MQA, but they can self-accredit their programs through its own internal quality system. However, the historical autonomy of Australian universities persists as institutions lead the process of comparing qualifications and making judgements about courses. TEQSA do conduct audits of public universities, but only when obvious and specific issues arise, and this happens rarely. The AQF is embedded in and interpreted through institutions’ own policies and procedures of academic governance and quality assurance, and for public universities the role of the regulator focuses much more on providing guidance and advice on minimum good practice, for example in areas such as academic integrity, recognition of prior learning, and more.

Impact

The impact of qualifications frameworks on quality is hard to measure, and the evidence is inconclusive (Pilcher, et al. 2017; Raffe, 2013). The supposed impacts have been less than expected, have often taken many years to appear, and have been negative as well as positive. It is not just in the higher education sector that we see only weak evidence that risk-based regulation improves quality assurance.

Like all NQFs, the AQF and MQF are outcome-based, and outcome-based education (OBE) is generally shown to be effective in improving educational attainment. In this sense, the implementation of OBE in both Australia and Malaysia should have improved academic quality. Certainly in Malaysia it has facilitated a rigorous process of ensuring the alignment of curriculum and assessments with the MQF standards. This has prompted many Malaysian institutions to thoroughly re-evaluate their programmes, ensuring compliance with the three main aspects of OBE: a focus on learning outcomes; the alignment of outcomes with curriculum, instruction, and assessment; and appropriate learning experiences for students' success (Kaliannan & Chandran, 2012). Through its detailed specification of level descriptors and the five clusters of learning outcomes, and the accompanying Programme Standard, the MQF has driven enhancements to the quality of programmes across the board, facilitating (in theory, at least) the large-scale transformation of the higher education system. In contrast to the MQF's highly prescriptive approach, the laissez-faire provider-led implementation of the AQF in Australia's public universities has perhaps had less impact. The autonomy of higher education institutions makes implementation more challenging from the perspective of the regulator, where the internal systems and processes established by powerful providers carry the responsibility for quality assurance rather than the regulator itself.

Since the launch of the AQF in 1995, we've certainly seen a significant improvement in metrics such as student satisfaction, graduate outcomes, and employability outcomes, as measured nationally by the Quality Indicators of Learning and Teaching surveys. But just how much of this is a consequence of the AQF, and other initiatives focused on quality, is hard to say. We suggest that the marketisation of higher education, and the need to not just teach students, but attract and retain them in an increasingly competitive sector, has likely motivated improvements to the quality of learning and teaching in Australian higher education much more than any regulations as such—and perhaps in Malaysia too, although differently, in the way these trends influence the development and implementation of the MQF itself. Moreover, pragmatic concerns such as academic workload allocation models (Gregory & Lodge, 2015) and support (or lack thereof) for academics' professional development perhaps have a far greater on the quality of student learning than any other consideration.

Ultimately, NQFs can only impact quality to the extent that the people 'on the ground' charged with their implementation are willing and able to do so—and are empowered to do so effectively. They are dependent on layers of interpretation and translation between policymakers and regulators, institutional systems and processes, and the faculty and supporting 'third-space' professionals (Whitchurch, 2012) who materialise these standards for students. A prescriptive framework such as the MQF leaves less room for interpretation than a looser framework such as the AQF—but a looser framework leaves much more scope for experimentation and innovation.

Innovation

How do NQFs help or hinder innovation in higher education, particularly in relation to online learning? Does regulatory complexity stifle innovation? Complexity tends to hamper implementation, and prescription can deter innovation. These frameworks are useful, and necessary, if only sometimes effective, to establish transparent standards, assure educational quality, and better align higher education to labour market and social needs. But they can also stifle innovation. There are often tensions between strategic goals and objectives of institutions versus those of regulators, and there is also often a failure to accommodate the

diversity of educational providers, qualification types, and delivery models—or to keep pace with best practices in a fast-changing sector, let alone wider-ranging societal and technological changes. The case is especially so for digital and online learning, where new delivery models are disrupting the status quo and regulators are challenged to keep pace with best practices and innovations in assessment, curriculum design, and teaching delivery.

