Investigating National Qualifications Framework Development: A Comparative Analysis of the United Arab Emirates, Bahrain, and Oman

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Abstract

Many countries have, or are in the process of developing, a comprehensive National Qualifications Framework (NQF) but the anticipated benefits of NQFs are not easily achieved. This thesis addresses this issue by using a qualitative comparative case study research design to explore the challenges faced by three countries the United Arab Emirates (UAE), Bahrain and Oman. The UAE and Bahrain represent countries that have been in the implementation stage of their respective NQFs for more than five years, but have yet to achieve many of the intended benefits of an NQF such as to recognise lifelong learning, achieve parity of esteem of different types of qualifications and enhanced consistency, mobility, and portability of national qualifications. Oman's comprehensive NQF is in the final stages of development.

By focusing on the implementation process underlying NQF development, this research aims to better understand how the intended purposes of NQF can be best achieved. Using semi-structured interviews from twenty-one policymakers, consultants and stakeholders who contributed to the NQF development process in each country, this research compares the similarities and differences in the challenges faced during the development process through a policy lending and borrowing lens.

Findings show that the countries differed particularly in the challenges they faced with institutional logics. For instance, while quality assurance systems of all educational sectors fall under a single authority in Bahrain, the UAE has challenges with coordination between the different sectors due to its federal

diversity and Oman faces challenges with the governance structure of the framework being situated within an authority historically dedicated to academic qualifications only. The countries faced similar challenges however, in policy learning from early developers of NQFs. They each greatly underestimated and miscalculated a number of elements during the development process, and in the case of the UAE and Bahrain this has caused significant challenges in quality assuring and placing qualifications on the framework register, thereby delaying anticipated benefits.

This thesis highlights the challenges of implementing an NQF when contextual factors have not been taken into account sufficiently. The research has shown that in each of these countries considered, the policy objectives are highly ambitious and the scale of policy intervention required to achieve these presents enormous challenges. In particular, challenges relate to huge underestimation of costs involved and the time required for building local stakeholder competencies and capacity. This study demonstrates the difficulties of policy borrowing for NQFs, and the importance of a broader contextual consideration of factors with respect to the sociocultural and sociopolitical system of both the *lending* and the *borrowing* countries.

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Dedication

This thesis is dedicated to my dad who always encouraged his children to go for a higher qualification than their parents.

I dedicate this to You, Daddy.

List of Abbreviations

AC	American Credits
ACTVET	Abu Dhabi Centre for Technical and Vocational Education and Training, UAE
ADEK	Department of Education and Knowledge, Abu Dhabi, UAE
BQA	Education and Training Qualifications Authority, Bahrain
CAA	Commission for Academic Accreditation, UAE
CEDEFOP	Centre Européepour le Développement de la Formation Professionnell/ European Centre for the Development of Vocational Training
DEC	Dubai Education Council, UAE
DSIB	Dubai Schools Inspection Bureau, UAE
ECTS	European Credit Transfer System
ETF	European Training Foundation
GCC	Gulf Cooperation Council
GIZ	Gesellschaft für Internationale Zusammenarbeit, Germany
HEC	Higher Education Council, Bahrain
KHDA	Knowledge and Human Development Authority, Dubai
MLSD	Ministry of Labour and Social Development, Bahrain
MoE	Ministry of Education
MoMP	Ministry of Manpower, Oman
MoL	Ministry of Labour, Oman
MoHERI	Ministry of Higher Education, Research and Innovation, Oman
NOS	National Occupational Standards
NQA	National Qualifications Authority, UAE
NQF	National Qualifications Framework
OAAA	Oman Academic Accreditation Authority
OSC	Occupational Standards Centre, Oman
OECD	Organisation for Economic Cooperation and Development
OPAL	Oman Society for Petroleum Services
OQF	Oman Qualifications Framework
QF*Emirates*	Emirates Qualification Framework, UAE
RPL	Recognition of Prior Learning
SCQF	Scottish Credit and Qualifications Framework
SPEA	Sharjah Private Education Authority, UAE
SQA	Scottish Qualifications Authority
TVET	Technical and Vocational Education and Training
UAE	United Arab Emirates

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UNESCO	United Nations Educational, Scientific and Cultural Organisation
VET	Vocational Education and Training
VETAC	Vocational Education and Training Accreditation Commission, UAE

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Chapter 1: Introduction

We cannot wander at pleasure among the educational systems of the world, like a child strolling through a garden, and pick off a flower from one bush and some leaves from another, and then expect that if we stick what we have gathered into the soil at home, we shall have a living plant. A national system of education is a living thing... (Sadler, 1900)

1.1 Background to the Research

This research study shares the concern expressed by Sadler (1900) that countries pick educational practices from different parts of the world and try to plant them together in their own soil and expect this approach to solve their educational problems. The National Qualifications Framework (NQF) is one such policy that has been borrowed by a number of countries around the world in order to reform their respective educational systems. Using a comparative case study approach, this study explores the challenges faced during the development of NQFs in three Arab countries in the Gulf Cooperation Council (GCC) region – the UAE, Bahrain, and Oman, using a policy lending and borrowing lens. This research is one of the early comparative research studies that contributes to the field of NQF in the GCC countries.

Qualifications Frameworks are national policy documents that are often brought into existence by governments in order to reform their educational systems (Coles et al., 2014). Development of NQFs started in the 1990s, by the Anglophone countries (Coles et al., 2014; UNESCO, 2014) and there were

around ten countries that developed NQFs during that period and by 2016, this number increased to 160 countries (Jonsson, 2016). This macroscopic spread of NQF development is attributed to the policy borrowing nature and not to its success (Chakroun & Keevy, 2018). The NQF policy bandwagon has also travelled to the Arab countries (Chakroun & Sicilia, 2010) and currently to the GCC countries as well. Most of these developing countries generally borrow structure and design from the early developers of NQFs for example, from Scotland, Ireland, New Zealand and England (Young, 2005). The three countries taken for this case study research, the UAE, Bahrain, and Oman also picked design elements of their NQFs from some of these early developers - particularly Scotland, Ireland and also Australia.

The UAE and Bahrain completed development of their comprehensive NQFs in 2012 and 2014 respectively and are currently in the implementation stages (BQA, 2020; NQA, 2012). Oman has a sectoral qualifications framework for higher education since 2004 and is currently in the final stages of development of its comprehensive NQF (OAAA, 2018b). The qualifications framework diagrams of the UAE, Bahrain, and Oman can be found in Appendix 1a, 1b and 1c respectively.

Investigating the role of NQFs in reforming education systems is a continuing concern that has received considerable critical attention as its effectiveness has not yet been fully demonstrated (Gallagher, 2010; Allais, 2011, 2017; Young, 2011; Bateman & Coles, 2013; Pilcher et al., 2017). Yet many countries are seen to continue to develop NQFs. A systematic understanding of how effectively NQFs contribute to educational reform is lacking. NQFs not being a

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topic of interest particularly for higher education researchers (Markowitsch, 2017) has not helped this concern. A much debated issue is, if NQFs are a necessary tool to reform education or are they a waste of time and resources for countries with weak education systems (Allais, 2014). Other researchers observe that although the criticism that qualifications frameworks have yet to deliver on many of its promises is valid, there are encouraging signs of progress (Keevy and Chakroun, 2015).

The problem of NQFs effectiveness has received scant attention in research literature. The main challenge faced by researchers is the lack of critical studies on many of the developing countries, in particular, the countries taken for this study. The UAE and Bahrain developed NQFs in 2012 and 2014 respectively and are in the implementation stages for more than five years, yet very limited literature on NQFs exists in these countries. While NQF is a growing field, yet publications on many of the developing countries remain few.

Educational systems in the GCC countries are quite young and they often rely on policy borrowing from developed countries to construct a contemporary educational system (Mohammed and Morris, 2019). A considerable amount of literature has been published on policy borrowing in education (Donn & Al Manthri, 2013; Lao, 2015; Phillips & Ochs, 2004b; Steiner-Khamsi, 2006). These studies highlight the importance of contextual factors during policy transfer between the lending and borrowing countries. Little attention, however, has been paid to other issues in policy borrowing, in particular the role of consultants in the policy borrowing process. Consultants play a prominent role

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in GCC countries not only in policy borrowing but also to legitimise borrowed policies. NQFs are one such borrowed policy developed using consultants and therefore his research finds policy lending and borrowing lens suitable to analyse the role of consultants and the challenges around the contextual factors that shape the NQF policy development and implementation processes.

Among the six GCC countries, the UAE, Bahrain and Oman are the three countries that either have or are developing an integrated/ comprehensive NQF. Selection of the three countries and the need for NQFs in this region is further discussed in Section 3.2 and Section 3.3 (Selection of Cases and Background to the Cases in the Case Study). Twenty-one participants were selected from these three countries to provide research data. Policymakers and consultants were selected from the UAE and Bahrain. In Oman, stakeholders who have contributed to the development of NQFs were selected in addition to policymakers and consultants. This is because Oman is currently developing its comprehensive NQF and hence stakeholders who were contributing to the development process were accessible. Semi structured interviews were used to interview these participants in order to gain in depth information about the policy development process. Interview data was analysed using a policy lending and borrowing theoretical lens. NQFs are dynamic policy documents that tend to evolve over time and hence this research is a snapshot in time.

This section set the background to the study; it further differentiates an NQF qualification from a traditional qualification; provides a definition of an NQF; clarifies some NQF terminologies; and explains the policy lending and borrowing perspective of an NQF.

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1.1.1 Qualifications in an NQF vs Traditional Qualifications

The definitions of the term '*qualification(s)*' show that the word has no one single meaning. The way the term 'qualifications' are defined in an NQF differs from the traditionally used meaning of the term 'qualification' and, in order to distinguish between the two terminologies, Allais (2011b, p.108) explains that traditionally the term '*qualification*' means a formal award that denotes that the bearer has some knowledge or competency, or that they have completed some learning programme in an educational or training institution. Further, traditional qualifications are usually bound in scope, evaluated using various forms of assessments and are based on the number of years studied in an educational institution (ILO, 2005).

Comparatively, qualification in an NQF is usually specified in terms of learning outcomes that describe knowledge, skills and competencies that an individual is expected to possess at the end of a learning process (Allais, 2011b; ETF, 2017; Tuck, 2007). Further, qualifications included in an NQF are independent of education and training providers and are based on levels, level descriptors and learning outcomes (ILO, 2005).

1.1.2 NQF Definitions

Several definitions of NQFs have been proposed by different countries, international organisations, and independent researchers and a generally accepted definition of an NQF is lacking. In addition, NQFs are found to suffer from the problem of jargon and obscure terminologies and there is a lack of connection between its various definitions found in NQF documents (Young, 2005). In fact, NQFs are said to be so jargon ridden that they are virtually

unreadable except by those who have written them or those who have learnt to read them (*ibid*, 2005).

Since the definition of NQF varies among different entities, it is important to understand how the term NQF is defined. Some countries define NQFs highlighting the benefits that they expect to achieve from NQFs such as improving quality, transparency, access and progression. This can be seen for example in the case of Bahrain, the UAE and Austria.

For example, Bahrain intends to use NQFs to improve quality, transparency, access and progression and hence defines its NQF as,

> *an instrument for the classification of qualifications according to*
> *a set of criteria for specified levels of learning achieved. It*
> *integrates and coordinates national qualifications' sub-systems*
> *and improves quality, transparency, access and progression*
> *(BQA, 2020, p.9).*

Similar to Bahrain, the UAE, also defines the NQF in terms of its envisioned benefits, such as improving transparency, access, progression, transferability and quality of qualifications. The UAE gives its definition as,

> *An instrument for the classification of qualifications according to*
> *a set of criteria for specified levels of learning outcomes that*
> *need to be achieved, enabling qualifications to be described*
> *and compared. A new framework of qualifications aims to*
> *integrate and coordinate certification subsystems within the*

UAE and improve the transparency, access, progression, transferability, and quality of such qualifications in relation to the employment sectors and other structures in civil society. A framework of qualifications has particular relevance as an aid in the recognition of foreign qualifications (NQA, 2012, p.97).

Austria also adds benefits such as transparency, comparability and comprehensibility to its definition and defines its NQF as,

an instrument for mapping qualifications from the Austrian education system. The aims are to provide a transparency tool to facilitate the orientation within the Austrian education system and to support the comparability and comprehensibility of Austrian qualifications in Europe (OEAD, n.d).

Compared to these countries, international organisations and individual researchers are seen to define NQFs in a more generic manner without highlighting their benefits. This can be seen for example, in the definition given by the Centre Européepour le Développement de la Formation Professionnelle (CEDEFOP) which defines an NQF as,

an instrument for the development and classification of qualifications (for example, at national or sectoral level) according to a set of criteria (for example, using descriptors) applicable to specified levels of learning outcomes (Cedefop (2011) in Coles, 2013))*.*

Similar to the definition given by international organisations, one of the leading independent researchers of NQF's, Ron Tuck also provides a generic definition and defines an NQF as,

> *an instrument for the development, classification and recognition of skills, knowledge and competencies along a continuum of agreed levels. It is a way of structuring existing and new qualifications, which are defined by learning outcomes* (Tuck, 2007, p.v).

From the above definitions, it can be seen that NQFs have been conceptualised in various ways with national and international variations. They are, however, similar in the use of terminology related to *learning outcomes*.

1.1.3 NQF Titles

Similar to the variation in definitions, the titles of NQFs also vary across countries, with some countries using the generic title 'National Qualifications Framework'. Some other countries use the country name as a 'prefix' and others use their country name as a 'suffix'. Within this study, the UAE use their country name as a suffix with the framework called as Qualification Framework for the Emirates (QF*Emirates*). By contrast, Oman uses their country name as a prefix with the framework called Oman Qualifications Framework (OQF). In Bahrain, the generic title, 'National Qualifications Framework' is used, although the name 'Bahrain Qualifications Framework' was initially used (BQA & QQI, 2014).

1.1.4 NQF Terminologies

Similarly, there are variations in the terminologies used in NQFs and this has been clarified in detail in the literature review chapter. One such terminology is related to the 'comprehensiveness' of NQFs. The related terminologies used include integrated framework, comprehensive framework, unified framework, all-encompassing frameworks, coordinated frameworks and inter-related frameworks (Blom, 2006). The common principle here is to have all the three sectors of education - general education or schools, higher education and vocational education and training under a single structure. Bahrain and Oman use the terminology 'comprehensive', and the UAE uses the terminology 'integrated'. To ensure consistency, this thesis will use the term 'comprehensive' NQF.

In addition to these variations in the comprehensiveness of frameworks, there are sectoral frameworks and these cover separate sectors of either schooling or higher education or the vocational education and training (VET) sector. For example, Oman had a sectoral qualifications framework for higher education from 2004 and is currently developing its comprehensive NQF. More explanation on the various other terminologies used in NQFs are further described in Chapter 2 (literature review).

1.1.5 Policy Lending and Borrowing

Various approaches to policy development and policy implementation studies have been discussed in literature. Public policy implementation studies received substantial research interest from 1970s with Pressman and Wildavsky seen as the pioneers in implementation research studies (Sabatier,

2005). Policy implementation studies include theories such as the advocacy coalition framework (Sabatier, 1988) and implementation staircase (Saunders and Sin, 2014). Approaches to policy development studies include cross-national policy lending and borrowing (Phillips and Ochs, 2003), world culture theory (Edwards, 2017), policy sociology (Stephen, 1995) and policy diffusion (Shipan and Volden, 2008). Most evaluative studies on education policies focus more on the impact of the policy or on the implementation gaps and not on the policy origin, policy travel between countries or issues in policymaking (Edwards Jr, 2017). This research study focuses on the issues in the policymaking process and uses policy lending and borrowing perspective to understand the way in which three countries in the GCC region, the UAE, Bahrain, and Oman, approached the qualifications framework development and uses this perspective to explore the challenges in policy development and implementation between totally different contexts - the context from which it was borrowed and the context in which the policy was implanted.

GCC countries borrow and implement policies from outside their borders in order to obtain and demonstrate educational, social and economic legitimacy with each other and with the international audience (Akiba & LeTendre, 2017). One of the interesting similarities between the three countries taken for this research study is that the NQF policy instrument is *borrowed* from European countries and developed using consultants from these countries. Consultants play a pivotal role in legitimising the choice of development and implementation design, as policymakers are attracted to the idea of aligning themselves to the

international arena. Such non-technical imperatives allow the approach of using policy lending and borrowing as the theoretical lens for this study.

Policy borrowing theories in education provides policy context that assists in understanding how and why policy tools on education have become a phenomenon in different countries. The preconditions and impulses for cross-national attraction and the forces of context that affect the lending and borrowing process specified by Phillips and Ochs (2003) are explored through the data to further understand why policy borrowing occurs and how this borrowed policy gets embedded and implemented in the local context. Burdett and O'Donnell (2016) argue that policy borrowing is not a bad thing and that it can be constructive and effective in certain circumstances. They add that policy borrowing becomes ineffective only when policymakers are short sighted and fail to look into all the contextual factors in order to gain an informed, evaluative perspective on the relationship between policies and educational outcomes. This research concurs with that of Burdett and O'Donnell (2016) who argue that borrowing is not a bad thing, provided all the surrounding contextual factors are considered during the policymaking process.

Almost all researchers of NQFs agree that developing countries borrow NQFs from each other and from the early developers of the framework without considering the differences in context and without understanding all aspects of framework development and implementation (Allais et al., 2009; Chakroun & Sicilia, 2010; Keevy, 2005; Young, 2005). Both comparative education researchers and NQF researchers have cautioned that adoption of foreign approaches in education will create enormous problems because the local

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context is alien to the implantation of the policy and practices that have been developed under totally different circumstances (Allais, 2011a; Phillips, 2006; Steiner-Khamsi, 2006). This advice holds good to all countries developing NQFs and also applies to the empirical cases taken for this research study – the UAE, Bahrain, and Oman because the social, economic and cultural context of these countries are very different to the countries who they borrowed the frameworks from. This thesis investigates how well the contextual considerations in these countries are taken into consideration during the design of the development and implementation process of NQFs.

1.2 Research Problem

NQFs are seen to have risen as an educational policy solution across the world (Chakroun & Sicilia, 2010). The process of an NQF development and implementation generally consists of six stages - exploration stage, conceptual stage, design stage, testing stage, implementation stage and review stage (Deij, 2009a). Developing countries borrow NQFs from the early developers of the framework (Allais et al., 2009) and tend to quickly complete the first three to four stages (Drowley, 2011) publicising that they too have developed an NQF. These countries then attempt to immediately reference or do a comparison of their frameworks that are yet to be populated with qualifications, with NQFs of other countries and sign international agreements with a desire to gain global recognition and to appear comparable with educational systems in developed countries (NZQA, 2018; SCQF & BQA, 2018). While, it is important to align or reference NQFs with other international frameworks, because it helps with articulation across borders, and establishes mutual trust between countries (Coles et al., 2014), referencing of frameworks requires

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qualifications to be placed on it in order for it to be mutually beneficial, and therefore the actual challenge lies in the final two stages – implementation and review, because it is at this point that the actual implantation of the borrowed policy begins.

At the start of implementation, normally, quality assured qualifications get collated (Pilcher et al., 2017). Many countries recently developing NQFs, however face challenges in collating qualifications due to weak quality assurance systems and hence continue being in the implementation stage for prolonged periods of time (ETF, 2017) and do not achieve the objectives for which they were once developed because extensive problems are encountered at the implementation stage (Chakroun & Sicilia, 2010). A comprehensive framework created during the design and development stages is a skeleton which is empty of qualifications and will be a useless construct (Deij, 2021) if during the implementation stage, this skeleton is not populated with qualifications from the school, higher education and VET sectors. Therefore, it is important to understand the reasons for this delay in the implementation stage in order to support the achievement of policy intervention objectives.

A number of comparative studies in educational policy transfer highlight that borrowed policies generally do not work well due to the contextual differences between the lending and the borrowing countries (Burdett & O'Donnell, 2016; Forestier & Crossley, 2015; Phillips & Ochs, 2003; Sadler, 1900; Steiner-Khamsi, 2013; Zymek & Zymek, 2004). In a study on NQFs in the Arab region Chakroun and Sicilia (2010) concur with Young (2003b), that in order to understand policy lending and borrowing in NQFs, analysis of the intrinsic logics

and institutional logics of the framework are important. According to the distinction made by Raffe (1988 in Tuck et al, 2007), intrinsic logics of NQFs form the design features of the framework such as typology, prescriptiveness, levels, level descriptors and learning outcomes; and institutional logics of NQFs are the supporting social structures which are required to enable the design features and these include the regulatory requirements, supporting polices, funding and other resource requirements. Countries who look to foreign models for development and implementation of NQFs, are often said to look only at the intrinsic logics that underpin other frameworks and fail to look at the dynamics of the institutional matrix in which the policy gets implanted (Chakroun & Sicilia, 2010).

This research extends Chakroun and Sicilia's (2010) study by examining the challenges in the contextual factors within the intrinsic and institutional logics of the framework during the development stages of NQF. This is achieved by undertaking a comparative case study research of three Arab countries in the GCC region – the UAE, Bahrain, and Oman. The similarities and differences of this comparative case study research can be useful to policymakers in the UAE, Bahrain, and Oman in order to further identify and address the challenges of the contextual issues within each country and also provide comparisons relative to other regional countries. Results of this study can be expanded and adapted to other GCC countries, Arab countries and other countries which are facing challenges in the form of the extended implementation of NQFs.

1.3 Research Questions

The research questions guiding this study are as follows:

1. What benefits do participants in the UAE, Bahrain, and Oman, think a qualifications framework will bring?

2. In participants view, how do the challenges during the development of the NQF differ between the three countries - the UAE, Bahrain, and Oman?

1.4 Contributions to the field of NQF

This research contributes to the existing knowledge base regarding the process of development of comprehensive NQFs and establishes that a broad contextual consideration of factors with respect to the sociocultural and sociopolitical contexts of both the lending and the borrowing country must be evaluated to inform policy decision making around NQF development and implementation. In addition, it makes two practical research contributions in ensuring that developing countries complete both the implementation and review stage, and thereby achieve the purposes for which the framework was developed.

There is currently very limited research on NQFs, as they are not normally seen as an academic research area and social scientists and educational researchers tend to show very little interest in NQFs (Markowitsch, 2017; Young, 2007). In addition, the usual research topics on NQFs are generally related to their design features, structural types, descriptors, implementation, impact, success factors, diffusion, and globalisation (Markowitsch, 2017). This research study bridges these gaps by contributing towards the NQF knowledge

base in carrying out a comparative case study research of the development process of NQFs in the UAE, Bahrain, and Oman. This study can therefore further inform developing countries in the GCC region, the wider Arab region and other emerging economies on what lessons can be learnt and shared more widely.

1.5 Researchers Position

I trust that NQFs can be a useful policy intervention in improving the quality of education in GCC countries particularly in Oman, where I have been working for the past 20 years. My personal interest in exploring challenges in the development of the National Qualifications Framework started when I began to work for Oman Academic Accreditation Authority (OAAA), the governmental authority mandated to develop the Oman Qualifications Framework (OQF), where I worked as a Review Director for audits and accreditation, and also had a supporting role in the development of the OQF. Later I worked with one of the implementing bodies of OQF, the Ministry of Manpower (now renamed as Ministry of Labour) and supported with the OQF testing stage. I was aware that being part of these processes, can both enhance and constrain my analysis and can inhibit my critical interrogations. In order to address this, I have ensured that all interview data were analysed with an unbiased mind to avoid any potential conscious or unconscious bias in interpreting data. To reduce such bias, I ensured that a reflexive approach was built into the study. This was done by internally reflecting on the research process and challenging my own assumptions. I also ensured that interview data was coded without judgement for exclusion. I also endeavoured to make a deliberate attempt to focus on the empirical evidence of the research study so that the findings can be presented

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with minimum of bias. My positionality is further discussed in Chapter 3 (research design and methodology).

1.6 Structure of Thesis

This chapter has presented an overview of the research that includes the research background, research problem, research questions and the study's contribution to knowledge. The second chapter provides an overview of the literature related to NQFs in order to identify the gap in research that this research addresses. The chapter also articulates the position of this research in the context of wider literature surrounding the adoption, development, and implementation of NQFs and how they relate to lessons from the UAE, Bahrain, and Oman. Chapter three presents the research design and methodology that was used to address the research questions and explains the choice of research paradigm, the research methods chosen and the methods of data collection and analysis. Chapter four presents the findings of this research in a thematic manner. Chapter five discusses the main findings in relation to the two research questions and clearly states this study's original contribution to research. Chapter five concludes with consideration for future research.

1.7 Chapter Summary

This chapter has introduced the research context, explained the research problem and the theoretical lens. It has highlighted that NQFs are a relatively under researched area of scholarly activity and that this study will contribute to the knowledge base of NQFs. Through the comparison of these three countries, this research aims to create a broader context considered method of developing and implementing NQFs. The next chapter reviews the literature related to

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NQFs. It highlights the gap in literature that this research addresses by extending current understanding about the adoption, development, and implementation of NQFs.

Chapter 2: Literature Review

*The authentic use of comparative study resides not in
wholesale appropriation and propagation of foreign
practices but in careful analysis of the conditions under
which certain foreign practices deliver desirable results,
followed by consideration of ways to adapt those practices
to conditions found at home (Noah, 1984, pp.558-559).*

2.1 Introduction

This research study aligns with Noah (1984) that contextual conditions of both
the lending and the borrowing countries play a vital role in the effectiveness of
a borrowed policy. The study suggests that there continues to be a gap in the
current understanding of the importance of context during the development of
educational systems and practices. This chapter aims to examine relevant
literature from previous research and other national policy documents available
on the qualification authority websites, in order to establish what has already
been done, thus positioning this thesis to fill the relevant gaps in knowledge.

This chapter is subdivided into three sections. The first section discusses
literature on educational policy lending and borrowing in comparative
education. This section focuses on the contextual factors which shape the
effectiveness of the implantation process. The second section discusses how
policy lending and borrowing is related to the contextual factors in the
development and implementation of NQFs which leads to the third section

which reviews characteristic features of NQFs in order to support discussion of the contextual factors.

This thesis positions itself in the following four areas of gap in knowledge. Firstly, this literature review identifies a global gap with respect to literature on NQFs. The thesis contributes to this gap through building on what is already known and being one of the first doctoral studies to focus on the developmental process of NQFs in the Gulf Cooperation Council (GCC) region. Secondly, a study of international literature suggests that it has neglected examining NQFs because these are seen as a Vocational Education and Training (VET) topic and thus not central to higher education. Situated in a higher education research, this thesis positions itself to fill this gap, although regionally, there is comparatively more literature on NQFs within the higher education sector. Thirdly, although a number of studies in comparative education studies show the importance of taking into consideration the contextual factors of the country while adopting or borrowing policies, there however continues to be a gap in the 'interpretation' of this context-considered approach and this thesis attempts to bridge this gap. Finally, this thesis reviews the wider literature surrounding the adoption, development, and implementation of NQFs and positions itself to address the lessons that can be learnt from these contexts.

A search indicated the availability of very limited literature on NQFs in the GCC region. An absence of NQF data on GCC countries was found in the global inventory of regional and national qualifications framework published and updated every two years by the European Training Foundation (ETF). In their recent version, ETF (2019) published an inventory of around 100 countries

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including the UAE for the first time. However, they have yet to feature Bahrain and Oman in their global inventory. The current available literature on NQFs in GCC countries show that previous literature is predominantly limited to paper presentations given by policymakers in conferences such as the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and the Arab Network for Quality Assurance in Higher Education (ANQAHE) (AlSindi & Jaffar, 2012; Dowling, 2017; Goodliffe & Clayton, 2019; Hornblow et al., 2019; Sutherland, 2017). Both the conferences INQAAHE and ANQAHE are higher education related conferences, and a search indicates very limited literature related to NQFs in conferences focused on vocational or school sectors in the three countries in question. This phenomenon lies in contrast to global studies where there is more literature on NQFs related to VET as internationally, NQFs are seen as a VET research topic (Markowitsch, 2017). This can also be attributed to a comparatively stronger higher education sector and a weaker VET sector as the case is normally with most developing countries (Young, 2005). This is an important dimension of this research as it addresses the lack of critical research on NQFs in the GCC region.

Most research on NQFs focuses on the early starter countries such as the UK (Lester, 2011; O'Connor, 2017; Raffe, 2007, 2015), South African countries (Allais, 2007, 2014; Keevy, 2005; Samuels & Keevy, 2008), New Zealand (Frederick, 2005; Philips, 2003; Strathdee, 2011) and Australia (Keating, 2003; Stanwick, 2005; Wheelahan, 2011). Lately, there has been increasing amounts of literature on NQFs focusing on European countries (Castejon et al., 2011; Deij, 2009a; ETF, 2016, 2019). Limited research focuses upon Asian countries such as Hong Kong, Malaysia, India and Mauritius (Bateman & Coles, 2017;

Castejon, 2015; Corpus et al., 2007; Ernsberg, 2012; ILO & World Bank, 2011; Keating, 2011; Marock, 2011) and within Arab countries such as Egypt, Jordan, Morocco and Tunisia (Castejon et al., 2011; Chakroun & Sicilia, 2010). Critical research however, on NQFs within the Gulf Cooperation Council (GCC) region are largely unexplored. This study aims to address this gap in literature in GCC countries.

Researchers have carried out comparative analysis and case studies on NQFs between countries such as Ireland and Scotland (Raffe, 2009), of 16 countries across four regions, Africa, the Americas, Asia and the Pacific and Europe (Allais, 2011a) and between six countries studying the labour market outcomes of NQFs (Allais, 2017a). Recently the UAE was one of seven countries involved in a study of level descriptors and learning outcomes that included Indonesia, South Africa, Chile, Scotland, South Korea, the UAE, and Australia (Keevy & Chakroun, 2015). More recently Bahrain was one of the seven countries to participate in the peer learning on transparency of NQFs that included Bahrain, Morocco, France, Ireland, Kenya and Portugal (ETF, 2021). This research adds to the list of comparative case studies of NQFs by carrying out a comparative study within the GCC region.

More recently, countries are moving towards developing Regional Qualifications Frameworks (RQF). Currently, there are around 17 RQFs including the Gulf Qualifications Framework, the European Qualifications Framework, the ASEAN Qualifications Framework etc. (Auzinger et al., 2021). This comparative research study on three of the six GCC countries can also contribute to the limited literature in this area. This present research study will

hence be useful as a resource for researchers and international agencies who wish to gain deeper understanding of NQFs in the GCC region.

2.2 Policy Lending and Borrowing in Comparative Education

This section examines the role of contextual factors during educational policy transfer between the lending and borrowing countries. Developing countries are often said to look to foreign models to solve their existing, emerging or potential problems (Phillips & Ochs, 2003). This phenomenon of policy lending and borrowing has attracted an increasing amount of literature which focuses on context, causes and rationales of educational transfer (Donn & Al Manthri, 2013; Forestier & Crossley, 2015; Lao, 2015; Phillips & Ochs, 2004b; Steiner-Khamsi, 2006; Zymek & Zymek, 2004).

At the outset, borrowing best practices from other countries appears to be a straightforward process that involves identifying successful practices from the 'target' (lending) country, introducing the policy to the 'home' (borrowing) country context and assimilation of the policy in the home country. This model is diagrammatically shown at Figure 2.1 below (Phillips & Ochs, 2004b, p.774);
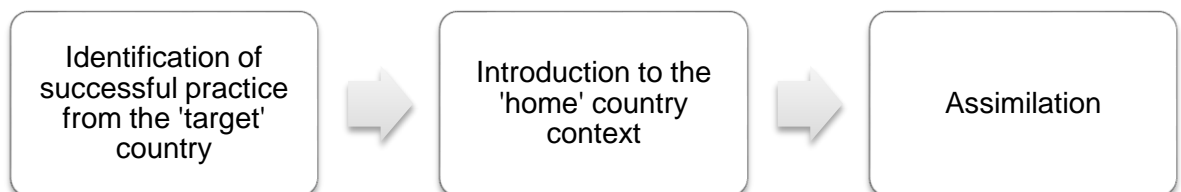
Figure 2.1: Policy borrowing process
Source: Phillips and Ochs (2004b, p.774)

In reality, however, policy borrowing proves to be a complex process and in fact poses a number of problems (*ibid*, 2004b). Phillips and Ochs (2004b) explain

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that the first problem starts with semantics. A wide number of linguistic terminologies are used synonymously to understand the process of educational transfer of policies such as policy transfer, policy borrowing, policy lending, policy adoption, policy learning, policy diffusion, policy convergence, policy import, policy influence etc. In this thesis, the term policy lending and policy borrowing are used, where, the term '*lending*' refers to the context from which the policy originated and the term '*borrowing*' refers to the context in which the policy was received (Waldow, 2009).

Studies suggest that governments often prefer to use the term '*policy learning'* in order to neutralise the connotations associated with policy borrowing or policy import (Steiner-Khamsi, 2012, p.9). In addition, policymakers justify importing foreign systems that differ to their own by downplaying and denying that policy borrowing occurs (Steiner-Khamsi, 2013). It has been observed that governments or policymakers might protest against such labelling and claim that their decisions are conscious and that, the borrowing and transfer of ideas are appropriate and justifiable as part of their rhetoric of reform (Fan, 2007). Burdett and O'Donnell (2016) support policy borrowing by stating that it can be constructive, however they also argue that it can become ineffective when policymakers are short sighted and do not look into all the contextual factors in order to gain an informed, evaluative perspective on the relationship between policies and educational outcomes.

A methodological gap is seen to exist between positivist and constructionist researchers with 18th century scholars viewing educational policy borrowing and lending from a positivist perspective (Chow, 2014). Positivist researchers

analysed large data sets to understand foreign educational systems and developed guidelines based on their scientific comparative model (*ibid*, 2014). Conversely, constructionist researchers believe that the positivist methodology lacks understanding of the context and therefore posit that foreign education systems have to be critically assessed based on their contextual, political and cultural dimensions. In 1900, distinguished comparativist Michael Sadler made a speech in a conference at Oxford titled '*How Far Can We Learn Anything of Practical Value from the Study of Foreign Systems of Education?*', Sadler's intervention marked the beginning of a paradigm shift. He argued that what works best for one environment might not work well in another environment because of contextual differences and urged policymakers to pay attention to the political, economic, social and cultural factors between countries in order to understand the meaning in local context before the borrowing process (Sadler, 1900). The qualitative data in this present research offers the opportunity to explore these contextual dimensions.

Most studies on policy lending and borrowing commonly use Phillips and Ochs (2003) four stages of borrowing - cross-national attaction, decision, implementation and indegenisation to understand the borrowing process. The critisism of this model is that, it applies more to borrowing between developed countries rather than a developing country borrowing from another developed country (Steiner-Khamsi, 2006) as the process involved in developing countries can be quite different (Eta, 2018). Furthermore, the borrowing sequence presented in Phillips and Ochs (2003) model is perceived to suit countries that borrow for local need rather than for political or economic reasons (Eta, 2018).

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Their model is however useful to study the borrowing process as it places emphasis on the importance of context in both the lending and borrowing milieu.

Phillips and Ochs (2003, p.457) explain five forces of context that can affect policy development and implementation;

- contextual factors that affect the motives behind cross-national attraction;

- contextual forces' that act as a catalyst to spark cross-national inquiry;

- contextual interaction that affects the stage of the policy development;

- contextual interaction that affects the policy development process; and

- contextual interaction that affects the potential for policy implementation

Phillips and Ochs (2003, p.458) recommend that these five forces should be considered within the context of both the 'home' (lending) country and the 'target' (borrowing) country in order to evaluate the compatibility and comparability in order to determine what is possible to borrow given the cultural mores and demographics. They also add that considering the context of the target country is particularly important for effective implementation. They also describe six foci of attraction guiding philosophy, ambition and goals, strategies, enabling structures, processes and techniques to determine if the policy will be adaptable to the foreign country in question. Relating the six foci of attraction to this research, the guiding philosophy in the case of the UAE, Bahrain, and Oman, is to achieve a knowledge-based economy. The second foci of attraction, ambitions are targets such as diversification from an oil-based economy or employability. Strategies involve all aspects of the governance of NQF. Enabling structures are the legislations and other structures which are

put in place for the administration of NQF. Processes include the regulatory systems and techniques, which comprise the way in which the policy is enacted. These contextual forces and interactions will be further explored during the discussion of the results in order to understand the various contextual forces that interact during the NQF development and implementation process.

The concept of 'donor logic' in policy borrowing and lending identified by Steiner-Khamsi (2006, p.674), shows that a comprehensive lending package is formulated by the lender for wholesale transfer of reforms where the selling of this global educational policy is profitable only if it is packaged as a tightly knit product with interconnected elements, which ensures that governments buy both the development package and the implementation package (Steiner-Khamsi, 2014). Furthermore, the implementation package is made sufficiently complex that the borrowing country continues to depend on the lending country's consultancy services (*ibid*, 2014). This experience can be commonly noticed in the GCC countries as noted by some researchers where the global education industry has created a 'business model' of buying and selling educational reforms (Mohamed & Morris, 2019, p.2). This is where the buying country enters into contractual arrangements with the global education industry, and is usually led by a consulting organisation. Consultants from these organisations are seen as external knowledge actors who facilitate this process by trading knowledge, expertise and experience through consultancy as a relational transfer process and/or instruct borrowers on what they should do and how (Edwards, 2018; Gunter et al., 2015). Consultants are frequently blamed for enabling this kind of policy transfer and not taking the cultural context into consideration (Edwards, 2018). This study will further explore the

business model and the role of consultants during the borrowing and implementing process.

Bray (2004, in Phillips & Ochs, 2004a) illustrates a scenario to explain the concept of educational policy borrowing and the lending that happens between two countries;

- Country A is an economic basket case having high levels of unemployment and low levels of economic growth. This is because the educational system in the country is not producing workers with appropriate skills.

- Country B is economically successful with low levels of unemployment and high levels of economic growth. This is due to an education system that produces a well-educated workforce.

Country B lends its educational policy to Country A and, Country A borrows the policy hoping to achieve similar levels of economic growth and employment. In such a setting, the borrowing countries get disadvantaged twice; firstly because they are on the periphery of global knowledge structures by virtue of their relationship to knowledge production and distribution; and secondly, by having to import knowledge, they increase the economic gain of the lending countries and hence Country B gains financially from this interaction (Phillips & Ochs, 2003).

The Scottish Qualifications Authority (SQA) is generally seen as the policy entrepreneur in the case of NQFs and hence is one of the common lending

countries for NQFs. This can be evidenced from, SQA advertising its NQF expertise on its website stating:

> *As a founding member of the world's first qualifications framework,*
>
> *we develop the framework you need*[1]

Countries such as Bahrain, Oman, Saudi Arabia, Jordan, and Croatia are listed as SQA's '*customers*'[2] on its website. This highlights the business activity between the lending and borrowing countries. Phan (2010) compares this kind of relationship between the borrowing country and lending country to a buyer-seller model. She also states that an unequal power dynamic can be observed in the GCC states between the borrower and the lender. She explains that the borrowing GCC country wields economic and political power as the sponsor of educational product, whereas in a neo-institutionalist paradigm, the lending country will impose its institutional structures on the borrowing country. The power shift in this case, allows the host GCC country to control the financial terms and conditions of the partnership. This paves the way to a process of dialogue, modification, and indigenisation of the policy between the borrower and the lender, and the borrower is not just simply a passive recipient (*ibid*, 2010). According to Fan (2007) understanding of comparative education is a prerequisite for investigating policy borrowing and this literature review contributes towards this understanding.

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[1] https://www.sqa.org.uk/sqa/84037.html, accessed on 8 October 2020

[2] https://www.sqa.org.uk/sqa/84034.html, accessed on 8 October 2020

2.3 Policy Lending and Borrowing in National Qualifications Frameworks

The previous section provided the comparative education perspective on policy lending and borrowing literature. This section places NQFs within the literature relating to policy lending and borrowing.

The emergence of a qualifications framework can be traced back to the 1990's and its popularity is said to be increasing through every decade (Keevy, 2005). At the last count in 2015, over 160 countries were involved (Jonsson, 2016). A recent study by Keevy and Chakroun (2018) found that the macroscopic spread of NQFs is not based on an NQF's success but rather due to a policy borrowing process. New Zealand was the first country to officially coin the title 'National Qualifications Framework' (Allais et al., 2009, p.1) although France predated these countries as its system of classification of qualification levels started in 1960s (Coles et al., 2014). From the 1990s, three generations of NQFs have evolved with the fourth-generation frameworks currently ongoing and presented at Table 2.1.

First Generation NQFs (1980s and 1990s) (7 countries)	Second Generation NQFs (2000s) (20 countries)	Third Generation NQFs (2010s) (100 countries)	Fourth Generation NQFs (from 2014) (More than 160 countries)
France, Scotland, England, Wales and Northern Ireland, New Zealand, South Africa and Australia	Malaysia, Mauritius, Hongkong, Mexico, Singapore, Philippines, Namibia and Trinidad and Tobago	UAE, Bahrain, France, Zimbabwe, Zambia, India, Angola, Tanzania, Turkey, Chile, Jamaica and Brazil	Azerbaijan, Italy, Morocco, Serbia, Turkey, Saudi Arabia and Oman

Table 2.1: Different generations of NQFs (Source: compiled from Keevy and Chakroun (2015) and Cedefop et al. (2019))

NQFs are dynamic entities that tend to change over time. Therefore '*time*' is one of the influencing factors on NQFs classification (Pilcher et al., 2017, p.6). This can be seen for example in Oman, where the country had a sectoral framework for higher education from 2004 and hence can be considered as having a second-generation framework. Oman is currently developing a comprehensive framework and so it can now be considered as a fourth-generation framework. Comparatively, the UAE and Bahrain can be considered as having third generation frameworks as they were developed in the 2010s.

Many developing countries model their NQFs on English and Australian models (Allais, 2016; ETF, 2012) and quite frequently, Scotland is said to be at the forefront of this lending process (Allais, 2014). Although developing countries model their NQFs with these early starters, studies show that the borrowing countries do not always follow the actual model of the early starters (Allais, 2017b). For example, qualifications framework in several early starter countries were developed to mainly cover vocational qualifications, whereas the recent frameworks are designed to be comprehensive in order to embrace all types of education (Chakroun, 2010). Scotland has developed its framework incrementally over two decades while the recent developers' aim to complete development over two years' (Drowley, 2013). Yet another difference can be seen in the prescriptiveness of the frameworks: the SCQF is a communications framework that avoids transformation by mapping onto existing practices (Fernie et al., 2014), meanwhile developing countries aim to transform their existing qualification systems to an outcome-based framework. These contextual differences between the lending and the borrowing countries will be further explored and discussed in the discussion chapter.

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Previous studies of NQFs have revealed that the conditions for success such as the relevant contexts, and other policies and processes being put in place are not apparent from official NQF documents (ILO, 2009). This view is supported by other researchers of NQFs who add that during the development of frameworks, many countries refer to official documents from the country from which they are borrowing but fail to take into account the actual difficulties faced by these countries, nor do they learn lessons from them (Keevy, 2005; Tuck, 2007; Young, 2005). Keevy (2006) cautions countries against making the same mistakes that other countries have already made. Allais (2017a, p.56) terms this as '*policy amnesia*' and Raffe (2009a, p.151), uses the term '*policy busyness*' to denote policies where historical mistakes are repeated, and development goes round in circles.

It is important that countries differentiate between '*policy borrowing*' and '*policy learning*' (Allais et al., 2009, p.3). UNESCO-UNEVOC (n.d) has compiled a selection of articles from NQF researchers on its website to support countries with policy learning from other countries. For example, it includes Ron Tucks (2007) publication '*An Introductory Guide to National Qualifications Frameworks*', Allais (2010) study on 16 countries, Coles et al. (2014) study which focuses on the massive development of NQFs around the world, and other NQF-related documents. The '*how-to*' guides for policymakers such as these are said to receive more attention during the development process than the technical, social and political dimensions (Allais et al., 2009, p.32). As a result, there is a danger that NQF development can be more of a tick-box exercise.

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In order to provide more effective support on policy learning and to remove concerns on policy lending and borrowing and to overcome its pitfalls, peer policy learning is used as a development strategy that helps policymakers learn from their own experiences and from others (Chakroun & Sicilia, 2010). NQF peer learning focuses on capacity building of policymakers, and Chakroun (2010) explains that this can serve a number of purposes such as to understand their systems better by comparing them alongside other systems; identifying common trends and pressures; clarifying alternate strategies; and identifying issues that can arise. ETF (2008) suggests to create a culture of policy learning by removing barriers to policy learning by adopting more realistic approaches and allowing more timescales for policy learning to develop. Five considerations that support the overcoming of barriers has been put forward by Baati and Schuh (2008) and includes: policy memory and evidence; mobilisation of policymakers; policy learning culture; timescales and policy learning; and policy learning and politics. NQF policy learning also requires building a knowledge base in developing NQFs and disseminating them with policymakers as learning is arguably more effective than policy recommendations (Chakroun & Sicilia, 2010).

NQFs are considered as social constructs and hence Chakroun and Sicilia (2010) argue that NQFs cannot be copied and quickly implemented as they are caught between the nexus of global versus local demands. NQFs are said to be good examples of globalisation and internationalisation of the education agenda whose context is marked by economic, social, and cultural specificities (*ibid,* 2010). It is these contextual challenges that this research study seeks to identify and understand through the analysis of data provided by policymakers

and stakeholders who have contributed to the development of NQFs in the UAE, Bahrain, and Oman.

2.4 Characteristics of National Qualifications Frameworks

There is a huge heterogeneity in NQF characteristics (Pilcher et al., 2017) and there is no single model of an NQF for all countries to follow, nor is there a generic template that can be quickly implemented by countries (Bateman & Coles, 2013; Coles et al., 2014). This section reviews the different characteristics of NQFs to in order to make more relevant comparisons and to support the qualitative analysis of the results in Chapter 4. The characteristics will be discussed with respect to the two key logics of NQFs - intrinsic logics and institutional logics of the framework. A summary of the NQF characteristics of the UAE, Bahrain and Oman is shown at Table 2.2. This section will then discuss the six stages of NQF development and implementation with an aim to situate the frameworks of the UAE, Bahrain, and Oman within the stages. The section begins by reviewing the purpose of the qualifications frameworks as it underpins how the different features of the framework are understood.

2.4.1 Purpose for developing NQFs

Countries have both overt (explicit) and covert (implicit) agendas to develop an NQF (Keevy, 2005). Studies show that the real purpose of NQFs may be covert and based on hidden political and economic agendas of the government (Allais, 2014; Tuck et al., 2004; Young, 2003a). The origins of the NQF movement in early developers in 1990s were neo-liberal policies and in particular the political agenda to transfer the control of vocational education from providers to employers (Young, 2005). In the mid-1990s the idea of NQFs was linked to

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governmental interest in lifelong learning (ILO, 2005). In the 2000s, NQF's were associated with the development of credit-based frameworks, which allowed learners to accumulate credits at different times (*ibid*, 2005). However, the drivers of the recent frameworks are attributed to economic reforms and globalisation (Coles et al., 2014; Keevy & Chakroun, 2015).

Relative to these covert purposes, researchers have also highlighted multiple overt claims about the purpose of developing a framework. These include achieving benefits such as increased consistency and currency of qualifications, maximising access, flexibility and portability of qualifications, minimising barriers to both vertical and horizontal progression, parity of esteem between qualifications in the different education sectors, ensuring that a broad range of learning forms are recognised and finally providing greater coherence of national reform policies (Allais et al., 2009; Bateman & Coles, 2013; Tuck, 2007; Young, 2003b). The most common ten benefits stated in the majority of NQF discourses and summarised by Bjørnåvold and Coles (2010) is shown diagrammatically at Figure 2.2.

In general terms and in most national settings it is probably reasonable to expect benefits in some or all of the following ten areas:

- Increased consistency of qualifications
- Better transparency for individuals and employers
- Increased currency of single qualifications
- A broader range of learning forms are recognised
- A national/external reference point for qualifications standards
- Clarification of learning pathways and progression
- Increased portability of qualifications
- Acting as a platform for stakeholders for strengthening cooperation and commitment
- Greater coherence of national reform policies
- A stronger basis for international co-operation, understanding and comparison

Figure 2.2: Common benefits expected from NQFs (Source - Bjørnåvold and Coles (2010))

The NQF Handbooks of the UAE, Bahrain, and Oman also declare similar benefits. These benefits will be further explored as part of the first research question.

2.4.2 Intrinsic Logics of NQFs

The intrinsic logics of NQFs are the design features which include the typology, prescriptiveness, levels, level descriptors and learning outcomes (Raffe 1988 in Tuck et al, 2007). This section attempts to clarify the different terminologies and to situate the frameworks of the UAE, Bahrain, and Oman within the various intrinsic logics to make more relevant comparisons and to support the analysis and discussion of data.

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2.4.2.1 Typology

Three main typologies are generally used to classify NQFs; NQFs can be partial or sectoral and cover separate sectors of school, higher education and vocational sectors; or they can be comprehensive or integrated, bringing all education and training sectors under a single structure; or finally they can be bridging frameworks (Bateman & Coles, 2013; Castejon et al., 2011). Sectoral frameworks may or may not have level descriptors and lack the links for progression between the educational sectors (Keevy, 2005). Comparatively, a comprehensive framework also known as an integrated framework or unified framework, has a single set of levels and level descriptors covering all education and training sectors and forms an integrating link between all education and training sectors. In a bridging framework, there are qualification levels with or without level descriptors with the bridging framework forming a formal link between the separate sectors of education and training (Castejon et al., 2011).

Another possible alternative is an overarching comprehensive framework with multi-level entities that have sub-frameworks (Raffe, 2011b). The over-arching framework and its sub-frameworks may have varying strategies and objectives. Raffe (2011b) advises that the appropriate strategy maybe to start with sub-sectors followed by building them into a comprehensive framework.

The UAE, Bahrain, and Oman have an integrated/ comprehensive framework. The QF*Emirates* Handbook states that it has been designed to be the '*single structure'* through which all qualifications in the UAE can be described and compared (NQA, 2012, p.27). Similarly, the model adopted for the Oman

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Qualifications Framework (OQF) and the NQF in Bahrain are comprehensive and encapsulates qualifications from all sectors and levels of education. Scotland, Ireland, England, South Africa, Australia, and New Zealand are examples of countries having comprehensive NQFs.

2.4.2.2 Prescriptiveness

The prescriptiveness of a framework is the measure of freedom or control a country wants to exert on the qualifications delivered (Keevy, 2005; Tuck, 2007; Young, 2003b). Prescriptiveness can range from *'tight'* frameworks to *'loose'* frameworks (Young, 2003b, p.226). Tight frameworks are also called *'regulatory'* frameworks and are used by countries where the frameworks are used to drive educational reform and loose frameworks are also termed *'communications'* frameworks (Tuck, 2007, p.22). The other terminologies used to describe frameworks that do not have strong framework-based quality principles are '*inclusive*' frameworks and countries operating their frameworks using strong quality principles are termed as '*restricted*' frameworks (Bateman & Coles, 2013, p.14).