Beyond their ‘good practice’ guidance, which is mostly about setting normative minimum standards, the AQF does not necessarily encourage innovation; their focus is on risk management, and the devolution of implementation and quality assurance to providers. Experimentation and innovation then are mostly left in the hands of institutions, or more likely faculty themselves. On the other hand, although it imposes more limitations, the MQF encourages innovation in curriculum design by promoting continuous improvement and provides a framework for aligning educational qualifications and competencies with the needs of industry and social needs market demands, ensuring that programmes are relevant and of high-quality. However, faculty are restrained in their innovativeness due to strict compliance to the framework, Programme Standards, and other documents.

And for online learning? The AQF does not differentiate between on-campus and online learning. The accreditation and audit processes are the same, although online learning may draw more attention sometimes due to perceived or actual issues of quality. There is no specific guidance on the design and delivery of fully online degrees, except for generic good practice guides. On the other hand, in Malaysia the MQF and COPPA:ODL help to ensure that online and distance learning programmes meet the same quality standards as their traditional counterparts. This ensures that online students receive a high-quality education and learning experience that is recognised and valued by students and their prospective employers.

Conclusion

While NQFs are clearly essential, there is a need for greater flexibility to consider the diversity of providers, qualification types, and delivery models, and to empower or encourage innovation in the design of qualifications, as well as assessment methods, curriculum and pedagogy, and teaching delivery. Although they do indeed mitigate risks for students, providers, and the sector itself, the counter-risk is that overly complex and prescriptive frameworks place real limitations on pedagogical and technological innovation: faculty and learning designers alike become increasingly cautious to step outside of the box due to this limitation and the need to maintain strict compliance with the framework. Whether administered by the regulator or the provider, the process of making changes to the curriculum, while also assuring and maintaining compliance with standards, and following established procedures, can also be time-consuming and complex, either slowing down or stifling possible innovation.

But perhaps the greater challenge for NQFs relates to their perceived relevance and value. With student perceptions of the value of formal higher educational qualifications changing, and the apparent shift away from formal qualifications towards micro-credentials and other non-award learning, how do NQFs better enable providers to keep up with the evolving needs and demands of both students and employers? This is the big question that will shape the third generation of NQFs and beyond. They will only maintain their value and impact if they can themselves innovate to ensure they remain relevant and useful to a current higher

education's sector that is changing rapidly, and a future higher education sector that we are only just beginning to perceive.

References

- Allais, S. (2017). What does it mean to conduct research into qualifications frameworks? *Journal of Education and Work*, 30(7), 768-776.
<https://doi.org/10.1080/13639080.2017.1380751>
- Australian Qualifications Framework Council (AQFC). (2013). *Australian Qualifications Framework* (2nd Edition). <https://www.aqf.edu.au/>
- Baird, J. (2013). TEQSA and risk-based regulation. *Australian Universities' Review*, 55, 72-79.
- Bajunid, I. A. (2011). Leadership in the reform of Malaysian universities: Analysing the strategic role of the Malaysian Qualifications Agency. *Journal of Higher Education Policy and Management*, 33(3), 253-265.
<https://doi.org/10.1080/1360080X.2011.564999>
- Czerniewicz, L. (2018, October 29). Unbundling and rebundling higher education in an age of inequality. *EDUCAUSE Review*, 53(6), n. p.
<https://er.educause.edu/articles/2018/10/unbundling-and-rebundling-higher-education-in-an-age-of-inequality>
- Edwards, F. (2011). The evidence for a risk-based approach to Australian higher education regulation and quality assurance. *Journal of Higher Education Policy and Management*, 34(3), 295-307. <https://doi.org/10.1080/1360080X.2012.678725>
- Fernie, S. & Pilcher, N. (2009). National qualification frameworks: Developing research perspectives. *Quality in Higher Education*, 15(3), 221-232.
- Gregory, M. S.-J. & Lodge, J. M. (2015). Academic workload: The silent barrier to the implementation of technology-enhanced learning strategies in higher education. *Distance Education*, 36(2), 210-230. <https://doi.org/10.1080/01587919.2015.1055056>
- Holon IQ. (2021, February 9). *1,377 university partnerships, OPM & bootcamp PPPs*. Retrieved 23 June 2022 <https://www.holoniq.com/notes/1377-university-partnerships.-opms-bootcamps-and-the-academic-ppp-acceleration>
- Huber, C. (2009). Risks and risk-based regulation in higher education institutions. *Tertiary Education and Management*, 15(2), 83-95.
<https://doi.org/10.1080/13583880902869554>
- Kaliannan, M., & Chandran, S. D. (2012). Empowering students through outcome-based education (OBE). *Research in Education*, 87(1), 50-63.
- Keating, J. (2003). Qualifications frameworks in Australia. *Journal of Education and Work*, 16(3), 271-288. <https://doi.org/10.1080/1363908032000099449>
- Keating, J. (2011). The Malaysian qualifications framework: An institutional response to intrinsic weaknesses. *Journal of Education and Work*, 24(3-4), 393-407.
<https://doi.org/10.1080/13639080.2011.584699>