- A communications framework is a bottom-up approach, its success depends on the voluntary use by stakeholders. Examples of countries that follow this approach are Scotland, France, Germany, Australia, Ireland (Allais et al., 2009; Bateman & Coles, 2013).

- In a top-down framework, it is mandatory for all stakeholders to comply with the framework (Allais et al., 2009; Bateman & Coles, 2013). This type of framework is costly and time consuming as the regulatory processes have to bring together diverse groups that previously had little

contact (Castejon, 2015). Examples of countries who follow the regulatory approach are New Zealand and South Africa (*ibid*, 2012).

The UAE, Bahrain, and Oman have regulatory frameworks. The NQF Handbook for Bahrain states that it is a mandatory framework where '*all Education and Training institutions are required to coordinate with the BQA to place their qualifications on the NQF, in accordance with BQA's regulations*' (BQA, 2020, p.15). Similarly, public documents show that, it will be '*mandatory*' for all qualifications awarded in Oman to be included in the newly developed comprehensive framework (OAAA, 2018b, p.16). Unlike Bahrain and Oman, the QF*Emirates* Handbook does not state that it is a mandatory framework, however within the UAE framework structure, there are features that are regulatory in nature (NQA, 2012).

2.4.2.3 Qualification Types

Qualifications can be whole qualifications or part (units) qualifications with the whole vs part qualifications being an area of contest in many countries (ETF, 2017). Unit-standards based qualifications are also known as modularised qualifications and non-unit standard based qualifications are also known as whole qualifications (ETF, 2017; Keevy, 2005; Tuck, 2007).

Unit-standard based qualifications can enable and promote access, progression, mobility of learners and transferability between different sectors, such as higher education and VET. They also allow learners to accumulate units of qualifications over a long period of time (Cedefop, 2010b; ETF, 2017; Samuels & Keevy, 2008). Although the labour market and vocational sector see advantages in unitisation, the higher education sector has not yet fully accepted
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unitised qualifications (Keevy, 2005). A critical reflection of NQFs by Samuels and Keevy (2008) suggests that one of the major goals of governments is to promote lifelong learning and in order to achieve this aim, it is critical for whole qualifications to be broken down into smaller units of learning. Countries including South Africa, the UK and New Zealand follow both unit-standard based qualifications and non-unit standard based qualifications. In addition, the NQF landscape is changing fast with new trends emerging such as micro-credentials and digital credentials. In a recent study on digital credentialing, Keevy and Chakroun (2018) stress the importance of unit-standard based qualifications in the digital credentialing ecosystem, which includes micro-credentials, badges and nano-degrees.

NQF Handbooks of the UAE, Bahrain, and Oman mention that they aim to promote the concept of lifelong learning (BQA, 2020; NQA, 2012; OAAA, 2018b). The efforts taken by the UAE, Bahrain, and Oman to promote unit-based standards will be explored as part of the research question and explored further in the discussion chapter.

2.4.2.4 Levels, Level Descriptors and Learning Outcomes

Qualification frameworks are constructed on level descriptors that are based on the complexity of the learning outcomes (Allais, 2014; Keevy & Chakroun, 2015; UNESCO, 2014). The structure of an NQF depends on how many levels of learning complexity is required and this can range from 6 to 12 levels (Tuck, 2007). Level descriptors use domains such as knowledge, skills, application, attributes, responsibility, accountability, communication, competence, IT, and numeracy to describe areas of learning. Different countries use different

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combinations of domains based on their education systems and individual requirements for economy (Bateman & Coles, 2013). A comparative study of sixteen countries that included Bangladesh, Chile, Malaysia, Mauritius and Sri Lanka identified that level descriptors are the most commonly borrowed element in an NQF (Allais, 2011a).

The UAE, Bahrain, and Oman each have a 10-level framework (BQA, 2020; NQA, 2012; OAAA, 2018b). The NQF Handbook of Bahrain, explains that this is a learning outcome-based framework comprised of ten levels, each being identified by a unique set of level descriptors. At each level, the level descriptors have three domains covering knowledge, skills and competencies (BQA, 2020). The learning outcomes specified in the NQFs of UAE and Oman are also defined on statements of knowledge, skills and competencies (NQA, 2012; OAAA, 2018b).

2.4.3 Institutional Logics of NQFs

The institutional logics are the supporting social structures which are required to enable the design features. These include the regulatory requirements, polices, funding and other resources (Raffe 1988 in Tuck et al, 2007). The role of institutional logics during the development stage is considered vital, as a framework will be ineffective during implementation if it is not complemented by measures to reform the NQFs (ETF, 2017; Tuck et al., 2004). This section will situate the frameworks of the UAE, Bahrain, and Oman within the different institutional logics in order to make relevant comparisons and to support the analysis of data and discuss as part of the research questions.

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2.4.3.1 Governance and Management

Governance and management of a framework is recommended to be assigned to an apex body such as a qualifications framework authority (Tuck, 2007). Keevy (2005) identifies three significant models of implementing authorities – strong authority, central authority and coordinating authority. A strong authority oversees all other bodies. The South African NQF is an example of a strong authority. A central authority has an oversight function and responsibility for quality assurance and accreditation but has separate awarding bodies for particular sectors of schooling, VET and higher education. The NQFs of Scotland, Ireland and New Zealand are examples of countries who use this model. A coordinating authority has largely administrative and coordinating powers, and the Australian NQF is an example of this model. It is interesting to note that New Zealand originally started as a strong authority, later became a coordinating authority and gradually evolved into a central authority model (*ibid*, 2005).

The National Qualifications Authority (NQA) in the UAE, the Education and Training Qualification Authority (BQA) in Bahrain, and the Oman Academic Accreditation Authority (OAAA) in Oman, are the apex bodies formed through Royal Decrees vested with legal powers to manage and maintain the qualifications framework in each respective country. In Oman, the OAAA is a historically academic body, and there are ongoing provisions to make it more inclusive (OAAA, 2021). The BQA in Bahrain can be perceived as a central authority (BQA, 2020). The NQA in the UAE is a coordinating authority due to its federal system of government (NQA, 2012). The distinctions in each of these models will be further be explored in the data analysis.

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2.4.3.2 Policy Breadth

The structures to support a framework include legislations, laws or decrees to manage the framework, procedures regarding compliance responsibilities, funding arrangements and setting up task groups for specific reforms (Castejon et al, 2011) as it cannot perform by itself (ETF, 2017; Tuck, 2007). Raffe (2015, p.153) terms this as '*policy breadth*', which is the process of developing qualifications in an organised manner in order to ensure that the policy for qualifications is connected with other policies in related areas.

The comprehensive Framework in Oman includes developing a number of supporting policies (OAAA, 2016). Policies related to implementation of the NQF in Bahrain have been included in the NQF Handbook.The Handbook of QF*Emirates* mentions that a QF*Emirates* Policy and Advisory Committee has been set up in order to develop policies (NQA, 2012). Policy breadth in all three countries will be further explored in the data analysis and discussed.

2.4.3.3 Skilled Expertise

Studies indicate that the human resource component in a framework can be substantial depending on the scope of the framework and developing countries are particularly challenged as they lack both capacity and human resources (ETF, 2012). Capacity building is the crucial element for effective operation of the framework and includes professionals, people developing qualifications, people assessing, people validating, teachers and trainers who have to adapt to their new roles (*ibid*, 2012). One of the main implementation challenges in South Africa has been the lack of skilled staff and the failure to make proper use of expertise (Allais et al., 2009).

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Qualification authorities in developing countries tend to have difficulty in recruiting staff with appropriate expertise, and, when staff who lack the appropriate skills and knowledge are employed, they protect themselves behind bureaucratic procedures causing delays in the registration of qualifications which makes the process very slow (Young, 2005). The availability of staff with the right skills and expertise to work on the framework appears from the literature to be a key factor in the effectiveness of its implementation. This will be explored during the interviews and further discussed in the discussion chapter.

2.4.3.4 Costs

The development of an NQF can be technically, institutionally and financially demanding for developing countries (Tuck, 2007). Studies show that it is essential to calculate all expenditures starting from the government down to the end users (ETF, 2012). Various studies have listed the major costs that can be incurred during the development and implementation stages of the framework. The major costs during the development stage typically includes salaries for consultants and other stakeholders involved in the development, capacity building the sectors, training activities, consultations, and development of new legislation. The major cost during the implementation stage includes capacity building sessions for stakeholders, providers, and teachers in order to learn new concepts. These include the use of learning outcomes, quality assurance and accreditation, development of guidelines, manuals, assessment arrangements, establishment of standards generating bodies, monitoring of compliance and listing and placement of qualifications on the register (Bengtsen, 2009; Corpus et al., 2007; ETF, 2017; McBride & Keevy, 2010).

Corpus et al. (2007) suggest that it is useful to develop a resource strategy prior to implementation as previous experience shows that although the framework development authorities may have enough financial resources, other bodies responsible for implementation of the framework may not have access to the same resources. Therefore, the potential future implementation costs incurred by NQFs receives less attention during the development process. Implementation is an expensive process as it requires a shift from the traditional approach to the outcome-based approach that requires training teachers to understand the new concepts and new approaches to teaching and learning which can be a major cost factor (Grainger et al., 2012). Several studies show that it is important for a country to be aware of its resource constraints, because of the expenses of redesigning qualifications across the whole country and creating a fully outcome-based system may not immediately justify the initial investments (ETF, 2017; McBride & Keevy, 2010; Tuck, 2007).

A number of developing countries are able to obtain donor financing and support from international agencies (Allais, 2011a; McBride & Keevy, 2010). Internationally, GCC countries are seen as the generous donors (World Bank, 2021). Countries in the Asia Pacific region have previously received assistance from the Asian Development Bank (Corpus et al., 2007). Framework development cost nearly 14 million Euros over an eight-year period for South Africa funded by the European Union and Canada (Tuck, 2007). It appears from the literature that finance can majorly affect effective implementation. Employing the right staff with expertise will also be impacted by finance and this study will therefore explore these factors in the UAE, Bahrain, and Oman through interviews. This will be further discussed in the discussion chapter.

2.4.3.5 Stakeholders

In relation to NQFs, the term '*stakeholders*' according to Keevy (2005, p.50) are individuals and institutions who influence NQF, and they include overseeing and implementing bodies, government departments, quality assurance bodies, employers and learners. NQFs are said to provide a platform for all stakeholders and in particular, the three main sectors of education (the school, higher education, VET) and the labour market to come together (Bjørnåvold & Coles, 2010).

The challenge with stakeholders is rooted in harnessing their support and building common understanding between them which is not an easy task because a lot of power play often exists between them (Deij, 2009b). Allais et al. (2009) state that an understanding of the framework and the practical need to know about it can improve stakeholder coordination. This study will further explore stakeholder challenges and discuss the implications in Chapter 5.

2.4.3.6 Consultants

A number of developing countries employ foreign consultants to support them in the development of NQFs (Young, 2005). While consultants play an important role in the development of NQF, studies show that there are also challenges in employing consultants. Young (2005) expresses concern that developing countries tend to have an over-dependency on foreign consultants. He also adds that indiscriminate employment of foreign consultants can lead to problems during the NQF implementation. A comparative study on sixteen countries showed that NQFs in many countries are mostly led by human

resource personnel, instead of technical experts and the process of development is often subcontracted out to consultants (Allais, 2011a).

Foreign consultants from Scotland, Ireland and South Africa have supported the UAE, Bahrain, and Oman in the development of their NQFs (SQA, 2015, 2019). In Barnett's (2015) view, GCC countries employ foreign consultants because they are able to deliver the product without claiming a stake in the policymaking process. Therefore, developing countries use international consultants to legitimise borrowed policies and indigenise them (Allais, 2014). This study will explore the challenges with consultants from both the point of view of the policymakers and consultants themselves, and discuss this further during the analysis of results.

2.4.3.7 NQF Register and Placement of Qualifications

For a comprehensive NQF to achieve its purposes such as lifelong learning, qualifications from all three sectors in education have to be quality assured and placed on a qualifications register or database. According to ETF (2017), this is the most important process. During the development process, Tuck (2007) suggests that countries need to make a decision on how to list existing qualifications, new qualifications, and foreign qualifications on the register. Some countries list existing qualifications automatically on the framework, while with others, where the aim is to promote outcome-based education, there might be a requirement to change the existing systems (*ibid*, 2007).

A study by UNESCO (2014) suggests that once implementation starts, a large number of qualifications needs to be defined, listed and placed on the

framework a few years down the line. This is an overwhelming task for developing countries because they need to develop hundreds of new qualifications and also review their existing qualifications (ETF, 2017). For example, South Africa generated 11,615 qualifications between 1997-2007; in China, 1933 qualifications were placed on the framework, between 1994-1999; and New Zealand's qualifications register included 850 whole qualifications and 16,500 unit-based standards between 1993-2002 (*ibid*, 2017). This suggests that countries may take 10 years or more to place qualifications on the framework.

The Annual Report of Cedefop (2014, p.45) argued that some of the European Frameworks are empty frameworks without any link to 'real' qualifications. Policy borrowing in many of the new generation framework countries has led to '*zombie NQFs*' or '*empty NQFs'* because they do not have qualifications placed on them (Keevy & Chakroun, 2015, p.91). Keevy's (2005) earlier study also showed that qualification registers are costly to set up and they also require continuous maintenance from highly skilled staff. This again highlights the importance of skilled expertise and financing.

Studies shows that many European and Arab countries such as Armenia, Belarus, Bosnia and Herzegovina, Egypt, Jordan, Lebanon, Palestine, Tunisia, and the Ukraine did not have a register for qualifications when they completed their development of the qualifications framework (UNESCO, 2017). More recently, there has been increased emphasis on qualification registers (Garmesh, 2020). An NQF must be populated with qualifications to become a framework of qualifications lest they become useless constructs (Deij, 2021).

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The NQF Handbook Bahrain and the QF*Emirates* Handbook mention the development of a national register. The QF*Emirates* Handbook states that it aims '*to establish and maintain an up to date public register of policies, advisories and supporting guidelines on the Qualifications Register and information System'* (NQA, 2012, p.85). Oman also has plans to develop a national database (OAAA, 2016). This study will further research the frameworks in the UAE and Bahrain to see if they are populated with qualifications and further explore if there are any challenges associated with this. The characteristic features discussed above are summarised at Table 2.2.

NQF Characteristics	UAE	Bahrain	Oman
Governance	National Qualifications Authority (NQA)	Education and Training Qualifications Authority (BQA)	Oman Academic Accreditation Authority (OAAA)
Purpose	Reforming	Reforming	Reforming
Typology	Integrated	Comprehensive	Comprehensive
Prescriptiveness	Regulatory	Regulatory	Regulatory
Type of regulation	Optional to put qualifications on the framework register/ database	Compulsory to put all qualifications on the framework register/ database	Compulsory to put all qualifications on the framework register/ database
Qualification types	Predominantly whole qualifications	Predominantly whole qualifications	Predominantly whole qualifications
Number of levels	10	10	10
Level of Integration	One set of level descriptors	One set of level descriptors	One set of level descriptors
Benchmarks	Australia, Ireland	Scotland, Australia, Malaysia, UK	Scotland, Australia, Ireland, Malaysia New Zealand, Bahrain, the UAE,
Qualifications Register/ Database	Individual Registers with the sectors	National Register/ Database	In development
Finance Arrangements	Institutions have to pay a fee to place qualifications on the register	Free	Institutions have to pay a fee to place qualifications on the register

Table 2.2: Summary of NQF characteristics in the UAE, Bahrain, and Oman

2.4.4 Stages in the development and implementation of NQFs

This section will situate the chronology of development and implementation in the UAE, Bahrain, and Oman within these stages in order to elucidate the data analysis. Several research studies have specified the various stages in the development of NQFs (Cedefop, 2010a; Deij, 2009a; ETF, 2014, 2017). The most common stages in development and implementation are as follows: exploration stage, conceptual stage, design stage, testing stage, implementation stage, and review stage (Deij, 2009a).

At the exploratory stage, countries attempt to understand the framework, take into account both successful and not-successful international practices, identify key stakeholders, and clarify the context (ETF et al., 2021). At the second stage - the conceptual stage, formal working groups are established and the rationale, scope and objectives are agreed upon (Deij, 2009a; ETF et al., 2021). Having identified these requirements, during the third stage, technical features of the framework are developed and the major temptation at this stage is in copying elements of framework design from countries with different contexts (Deij, 2009a).

In the fourth stage, new mechanisms developed such as the levels, level descriptors, qualification register, assessment procedures, and recognition of prior learning are tested and negotiated with stakeholders. The main challenges at this stage are ensuring costs, time and critical evaluation. Some countries skip this stage and Deij (2009a) cautions that this is a big risk to take. In Bahrain, this stage was called the set-up phase. Seventeen institutions took part at the testing stage (SCQF & BQA, 2018). In Oman, this stage is called the

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pilot stage and was launched at the end of 2018 (OAAA, 2018c). A number of briefing sessions with stakeholders were held to support this initiative (OAAA, 2019b).

The framework becomes operational when it gets approved by a legal authority at the fifth stage and implementation normally starts with populating the frameworks with qualifications (Deij, 2009a). This stage takes time, and its impacts take years to manifest. The final stage that of review, is normally carried out five to seven years after implementation. Here the functionality of the framework, its achievement of objectives, and the commitment of stakeholders are evaluated (Deij, 2009a; ETF et al., 2021). The time dimension is said to be an important factor to be considered for impact evaluation (Cedefop et al., 2017; Pilcher et al., 2017). In the first two years after implementation, only the evaluation of architecture is possible and at least five to ten years is required for actual impact to be assessed (Taylor (2010) in Cedefop et al. (2017)). Table 2.3 shows the chronology of the different stages in the development and implementation of NQFs in the UAE, Bahrain, and Oman.

Stages (Deij, 2009a)	QF*Emirates* (NQA, 2012)	NQF Bahrain (BQA, 2020)	OQF (OAAA, 2018)
Exploration Stage	2010	May 2010[3]	2014
Conceptual Stage	2010 to Feb 2012	Jan 2010 to Nov 2011	May 2015 to March 2017
Development Stage			April 2017 to 2020
Testing Stage	-	2012	Dec 2018 - 2020
Implementation Stage	2012	2014	Expected from 2021
Review Stage	-	-	-

Table 2.3: Chronology of NQF development and implementation stages in the UAE, Bahrain, and Oman

2.5 Chapter Summary

This chapter has explored the literature related to policy lending and borrowing in comparative research, highlighting NQF policy lending and borrowing thereby justifying its application to this research. This chapter has also reviewed international literature on the design features of NQFs centred on the intrinsic and institutional logics of NQFs, providing the lens for exploring and explaining the research data. The concepts discussed in this section will be revisited during the analysis of research findings. The next chapter describes the research methods used in this study.

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[3] http://www.tradearabia.com/news/EDU_170839.html, accessed on 25 August 2020

Chapter 3 Research Design and Methodology

3.1 Introduction

This chapter explains the methodological choices behind this research, the sources of data along with the philosophical assumptions underpinning the thesis's choice of research questions, research design, methodology, and the ethical constraints of the geography of this study. In line with most research which looks at the participants' experiences, meaning and perspectives in order to understand the issues, tensions and outcomes, I chose a qualitative research method located within a constructivist paradigm. This research lends itself to a comparative case study research because the focus of the study is to investigate the challenges faced by the three countries the UAE, Bahrain, and Oman during the development of their National Qualifications Frameworks (NQFs). To understand the cases in this research context, case study rationale is provided below.

3.2 Selection of Cases – the UAE, Bahrain, and Oman

Around 160 countries in the world are currently developing NQFs (Jonsson, 2016). Among these, three Gulf Cooperation Council (GCC) countries - the UAE, Bahrain, and Oman have been selected as cases for this research study, due to their geographic proximity. There are six GCC countries and they have similar monarchial form of government, are culturally homogeneous, and have similar political and historical characteristics. This homogeneous and similar nature of these countries lends itself for this comparative case study research as suggested by Fraenkel et al. (1993, 2012).

Appropriateness of the cases are demonstrated by their fit to the purpose of this research study (Huberman & Miles, 2002). This was decided upon based on the criteria of countries having a 'comprehensive' NQF. The UAE, Bahrain, and Oman have been chosen because these three countries have a comprehensive NQF. Among the other GCC countries, Saudi Arabia has a sectoral academic qualifications framework, Kuwait has a sectoral vocational qualifications framework and Qatar is planning to develop a comprehensive qualifications framework (Grainger et al., 2012). This also ensures adequacy on the number of cases and is in line with Creswell's (2007) guidance, that a researcher should choose no more than four or five cases to focus upon because a greater number of cases can dilute the overall analysis and reduce the depth of the cases.

3.3 Background to the Cases in the Case Study

The historical context of this research study was the GCC region. GCC countries are an alliance of six Middle Eastern countries – the UAE, Bahrain, Oman, Qatar, Saudi Arabia and Kuwait. These are shown on the map at Figure 3.1.
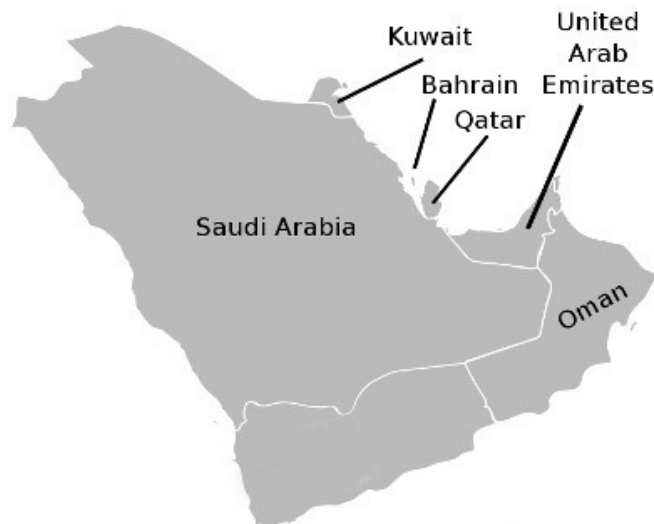
Figure 3.1: Map of the GCC Region
(Source: https://commons.wikimedia.org/wiki/File:Arabian_Peninsula_Map.svg)

Education in the GCC countries started a century back, with Kuwait and Bahrain having the oldest education systems (Dowling, 2017). School education started in 1911 in Kuwait; 1919 in Bahrain; 1930 in Saudi Arabia; 1956 in Qatar; and not until the 1970's in the UAE and Oman. Compared to school education, developments in higher education in all the GCC countries are relatively young and happened only over the past 60 years. The oldest university in the GCC region started in 1957 in Saudi Arabia. The first university was established in 1968 in Bahrain; 1976 in the UAE and 1986 in Oman (*ibid*, 2017).

3.3.1 The Gulf Cooperation Council (GCC) Region

The GCC region is an interesting region for this case study research on NQFs because its education systems are relatively young and there is a pressing need for human capital and skills development in the region. The shortage of skills and human capital has resulted in the large presence of a global expatriate workforce that brought in talent and labor. The dependency on foreign

workforce has resulted in limited development of the skills of the local people and this has caused unemployment of the citizens (Shediac & Samman, 2010).

The GCC education system has yielded disappointing results starting from school education, and neither higher education nor vocational education and training have supported in enhancing the employability skills of the citizens (*ibid*, 2010). Economic strategies were disproportionally focused on the energy sector and, with the oil economy declining in recent years, the GCC countries are aiming to move towards a knowledge-based economy (Kumar & van Welsum, 2013). Hence there is an increased demand for skills, particularly in the sectors identified for diversification such as tourism, fisheries, mining, transport, logistics etc.

In order to reduce dependency on a foreign workforce, the governments have led workforce nationalisation initiatives (such as, Saudisation, Qatarisation, Omanisation, Emiratisation, Bahrinisation and Kuwaitisation) to provide employment to its nationals and encourage its citizens to gain skills and competencies for employment in these sectors (Randeree, 2012). However, in order for these initiatives to be effective, stronger links with industry is required and NQF is a tool that has the potential to help in strengthening these links across the sectors of education, training and industry.

3.3.2 Case Context: the UAE, Bahrain, and Oman

As shown in Figure 3.1, Bahrain is the smallest country in the GCC region with Manama as its capital. Oman is the second largest among the six GCC countries. Its capital is Muscat. The UAE is a federation of seven emirates - Abu

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Dhabi, Dubai, Sharjah, Ajman, Al Ain, Fujairah, Ras Al Khaimah and Umm Al-Quain. These emirates were established in 1971 with Abu Dhabi as their capital. Each of these Emirates are ruled by seven monarchs who are represented in the Federal Supreme Council, which is the core decision-making body of the country (Kamal, 2018). The three countries vary considerably in their population and size. This is shown at Table 3.1.

	The UAE	Bahrain	Oman
Country Size	83,600 km^2	765 km^2	309,501 km^2
Total Population	9.4 million	1.5 million	4.6 million
Capital	Abu Dhabi	Manama	Muscat

Table 3.1: Country size, population and capital of the UAE, Bahrain and Oman study (Source: https://databank.worldbank.org/)

3.3.2.1 Qualification Systems

In Bahrain, schooling or general education is the responsibility of the Ministry of Education (MoE); Higher Education is supervised by the Higher Education Council (HEC) and the Ministry of Labour and Social Development (MLSD) is responsible for the Technical and Vocational Education and Training (TVET) sector. In Oman, schooling is supervised by the Ministry of Education (MoE); Higher Education falls under the remit of the Ministry of Higher Education, Research and Innovation (MoHERI); and VET is under the Ministry of Manpower (MoMP), (now known as the Ministry of Labour) (SQA, 2016).

The UAE differs from Bahrain and Oman in that it has multiple bodies responsible for its education systems due to its federal system of government. The Ministry of Education (MoE) supervises both school education and higher education at the federal level. At the state level, the Department of Education and Knowledge (ADEK) is responsible for schools in Abu Dhabi, and the Sharjah Private Education Authority (SPEA) is responsible for schools in Sharjah. There are two key bodies regulating school education in Dubai, namely the Dubai Education Council (DEC) and the Knowledge and Human Development Authority (KHDA) (KHDA, 2014). The Vocational Education and Training Accreditation Commission (VETAC) is responsible for vocational education and training at the federal level. At the state level, VETAC is supported by two other bodies – the KHDC in Dubai which covers only Dubai and the Abu Dhabi Centre for Technical and Vocational Education and Training (ACTVET) which covers Abu Dhabi as well as the other five Emirates (also known as the 'Northern' Emirates) (Kamal, 2018).

The nature of qualification systems is seen to vary between these three countries, and they are influenced by the context in which they reside. The selection of three countries responds to the criteria of purposeful sampling and the unique social, cultural and political contexts in these three countries supports the case to site this research within these contexts.

3.3.2.2 Quality Assurance of Qualification Systems

Bahrain has a single independent entity that manages the quality assurance of its entire education system known as the Education and Training Qualifications Authority (BQA). In Oman, quality assurance of school qualifications is

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managed and supervised by the General Directorate of Educational Evaluation and Examinations which falls under the remit of Ministry of Education (MoE). Quality assurance for higher education institutions is regulated by an independent body, the Oman Academic Accreditation Authority (OAAA); and it is not clear who performs the quality assurance for vocational programmes in Oman (SQA, 2016).

Similar to Oman, the UAE also has multiple bodies responsible for the quality assurance of its education systems, however, they are more complex in the UAE due to its federal nature, with Abu Dhabi and five northern Emirates having separate systems to the Emirate of Dubai. The Department of Education and Knowledge (ADEK) is responsible for quality assurance of schools in Abu Dhabi. Dubai Education Council, (DEC) and the Dubai Schools Inspection Bureau (DSIB) both have responsibilities for the quality assurance of schools in Dubai, and the Ministry of Education (MoE) is responsible for quality assurance of schools in other emirates (TRA, 2021). The Commission for Academic Accreditation (CAA), governed under MoE is responsible for the quality assurance and accreditation of higher education. Quality assurance of Technical and Vocational Education and Training (TVET) is the responsibility of Vocational Education and Training Accreditation Commission (VETAC) (NQA, 2014b). Abu Dhabi Centre for Technical and Vocational Education and Training (ACTVET) is authorised to regulate quality assurance of TVET for Abu Dhabi and the northern Emirates (Kamal, 2018; NQA, 2012) and Qualifications and Awards in Dubai (QAD), an arm of KHDA, is responsible for quality assurance of TVET in Dubai (KHDA, 2014). The unique nature of the educational and quality assurance of these systems provides a distinctive opportunity to learn

about the context in which the NQFs get developed and implemented in particular to understand the federal diversity in the UAE.

3.3.2.3 National Qualifications Framework Formation and Governance

The Bahrain Qualification Framework (BQF) was launched in May 2010 by Tamkeen, a semi-autonomous government agency. This agency has been provided with technical assistance by the Scottish Qualifications Authority (SQA) to develop and implement the BQF (SCQF & BQA, 2018). In 2012, the project was transferred from Tamkeen to the BQA. With the shift in responsibility from Tamkeen to the BQA, there was a change in the title of the project from 'Bahrain Qualifications Framework' to 'National Qualifications Framework', Bahrain (BQA & QQI, 2014). Responsibility for listing and placing qualifications of all three educational sectors on the NQF rests with the BQA (BQA, 2020).

In the UAE, the Abu Dhabi based National Qualifications Authority (NQA) is responsible for the Qualification Framework for Emirates (QF*Emirates*). In contrast to the UAE and Bahrain, Oman first developed a sectoral qualification framework for higher education in 2004. Oman is currently developing a comprehensive Oman Qualifications Framework (OQF) and this is expected to start its implementation in 2021 (OAAA, 2018a).

This section has sited the qualification systems and the quality assurance systems of the three countries - the UAE, Bahrain, and Oman in the research context. The findings will be collected separately from each country and compared in order to enable a response to the research questions. A summary

of the education systems, quality assurance and NQF formation and governance in all three countries is shown at Table 3.2.

Country		General Education Sector	Higher Education Sector	Vocational Education and Training Sector
The UAE	Education	MoE, DEC, SPEA, KHDA	MoE	VETAC
	Quality Assurance	MoE, KHDA, DEC, DSIB	CAA	KHDA, QAD, ACTVET
	NQF Authority	NQA		
Bahrain	Education	MoE	HEC	MLSD
	Quality Assurance	BQA		
	NQF Authority	BQA		
Oman	Education	MoE	MoHERI	MoL
	Quality Assurance	MoE	OAAA	unknown
	NQF Authority	OAAA		

Table 3.2 Summary of educational systems, quality assurance and NQF structures in the UAE, Bahrain, and Oman

3.4 Qualitative Methodology

3.4.1 Philosophical Position and Approach

The philosophical stance that is taken in this research study is that of constructivism. The decision to use constructivism was based on the belief that the social world is subjective and is constructed and interpreted differently by people. In this approach, constructed meanings and interpretations are based on the participants' views. This research investigates the developmental process of a national policy by exploring the contextual variations in the three GCC countries taken as case studies. In order to understand these challenges, the lived experience of people involved during the development and implementation stages of the policy were gathered.

Research considerations are commonly characterised by their ontological, epistemological and methodological questions. The dimensions of understanding the world around us is given by ontology, and epistemology influences how a researcher frames research to build knowledge and these support in how the research outcomes are meaningfully interpreted. Epistemologically a constructivist position is adopted and the researcher and the participant co-construct meanings through a dialogic process and build knowledge within the interview environment. A dialogic interviewing process helps participants construct a conscious account of their working milieu and through a dialogic interviewing process, participants tacit understandings of their professional environment can be brought to the forefront (Knight and Saunders, 1999). NQFs are social constructs (Higgs & Keevy, 2007; Keevy, 2005) and therefore a constructivist approach is suitable for this research as it

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supports in the interpreting and understanding of participants' construction and reflection of their experience on the development of NQFs. Dialogic interviews provided the participant with the opportunity of reflexive thinking where the participant undertook a process of construction with the interviewer (Knight and Saunders, 1999).

3.4.2 Methods: Comparative Case Study

According to Goodrick (2014), a comparative case study is an appropriate method to use when understanding the context as being important to understanding the success or failure of a policy. He adds that a case study approach provides in-depth examination of a single case such as a policy or an implementation process; or covers two or more cases to produce a generalised knowledge on how and why particular policies worked or did not work. Hence, this method was selected in order to examine the NQF policy process, and how the challenges faced by the three countries differed. Exploring the benefits and challenges of policy development in three cases (countries), the UAE, Bahrain, and Oman also provide a real-life context suitable for this comparative case study research (Yin, 2003). And in order to construct these case studies a series of interviews were conducted with relevant policy makers, consultants and other stakeholders who contributed to the policy development process.

Creswell (2007) explains that in a comparative case study method, one issue or concern is selected, and the researcher selects multiple case studies to illustrate the issue. The three cases selected are the three countries, the UAE, Bahrain, and Oman, and the issue investigated the development of an NQF. As a researcher I was aware of the many possible variables for selection (Eckstien,

1975 in Merriam 1985). For example, if a qualifications framework development is investigated across three countries, the focus of study can be: NQF development (n = 1) or the three countries (n = 3) or the main stakeholders involved in the development of NQF - school, vocational and higher education (n = 3) or the individual institutions (n = 1) or the users (say n = 100,000). This study uses n = 3, the three countries in order to investigate the different perspectives on the development of NQFs.

The results and analysis in this research study follow a combination of description and thematic interpretation using the policy borrowing and lending perspective. The discussion of the findings in this study will consider the similarities and differences in cross-case comparisons to explore for example, why one case is more effective than the other as explained by Crowe et al. (2011).

3.5 Ethics

This research has been designed and approved in line with Lancaster University's Ethics and Research Governance Code of Practice in April 2018. This research study is considered as 'low risk' and not a 'minimal risk' research due to the elite nature of some of the participants. All participants in this research were provided with information about the research in the form of a participant information sheet, and consent was obtained in writing based on that information. To mitigate all risks to participants, the risks were also verbally explained to the participants, and informed consent was agreed prior to the interview taking place. All data generated during this research such as audio recordings and transcripts are stored on a secure password protected university

server. All transcription files and digitally recorded files will be deleted after the completion of this study.

Ethical concerns relate to the risk of identification for the participants. Case study research involves taking extensive data from people and hence to sustain the concept of respect for persons, having arrangements for concealing individual identity is important (Bassey, 1999). Bassey (1999, p.78) explains that concealing individual identity is not easy as people working within the organisations are likely to recognise their colleagues in a 'disguised' report, particularly those with senior responsibilities. During transcription and analysis, index coding using letters and numbers was given to participants' names to de-identify them. As the number of key policymakers and consultants are key figures in the three countries, their gender was not revealed so as to avoid easy identification.

Most participants were non-native speakers of English and hence many quotations used in this thesis have a non-standard use of English. Editing quotations may alter the originality and hence they have not been edited. However, the thesis has ensured increased awareness and sensitivity to ensure credibility and authenticity when using these quotations (Feldermann & Hiebl, 2019). Verbatim quotations of participants are used in text to support the analysis of data in order to create more impact than the researcher's narrative in conveying participant views.

3.6 Researcher's Position: Insider Research

At the time of this research study, I was working as a Review Director for audits and accreditation in the Oman Academic Accreditation Authority (OAAA), the

organisation mandated to develop Oman Qualifications Framework (OQF). I was also part of the OQF development team. Later I worked with one of the implementing bodies of OQF, the Ministry of Manpower, (now known as Ministry of Labour). Working with entities responsible for both OQF development and implementation provided me with the opportunity to participate in various activities such as workshops and discussions. This gave me a good understanding of the actual development process taking place in Oman and the intended implementation process. This therefore makes this research study an insider research project.

Insider detailed projects can be fully informed and are better placed to propose effective change strategies (Costley et al., 2010). Having an insider status in Oman, helped me to source interviewees more easily. As part of this research study, I had to visit two other countries, the UAE and Bahrain, and being an insider in Oman supported me with the gaining of access to participants. I was welcomed and supported as someone working in a peer organisation in both the UAE and Bahrain as I was working in a similar government organisation. I was aware that insiders have more access to secondary data such as minutes of meetings, working reports, policy papers etc and even if the researcher does not use this data, the researcher has the knowledge of the data that can affect the analysis *(ibid*, 2010).

As my professional role was closely connected with this research, it was important to consider my positioning and any conscious or unconscious bias during the research process as I had the potential to be committed to the successful implementation of the NQF policy. This was done by ensuring that

reflexivity was built into the study by internally reflecting on the research process. I have also endeavoured to make a deliberate attempt to focus on the empirical evidence of the research study and be mindful of my positionality so that the findings can be presented with the minimum of bias.

3.7 Research Participants

In this research study twenty-one participants were purposefully selected from a pool of policymakers, consultants and stakeholders who have contributed to the development of NQFs in the UAE, Bahrain, and Oman. One of the main pillars of this research was interviewing the right people who can address the concerns raised in my research objectives. I did not want to interview people who only had opinions on NQFs; rather I wanted to interview a specific group of people who would be able to provide answers to the research questions. Hence the sample chosen is based on the relevance of participants to the research questions of the study. This is known as purposeful sampling where the researcher selects a sample from which most can be learned (Fraenkel et al., 2012; Merriam & Tisdell, 2015). The purposeful sampling carried out in this research is '*stakeholder sampling*' which is useful when doing a policy analysis because it involves identifying the major stakeholders such as the policymakers and consultants who have been involved in designing the policy being explored (Given, 2008, p.697).

There are a number of people involved in the policy development process and they each have unequal power and knowledge about the policy. Among them, interviewing policymakers and stakeholders involved directly with the policy development was important to this research in order to ask relevant questions

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to participants who were considered as experts on NQFs in the UAE, Bahrain and Oman. This research categorised interviewees into three main categories – policymakers, consultants and stakeholders who were involved in the policy development process. Each category had differing levels of power in the decision-making process and they provided different insights to the NQF policy development process. The status, roles and positionality of each of these participants varied. Policymakers are senior bureaucrats who are responsible for the monitoring the development and approval of the policy. Policymakers had the decision-making power and hence had more status than consultants and other stakeholders and this included the researcher as well. Consultants are individuals responsible for the design and development of the policy. Consultants are policy experts who have more power in terms of knowledge, although this is more advisory in nature. Stakeholders are representatives from the various sectors in education who provide their feedback to the developing policy instrument in consultation with their respective sector. Oman is currently developing its NQF, hence stakeholders representing NQF stakeholder bodies were identified and selected. This was not possible in the UAE and Bahrain where development was completed more than five years back, Semi-structured interviews were used to interview participants in order to gain in depth information about the policy development process that is generally not available in policy documents. Semi structured interviews also reveal how the policy network is interconnected and how each participant maintain their respective powers.

Interviewing participants who hold formal positions of power as policymakers in government organisations are considered as elite interviews. Elite interviews are generally undertaken with people who are in a privileged position in a particular area of policy and have direct influence over it (Huggins, 2014). Elites can be categorised as experts on the topic in question with more influence and power relative to the researcher (Wicker, 2014). Interviews with elite participants were scheduled with power dynamics in mind, at a time and location that was convenient to them. During interviews, there was no transfer of power onto the interview space due to the participants' professional positions (Smith, 2006). One of the practicalities in an elite interview is the possibility of contingency that can arise due to an elite interviewee's professional priorities (Huggins, 2014). This happened to me in one case with an elite participant in Bahrain, who had to reschedule the interview, due to another important meeting with a Minister.

3.7.1 Sampling Strategy

The research aimed to identify and ensure balance of interview participants in all three countries. However, as the development process was completed in the UAE and Bahrain, and Oman was in the development stage, stakeholders who supported in the development process were available in Oman. Hence this stakeholder group was additionally interviewed in Oman in order to gather in depth and more current information about the policy development process. As a result, five participants from Bahrain, four participants from the UAE and twelve participants from Oman were identified and selected. Snowball sampling was used to enlist participants to gain access to the participants in the UAE and Bahrain. Snowball sampling is a process where existing interviewees help a

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researcher to enlist other participants from their connections (Merriam & Tisdell, 2015). In this method, initial participants selected were requested to identify and recommend other people who could also contribute to this study. Initially one participant was identified from each of the two countries the UAE and Bahrain based on their availability and willingness to participate. Through them, four more participants from Bahrain and three more participants from the UAE were enlisted. All participants from the UAE and Bahrain are government officials who are either policymakers or consultants and involved in different aspects of the NQF development and implementation. A two-stage process was adopted to gain access. Initial access was made through an email request about the participants' willingness to participate. Once they agreed, participants were then formally invited to take part and were provided with all the relevant information. This led to them giving their informed consent to take part in the study.

Initially, it was decided to select only participants who are part of the development process of the NQF policy as it was thought that they will be adequate to address the concerns in the research objectives and research questions. However, during the snowball sampling process some of the participants who were referred in Bahrain, were part of the implementation process of the policy. Participants who were part of the implementation stages were able to give more insights into the various problems that could have been addressed during the development phase. This changed my participant sampling. For the next set of interviews with the UAE participants, I requested to interviewing participants from both development and implementation stages. The interviews carried out in Bahrain were transcribed before my visit to the UAE. This helped in focusing the questions and exploring similar issues.

Participant sampling in Oman consisted of policymakers involved in different aspects of the NQF development and included government officials, consultants and stakeholders who have contributed to the development stage of the NQF project. Snowball sampling was not used in Oman, and as an insider, I approached potential participants directly through emails. Most participants agreed to the interviews and emails were not resent to anyone who did not reply. Participant selection in Oman ensured that all areas of the NQF framework development are represented in the sample and a total of twelve participants were interviewed in Oman. Interviews continued until saturation was reached in each of the case study contexts, and the data collection produced no new information into the phenomenon being studied (Merriam & Tisdell, 2015). When majority of participants in the UAE, Bahrain, and Oman were giving similar information, further interviews were not requested.

3.7.2 Participant Demographics

A total of twenty-one participants (n = 21) participated in the interviews with five participants from Bahrain (n = 5), four participants from the UAE (n = 4) and twelve participants (n =12) from Oman. To ensure confidentiality and anonymity in reporting the findings of the data, a gender-neutral index coding was used – a letter of the alphabet followed by an arbitrary number. The letter 'B' refers to a participant from Bahrain; 'E' denotes 'Emirates' and refers to participants from the UAE and 'O' refers to participant from Oman. Demographical information about the participants is presented at Table 3.3.

To avoid identification of participants and putting participants at risk of facing action for being critical of their country during interviews, their gender or the

exact job title or job description have not been identified. This is because the UAE, Bahrain, and Oman are small countries with limited numbers of staff involved in NQF development and/or implementation, hence identifying participants would be comparatively easy to do. It has however been noted if the participants are policymakers, consultants, or stakeholders along with the stage of development and/or implementation that they were involved in.

Participant Code	Country	Role
B1	Bahrain	Consultant, involved in the development of the framework
B2	Bahrain	Policymaker, involved in the development and implementation of the framework
B3	Bahrain	Policymaker, part of the implementation of the framework
B4	Bahrain	Policymaker, part of the implementation of the framework
B5	Bahrain	Policymaker, part of the implementation of the framework
E1	UAE	Consultant to the implementation of the framework
E2	UAE	Policymaker, involved in the implementation of the framework
E3	UAE	Consultant, involved in the development and implementation of the framework
E4	UAE	Consultant, involved in the development and implementation of the framework
O1	Oman	Policymaker from the vocational sector, involved in the development of the framework
O2	Oman	Policymaker from the school sector, involved in the development of the framework
O3	Oman	Policymaker from the medical sector, involved in the development of the framework
O4	Oman	Policymaker, part of the development of the framework

Participant Code	Country	Role
O5	Oman	Policymaker, part of the development of the framework
O6	Oman	Consultant, part of the development of the framework
O7	Oman	Consultant, part of the development of the framework
O8	Oman	Consultant, part of the development of the framework
O9	Oman	Stakeholder from the vocational sector
O10	Oman	Stakeholder from the higher education sector
O11	Oman	Stakeholder from the vocational sector
O12	Oman	Stakeholder from the vocational sector

Table 3.3: Overview of participants demographics from the UAE, Bahrain, and Oman

3.8 Data Collection

Qualitative data for this research was generated through semi-structured interviews with participants designed to elicit responses to be compared and contrasted (Fraenkel et al., 2012). The interview guide for the semi-structured interviews can be found at Appendix 2. Interviews in Bahrain were conducted in October 2018, the UAE in November 2018 and in Oman from December 2018 to January 2020. A set of interview questions was initially prepared, and during each interview, further questions emerged from the immediate context. The dialogic nature of the interviews allowed the researcher and the participant to engage in a conversation. A pilot interview to test the questionnaire was first conducted in July 2018 over the phone. All other interviews were face to face interviews.

Most interviews were conducted within the interviewees' environments (Merriam, 1985) as the location in which the interview takes place can affect the

responses (Fraenkel et al., 1993, 2012). It was found that policymakers tend to prefer interviews in their official environment, and interviews with consultants were conducted at a location of their preference. Interviews with policymakers in the UAE were conducted at the National Qualifications Authority (NQA) headquarters in Abu Dhabi; interviews with policymakers in Bahrain were conducted at the Education and Training Qualifications Authority (BQA) headquarters in Bahrain, and most interviews in Oman were also conducted at the interviewee's work location.

A digital recorder was used to record all interviews. The interview data was then prepared for analysis through the process of transcription. Gibbs (2007) explains that there are various strategies used for transcribing, and that sometimes, if the interviewee goes off topic, this part may not need to be transcribed as transcribing is a time-consuming activity. All the interviews were transcribed and transcribing one hour of data took around five hours. To support in the process of coding of the textual data and further analysis, all transcripts were uploaded to the computer assisted qualitative data analysis software NVivo^{TM}.

Data in NVivo^{TM} was first coded manually and as a result a large number of themes were initially identified. Then, through the process of structural coding in NVivo^{TM}, five themes that are related to the research questions emerged. Recurring themes were put together and this helps in identifying saturation.

3.9 Data Analysis: Thematic Analysis

Interview data was analysed using Braun and Clarke's (2006) thematic analysis, which is described as a method to systematically identify and organise data in order to identify patterns or themes across a data set. According to Cohen et al. (2013), qualitative data analysis involves making sense of the data, which is making sense of participants' perspectives, views, perceptions, and noting the themes, patterns and categories that emerge from the data in order to move from having raw data to a deeper meaningful data.

Braun and Clarke's (2006) thematic analysis consists of a six-stage approach to analyse data. The first stage was to become familiar with the data set which was achieved through reading the transcripts and taking notes to get to know the data. The next stage was to generate initial codes by collating the relevant data across the entire data set. NVivo^{TM} software supported in collating the data and emerging themes were identified that arose from the examination of data. Initial codes were developed, and these were a mix of both descriptive and interpretive coding. Initial coding generated over a hundred potential codes as well as a number of themes. Areas of similarity and overlaps in the initial coded data were identified to see if a cluster of codes could form a meaningful pattern in the data. The transcripts were then structurally coded in Nvivo^{TM}. Stage three of thematic analysis was to identify themes. Through an iterative process of coding and theming, potential themes and codes were further developed. The query and matrix function of Nvivo^{TM} were used to interrogate the data to help consider the potential codes and themes in a systematic manner. The data was probed to address the 'why' elements of the research questions, ensuring the principles of policy borrowing and lending were used in the development of

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these codes. In stage four of the analysis, the codes and themes were further refined, and a more holistic approach of themes were considered, thus ensuring that a theoretical lens is employed.

The fifth stage in thematic analysis is to name the themes. For example, one of the initial theme name was 'Is the whole equal to sum of the parts'. Some of the sub-themes were 'Drivers of Reform', 'Tensions' and 'Coordination between the Sectors'. After a process of refining, the theme 'Synergetic Potential of the Framework' was firmly established along with the sub-themes 'Synergy Created due to Anticipated Benefits of NQF' and 'Synergy Created by the Drivers of NQF'. Through a similar process, the other four major themes and their sub-themes were also firmly established. The final codes extracted from Nvivo™ are shown at Appendix 4. The final five main themes that emerged are;

Theme 1: Synergistic Potential

Theme 2: Embedding in Context

Theme 3: Sociopolitical Considerations

Theme 4: Sociocultural Considerations

Theme 5: Outcomes

The sixth phase of the thematic analysis was to produce the report. The thematic findings of the research are analysed in the results chapter.

3.10 Robustness of the Study

In this study, Lincoln and Guba's (1986) concept of trustworthiness in order to clarify the ethics of respect for truth and trustworthiness was used and in a case study research, this includes using a variety of data sources. Lincoln and Guba's (1989) four standards were applied, in order to assess the

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trustworthiness of data – credibility, transferability, dependability and confirmability.

Credibility refers to the confidence that can be placed in the research findings and according to Baxter and Jack (2008), in case study research, triangulation of data is a primary strategy to ensure data credibility. Triangulation brings together data from different sources or from the same source through different methods of enquiry, and this strengthens the confidence in a statement (Bassey, 1999). During interviews, information provided by participants in the three countries was triangulated by comparing and cross-checking information obtained at different times. Data was also triangulated with texts, documents, reports and from government websites to ensure consistency with the interview data. This collection and comparison of data enhances data quality based on the confirmation of findings (Breitmayer et al., 1993; Thurmond, 2001).

Transferability is dependent on the context of the study according to Lincoln and Guba (1986). The results of this study were compared with the literature review chapter and this gives strength to this research; hence these results can also be applied on a wider scale and transferred to another country's context. The interpretation of data is not based on personal preferences but based on the data itself, and this ensures confirmability (Korstjens & Moser, 2018). In this research, thorough descriptions of the research steps and sufficient descriptions of research context have been provided to ensure transparency. Together, transferability and transparency support the dependability and confirmability of the study's original contributions.

3.11 Chapter Summary

This chapter has outlined the research design and methodology employed for the study of the challenges in NQF development in the UAE, Bahrain, and Oman. It has clarified the research paradigms, ontology, epistemology, and methodology that informed the research methods and sources of data collection and data analysis. It has also explained the insider status and the trustworthiness and the limitations that bounded this research. Together with the literature review and the theoretical lens of policy lending and borrowing presented in Chapter 2, this chapter forms the basis of the next two chapters in this thesis - Chapter 4 (results) and Chapter 5 (discussion and conclusion).

Chapter 4: Results

The research community in particular has a role to play to share both the good and the bad lessons, for that to be published more widely and make it accessible to policymakers. The NQF research community is very small and it is good to see more and more people engaging. We are the community that share the good and the bad lessons (E1).

4.1 Introduction

The section is guided by the research questions and aims to present both the positive and negative experiences of participants in order to support policymakers who may have an earnest desire to use research to inform policymaking. The section will explore the challenges faced during the development of NQF, within each of the three countries selected for this comparative case study research. Five main themes emerged from the data analysis which then formed the focus for the subthemes. The relationship between the research questions and the themes and subthemes stemming from the research questions are shown at Appendix 3. The results of the investigation are presented in thematic form with each of the sub-themes providing comparisons between the three countries. The lines of demarcation in the results are not discrete and there are overlaps in the analysis of results between the themes.