- Komljenovic, J. & Robertson, S. L. (2016). The dynamics of 'market-making' in higher education. *Journal of Education Policy*, 31(5), 622-636. <https://doi.org/10.1080/02680939.2016.1157732>
- Lewis, N. & Shore, C. (2019). From unbundling to market making: Reimagining, reassembling, and reinventing the public university. *Globalisation, Societies, and Education*, 17(1), 11-27. <https://doi.org/10.1080/14767724.2018.1524287>
- Marginson, S. (2013). The impossibility of capitalist markets in higher education. *Journal of Education Policy*, 28(3), 353-370. <https://doi.org/10.1080/02680939.2012.747109>
- Marginson, S. (2016). The worldwide trend to high participation higher education: Dynamics of social stratification in inclusive systems. *Higher Education*, 72(4), 413-434. <https://doi.org/10.1007/s10734-016-0016-x>
- Malaysian Qualifications Agency (MQA). (2017). Malaysian Qualifications Framework (2nd Edition). <https://www.mqa.gov.my/pv4/mqf.cfm>
- McCowan, T. (2017). Higher education, unbundling, and the end of the university as we know it. *Oxford Review of Education*, 43(6), 733-748. <https://doi.org/10.1080/03054985.2017.1343712>
- Morris, N. P., Mariya, I., Taryn, C., Rada, M., & Bronwen, S. (2020). Negotiating growth of online education in higher education. *International Journal of Educational Technology in Higher Education*, 17(1), n. p. <https://doi.org/10.1186/s41239-020-00227-w>
- Muslim, N. & Yunus, N. (2014). The direction of generic skills courses at National University of Malaysia (UKM) towards fulfilling Malaysian Qualifications Framework. *Asian Social Science*, 10(4), n. p. <http://dx.doi.org/10.5539/ass.v10n4p195>
- Pilcher, N., Fernie, S., & Smith, K. (2017). The impact of National Qualifications Frameworks: By which yardstick do we measure dreams? *Journal of Education and Work*, 30(1), 1-12. <https://doi.org/10.1080/13639080.2015.1122178>
- Raffe, D. (2009). Towards a dynamic model of NQFs. In S. Allais, D. Raffe, & M. Young. (Eds.). *Researching NQFs: Some Conceptual Issues*. Employment Sector Working Paper No. 44. 22-43. International Labour Office (ILO).
- Raffe, D. (2013). What is the evidence for the impact of National Qualifications Frameworks? *Comparative Education*, 49(2), 143-162. <https://doi.org/10.1080/03050068.2012.686260>
- Robertson, S. L. & Komljenovic, J. (2016). Unbundling and making higher education markets. In A. Verger, C. Lubienski, & G. Steiner-Kamsi (Eds.). *World Yearbook in Education: Global Education Industry*. 211-227. Routledge.

Swinnerton, B., Coop, T., Ivancheva, M., Czerniewicz, L., Morris, N. P., Swartz, R., Walji, S., & Cliff A. (2020). The unbundled university: Researching emerging models in an unequal landscape. In N. Bonderup Dohn, P. Jandric, T. Ryberg, & M. de Laat (Eds.). *Mobility, Data, and Learner Agency in Networked Learning*. Networked Learning Conference Series. 19-34. Springer.

Tight, M. (2019). Mass higher education and massification. *Higher Education Policy*, 32(1), 93-108. <https://doi.org/10.1057/s41307-017-0075-3>

Whitchurch, C. (2012). *Reconstructing Identities in Higher Education: The Rise of 'Third Space' Professionals*. Routledge.

Young, M. F. D. (2009). National qualifications frameworks: An analytical overview. In *International Handbook of Education for the Changing World of Work*, 2867-2880. https://doi.org/10.1007/978-1-4020-5281-1_188

Contact email: Stephen.Abblitt@keypathedu.com.au