4.2 Theme 1: Synergistic Potential

In the first phase of analysis, the capacity for NQFs in the UAE, Bahrain, and Oman to achieve their anticipated benefits were investigated and synergistic potential of NQFs was one of the first overarching themes that emerged from the synthesis and analysis of data. This synergy is explored through two sub-themes – firstly, synergy that can be created due to the anticipated benefits from an NQF and secondly, the synergy that can be created by the various drivers of the NQF.

4.2.1 Synergy Created Due to Anticipated Benefits of NQF

The anticipated benefits identified by participants in this research study matched with the common benefits that all countries generally expect from NQFs. Participants linked the problems that they were aiming to solve through NQF to addressing issues related to trust, transparency, consistency of qualifications, mutual recognition of qualifications within and across countries, recognition of prior learning, comparability, and transferability of qualifications between higher education and vocational education, and quality assurance of qualifications. The lack of all these parameters in the qualifications systems in the UAE, Bahrain, and Oman provides an indication of the issues that act as impulses for the development of NQFs in these countries. Reforming and restructuring the qualification systems across the country was mentioned by almost all the participants either directly or indirectly throughout the conversations, and this was the underlying subject in this theme. This concurs with (Phillips & Ochs, 2004b) model of policy borrowing: cross-national

attraction, particularly the need for educational reform, can act as an impulse for policy borrowing.

Participants from Bahrain and Oman expressed concern over the standard and quality of education. Two participants from Bahrain were concerned with the number of unregulated qualifications within the country and how different institutions were providing different standards of education and saw the NQF as a tool to standardise the qualifications awarded by different providers thereby providing an opportunity to rectify the qualification system. For example, a participant from Bahrain said:

> *It was aiming to solve the differences, in my understanding, was that the qualification system was difficult to understand. And there was some concern that within the higher education sector, a degree was not the same across all of the institutions, that some institutions were making the degree a little bit easier for students [….] and also to try and put order into the qualification system* (B1)

Here the participant is seen to feel optimistic that the NQF can regulate the qualification system. Ensuring comparability between similar qualifications from different providers was seen as another benefit that the NQF might help with or even solve. For instance, a participant from Bahrain stated that:

> *there was like no clear value of the qualification to the learners and to the parents. So they cannot compare between the qualifications [.….] We have scattered qualifications, without being standardised* (B5)

One participant from Oman expressed concern that within higher education, different institutions were providing different standards of education. The participant indicated that an NQF can improve matters in this respect:

> *One of the problems that they [policymakers] wanted to solve was the difference in the quality and the standards of the higher education qualifications. Because it was the case that, in some universities, the degrees were demanding than another, so they [policymakers] want to have more equity* (O8)

A similar concern in the vocational sector was expressed by two participants from Bahrain, who explained the challenges in having similar vocational awards with different numbers of credits and as a result, not having a standardised system of qualifications. For instance, a participant from Bahrain mentioned that:

> *Courses are having different credits. And we, and people do not know which one exactly the diploma, the actual diploma could be diploma for two weeks for one month or for one year. So, we didn't have a system for that* (B4)

Another benefit expected was that recognition of qualifications which are not commonly known, such as residency (that medical doctors undertake). For example, a participant from Oman said:

> *I think there will be a lot of benefits for the Ministry of Health in terms of identifying people's qualification. There are a lot of professional qualification that are not at the normal standards*

qualification that are known by people [....] When you tell

somebody I have completed residency program, what is the

residency program to public (O3)

The participant was hopeful to use the NQF as a tool to recognise professional qualifications and health sector qualifications such as fellowships in a similar way to the Bachelor's degree or Masters degree qualifications.

One of the key uses for policymakers across the three countries the UAE, Bahrain, and Oman, is the potential for the NQF to achieve parity of esteem between higher education and vocational education sectors. The main challenge however, lies in establishing trust between these two sectors. For example, a participant from Bahrain stated:

The higher education doesn't have trust that learners coming from

the vocational sector have achieved those learning outcomes and

have been assessed properly […] So, once we put those

qualifications, from the vocational on the NQF on the same levels,

and they can see that we have validated them, then they can trust

the system and take the input and accept them into higher education

(B4)

The participant believed that when higher education and vocational qualifications were put at the same level on the framework, this issue can be resolved, as trust between these two sectors can then be enabled. A similar view on trust was expressed by participants from the UAE and Oman. For example, a participant from the UAE explained:

Many countries see a framework particularly as a technical tool and actually the framework has the ability of a social construct to bring different sectors together, to build trust, and to build a community of understanding of learning. And to build that kind of trust and relationship between different parts of a system, that perhaps, previously doesn't even talk to each other, TVET and HE for example. NQF allows those conversations to happen (E1)

It was clear that countries were expecting NQFs to create mutual trust between these two sectors. Recognising different kinds of learning was another area that the NQF is expected to provide in all the three countries selected for this study. Earning credits for learning in different contexts and recognising the broad range of learning forms were seen as a challenge by participants in all three countries. For instance, a participant from Oman explained:

Another challenge is that we were thinking about the people who have experience, but they do not have any qualifications [......] but they have a lot of experience in, let us say driving (O2)

The participant gave a simple example of a driving instructor who gives driving lessons through competency gained through experience but who has no formal qualifications. The NQF is seen as a tool that can recognise these learning experiences. A similar view was also echoed by a participant from Bahrain who stated:

People without qualification they need to go to universities. We have many people didn't go even to schools. They don't have high school

diploma. But they need to go to university, they need to continue their education. NQF will actually go into solve this problem for them (B2)

In addition to the above-mentioned problems that NQFs are expected to solve, Bahrain and the UAE appear to be keen to obtain international benefit by referencing or mapping their frameworks with other countries. Two participants from the UAE mentioned peer referencing their framework with other countries such as the UK, New Zealand and Australia. For example, one participant stated:

Qualification cannot work only within the national level, it needs international one, and it needs, of course, mutual recognition [….] And this is why we did, when we worked with the UK, New Zealand and Australia, in the mapping of frameworks (E3)

A participant from Bahrain, however, although acknowledging the importance of referencing, was sceptical of the real value of mapping to other countries and questioned:

Whether this international recognition will give you full recognition or just improve the reputation of your qualification, that's another matter. So, we are referenced to the SCQF [Scottish Credit and Qualifications Framework]. But does this mean that anyone any holder of Bahrain qualification will immediately go into the process? No, that's not achieved yet. So, these are good words, good aspirations. But to what extent can they be fulfilled? (B3)

Another aspiration is to build a strong employable workforce like that seen in other countries. For instance, a participant from the UAE stated:

> *NQF really has been of much help to many countries. Talking about South Africa, talking about many European countries, especially when talking about the Eastern European countries when they wanted to build a real, you know, a workforce that can work such as in countries in Western Europe like Germany, UK, and others* [….] *there must be a belief in qualification framework and qualification system by all the stakeholders, that, it is for the benefit of the education system, for the benefit of the socio-economic development, it is for the benefit of the labour market and the workforce* (E3)

Employability agenda is clearly seen as an important dynamic in these countries. Policymakers and other stakeholders definitely see benefits for their respective countries. It can be observed that all these problems are an answer to the fundamental question of why policy borrowing occurs, the need to problem solve local issues being one of its reasons (Phillips & Ochs, 2003) and in particular, solving employability issues attracts policy borrowing (Eta, 2018). Although all the benefits mentioned by participants are the usual rhetoric claims of NQFs, findings indicate that, the expectation of achieving all the anticipated benefits from developing an integrated NQF creates enhanced initial synergy.

4.2.2 Synergy Created by the Drivers of NQF

A variety of general perspectives have been expressed as drivers for the development of the NQFs. Some participants perceive that the NQF was

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developed to support a knowledge-based economy, some others considered it to be developed as a result of national pressure, while others saw this as peer country pressure. Motives for policy borrowing can be observed to range from economic reasons to advances in knowledge (Phillips & Ochs, 2003).

A participant from Bahrain emphasises the need for knowledge economy and stated that:

> *NQF is a gate, it's a gate, and it will going to have a big impact on the successful of knowledge economy [….] You need to have people with a strong background with a robust qualification system in order for you to have a knowledge economy* (B2)

Another participant from UAE perceives that they cannot be left behind and also added that UAE strives to be number one in everything:

> *The most benefit, for me, as I've been working with it, I consider it as a tool that give you a trust and transfer system or education system internationally, because now, every country got a qualification framework, most of the European and everyone is moving to that track. And if we stay behind [….], and especially as UAE we are looking ahead, where you know, number one and everything, so we cannot go behind* (E2)

It can be seen that the fear of falling behind internationally is one of the motives behind policy borrowing (Steiner-Khamsi & Stolpe, 2006). Another participant from Oman had a similar view and stated that it was peer pressure:

I must be very honest. That it was peer pressure from everyone

here. And we didn't have one. UAE had one. Saudi, Bahrain and it

was like, why haven't we one (O6)

In addition to the above-mentioned reasons, interview data also indicates specific drivers in each country that provided the initial leverage for NQF development. Findings suggest that the UAE and Bahrain have internal drivers for the development of the framework in comparison to Oman, which has an external stimulus.

The necessity to recognise the work experience of the older generation particularly qualifying the military personnel was reflected by two participants in the UAE. For example, a participant stated:

It started with a very strong focus on military and for the military

qualifications to be regularised. As well as a strong focus on prior

learning (E1)

The drive for developing a comprehensive qualifications framework in Oman, is influenced by an external impetus, which is a report by the World Bank that was produced in coordination with the Ministry of Education in 2012, as one participant explains:

The drive for Quality Report, written by the World Bank and the

Ministry of Education, where they said that there should be a

comprehensive qualification framework (O8)

It can be observed that policy borrowing does not always start because of local needs, and international organisations such as the World Bank have been criticised for encouraging such education policy transfer in developing countries (Rappleye, 2006). The advantage of international drivers is that it provides lower resistance to policy borrowing at the local level.

4.2.3 Summary

What has emerged from the results reported here is that the participants are found to be imbued by the ideals and rhetoric of NQFs. The reasons for policy borrowing were similar across the three countries and ranged from solving national problems to meeting international standards. The need and a desire for a reform in the qualification system is apparent in all the three countries and the global solution is seen as a good fit for the local problem (Steiner-Khamsi, 2013). Findings from interviews suggest that stakeholders from different sectors working together to develop the framework ignite a synergy between them, however, the synergy to propel NQFs into achieving their benefits is not explicit in the three countries. This was concluded from interviews with participants in Bahrain and the UAE, who continue to talk about solving problems and achieving anticipated benefits even after having implemented NQFs for more than five years. This indicates that the rhetoric of NQFs may need to be separated from the practical problems associated with the development and implementation of the framework. Interview results also indicate that the momentum caused by this synergy is minimised during the implementation stages, and this has been evidenced in the UAE and Bahrain as explored in the subsequent themes.

4.3 Theme 2: Embedding in Local Context

During the development stage, the core architectural elements of NQFs, such as the levels, level descriptors, learning outcomes and credit framework gets embedded into the local context. These are the intrinsic logics of the framework as explained by (Raffe 1988 in Tuck et al, 2007) and discussed in Chapter 2 (literature review). The related issues that emerged during the synthesis of data have been grouped together and are analysed within this theme. Policy learning is evident in this theme and active engagement of policymakers in embedding these architectural elements can be observed in the data. These elements have been adopted to the local context through a process of debates and discussion with stakeholders.

4.3.1 Framework Levels and Level Descriptors

All three countries in this case study agreed independently on a ten-level framework similar to Australia and Ireland, as opposed to the twelve-level framework in Scotland. Participants from Bahrain and the UAE stated that a number of discussions were held to ensure a robust framework design, contexualised to the requirements of each country that allowed end users such as the learners and employers to understand the framework. Such contextual interactions are said to contribute to the policy development process (Phillips & Ochs, 2003). For example, a participant from Bahrain said:

> *I think level eight, for the Bachelor degree, we had a problem where to put year number four, at eight, seven, because the wording was not clear and people didn't understand few words in English [….]. So, institutions, they couldn't understand what it*

meant. Because as you know, the case different from Scotland,

Ireland and Bahrain. So, we did big changes (B2)

Similar discussions took place in the UAE regarding the number of levels. A participant from the UAE explains the reason for choosing a ten-level framework:

> *we started with, how many levels, some suggested, for example,*
>
> *eight levels, some suggested ten levels [.....] we did not want any*
>
> *kind of misunderstanding that might happen later of the*
>
> *interpretation of the learning outcomes for the level descriptor.*
>
> *Because when we say, eight levels, it means that within level*
>
> *seven, we might, you know, have a postgraduate diploma or*
>
> *postgraduate certificate and maybe the Masters as the case in*
>
> *many countries [....]. So, we wanted to develop 10 levels, to give*
>
> *it a kind of enough space for education training providers. That was*
>
> *a UAE decision and not South African or Australian (E3)*

Oman, similar to Bahrain and the UAE, had similar debates on the number of levels and pegging qualifications at a certain level on the framework. In particular, in Oman, debates focused around allocating suitable levels for vocational and school qualifications. As a participant explains:

> *when we talked about schooling qualifications, they were intending*
>
> *to put schooling qualifications in level three. And we said that [....]*
>
> *because we have done benchmarking, for a lot of qualifications*
>
> *from all over the country. So, I say to them no, if it is a Grade three,*

then it will be a gap with the vocational. Vocational are at Level 4. So, when they match and see, they were convinced, yes. The vocational which are very similar to the secondary schooling is in Level 4. how can I put a qualification at Level 3? So, we decided to put Grade 10 at Level 3, because Grade 10 is also in both - vocational and schooling [....] and they agreed with us (O2)

A participant from Bahrain explained the contextualisation which was carried out on the level descriptors:

The level descriptors they [consultants] work with us to develop them. But we contextualise them to the Bahrain labour market. So, everything even the standards we didn't, we didn't take from them anything ready from the shelf, and we like applied here. We contextualised everything to fit the labour market (B5)

A process of dialogue, modification and indigenisation of the policy between the borrower and the lender can be seen here, and the borrowing country is not just a passive recipient in this process (Phan, 2010). This process of discussion sometimes resulted in dissatisfactions as two participants from Bahrain explain that the level descriptors were copied from other countries, for instance:

We were not happy because they were copied from two level descriptors [....] So, we had to change that. So, once it came here, and we realised that, we worked on changing them. Yeah, and updating them in a way that it's not copy paste from two other

qualifications [....] We didn't expect to have a problem with the

level descriptors. And that set us behind for quite a while (B3)

Policy learning is evident in all three countries. Bahrain has spent considerable time and effort in ensuring adaptability of levels and level descriptors to its national context. The UAE and Oman have also made suitable changes to the structure of the framework in order to adapt to the context of their own country. All three countries have made an informed decision to go for a ten-level framework in order to give sufficient space between levels so that pegging qualifications at a particular level does not overlap with the level above or level below it.

4.3.2 Learning outcomes

Designing learning outcomes facilitates the change from a traditional based qualification to an outcome-based qualification required by an NQF. A participant from the UAE said:

The key of these criteria that the framework should be established

on learning outcomes, should be based on learning outcomes (E3)

Though the role of learning outcomes in an NQF was clear, countries have faced challenges as the institutions were not able to use learning outcomes and hence not able to practice their NQF as a participant from Bahrain explains:

Some of them are not aware of the learning outcomes approach,

they are still using the old approach like objective based approach,

some of them are not aware that they should there should be like,

proper study or market research before developing the program,

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*some of them are not aware that assessment should cover the learning outcomes (*B5)

This was also echoed by participants from the UAE and Oman:

Learning Outcomes not lining up you know. The level descriptors, not having assessment criteria (O7)

We've done like focus group previously, and this is now like, this is the third or fourth workshop, to look at it to be been working on credit matrix, learning outcomes, looking at what will fit more the market, how to make it more simple for them to understand it, because some of them they don't know how to write learning outcomes, its really difficult to get their engagement, and they understand that we spend lots of time doing workshop for them to get them understand that how to write learning outcomes (E2)

Capacity building through workshops is evident in Bahrain and in the UAE. A participant from Oman reasoned that lack of awareness in designing learning outcomes is because qualifications are imported from other countries and taught in Oman.

The problem and the challenges is, most of these colleges, they do not design their own qualifications. They are professors lecturers, but they have no idea. Everything is ready for them, the learning outcomes, assessment is ready, they come, and they teach and that's it. So, they don't know even how to do the learning outcomes. It is a new thing for them (O5)

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All these comments highlight the lack of expertise in defining and applying the learning outcome approach. According to SAQA (2000, in Keevy, 2005), outcome-based education is not just a curriculum change, but it is a systemic change that requires a commitment to focus and organise everything in an educational system around what is essential for a learner to be able to successfully do at the end of their learning experience. Infrastructure for such experiments should ideally be in place (Phillips & Ochs, 2003) and countries may need to be aware of Keevy's (2005) caution that shifting to outcome-based education can open a pandora's box of confusion as it can bring along with it a number of problems if there is insufficient regard to the contexts of implementation.

4.3.3 Credit Framework

Most NQFs quantify the time taken by the learner to complete a qualification using a credit framework. And all three countries encountered challenges to integrate the different sub-systems of education and in particular, higher education and vocational education in terms of credit and notional learning hours. A participant from Bahrain explained:

> *In order to reach the ideal goals of the NQF [….] one of which is having a credit framework [….]. Another thing is having an accumulation transfer system, if your goal is to have an RPL eventually to be and to have this kind of progression pathways, and trust between vocational education training, and the higher education, you need to have a unified credit system within the*

country. So that's something that we don't have yet and we need

to work on (B3)

The UAE has had deliberations in assigning learning hours to credits, since the UAE follows a 15-hour credit system and many other countries around the world follow a 10-hour credit system. Yet, after discussions, the UAE has decided to keep the 15-hour credit system that the country was following earlier, in order to avoid further confusions within the education and training systems. A participant explains:

> *With the issue of the credit, you know, I mean 10 hours, or 15*
> *hours. Now, what was at that time implemented, in UAE is still is*
> *that one credit equal to 15 notional hours. So, we did not want, you*
> *know, to create a kind of confusion with the education training*
> *providers and the system. We said, no, we will keep working one*
> *credit equals to 15 notional hours* (E3)

Oman has also had discussions around the assignment of credits including the accumulation and portability of credits required for learning in different contexts. A participant explained:

> *It is basically, one credit is 10 hours. One credit is the lowest*
> *amount that you can register on the framework. you can add two,*
> *four, five, twenty. It would be full training. So, it was little, and you*
> *can make them have different qualification can consist of whole*
> *range of credits put together and they can be compounded into*
> *different qualifications based on what the industry needs* (O6)

A credit framework supports in the articulation and transfer between academic and vocational sectors as learners can accumulate credits to obtain various qualifications. The value assigned to credit is seen to differ between the three countries and the nature of policy learning and adaptation to local context is evident from the data.

4.3.4 Recognition of Prior Learning

The ability of NQFs to integrate all learning systems, by recognising prior skills acquired through experience, was one of the attractive elements for all three countries. However, the interviews have highlighted the challenges faced by countries in embedding the Recognition of Prior Learning (RPL) into local context. A participant in Bahrain expressed concern over the higher education sector not being comfortable with the concept of RPL and stated:

> *The one area for the Recognition of Prior Learning, in the NQF, that was one of the reasons it was set up [….] but within the higher education sector, that's not allowed. So, we're trying to develop something that's not allowed by the Higher Education Council. And I think there was some internal discussions [….] But really, there was conflicts in the policies, in what the NQF is trying to achieve in respect for RPL, and the existing regulation. So, they would have to find a way around that* (B1)

The UAE is also developing its RPL policy as explained by a participant:

> *We have developed a policy as because we don't have a policy. But the qualifications framework facilitates that policy, which is*

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RPL recognition for learning, and it is a well-known in European

where they implement the implement framework [….]. we have a

guideline of policy for vocational education, higher education and

for general education [….] It is not yet been finally approved, it is

*in the final stages to be approved (*E2).

Both Bahrain and the UAE have had challenges with implementing RPL five years (or more) after implementation of the NQFs. Higher education was found to be quite inflexible, and approval of policies requires the consensus of all stakeholders, particularly the higher education sector, as the more dominant sector. The education sectors, particularly the higher education sector, has been found to be territorial in guarding its boundaries. Hence the RPL can be seen to require a stronger enabling environment to support it. It can be observed that the preparedness of the local context to accept or receive ideas such as these are central to policy borrowing (Steiner-Khamsi, 2014).

4.3.5 Summary

This theme has analysed the debates and discussions in contextualising the various elements of the borrowed policy in the UAE, Bahrain, and Oman. Results clearly suggest that NQF policy is influenced by other countries, particularly the design of levels, level descriptors, credit systems, learning outcomes and RPL. Countries have attempted to balance various aspects while constructing their frameworks to ensure coherence with international practice, and embedding them into local context which was found to be difficult at times. In order to effectively implement these core functions, NQFs should aim to go

beyond designing the set of technical features and harness the trust and ownership of all stakeholders (Chakroun & Sicilia, 2010).

4.4 Theme 3: Sociopolitical Considerations

This theme analyses the sociopolitical discussions around the enabling aspects for the framework such as legislative and regulatory requirements, policy breadth, structural arrangements, and resource constraints, which also constitute the institutional logics of the framework. These are the institutional logics of the framework as explained by (Raffe 1988 in Tuck et al, 2007) and discussed in Chapter 2 (literature review). The political function of a framework specified here does not relate to politics but relates to the coordinating functions that evolve during the development and implementation of the framework (ETF, 2011). Although policy learning is evident in this theme, it has been observed that it is not always very successful.

4.4.1 Legislations and Regulatory Requirements

Effective implementation of NQFs requires a legislative base. Analysis of the interviews with participants in both Bahrain and the UAE suggests that participants feel the need for some of the dated legislations to be amended to reflect the current mandate of NQFs. Views of two participants in Bahrain, suggests that governments are still working on some of the legislations five years after implementation. For example, a participant from Bahrain described:

> *The biggest challenge of all, and I think this was not taken care of unfortunately, is that the, the education law, has not been updated ever since the 1990's. So now we have a new body that is producing reports. And these reports, they do go to the board or to*

the cabinet and everything, but there isn't a legal channel to take

this as an input for other decisions through the ministries. So, if the

law is updated, that will complete the cycle (B3)

A participant from the UAE has also had a similar view on the legislation:

That there must be, of course, the legal framework for the

framework itself that based on a national law and a national

decree, whatever it is (E3)

Oman, currently in its development stage, has recognised that there needs to be concurrence between legislation and NQF regulations, as indicated by three of the participants. Participants views signify that legislations indicate that the government believes in NQF and this can provide a strong enabling framework for implementation. For instance, one participant stated:

I think that the first thing [….] to get a Royal Decree before doing

everything for all the bodies to implement OQF because without

this decree, it's will be hard for them to work on something (O4)

Although governments, bureaucrats and policymakers are seen to understand the importance of NQFs, it is important to move beyond the symbolic understanding of policy learning to ensure actual change as regulatory requirements are significant to achieve the social transformation required from an NQF.

4.4.2 Policy Breadth

Policy breadth enhances integration across the different learning sectors and interviews with participants suggest that there are challenges with it. The UAE has had major challenges in implementation because there were limited supporting polices developed during the development stage of the project. By comparison, Bahrain has progressed to the implementation stage with a number of supporting policies. Participants appear to be aware that the design features such as levels and level descriptors form only the skeleton, and that a framework requires supporting policies to enable NQF implementation. All four participants from the UAE cited this as being a major issue. For example, a participant stated:

Even if you develop the framework, the framework by itself is nothing, the framework by itself is [....] just like a skeleton. Now, for the framework to be implemented, you need the associated policies and procedures, and this is the key issue (E3)

On the same issue, another participant advised:

Maybe it should be like when they begin, at the beginning, when they started developing the qualifications framework, you need to develop all according policy and procedures system and then go for implementation (E2)

Another participant from the UAE perceives that Middle East countries are snobbish and explains that countries rush into implementation. This can have a

detrimental effect on other areas such as losing the trust of stakeholders. The participant summarised this:

> *Middle east countries having resources [finance] can bring in the international consultants to do the groundwork for the development. The weakness is that you do it quickly and you rely in international consultants so much, you don't do the proper contextualisation […]. If you can do quicker, some countries with enough resources, the risk is that you lose the stakeholders that should understand the process because eventually, they just like the they see the consultant and the next thing they see is the framework is in place. Because the framework is supposed to be a social construct, not only a technical device, [….] and the trust building just doesn't happen. And then you re-struggle with the implementation* (E1)

In Oman, the importance of developing all quality assurance systems before going to the implementation stage, is seen to be understood as explained by a participant:

> *And ultimately to get the qualifications listed, they need to sort these things. They should have right quality systems in place so that they can move forward with the qualification* (O7)

Participants' awareness that NQFs cannot work in isolation was observed in this sub-theme. Participants were aware that if initiatives such as these are

driven without the policy network, they can become an unrealistic goal to achieve.

4.4.3 Structural Arrangements

All three countries were found to have different kinds of challenges with the structural arrangements of the framework. It was observed that each country has tried to take into account policy learning of its own institutional environment in order to support their NQF. Participants observed that Bahrain has a comparatively better structural arrangement than the UAE and Oman: the quality assurance of all its sectors falls under a single umbrella, the Education and Training quality Authority (BQA). A combined study carried out by international agencies showed that countries with dedicated authorities are able to do well (Cedefop et al., 2017).

Initially at the start of the NQF development, Bahrain had challenges, with the NQF starting with another entity [named Tamkeen] and this was later transferred to BQA after the design stage. This transition caused delays in development. This was explained by a participant:

> *The project did not start with BQA, they were in a different place and then moved to BQA. So we inherited something, and we worked with [….] I think it should have started with us, or this kind of transition in the middle is not a healthy move for project that's big, it caused us a lot of a lot of problems and challenges to be honest* (B3)

By comparison, the UAE and Oman have a more complex structural arrangement. In the UAE, three participants indicated that there are challenges with coordination and jurisdictional ambiguity, with respect to the placement of qualifications. The delegation of authority was given to the Ministry of Education (MoE) for school qualifications and the Commission of Academic Accreditation (CAA) for higher educational qualifications. The National Qualifications Authority (NQA) is legally responsible for placing vocational, higher educational and schooling qualifications on the framework, however, in practice, CAA places accredited higher education programmes on its own register and MoE does the same for its schooling qualifications. In reality, NQA is responsible for quality assuring only vocational qualifications. For example, one participant explained the rationale behind this:

> *The dominating concept is that NQA is responsible for the vocational education, which is good, because I mean, Ministry of Education now, including both the general and higher education is a well-known ministry, you know, the first ministry established in the country in 1971. So, it has more experience, more knowledge, more expertise, a lot of things compared to the NQA, which is a new entity, that will be fine (E3)*

The participant's view is that the NQA in the UAE is a newly established entity, so it may not have sufficient experience to deal with all three sectors. Oman also has structural challenges with the setting of the qualifications framework authority as it is within an academic sector. Three participants are concerned

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with the Oman Qualifications Framework (OQF) being located within the higher education accreditation body, that of Oman Academic Accreditation Authority (OAAA). All board members who initially approve the OQF documents are from the higher education sector. Participants have indicated their disapproval that a comprehensive framework should be decided by all education sectors, and not just that of higher education. Summarising this, a participant explained:

> *OAAA board is purely concentrating on higher education, and there's the problem because the framework is not decided by higher education only. They need to be decided by vocational professional and school qualification [….] the framework is the business of all sectors in Oman, not just higher education. And that's not considered* (O8)

This was confirmed by another participant who stated:

> *Challenge was that it was that it was located in a higher education accreditation agency* (O6)

Another participant expressed grave concerns and explained four areas of concern with this kind of a structural arrangement. This participant alleges that OAAA gives more importance to accreditation and there is comparatively less involvement of the authorities in the Oman Qualifications Framework (OQF) development. The four areas as explained by the participant are:

> *Because it [OAAA] is a quality assurance agency and they have other bigger projects that's not completed yet. And it is Accreditation Authority, so they focus more [….] in terms of the*

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finance and the human resource on the accreditation and sometimes I feel there is no involvement with the OQF because they don't have a time for that and they don't have a money and they don't have human resource [….] So, if it is a separate authority, that's just a specialised for OQF, people can concentrate more, because this is a big project. I know that ISA [Institutional Standards Assessment], PSA [Program Standards Assessment] are big projects. But this is the first thing.

The other thing, I think we have to have our entity, you know, our own OQF body. Because when we say Oman Qualifications Framework, they always ask us in all the capacity building sessions, is that going to help us in the accreditation, if we are listed if we are listed in the OQF. There is no relationship between accreditation, but they are relating to us, because we are in the same building.

The other things sometimes we have to share the finance, it is like divided between accreditation and the qualification framework, which is unfair because we need a lot of, you know, finance, financial support, and we cannot do that. So, this is another problem.

The other problem we have sometimes to share or even our consultants with the accreditation, and sometime even the human resources have to do things for the accreditation, so there is not a lot of focus (O5)

The participant feels frustrated that all this can undermine the effectiveness of the framework. Participants' views suggests that the role of the qualifications authority primarily deals with technical aspects of the framework in all the three countries. For example, the current structures are restricted to just quality assuring and placing qualifications on the framework. These roles may need to be expanded in future and in this perspective, a social context-specific view becomes more relevant than a technical view that can go beyond accreditation and quality assurance roles (Chakroun, 2010).

4.4.4 Resource Constraints

Findings suggest that progress in all three countries is constrained by a lack of both human resources and financial resources. None of the three countries have financial constraints with the development of the project, as they are fully supported by their respective governments. Participants however do have concerns over resources for implementation. A participant in Bahrain makes an important observation and questions whether or not countries are really prepared for the NQF in terms of expertise, costs and time in particular, since maintenance of the framework also needs expertise, costs and time. This participant stated:

> *And if they want to develop a framework, then you need to start off*
> *by thinking, what do you need this for? [….] Because you know,*
> *everybody else has got one, you need one. If you don't need to,*
> *why develop [….] And why would you take the time and the money*
> *and the resources to do that? And are they going to resource it, it*
> *costs money. And if not just for the development, but for the*

ongoing maintenance. Institutions have to spend resources, in terms of manpower, so think carefully (B1)

Two other participants also confirm resource issues and as one participant puts it:

When we started, we were aiming to finish everything in five years' time. But we faced some challenges, because of staffing especially. And we are a government organisation, we faced challenges with budget and with staffing. So we didn't have enough staff (B4)

Two participants from the UAE also express a similar concern regarding the lack of expertise, and perceive that the lack of understanding of the concept of qualifications framework inhibits the employment of more human resources specialised in NQFs. The participant said:

Even at this stage, the concept of the qualifications framework, for many is not instilled. And maybe this is because of the education system within the Arab world itself. I mean, this is why I cannot say that we have enough expertise (E3)

Another participant confirms this, stating:

They need to know how to read learning outcomes and evidence and assessment practices, I need the whole process in the head about education, policy development, improvement. And that takes a long time. And so, we've got a real shortage of talent (E4)

Eight participants from Oman express similar concerns on expertise and financial constraints. This indicates the extent of awareness among participants particularly the policymakers at this major hurdle. Similar to Bahrain, a participant from Oman highlights the issue of countries underestimating resources and stated:

> *People don't realise the work involved and unless you resource it, it's going to take a long time [….]. Be aware of resources [….] we are constantly trying to get that message that we thinking about the resources ahead and they can't just implement or create a qualifications framework because it seems like a good idea. You're not just creating something and then leaving it there* (O7)

Another participant from Oman accepted the fact that the NQF is a specialised area where local experience is not available. They explain:

> *This is one it's rare field [….] We don't have any Omani in this field. Because this is a new field in all the world maybe if they train the Omani people, maybe in the future, we will have good, experienced people. It will take time, but it is like learning by doing* (O5)

Another participant from Oman was concerned that, in Oman, a number of other entities are also involved in the implementation of the framework and hence specialised human resources will be also required by them. They explain:

There are a lot of actors in this, we've got the ministries, Oman Medical Specialty Boards, there's OAAA. So, several actors, and whether or not these actors are, they also need resources (O8)

Another participant in Oman has expressed concern on the bureaucracy that exists in getting permission to recruit skilled human resources. They stated:

They need to find expertise for this type of the work from even the Ministry of Civil Services because here the financial decree in order to bring more people [….] they need permission from them. And now they stopped you know, according to the situation in Oman, they stop all the offer for any new jobs (O1)

In addition to human resources and expertise challenges, the findings suggest that all three countries differ in their funding models. In Bahrain, placing a qualification on the framework register is free of charge for the institutions, however the government has started to realise the burden of this. In the UAE, institutions have to pay money to place qualifications on the framework, however it is optional for institutions to place qualifications. Oman has made it compulsory for all institutions to place qualifications on the framework and institutions have to pay for this. Oman's model looks more rigid in structure; however, its effectiveness is yet to be seen.

A participant from Bahrain was concerned that not getting a fee sometimes, sends the wrong message out, and stated:

Bahrain is free of charge, completely capacity building, validation,

listing, reviews, all of this is free of charge. So, this is free. It's a

free highway (B3)

Another participant from Bahrain compared Oman to Bahrain and stated:

In Oman they pay, because your bylaws allow you to take money.

Our bylaws doesn't allow us to take money, but we are we are

changing our bylaws soon (B2)

From the participants' views, it can be concluded that the implementation of
NQFs in Bahrain and the UAE is troubled by a lack of resources. These two
countries recognise that NQFs are hugely demanding in terms of time, costs,
and human expertise. The participants' views suggest that in order to be
effective, countries require effective planning and allocation of financial and
human resources. This is not just for the authorities developing the framework,
but for all the implementing bodies too (Corpus et al., 2007). It is evident from
these results that some elements of policy learning such as resource
requirements have been greatly overlooked and miscalculated.

4.4.5 Summary

The findings in this theme have revealed some of the challenges faced by
Bahrain and the UAE with respect to legislations, coordination between the
sectors, policy breadth and resources. The theme also highlighted the need to
support the structural and operational arrangements of NQFs in order to ensure
integration between the different sectors, particularly in terms of practical
arrangements such as staffing and finance where policy learning has been
overlooked. Policy learning was not entirely absent in this theme. The lack of

planning for local conditions can often lead to failure of the policy (Burdett & O'Donnell). Although policymakers try to learn lessons from other experiences, policy learning failure can happen when the lessons are difficult to spot due to the limited knowledge base of policymakers (ETF, 2008).

4.5 Theme 4: Sociocultural Considerations

The sociocultural challenges faced during the development process of NQFs were the main focus in this theme. The four subthemes that emerged from the data are: policy borrowing and consultants, stakeholder consultation, bridging the vocational and higher educational space, and vocational qualifications and its relation to National Occupational Standards (NOS).

4.5.1 Policy Borrowing and Role of Consultants

The governments of all three countries have appointed international consultants to support in developing NQFs. Consultants are often said to be responsible for spreading the policy tools to other parts of the world (Ip, 2013). The notion of policy borrowing however, appears to be a contested issue in all three countries. Countries were seen to be defensive on the issue of policy borrowing. A participant from the UAE justifies policy borrowing, reasoning that only the policy regarding the main framework is borrowed and not the supporting policies which are developed for implementation. The participant pointed out:

I do not believe in the concept of borrowing. Because the Qualifications Framework is a national need [….]. Now, when you borrow Qualifications Framework, it means that automatically you will borrow all the policies and procedures that are associated with that Qualifications Framework. Because as I told you, the

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Qualifications Framework at the end… […] is a level descriptor that

can be written by anyone (E3)

Similar defensive comments on policy borrowing were also mentioned by participants in Bahrain. Two participants from Bahrain admitted that their framework was initially developed by combining two level descriptors from two other countries, however they defended this saying that there is no policy borrowing at present as the NQF has been contexualised. For example, one participant commented:

I wouldn't say we borrowed it from Scotland, what I'd say in the

beginning, the early stage of the design, there was a big element of

borrowing, yes, that's happened, but after the pilot, we changed lots

of them (B3)

Similar views on policy borrowing are expressed by participants from Oman, who claim that there is no borrowing at present. For example, the participant said:

The consultant, I think when they bring them and when they try […]

OAAA [Oman Academic Accreditation Authority] didn't allow them

to copy and paste the things. They tried to make a survey, to make

a search what's offered in Oman what the what the education

institute in Oman, what kind of the education they are offering […]

Based on this, they start build our framework. But through their

experience for sure (O1)

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This denial aligns with Steiner-Khamsi's (2012) view that governments prefer to use the term policy learning in order to neutralise the connotations associated with policy borrowing. Although these statements from the policymakers are defensive, policy borrowing and learning are generally not unconventional approaches to the development of frameworks, and policy borrowing can also be constructive (Burdett & O'Donnell, 2016). However, countries need to be aware of the challenges in policy borrowing, because denial of policy borrowing will not help in understanding the pitfalls of policy borrowing as explained by a participant in the UAE who stated:

> *I find the UAE framework to be a mix of policy borrowing and policy learning. And so, it has contexualised the framework. [….] Exposure of senior policymakers to these kinds of discussions such as policy borrowing, can alert them to the pitfalls. We always tell the policymakers of these issues. In many cases, they simply want to get the job done. They have a budget to do it and it is much quicker to have an international consultant do it [….] tell exactly what they need to, get the job done quickly and ignore it* (E1)

A note of dissent was perceived from this participant who perceives that GCC countries are conceited and stated that since these countries have enough financial resources, they employ consultants in order to quickly complete the job.

While consultants alleged that policymakers only wanted to get the job done, consultants are blamed (Mohamed & Morris, 2019) by the policymakers for copying and pasting parts of NQFs from other frameworks without

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contextualising it to their country. A participant from Bahrain felt annoyed that some consultants do not put in enough effort to develop a policy to the GCC context. The participant stated:

> *Some consultants, they will not willing to actually to write your own policy, you will go into copy other policy. This is the major problem policy borrowing versus policy learning. They think that in Bahrain or the Arab region. I mean, they can take anything. Yeah, they don't know that we check and make sure. And you know, so this common* (B2)

Through this experience, policymakers from Oman and the UAE seem to have realised the need to reduce dependency on foreign consultants and increase the internal capacity of the people within the country. For instance, a participant from the UAE suggested:

> *This is something that I would flag to you as well. The capacity building of the local experts and skills transferred are so important and risk of only international consultants is very high, and you will have a lot of policy borrowing of policies. I think in the UAE there was a bit of it. It is getting better in the latest version but there is a lot of policy borrowing from the UK, Australia influencing very strongly* (E1)

In spite of having issues with some consultants, countries acknowledged that there were good consultants too as explained by a participant from Bahrain:

But at the same time, I have seen some good consultants with SQA [Scottish Qualifications Authority] [….] But if you asked me do it again. Don't bring a consultant. I will bring a practitioner [….] if you see SQA, I think this is just my view, for them, consultancy is becoming a business, a part time business [….] And their research says they are well established, so everyone asks them, and they gave maybe they gave the good consultants to other countries [….] (B2)

In addition to being appreciative, this participant highlights the economic gain for the lending countries, as explained by Bray (2004, in Phillips & Ochs, 2004a) scenario where the lending country gains financially from the lending process.

Another participant from Bahrain, explains that they declined an offer for support for implementation from the Scottish Qualifications Authority (SQA). They pointed out that:

When we started the validation, the SQA advised that we bring foreigners to do the validation. But we said no, we will depend on local people. And they said that you might face challenges and this, but we said, we'll try it. And we did it. [….] Actually, these are some of the things that I mean, some of the issues they were advising us, but we were not convinced, we were not going by their way. Yeah, we were not accepting anything that the foreign consultants telling us (B4)

The negative experience during development of their NQF has made countries beware of consultants' expertise for implementation. This also highlights Steiner-Khamsi's (2006, p.674) concept of 'donor logic' where the policy is sold as a tightly-knit package that ensures governments buy both the development and implementation packages. Since the policies are borrowed and implemented in another context, the lending country might be more knowledgeable to problem-solve any initial issues that may arise.

Another consultant from Oman explains that countries assume that once development is over, countries can implement the NQF by themselves. They stated:

> *What I see in all the Gulf countries, the development is divorced from implementation. These people in a sense, I mean, the government of Oman or other country, they call people, they call the experts to develop and then they have a contract for the development stage. And once the development stage completes, they will go. Yes, do you have the capacity to implement it? (O9)*

This shows the importance of capacity building people to implement the framework. The overall view of participants points to NQF policy being borrowed and participants accepting the influence of Scottish, Australian and Irish frameworks. Results suggest distrust with consultants although it also indicates that the countries have realised the need to be more self-prepared with knowledge and information on NQFs. Countries have also realised the importance of building competencies within the country.

4.5.2 Stakeholder Consultation

The participants' views in this sub-theme suggest that all three countries face challenges in engaging the three main stakeholders in the qualification system - schooling, higher education, and VET, together with the industry. Participation of stakeholders is a key element in policy decision-making and though a comprehensive NQF provides the opportunity for dialogue between the different stakeholders of the framework, in reality countries are seen to face a number of challenges. Compared to Bahrain, the UAE and Oman are seen to face more challenges in engaging stakeholders. The UAE has a federal system of government, and this poses greater challenges in the qualification system, thus affecting stakeholder coordination.

A participant explains that since the UAE comprises of seven emirates, and because some of these emirates have their own separate qualification systems, the UAE qualification system is fragmented. They gave a detailed explanation:

> *In the UAE experience, it might be different, again, from other countries. We have the local system and we have the state system, I mean the federal one [….] For example, KHDA [Knowledge and Human Development Authority] works only within the Emirates of Dubai [….] The same again, the ADEK [Department of Education and Knowledge] is responsible for both public and private schools, but indeed, in Abu Dhabi, yes, the other Emirates, there was the education you can say, like the Education Council, or Education Authority or department, but belongs to the Ministry of Education. This is why the federal system was there,*

like the Minister of Education, and then you have all these systems

[….] Qualification framework is only one element of a system […..]

And there must be a share of responsibilities among these entities

(E3)

This participant considers that stakeholders from the different Emirates should ideally view the framework as a shared responsibility. It can be observed that an introduction of new policy solutions could often be a contested process, particularly when competing, or when contradictory processes are involved (Olsen, 2007).

In Oman, some participants show dissatisfaction with the method of stakeholder consultation. A tone of frustration was heard from one of the participants because of policymakers working in isolation and independently to many of its stakeholders. The participant's criticism falls firstly on the number of members in the Oversight Committee [22 members representing various ministerial stakeholders], and secondly, because this committee is only an advisory body. The participant said:

There's too many members on the committee. And you can't

manage a framework like this by committee, management by

committee does not work. And then they really don't manage the

framework but only as a guide [….]. The Oversight Committee was

not a decision-making body. The Oversight Committee was there

for guidance (O8)

The participant however agreed that the Oversight Committee was useful up to a particular period in time, in other words a limited period.

> *But the Oversight Committee, it was useful. But I think it's now past its usefulness. And they need to, I think former smaller committee in order to manage [....] the Oversight Committee hasn't met for since April 2018, and there's no plans to meet at the moment (O8)*

A participant from Bahrain who is aware of the Oman model of development perceives that Oman may not be a model for other countries to follow, and alleges that the Qualifications Development Authority in Oman works in isolation of some sectors. They explained:

> *The Oversight Committee receives completed documents, they don't see receive documents that are being in the state of, of being developed, they receive completed documents, completely different system to Bahrain. And to be quite frankly, the Bahrain system is better. Omani system, it's a difficult process, because we are working very much in isolation of the sectors [....]. It's not, it's not the best way of doing a framework. So, if I was giving advice to anybody, don't do it that way. Use a working group, get the people who are involved in the system together (B1)*

Committee members in Oman are given the opportunity to engage with NQF discussion documents but there is no assurance that their feedback is taken into consideration. This caused considerable dissatisfaction. By contrast, small working groups are perceived to function in a better manner. Involving

stakeholders appears only for the purposes of official documents and this can cause issues with stakeholder buy-in during the implementation stage.

Four participants in Oman expressed dissatisfaction that stakeholders from school and vocational sectors have limited influence in the process of OQF development. For example, one participant said:

> *OAAA board is purely concentrating on higher education, and there's the problem because the framework is not decided by higher education only. They need to be decided by vocational, professional and school qualifications (O8)*

Three other participants from Oman also expressed similar concern over the framework being developed in isolation of one of its important stakeholders, the industry sector. The issue has been identified in earlier studies that stakeholder mobilisation and commitment needs to be at the forefront of NQF development and some countries are less able to mobilise industry stakeholders (Cedefop, 2019). Participants observed that the oil and gas industry sector was involved, but many other industry sectors were not included during consultation. As one participant explicitly stated:

> *In terms of the stakeholders, it's very limited industry players which we interact with. It's largely the oil and gas sector which is the represented by OPAL* [Oman society for Petroleum Services] (O11)

Two participants from Oman reasoned that if Oman is planning to diversify its economy, then the stakeholders from the sectors chosen for diversification could have been involved during consultation. The participant explained:

> *if you see, the oil and gas sector is going down [….] On the other hand, the government is giving importance to the hospitality sector or the tourism sector which they want to develop, or the handicraft sector is they want to develop. So, our focus should be on those sectors where there is alignment with the national priorities [….]. So, we are not identifying the right problem to answer, it is trying to develop the answer first* (O11)

Another participant echoed this view and compared the OQF development and Oman Vision 2040 to railway tracks that ran parallel and were not converging and stated:

> *Three areas they are targeting in the Oman Vision 2040, manufacturing, tourism and logistics…… to suit the diversification. But diversification and OQF run like a railway track, not talking to each other. I would have much, much more to the industry and if given power, I would have consulted much more with the industry. We have not even touched the surface* (O6)

Policy learning emphasises the need for cooperation between stakeholders in the development process (ETF, 2011). Not involving key industry stakeholders can result in less dialogues between the sectors and less buy-in during implementation. This attitude shows more focus toward the completion of the

development process rather than an inclusive process of development. Policy learning on NQFs suggests that, for NQFs to be successful in the long term, they should be built on existing systems with the aim of building communities of trust in the framework. Thus, involving stakeholders in decision-making can increase the prospect of achieving the purposes of NQFs.

4.5.3 Bridging the Higher Education and Vocational Space

All three countries were hopeful that an NQF will provide equal status to higher education and vocational qualifications. They believe NQF could blur the divide between the differences in the value of qualifications from both these sectors, and participants from all three countries mentioned this attribute. These divisions are perceived to inhibit the progression of learners between the two sectors. For example, a participant from the UAE stated:

> *The time before qualifications framework was approved, the concept of vocational education very much similar to the rest of the Arab world is a second degree [….] compared to the academic one* (E3)

Another participant from Oman had a similar view:

> *Vocational sector is not integrated at all. Really, it's the poor relative of education in Oman [….]. And I think that they need in order to really give more status to vocational training, make it look more attractive [….]. They verbalise and they pay lip service to wanting to raise the esteem of vocational* (O6)

A solution to bridge this gap was suggested by the participant from Oman who proposed that employers should be able to recruit employees based on the levels in a framework, and pointed out:

And in the UK, you'll see advertisement like if you want somebody with level five qualification. Then it doesn't matter if that level five is from University or vocational regardless of how they got their skill set. That is the only way you can equivalise academic and vocational (O6)

By making the framework visible to employers and learners, their support and engagement can be harnessed. The overall rationale for developing NQFs is to reform education and VET sectors, and this requires the support and engagement of all relevant stakeholders that includes end users of the framework such as the learners and employers.

The UAE and Bahrain have faced challenges when they attempted to engage the higher education and vocational sectors through workshops. For instance, a participant from Bahrain stated:

Another challenge is that we intend to bring higher education with vocational education, the same capacity building, because we want to break this barrier between the higher education and the vocational education training, however, sometimes we find that attendees are not comfortable with that. So, there's a cultural change here that we need to […] take care of (B3)

VET sectors are generally said to have weak structural arrangements and according to Chakroun and Sicilia (2010) in many Arab countries, either governments are reluctant to involve social partners such as employers or social partners themselves do not respond to invitations to provide their input. This situation can be seen in the UAE where policymakers find it difficult to get stakeholders from the vocational sector to attend workshop sessions. As one participant said:

> *When we advertise workshops [….] I send out 450 invitations, that included the community members, and others [….] So tomorrow I got 20 people coming, then by the time we readvertise, I'll get [….] hope 20 and 20. That's what I aim for* (E4)

Often, policy development processes can have such unintended challenges, that depends on interaction patterns and institutional contexts. Efforts put in by countries to blur the gap between the academic and vocational sectors may not seem to be immediately effective, as new policy solutions need time to evolve because these processes often interact with the existing social and cultural contexts.

4.3.4 Vocational Qualifications and its counterpart National Occupational Standards

National Occupational Standards (NOS) is a vital element in quality assuring vocational qualifications that need to be placed on the framework register (ETF, 2013; Raffe, 2015). NQF development provides an opportunity for countries to start developing their own NOS, however all three countries have faced challenges in developing their own NOS. A participant from the UAE explains:

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Back then, the only vocational qualifications we had were foreign.

We didn't have any developed here over the country. As soon as

the Qualifications Framework was approved, because in our

mandate, that's what one of the key things we have to do - says

establish councils to develop NOS, occupational skill standards.

So that then you could make it really clear because VET sector

was fragmented or underdeveloped (E4)

When countries borrow vocational and training courses from foreign countries, then the *National* Occupational Standards (NOS) used in those qualifications are not really *'national'*. A participant from Bahrain demonstrates awareness of NQFs initiating NOS development, and states:

One of the criteria for being placed on the framework is that there

are National Occupational Standards. The National Occupational

Standards should be used in the design of that qualification. So,

there must be an effect, because the National Occupational

Standards are developed by employers, these are the skills that

employers are looking for (B1)

Oman too has faced challenges with both developing and implementing NOS. According to participants, NOS development started in 2005 with a German organisation GIZ. Later around 2013, the Oman society for Petroleum services (OPAL) developed some NOSs with a UK sector skill council, and recently NOSs are once again being developed by the Occupational Standards Centre (OSC). Policy learning is not just learning from history and Higham and Yeomans (2007) explain that policy amnesia is the failure to learn from

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experiences of previous reform. Three participants show frustration that first, many of these NOSs are not converted into new qualifications, second, no lessons are learned and third, time and resources are wasted every time. For instance, one participant explained:

> *Ministry of Manpower started doing something probably somewhere between 2000 2005 I'm not really sure at the time, because they asked us to send subject matter experts to participate in those workshops. So initiative was there. All our trainers spent quite a bit of time in the workshops [….] But what came of it, we never heard of it. I think it had its natural death. So, it didn't complete (O9).*

The participant continued:

> *And then over the last three, four years, we heard OPAL trying to lead this initiative again, I think the wheel was reinvented again.* (O9)

It can be seen that Oman has NOSs developed but most of these NOSs were not converted into qualifications because the right expertise was unavailable as explained by three participants. They explained for instance:

> *Somehow those documents which have been prepared so far the National Occupational Standards is not something which is being comprehended well in the country, and they've not been translated into , the curriculum or the training material or they are not being used for any of the application part of it [….] these are very*

specialised kind of job roles or you can say the competency which

is required. (O11)

Solving complex issues such as NOS development that involves industry stakeholders who have diverse interests can create ambiguity particularly when processes are not well linked. With such recurring challenges with NOS, placing vocational qualifications on the NQF register will be a challenge for these countries. The institutions responsible for policy development and the institutions regulating vocational qualifications need to have sufficient life expectancy and continuity to function and accumulate policy memory (Raffe, 2015).

4.5.5 Summary

The debate of sociocultural interaction and its effect on academic and vocational perspectives is an important feature in this theme. The NQF provides the opportunity to narrow down the inequality between the academic and the vocational, and policy learning can play a vital role in resolving many of the complex issues. Countries appear to use consultants effectively for development of policies, but find it challenging to implement them effectively without their expertise. This supports Steiner-Khamsi's (2014) view on policy borrowing, that the implementation package is made sufficiently complex such that the borrowing country continues to depend on the lending countries for support.

4.6 Theme 5: Outcomes

Theme 1 analysed the anticipated benefits that the UAE, Bahrain, and Oman set out to achieve through the development of the NQFs. This final theme

analyses the outcomes or the results of the policy intervention in relation to these anticipated benefits. These outcomes are not an impact evaluation or assessment of the frameworks, as an impact evaluation exceeds the scope of this thesis.

Three subthemes emerged from the data. The first subtheme synthesised from the data is related to Bahrain's slow progress in placing qualifications on the framework; the second subtheme is related to the challenges in the coordination issues faced by the UAE in placing qualifications on the national register; and the third subtheme is Oman's degree of awareness of the challenges in implementing NQFs. This theme analyses the reasons for these three outcomes to NQF policy development and implementation.

4.6.1 Bahrain - Slow Progress

Interview data indicates that Bahrain had survey data on the number of qualifications in the country and estimated the time period required to place all qualifications on the framework. Three participants, from Bahrain confirmed this data, as stated in this example:

> *The original plan was to do it in five years [….] It was actually 700 [qualifications] after we updated the survey [….] So the survey if it wouldn't happen in the beginning, it was more than that [….] But some institutions closed some programs [….] So the update is 700*
> (B3)

However, the situation in Bahrain after more than five years of implementation indicates slow progression in placing qualifications on the framework. A

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participant from Bahrain explained that this slow progress was due to shortage of expertise and explained:

When we started, we were aiming to finish everything in five years' time. But we faced some challenges, because of staffing especially. But we did it right. I mean, we were a bit slow at the beginning, but we did it correctly (B4)

Another participant in Bahrain attributed the slow progress in placing qualifications on the framework to underestimating the length of time taken and the actual process it involved. They explained:

The mapping process involves people looking at their learning outcomes, their assessment, making sure all the outcomes are written clearly, making sure the assessment is, all the outcomes that are assessed, that the documentation is easily, easy to understand. And then for them to actually set up committees to do the mapping of the units to the learning outcomes, the level descriptors. That involves work, and it involves more work than people would realise (B1)

Lack of skilled staff and underestimation of time has had a significant influence on placing qualifications on the framework in Bahrain. Several earlier studies have cautioned countries to be aware of the pitfalls regarding time and resources for implementation (ETF, 2017; McBride & Keevy, 2010; Tuck, 2007).

Findings also indicate that Bahrain is currently placing only higher education and vocational qualifications on the framework and has not yet started to place

school qualifications on its framework. This situation is similar to the UAE where school qualifications are not yet placed on the framework. A participant from Bahrain attributes this to a lack of quality assurance systems in the schooling sector. For instance, the participant said:

We are actually just about to start with the school [....] to do more courses, give them more training, capacity building [....] Right now, no, they don't have proper documentation, government schools, private they have, but government school they need to do more documentation in order for them to apply and to place their qualification (B2)

Results suggest that underestimation in planning for implementation is the primary cause. The strength of policy learning intervention is to have an understanding of national policy environment rather than the lending country's environment (ETF, 2008) to ensure effective implementation.

4.6.2 UAE - Coordination Issues

The UAE had a different kind of a challenge in placing qualifications on the framework compared to Bahrain, due to its federal diversity which created coordination issues between the three sectors of education and the National Qualifications Authority (NQA). The UAE has not yet listed any qualification formally on its national framework register since the NQF national register is yet to be approved. However, the three sectors of education have their own internal database that can be compared to a '*pre-NQF database'* which focusses on programmes rather than qualifications, similar to some European countries (Cedefop, 2020, p.17). For example, one participant stated:

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we say that these qualifications are aligned, but we didn't have it as a database yet […] We have an internal database. We still we are working on developing a database for it. Yeah, but here we are still […] We need to have all the qualification holder on that database, plus the qualification registry (E2)

Participants also point out coordination issues particularly between the Commission of Academic Accreditation (CAA) that accredits higher education programs and the NQA. As one participant explained:

They [higher educational qualifications] don't get listed, because they're listed on the CAA side. In our decree, which we work to, we're only required to develop a national registry for national vocational qualifications and occupational skill standards [….] But on our decree, it also talks about NQA developing regulations and policies for all three sectors. And it also talks about regulating providers, which we don't do [….] We don't register or keep track of CAA accredited qualifications (E4)

Another participant agreed that this can be improved.

And until now this has not been implemented the right way [….] And this is why it is just like almost now, all the authority is within the CAA rather than part of it, especially the part relevant to the qualification framework should be within the NQA (E3)

Another participant from the UAE advised:

As advice, if you will start, do your qualification framework prepare and approve all the policies to raise awareness, then you can implement and have all your system IT systems and please enter place before you go ahead. You will call people, okay, come in and register your qualification. But if you don't have a system in place, that would be very difficult (E2)

The CAA and the NQA seem to be two custodians of the NQF in the UAE and this seems to inhibit coordination within the system. It is observed that policy breadth as advised by (Raffe, 2015) which is intended to enhance integration across the different sectors is yet to be achieved. Hence although there is a possibility of achieving benefits such as articulation, portability, or comparison of qualifications within the individual sectors, portability or articulation across the sectors may not be possible with individual sector-based databases. Therefore, this does not support the purposes of an integrated framework.

4.6.3 Oman - Underestimation

Most participants in Oman were of the view that Oman underestimates the process of implementation. They cautioned that if the right human resources are not employed, it will take a long time to place all qualifications on the framework. As one participant explained:

There is a general kind of underestimating the process, not just you're not just have to do it at the beginning, you have to do it continually. And lots of different bodies are involved in that process. So, people don't realise the work involved and unless you resource it, it's going to take a long time (O7)

The participant also advised Oman to be well prepared for the task ahead, and that they should start dealing with the details. They said:

Making sure that all the different bodies licensing bodies are aligned and geared up for this because there's going to be a lot of changes. Resources, people, you know, don't underestimate the team that needs to be in place [….] I deal with detail (O7)

Similar to Bahrain, according to two participants, Oman also expects to place all the qualifications in the country on the framework in five to ten years' time provided the right human resources are employed. For instance:

I don't want to give a number, but maybe more than six or seven years, you know, even 10 years, you need more staff. Yeah, we need more staff. We need a lot of training, we need human resource (O5)

Participants also questioned competence capability of the institutions to quality assure and place qualifications on the framework. In particular this related to the Ministry of Manpower. The participant stated:

If you had a fully functional Ministry of Manpower, we could see how that could work very well. But it's a huge, huge undertaking a […] how are training providers in the vocational sector going to get qualifications developed on their own, with their own expertise, with their own resources (O6)

The challenge here is the competence of other stakeholders involved in implementation. The participant recommended the setting up of Standard Generating Bodies (SGB) to support in populating the framework more quickly, similar to other countries that have similar weak education systems. They stated:

> *Only way, to get the framework populated, is to create* Standard Generating Bodies. *Because if you just rely on providers to come forward, you don't know how the quality is like. At least with SGB, there are people from industry, and the training is largely authentic [….] how are training providers in the vocational sector going to get qualifications developed on their own, with their own expertise, with their own resources (O6).*

Participant views indicate that they are aware of the challenges involved in placing qualifications on the framework in particular the VET sector which may not have the required resources for implementation. How these challenges will get translated into solutions is yet to be seen in Oman.

4.6.4 Summary

The outcomes indicated both optimism and frustrations of participants in all the three countries taken for this case study. The findings in this theme suggest that the NQFs developed in Bahrain and the UAE with a lot of expectations, time and resources, remains less functional after more than five years into implementation. This theme also shows challenges with policy learning. Bahrain has a shortage of staff with expertise, which has led to their slow progression in placing qualifications on the framework. Similar to Bahrain, there are

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concerns in Oman about the shortage of staff with expertise. In the UAE, it is evident that the policy breadth required to support the achievement of an integrated framework is yet to be achieved. It is important to note that five years is a short time period to assess the actual impact of the framework. It is therefore important for the UAE, Bahrain, and Oman to identify barriers to policy learning and adopt more realistic approaches and ensure that policymaking schedules reflect the needs of policy learning imperatives (Raffe & Spours, 2007).

4.7 Chapter Summary

This chapter has presented findings from the interview data on the challenges faced by the UAE, Bahrain, and Oman during their NQF development process and how the policy lending and borrowing aspects has implications for the implementation of the policy. Policy learning and adaptation to local context was observed with the design elements or the intrinsic logics of the framework. However, it is noted that it has not been easy for the three countries to apply policy learning lessons to the institutional logics of the framework. A possible reason for this is because the institutional logics lie within each country's social, cultural, political, and institutional contexts. In the next chapter, I use these results to discuss the main findings with respect to the two research questions, providing potential suggestions to overcome these challenges.

Chapter 5: Discussion and Conclusion

Countries and regions involved in qualifications framework
development need to chart their journeys with great care;
there are dangers and there will be broken promises, but with
modest ambitions, the once ''mythical beast'' can be reshaped
and replaced by a well chartered region…

(McBride & Keevy, 2010, p.200)

This research shows how the act of policy borrowing with respect to the development of NQFs is insufficient for effective implementation, and a more individual country-specific approach based on the contextual circumstances is required. A policy lending and borrowing theoretical lens has been used to understand this process in three countries – the UAE, Bahrain, and Oman. The results show how the sociocultural and sociopolitical factors influence the development and implementation of NQFs in the UAE, Bahrain, and Oman. Through a context-considered comparison for these three countries, this research creates a broader context considered understanding for other developing countries when developing and implementing a comprehensive NQF. Concurring with McBride and Keevy (2010) this thesis acknowledges that during the course of the NQF journey, countries can expect to face a number of hurdles and encounter several broken promises along its path. In the long run, however, the benefits of the NQF in driving quality in the qualifications awarded will make this journey worth the effort taken.

In response to the first research question, the results in this study show that all three countries taken for this case study expect similar benefits from NQFs. This is a noteworthy finding because the context in which the NQF is being developed and implemented in each country differs. This finding is consistent with the finding of Allais's (2011a) who attributes this similarity to the policy borrowing of NQFs from other countries. Findings show that after more than five years into implementation. the UAE and Bahrain frameworks are yet to achieve the benefits they aim for, such as facilitating lifelong learning, recognising prior learning and achieving parity of esteem between the higher education and vocational education qualifications. This is because, qualifications from all the three sectors in education (schooling, higher education and vocational education and training) are yet to be placed on a single framework to enable comparison and hence progression from one sector to another. This is the core feature of a comprehensive/ integrated framework that can facilitate achievement of the benefits that an NQF claims to deliver.

Results of the second research question show that all three countries have contexualised most of the architectural and design elements of the framework to their national contexts. These countries however, have had varying challenges in embedding other institutional elements of NQFs within their broader contextual environments. In addition, results in this thesis shows that although there were attempts at policy learning, planning and resources required for implementation were highly underestimated during the developmental process and this affected the implementation of the NQF in the UAE and Bahrain. These results are consistent with previous studies on the various challenges in NQF development and implementation in many

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developing countries (ETF, 2017; McBride & Keevy, 2010; (Chakroun and Sicilia, 2010); Tuck, 2007).

This final chapter discusses these results further through a constant comparative method of data analysis. The results are discussed in relation to the two main research questions and existing literature on policy lending and borrowing in order to highlight similarities or differences and identify key findings. This chapter then presents the conclusion and explains the research contributions to knowledge. Limitations and recommendations for further research conclude this chapter.

5.1 Research Question One - What benefits do participants from the UAE, Bahrain, and Oman, think a qualifications framework will bring?

The results show that the reasons for introducing NQFs in the UAE, Bahrain, and Oman were both problem-driven and solution-driven. NQFs claim to offer solutions to problems concerning employability, labour market issues, inconsistency in qualifications, parity of esteem between vocational and higher education sectors, promoting lifelong learning, and referencing with other frameworks for communication and comparability. Hence the NQF was borrowed as the policy solution and used as a tool to address the shortcomings in the existing qualification systems. Results show that the three countries expect all the listed benefits that NQFs typically claim to offer. The similarity in the benefits expected by the three countries is consistent with the notion that developing countries are tempted to develop NQFs based on the common rhetoric found in NQF literature regarding the purpose of these frameworks

(Allais et al., 2009; Bjørnåvold & Coles, 2010; Cedefop et al., 2015). The following sub-sections will analyse the benefits stated by the participants.

5.1.1 Employability and Economic Benefits

Findings show that the benefit of attaining socio-economic development to support the labour market, employability and the creation of a knowledge-based economy was one of the anticipated benefits. These benefits can also be found stated in the NQF Handbooks of all three countries. For example, the problems that a comprehensive NQF is expected to solve in Bahrain are: (BQA, 2020, p.13):

- Links between qualifications and labour market are not strong

- Lack of consistency in qualifications

- Absence of a system for comparing qualifications to each other

- Pathways of progression between qualifications are not clear

- Value of qualifications to employers and learners are not clear.

Compared to Bahrain, in the UAE and Oman, broader employability goals connected to the economy are explicitly stated in their respective NQF Handbooks for the comprehensive NQF to address. In the UAE, within the seven Emirates there is an urgent and ongoing need for human development of the UAE citizens and residents and this has led to recognition of the need for a highly skilled, educated and qualified workforce to contribute to the UAE's economic growth and prosperity (NQA, 2012). Similarly, in Oman there is a need to ensure the available workforce is employed and productive, and for awarding bodies and institutions to ensure that the programmes meet labour market needs (OAAA, 2018b). The NQF can be seen here as one policy

solution to address varied needs of a developing country such as skills development, employability, and development of a knowledge-based economy. Such anticipated benefits makes NQFs attractive to developing countries; they appear suitable to be borrowed and adapted to the home country (Phillips & Ochs, 2003). This is also consistent with Coles et al. (2014) study that economic drivers clearly dominate the pressures for developing NQFs in many countries including South Africa, Ireland, Russia and Poland.

In order to achieve this benefit, understanding the role of the NQF within the context of the qualification system and the wider labour market context is important. For instance, the government and employers can understand the practical benefits of NQFs when they are able to actually use them, and learners can also benefit indirectly from such initiatives. Awareness and visibility for employment purposes can be created by referring an NQF level in job advertisements, in job applications and by ensuring its relevance in labour administrations and in employment decisions (Reglin, 2017). A good example of a visible framework is said to be the French NQF, where qualifications are linked to levels of occupation, work and pay (Allais, 2017a). Findings show that in Bahrain, visibility is created by indicating NQF level on the award certificates, while in the UAE, this practice has not yet been adopted. Participants views indicate that if the benefit of promoting employability and its related economic benefits are to be achieved, countries including the UAE, Bahrain, and Oman need to further understand the role of the NQF in social and institutional contexts in particular, to the labour market. And to create this visibility, populating the framework with qualifications from all the three sectors of education is an important first step.

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5.1.2 Consistency in Qualifications

The need to problem-solve the issue of inconsistency in qualifications and lack of confidence in existing awards is a common finding across the three countries. Participants stated that the standard and quality of education varied as institutions were providing different standards of education, and even within the same sector such as in higher education, the awards were different. For example, as a participant stated, *'in some universities, the degrees were more demanding than another'*. Previous studies have shown that inequalities in education are a product of institutional arrangements in the country and this cannot be corrected by a creating a qualification structure or framework (Young, 2005). More recently, this finding was also reported by the ETF (2017), that NQFs are a tool which brings order to the qualifications landscape but they themselves cannot correct a system. Therefore, a context-based reform of the qualification system is required, and linear borrowing from developed countries may not support in resolving this issue.

5.1.3 Parity of Esteem between Higher Education and VET

Achieving parity of esteem between vocational and higher education, and creating trust between these sectors was another benefit that all three countries expected from NQFs. According to participants, the UAE and Bahrain are putting efforts to create common platforms that will enable higher education and VET sectors to come together by involving them in committees, working groups, conducting workshops and focus groups and requesting their feedback on documents in order to build trust and understanding between them. This falls in line with policy rhetoric that NQFs can create platforms for the different sectors in education to come together (Bjørnåvold & Coles, 2010).

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In the UAE and Bahrain, results suggest that efforts taken are yet to prove entirely successful. For example, in the UAE, it has been a challenge to get industry stakeholders to attend workshops; participants indicated that with every 450 invitations sent, only 20 to 60 people actually attend the workshops. This mirrors Chakroun and Sicilia's (2010) observation in earlier studies that in many Arab countries it is difficult to get social partners involved in national reform efforts and they often do not respond to invitations to provide their input. Participants indicated, Bahrain is also putting efforts into bringing both higher education and VET sectors together for capacity building sessions, however, the people from these two sectors who attend these workshops are not comfortable with each other and the results suggest that there needs to be a cultural shift. The need for such a change in attitude was also seen in Oman where participants stated that VET is seen as a poor relative of higher education. Achieving parity of esteem necessitates several compromises, reconciliation of interests, sensitivity and coordination between actors from both sectors. These results further corroborate Chakroun's (2010) study that an NQF needs to embed itself in the social context in order to harness the partnership and power of stakeholders. Concurrently, countries also need to be mindful of Coles et al. (2014) findings that even in mature frameworks, prejudices between higher education and VET have not been fully removed.

5.1.4 Mobility of Learners and Progression Routes between Qualifications

The results indicate that promoting international mobility of learners and progression between sectors in education were other potential benefits expected. Studies mention that progression and increased mobility of learners is one of the benefits that actually can be obtained from an NQF (Coles et al.,

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2014; Keevy & Chakroun, 2015). For an NQF to enable and promote access, progression, mobility and transfer between higher education and VET, previous studies recommend qualifications to be structured on a modular system or unit-based standards and redesigned using learning outcomes (Samuels & Keevy, 2008).

Results show that the UAE, Bahrain, and Oman's modularised or unit-standard based qualification is underdeveloped and the existing system operates predominantly on whole qualifications. Results also suggest that in Bahrain both existing and new higher educational and vocational qualifications that meet the criteria of outcome-based standards are placed on the national register. In the UAE existing and new higher education programmes on the Commission of Academic Accreditation (CAA) register and new qualifications created in the vocational sector are placed on the VETAC register. These are found similar to pre-NQF databases which focusses on programmes rather than qualifications (Cedefop, 2020).

Compared to some other less easily attainable benefits, mobility of learners between different educational sectors is an achievable benefit. The UAE, Bahrain, and Oman need to be aware however, of its challenges as studies by Young (2005) have cautioned that unit standards take a lot of time and cost to set up. In addition, it is important for all qualifications to be placed on the register in order for the benefits of mobility of learners across the education sectors and across the international borders to be achieved (ETF, 2017).

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5.1.5 Lifelong Learning and Recognition of Prior Learning

Results show that the UAE, Bahrain, and Oman look forward to effectively promoting lifelong learning and successfully implementing recognition of prior learning (RPL). NQF Handbooks in all three countries mention lifelong learning and RPL as intended benefits (BQA, 2020; NQA, 2012; OAAA, 2018b). NQFs however are said to have a limited part to play in facilitating lifelong learning (Coles et al., 2014). Enabling lifelong learning requires a paradigm shift from traditional qualifications system to an outcome-based system. This is because traditional qualification systems do not recognise all forms of learning, especially learning that takes place outside formal learning (Bjørnåvold & Coles, 2010). A qualification framework can do so, provided NQF's are designed on outcome-based education that allows accumulation of transfer of credits. Developing individual learning modules in subject hierarchies allows learners to progress and enables RPL learners to earn credits for unit standards. Results show that all three countries have a contextualised system for credits, however the current provision where Bahrain and the UAE are directly linking qualifications to programmes can be a barrier to flexible access. Results indicate that even within higher education, it is difficult for higher education institutions (HEIs) to transfer credits between HEIs.

Although all three countries have legislation on RPL, other enabling systems such as designing qualifications on modular curricula are yet to be put in place as explained in the previous section. To promote lifelong learning, unit-standard based qualifications are critical, as highlighted by Samuels and Keevy (2008). South Africa and New Zealand set up Standards Generating Bodies (SGB) during the NQF implementation stage to develop new modular qualifications

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based on the learning outcomes approach, and results indicate that consultants have recommended this approach. Although there are related challenges with this approach where countries develop too many new qualifications and end up not using them such as in South Africa, Mauritius, Mexico, Australia and New Zealand (Allais, 2011b), this process can support the VET sector where many training providers may not have resources and expertise to develop new qualifications. Effectively promoting lifelong learning and implementing RPL, however, is an ambiguous objective that involves multiple processes and hence it should be seen in a much wider social context.

5.1.6 Communication

NQFs are a tool for communication and referencing national frameworks against international frameworks is a form of communication (ETF, 2011) and this was one of the anticipated benefits indicated in the findings. Referencing is a specific form of benchmarking that has emerged in recent years (Keevy & Jaftha, 2016). Referencing of NQFs can be of three types; upward referencing (from NQF to transnational frameworks), peer referencing (between two NQFs) or downward referencing (from transnational frameworks to NQFs). Among these peer referencing is less common (Keevy et al., 2011). Findings show that Bahrain and the UAE peer referenced their frameworks with NQFs of other countries. For instance, the Bahrain framework was referenced to the Scottish Credit and Qualifications Framework (SCQF) immediately after completing its development process. Participants mentioned that Bahrain, was advised by SCQF against referencing its framework during the early stages of implementation. However, an informal comparison with National Framework of Qualifications, Ireland was carried out in 2013/ 2014 when the framework was

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empty of qualifications (BQA & QQI, 2014). Later referencing with SCQF was carried out in 2018 (SCQF & BQA, 2018).

Similarly, the UAE framework was aligned with the UK framework in 2015 (Emirates News Agency, 2015) and also carried out a joint mapping exercise with New Zealand in 2018 (NZQA, 2018). Coles et al. (2014) supports aligning or referencing NQFs with international frameworks, as they have a number of advantages such as supporting international mobility, articulation across borders, and the establishment of mutual trust. Participants indicated that the referencing processes carried out by the UAE and Bahrain are currently more of a technical exercise and when referencing is done at a much more mature stage, it can be more effective as a communication tool.

5.1.7 Summary

The findings relating to this research question have shown that the UAE and Bahrain are considering the NQF as a tool to address the shortcomings in their qualification systems. Studies have shown that when a country uses the qualifications framework as a lever to drive reform of the education system, conflicts can arise, because fundamental changes will take time in order to enable transitions from existing systems to be made (Parker, 2011). Qualification systems involve a wide range of stakeholders who directly and indirectly influence these transitions and hence they must be understood within the wider sociopolitical and sociocultural contexts.

While some benefits can be gained from developing and implementing NQFs, the development of qualifications databases or registers are required to make NQFs operational, in order to support in achieving their wider benefits (Castel-

Branco, 2020; Cedefop, 2020). The UAE and Bahrain's frameworks are not yet fully populated with qualifications from all the three education sectors: school, higher education, and VET and hence impact remains largely formative.

Although the results relating to this research question show a convergence by the three countries at the level of policy rhetoric, the approach to the implementation of the NQF varies between the countries. This is further explored in relation to the second research question.

5.2 Research Question Two – In participants view, how do the challenges during the development of the National Qualifications Framework differ between the three countries – the UAE, Bahrain, and Oman?

Although countries developing NQFs expect similar benefits, there are significant differences between different national contexts. This can lead to different kinds of challenges during the development and implementation of the NQFs. This research question examines how these differences in context support or oppose the development and implementation of the NQFs in each country relative to the literature of policy lending and borrowing. In exploring these differences, several issues have emerged from the results that contribute to existing knowledge on NQF development and its policy lending and borrowing nature. These findings will be discussed in relation to seven broad areas; Evolution and Institutional Structure, Contextual Considerations of Policy Borrowing, Role of Consultants and Project Management, Significance of Resources, Reform in the Context of School and Higher education, Reform in

the context of developing National Occupational Standards for the VET sector, and Populating the Qualifications Register.

5.2.1 Evolution and Institutional Structure

Results show that all three countries have different approaches to developing NQFs. The UAE and Bahrain have internal stimuli to the development of NQFs compared to Oman, which has an external stimulus. The key driver in the UAE is the need to recognise military qualifications and in Bahrain, the anticipated benefits offered by NQFs is the main driver. In Oman, the World Bank Report has recommended the development of a comprehensive NQF (World Bank, 2012) and this is the external driver behind its development. Such drivers, and in particular, the need for educational reform are the preconditions that act as cross-national attractions for developing countries and stimulate policy borrowing (Phillips & Ochs, 2004b).

The broad design and architectural structure of the frameworks of the UAE, Bahrain, and Oman were found to be almost similar and as Grainger et al. (2012) explains, this is not surprising because all NQF developers borrow policies, aims and structures from each other. Findings suggest that frameworks in the UAE are influenced by the frameworks of Ireland and Australia and the frameworks of Bahrain and Oman are influenced to a certain extent by the Scottish system. Prior studies have noted that Scottish and Irish frameworks are two of the longest established comprehensive frameworks and are often seen as models by other countries (Raffe, 2009).

With respect to the institutional structures, at policy level, it is clear from the results that during their NQF developmental stages the UAE, Bahrain, and Oman have attempted policy learning from previous experiences of NQF. The NQF Handbooks of the three countries and a number of other development and implementation related documents on the respective qualification authority websites confirm extensive benchmarking exercises with other countries. Theoretically, therefore countries '*tick the boxes'* with respect to policy learning. Results however, show that in reality, countries face challenges with policy learning and a more holistic learning culture is found to be absent.

For instance, policy learning suggests getting support of other ministries and stakeholders (Tuck et al., 2004) and emphasises the importance of involving all key stakeholders during the NQF development stages (Allais, 2011a). In line with this, participants noted that the UAE, Bahrain, and Oman developed working groups, focus groups and committees and ensured that these working groups are represented by all stakeholders of the framework. In Oman, for instance, the Oversight Committee which had representation from all stakeholders was formed as part of the development process. Interview participants suggest that although the Oversight Committee was initially active and useful, there were issues because there were simply too many members on the committee. This committee also faced challenges such as committee membership changing as well as, members getting transferred and hence replaced with new members and these new members sometimes were not aware of the framework. It can be observed that although stakeholders representing all sectors were involved in the development process, the contextual factors that govern the effectiveness of committees have not been

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taken into account. Previous studies have cautioned that big committees are inter-ministerial and can tend to meet infrequently and that small committees and working groups work better (Cedefop et al., 2017).

Participants in Oman also reported other issues with the institutional structure, in particular, the location of the Oman Qualifications Framework (OQF) within a higher educational body. The interviews suggest that this has posed a number of challenges for the OQF project such as; shared financial arrangements between higher education projects and OQF projects; sharing of human resources for the OQF project with accreditation projects; and accreditation projects getting priority over OQF requirements. Interviewees also showed concern that the decision-making power of the OQF is vested with the academic stakeholders of OAAA. Participants from Oman perceive that while the OAAA Board has representation from vocational, professional, and school sectors, this is limited. Since all OQF documents are initially approved by the OAAA Board, participants have observed decision-making to be biased in favour of higher education. A number of earlier studies have stressed the importance of involving stakeholders in decision-making, yet countries are often seen to overlook the real importance of this. Oversights made during the development stage can cause problems during implementation, when the support of the other ministries and stakeholders will be required; this is because NQFs are social constructs (Tuck et al., 2004) that operate in social contexts.

In Bahrain, the quality assurance bodies of all sectors fall under the same organisation, the Education and Training Qualifications Authoriyu (BQA). Participants noted that this structure was better compared to institutional

structures in the UAE and Oman. Initially, Bahrain faced some challenges with the transfer of the NQF structure from Tamkeen (a semi-autonomous government body) to the BQA; however, this was later resolved satisfactorily.

Similar to Oman, participants indicated that the UAE also faces issues with its institutional structure due to its federal diversity. Participants noted jurisdictional ambiguity with respect to the placement of qualifications between the National Qualifications Authority (NQA) and the Commission for Academic Accreditation (CAA). The research identified that NQA is legally responsible for placing vocational, higher educational, and schooling qualifications on the framework. However, in practice, the CAA places accredited higher educational qualifications on its own register and MoE does the same for its schooling qualifications. The NQA in reality is responsible for quality assuring only vocational qualifications. Participants explained that the CAA has more experience than the NQA, as the NQA is a newly established body. This concurs with Keevy's (2005) observation that power relations are not about who has the power, rather they are concerned with the matrix of power relations in which role players are embattled. Parker (2011) sounds confident that the NQF in the UAE aims to bring together qualifications within two existing Commissions, MoE for general education, CAA for higher education and a third, the new Vocational Education and Training Accreditation Commission (VETAC) for vocational education and training. While the intention of the government seems to be in the right direction, this research suggests that the existing coordination issues within the institutional structures need to be resolved, in order for the framework to be able to achieve its integrated goal.

Similar to the UAE, Australia has also had the issue of federal diversity and this was also the case with the UK countries (Coles et al., 2014). Governmental power in Australia is shared between the National Government and the eight State and Territory governments (Wheelahan, 2011). Coordination of education policies is governed through Ministerial Councils and Wheelahan (2011) noted that the relationship has been tense and difficult at times. While VET is meant to be a national system, in practice, there is a considerable diversity between the States, because the States have authority for VET (*ibid*, 2011).

However, the Australian Qualification Framework (AQF) has been relatively successful in creating a national VET system out of fragmented state-based VET systems and has achieved a high level of acceptance within the sectors because the sectors own the qualifications within the AQF (*ibid*, 2011). Awareness of other systems combined with analysing, evaluating and drawing lessons from previous experiences can promote informed decision-making and support in policy memory (Baati & Schuh, 2008) in particular, as Australia is one of the lending countries for the UAE framework. It can be observed that in order for NQF reforms to be successful, policy learning should not be restricted to policy learning on the NQF discourse in isolation but encompass the policy learning of the education systems of the lending countries and using those data to inform local solutions (Burdett & O'Donnell, 2016).

5.2.2 Contextual Considerations of Policy Borrowing

An interesting finding of this study is that policymakers in all the three countries – the UAE, Bahrain, and Oman deny 'policy borrowing' and preferred to use the term 'policy learning'. This is consistent with the findings of Steiner-Khamsi's

(2012, p.9) study that governments prefer to use the term 'policy learning' in order to neutralise the connotations associated with policy borrowing or policy import. This also concurs with Steiner-Khamsi's (2013) opinion that policymakers justify importing foreign systems which are different from their own by downplaying and denying that policy borrowing has occurred. Interviewees who are policymakers argued that contextualising NQFs ensured that it is not a borrowed policy and claimed that modifications render the NQF localised. Results show that although some of the design elements have been contextualised, there are many other contextual factors that have been overlooked during the development stages; this suggests that countries should be advised to look into contextual factors at a wider sociocultural and sociopolitical level.

Participants shared examples of contextualisation that were done during the design of NQFs. For example, in the UAE a number of workshops and focus groups were conducted that involved stakeholders, who collectively decided to have a 10-level framework that ensures all qualifications in the UAE to be placed at the right level without the overlapping of levels in qualifications. Participants in Bahrain and Oman explained that while Scotland has a 12-level framework, Bahrain and Oman decided to have a 10-level framework based on the contextual requirements of their region.

Similarly, with respect to designing the level descriptors, results indicated that the UAE, Bahrain, and Oman contextualised them according to the requirements of their respective labour market. All three countries similarly have three main strands of learning outcomes that are based on - Knowledge, Skills

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and Competencies. However, within these strands there are differences in the nuances that ensure contextualisation within each country. For example in Oman, one of the stated anticipated benefits is to ensure that their available workforce in the country is employed and productive, and this is reflected in the learning outcomes in the level descriptor (OAAA, 2018b).

Similarly, participants in all three countries noted contextualisation in relation to the respective credit system within each country. The Bahrain and Oman credit systems currently in operation are similar to the UK system of awarding credits. Comparatively, the UAE system is aligned to with US system of credit hours, and hence 1 credit value equals 15 notional learning hours. However, in most NQFs, one credit equals ten notional learning hours. Participants in the UAE noted that no changes were made to the existing credit system in order to avoid confusion with the existing education training providers. Participants in Bahrain also indicated that the conversion of credits from American Credits (AC) and the European Credit Transfer System (ECTS) to the NQF in Bahrain did not create confusion with the existing systems. From the above examples, policy learning is evident with respect to design elements of the framework. All three countries have spent considerable time and effort in ensuring adaptation to their national contexts.

Although contextual factors related to design were considered, the results show that broader contextual factors explained by Phillips and Ochs (2003) such as the context of the lending country, and other related contextual interactions required for the successful implantation of the policy were not taken into account by the UAE, Bahrain, and Oman. Previous studies note that borrowing countries

typically do not consider the differences in contexts, or fully understanding all the aspects of how the framework was developed and is being implemented in that country (Allais, 2011a). For instance, typically, large disparities in the education system of the lending and the borrowing countries exists. In addition, there are disparities in resources as most of the lending countries are highly resourceful. Furthermore, a number of studies emphasise the need for NQFs to develop incrementally (Allais, 2017b; Chakroun, 2010; Gallagher, 2010; Raffe, 2011a; Tuck, 2007; Young, 2005). Experience of first-generation frameworks show that initially, sectoral frameworks are more effective, and countries can eventually go for a comprehensive framework once the sectoral frameworks have been firmly established (Tuck, 2007). Scotland, Ireland and Australia are examples of countries that each had an incremental and sectoral approach to their qualification systems that eventually resulted in a comprehensive qualifications framework (ETF, 2012; Young, 2005).

Results show that policymakers in the UAE and Bahrain have been under pressure to expedite the policy development process and that as a result, they hastily introduced the policy. This was seen, for example, when Bahrain was keen to quickly reference its framework that had no qualifications on it, with Scottish and Irish frameworks (BQA & QQI, 2014). Similarly, results show that the UAE wanted to be the first country in the GCC region to complete NQF development. This concurs with the finding of Burdett and O'Donnell (2016) that policymakers are often under pressure to hastily roll out the borrowed policy and that this leads to potential longer-term collapse and finally the policy being discredited in its new context. The comprehensive frameworks in the UAE and Bahrain were developed quickly over a period of two years and hence neither

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was an incremental journey. Findings show that the UAE completed its development of the QFEmirates within two years' and Bahrain completed development of its NQF in around four years'. Drowley and Marshall's (2013) study confirms that development of NQFs in the UAE and Bahrain were very ambitious with development of QF*Emirates* aiming to be completed in one year and NQF, Bahrain aiming to be completed in two years.

Scotland reformed the qualification systems of its three educational sectors over a period of 15 years with reform happening independently in the school system, vocational system and in higher education, and the framework then bringing them together (Young, 2005). In Australia, reform of the national qualifications system took place in the 1990s (Keating, 2003). During the same period in Australia, schools reformed their senior secondary school qualifications. Higher education also went through reform during this period and in 1995, the Australian Qualifications Framework (AQF) was established and brought all these three systems together (Coles et al., 2014). This indicates that the early developers of the frameworks, who influenced the frameworks of the UAE, Bahrain, and Oman, had an incremental approach. Phillips and Ochs (2003) explain that attention should be paid to the contextual factors that contribute to the success of the lending country also, to determine the compatibility of the policy during its implantation. This shows that pre-implementation learning is important for a successful NQF implementation. Results indicate that the UAE and Bahrain can draw from the Scottish experience, Irish experience or take their influence from by the Australian experience, but they should not overlook the incremental journey of these countries.

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It was observed from the results that Bahrain has a regulatory framework that is compulsory and is not incremental; the UAE has a regulatory framework that is voluntary, with limited policy breadth and is not incremental. Comparatively, Oman has had a sectoral framework for higher education since 2004 (OAAA, 2004a). This sectoral framework has been used by HEIs and the Ministry of Higher Education in Oman for licensing and accreditation purposes (OAAA, 2018b). Hence, Oman can be considered to have had something of a sectoral approach and to some extent an incremental approach as compared to the UAE and Bahrain. Alternatively, countries could choose to have an over-arching comprehensive framework that has sub-frameworks with varying strategies and objectives with respect to the institutional logics of the respective sectors (Raffe, 2011b). For many developing countries, this study suggests that an appropriate strategy maybe to start with sub-sectors and then build them into a comprehensive framework.

These findings suggest that policy learning is evident in contextualising some elements of the design of the framework (intrinsic logics) to the respective country (the UAE, Bahrain, or Oman) although there are other factors as explained by Phillips and Ochs (2003) during the policy borrowing process that did not get contextualised during the development process. As explained in the literature review, Phillips and Ochs (2003, p.457) observe there are five forces of context that affect borrowing:

(i)   contextual factors that affect the motives behind cross-national attraction

(ii)   contextual forces that act as a catalyst to spark cross-national inquiry

(iii)   contextual interaction that affects the stage of the policy development

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(iv)   contextual interaction that affects the policy development process

(v)   contextual interaction that affects the potential for policy implementation

Findings indicate that the UAE, Bahrain, and Oman have taken into consideration the contextual factors that affect the policy development process, but have not taken into account the other four contextual factors explained by Phillips and Ochs (2003). This corroborates earlier findings on Eastern European countries where technical issues related to the policy development process such as levels and level descriptors dominate discussions (Chakroun, 2010). Furthermore, these results demonstrate the importance of taking into account all the contextual factors during policy borrowing, when implanting in foreign soil (Forestier & Crossley, 2015; Phillips, 2006; Steiner-Khamsi, 2013; Zymek & Zymek, 2004).

5.2.3 Role of Consultants and Project Management

Findings show that consultants significantly influenced the framework development in the UAE, Bahrain, and Oman. The Scottish Qualifications Authority (SQA) provided consultants for the development of the frameworks in Bahrain and initially in Oman (SQA, 2015, 2019). Results indicate that policymakers did not have a satisfactory experience with some consultants as they reportedly tried to copy design elements from NQFs of different countries and pasted them together. For example, in Bahrain, the BQA identified the copying of level descriptors and other elements from other countries when the project was handed over to them, and the BQA attributed delay in the NQF development process to this. This finding supports the study by Allais (2011a) that the technical assistance provided through consultants by richer countries

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might not be appropriate for the specific problems faced by a country and that often NQFs are not led by technical experts of the borrowed country, rather the process of development is subcontracted out to consultants. The finding also concurs with Mohamed and Morris (2019) that in the GCC region, consultants often get blamed when difficulties arise.

Contrastingly, interviewees who are consultants are of the opinion that the GCC countries have financial resources and hence only want a completed product without understanding that an NQF is not an engineering construction but a social construct that is shaped by the consensus of all stakeholders. This is consistent with Barnett's (2015) view that GCC countries employ foreign consultants because they deliver the product without claiming a stake in the policymaking process.

Another finding that was common across the UAE, Bahrain, and Oman was that consultants are generally recruited only for the development stages with the assumption that implementation can be achieved solely based on the policy documents already developed with the support of consultants. For example, in the UAE and Bahrain, NQF project management with consultants ended when the development of the skeletal framework was completed. Findings indicate that there is a presumption in these countries that if written policy documents are available, anyone can implement them. This may be a naive assumption as explained by Steiner-Khamsi (2006), adoption of any foreign approach will create enormous problems during implementation. This is because the local context is alien to the implantation of the policy and practices that have been developed under different circumstances and hence borrowing countries may

not be able to solve unanticipated issues that consultants may be familiar in resolving.

Results show that in Bahrain, although consultants from the Scottish Framework Authority (SQA) extended support for the implementation process, policymakers declined the offer, preferring to implement the framework by themselves. A possible explanation for this is the lack of trust of consultants due to the earlier experience of copying NQF documents. Another reason could be the economic concerns related to the borrowing and lending process as explained by Phillips and Ochs (2003). This concurs with the contextual considerations put forward by Phillips and Ochs (2003) during the policy lending and borrowing process and shows that contextual interaction affects the potential of the policy implementation.

5.2.4 Significance of Resources

A common finding across all three countries was the challenge of financial costs and recruiting staff with expertise. It was evident from the results that costs related to NQFs and staffing were the most underestimated aspects of the development stage. Results show that cost is a huge challenge in light of the limited competencies available within the three countries for implementing the framework. The UAE and Bahrain greatly miscalculated the costs and time period required for achieving their stated benefits of the NQF. Although Oman is still in the development stage, participants from Oman were also quite apprehensive with respect to costs and staffing related to the implementing bodies including institutions and felt that these factors can impede effective implementation. A possible explanation can be due to planning being developed

under totally different contexts and a perceived underestimation of the monumental resources that can be consumed by undertaking a qualifications framework.

Findings show that all three countries were able to meet the cost demands during the development process but were not organised to meet the costs for the implementation stage. And this was because, costs during the development process were incurred only by the developing authority, whereas implementation costs had to be borne by many stakeholder bodies including the education and training institutions. This concurs with a study by Corpus et al. (2007) who suggest that while the framework development authorities may have enough financial resources, other bodies responsible for implementation of the framework may not have access to the same resources. These results confirm that lack of planning for local conditions can often lead to policy failure (Burdett and O'Donnell). A suggestion will be for countries to develop and implement a comprehensive resource strategy that includes all costs related to framework implementation.

5.2.5 Reform in the context of School and Higher Education Sectors

All countries around the world have an existing qualifications system through which school, higher education or vocational qualifications are awarded to learners (ETF, 2017). The findings in this study indicate a mismatch between existing qualification systems and the desired outcome-based qualification systems in the UAE, Bahrain, and Oman. Keevy and Chakroun (2015) note that in countries with weak educational systems, the growth of qualification systems

is typically unregulated and the UAE is seen to recognise its unregulated vocational sector (NQA, 2014a).

Evidence of a weak school system was found in both the UAE and Bahrain. Findings in the UAE and Bahrain indicate that, even though both the comprehensive frameworks have been in implementation for more than five years, there have been challenges in placing school qualifications on the register and participants mentioned that quality assurance systems are not in place in order to place school qualifications on the NQF database/ register.

Comparatively, the higher education sector was found to be stronger in all the three countries as they are regulated by quality assurance systems. Implementation of the comprehensive framework in the UAE is through accreditation (NQA, 2012) and through institutional reviews in Bahrain (BQA, 2020). Implementation of the sectoral higher education framework in Oman is through quality audits and institutional accreditation (OAAA, 2004b). This was found to be similar to the Malaysian Qualifications Framework which is also dominated by the higher education sector. The implementation of this framework is carried out through the accreditation and quality assurance of higher education (Allais, 2011b).

It has been observed that reinforcing the stronger sectors (higher education) and delaying reforms in the school sectors and may not help in fully achieving the intended aims of a comprehensive NQF. This finding broadly supports the work of Young (2005) in his report to the International Labour Organisation (ILO) where he explains that developing countries need to be cautious at the beginning when adopting a comprehensive framework, and he recommends

having sectoral frameworks that eventually lead to a comprehensive framework. Young (2005) gives three reasons for this; first, most developing countries have stronger higher education and a weaker vocational sector and hence he suggested that caution should be exercised so as not to be distracted by the sector that is dominant; second, in every developing country there will be resistance from schools, due to NQF linkage with examinations; third, qualification reform has to be carried out in parallel with institutional reform, which is a very high resource approach, hence an incremental strategy will help (Young, 2005). This study concurs with Young's (2005) statements and suggests that if the NQF can work better for a specific sector, then this is information can to be taken into account during the NQF development process as it can support in identifying more realistic approaches for the weaker sectors. This further supports Phillips and Ochs (2003) view that critical engagement with the broader contextual issues within the qualifications system is important.

5.2.6 Reform in the context of developing National Occupational Standards for the Vocational Education and Training Sector

Vocational Education and Training (VET) qualifications placed on a qualification framework means that they are developed based on National Occupational Standards (NOS) of the country (Raffe, 2015). Traditional VET qualifications are based on input-based educational standards, and qualifications for an NQF require the shift from input-based education to outcome-based teaching and learning using NOS to design learning outcomes.

All three countries in this study initially contracted German International Cooperation (GIZ) to support in the development of the NOS – the UAE in 2008,

Oman in 2005, Bahrain in 2012 (Stephan, 2013). The UAE got support from GIZ to develop vocational training institutes by the Abu Dhabi Education Council (GIZ, 2008). This concurs with Young (2005) whose view is that the vocational qualifications' framework is over-dependant on consultants to develop NOS. Findings show that using these standards is not compulsory for all the training institutes when they develop new VET qualifications. In the view of interview participants in Bahrain, the vocational sector is not yet mature enough to handle aspects of NQF and might need more time to build capacity.

Similarly, in Oman, the Ministry of Manpower (now Ministry of Labour), developed around 60 NOSs for different occupations between 2005 to 2010. Interview participants in Oman indicated that although some of the NOSs are being used in developing new qualifications, most of these NOSs are yet to be converted into new qualifications. This is in line with a study by ETF (2014) which found that dependency on consultants for NOS development does not support in the NOSs getting converted to new qualifications.

Findings showed that within the UAE, two similar, yet different systems are followed to place vocational qualifications on the Emirates Qualifications Framework: ACTVET is responsible for quality assurance of VET qualifications in Abu Dhabi and the Northern Emirates; and KHDA for quality assurance of VET qualifications in Dubai. In the UAE, three ways of placing VET qualifications on the framework are adopted - VET qualifications based on learning outcomes in the level descriptors of NQF, VET qualifications not based on learning outcomes, and foreign VET qualifications are all placed on the VETAC register (NQA, 2015). Bahrain and the UAE have allowed training

institutes to develop vocational qualifications that are not based on NOS to be placed on the framework. It can be observed that developing VET qualifications based on NOSs of their country rather than the NOSs of a foreign country, will be more beneficial as the NOSs will then be contextualised to the labour market requirements of the respective countries. This requires not only the competence to develop NOSs, but also the competence to convert NOSs into qualifications. Policy learning is a participatory process, and the support and capacity building of industry and employers will be critical to support in implementing this.

5.2.7 Populating the Qualifications Register

Results show that the comprehensive frameworks in the UAE and Bahrain have challenges in placing qualifications on their national registers as a result of issues that were overlooked during the framework development stage. Populating an NQF with qualifications is the first critical step, without which, the framework can have no impact (ETF, 2017) and can become a useless construct (Deij, 2021). A national register populated with qualifications is important for all the anticipated benefits of the framework to be achieved (ETF, 2017).

Oman has had a sectoral framework for higher education since 2004, which is primarily used for developing and reviewing new programmes, licensing purposes, and as a reference point for institutional accreditation (OAAA, 2018b). However, it has not gone beyond these objectives to achieve its purposes of '*to provide consistency in programme requirements and award titles, as well as to provide equivalence of standards in comparison with respected international institutions of Higher Education'* (OAAA, 2004a, p.2). A

possible reason is because, no higher education qualifications were placed on it, although the Handbook for Requirements for Oman System of Quality Assurance (ROSQA) mentions quality assuring qualifications through programme accreditation and placing them on a '*register of accredited programmes'* (OAAA, 2004b, p.152), The process of developing standards for programme accreditation in Oman is still ongoing in 2021[4].

During the developmental stage, Bahrain estimated that there were around 700 qualifications in the country that needed to be placed on the NQF register in order to achieve the purposes of the BQF. At the start of the implementation stage, Bahrain expected to populate the register with all qualifications in the next five years', but at the time of interviews in 2018[5], around 53 qualifications were placed on the framework and 30 qualifications were still under process. Participants attributed this slow progress to lack of resources, particularly in recruiting staff with the right skills to place qualifications on the framework. This is consistent with the findings of Keevy and Chakroun's (2015) study, which shows that limited budgets for implementation can cause slow progress in placing qualifications onto the framework and also with a study by (Young, 2005) which explains that lack of skilled staff can also cause delay.

Compared to Bahrain, findings indicated that the UAE, went to the implementation stage with no supporting policies. The NQF database was in the process of development at the time of interview in 2018. Results show that the education sectors have their own registers – CAA has a register for higher

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[4] http://www.oaaa.gov.om/Program.aspx#Pgm_Standards_New, accessed 20 February 2021.
[5] By end of 2020, more than 100 higher education qualifications and around 50 vocational qualifications have been placed on the framework.

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education qualifications and VETAC has a register for vocational qualifications. These were found to be similar to pre-NQF databases which focus on programmes rather than qualifications (Cedefop, 2020). A national register, populated with qualifications from all three sectors, is important in order to achieve the integrated purposes of an NQF.

The process for a qualification to be placed on a framework is extensive because each unit in a module/course/programme is mapped individually and then collectively for the whole programme. This is generally conducted by a specialised skilled panel, which is aware of this mapping of the learning outcomes with the levels in the level descriptor. Results show that in the UAE, qualifications are claimed to be placed by trust and not through the required NQF quality assurance process. This is consistent with the findings of Keevy and Chakroun (2015) that although mapping qualifications may appear to be a relatively straightforward process, it is not so in reality.

Findings indicated that with respect to school qualifications, both the UAE and Bahrain have not yet started to quality assure and place school qualifications on the framework. This reflects the findings of the study by ETF (2017) which states that internationally, many developing countries are facing difficulties in populating their framework with qualifications from all three sectors of education and, at the time of the ETF study, none of its partner countries had a fully populated NQF database.

Results show that the link between policy learning and policy development is weak and a need to develop conducive conditions for a policy learning culture was observed in these countries. Developing greater awareness of other

systems through peer learning and identifying barriers to policy learning can support in adopting more realistic approaches to populating an NQF register.

5.2.8 Summary

The findings relating to the second research question have shown the weaknesses in the sociocultural and the sociopolitical systems which hold a policy in its position relative to the context within which it operates. In order to enable them, the contexts into which the policy gets adopted (Phillips & Ochs, 2003) and the multiple contextual contingencies that can arise (Verger, 2014) need to be considered. For developing countries, NQFs along with their learning outcome-based system are a huge challenge in terms of costs, human resources, and the competencies available. Although evidence of policy learning was observed in all three countries selected for this case study, a number of elements were miscalculated during the development stage that had implications during the implementation stages. The results shown in this thesis confirm the finding of Young (2005), where developing countries wanting to establish qualification frameworks expect a straightforward process that takes the form of establishing the framework itself and assume that this does not require any major institutional changes. Hence during development stages, this does not challenge the interest of the stakeholders enough to provide their critical inputs during the development process. Problems are encountered when the borrowed policy gets implanted into the local context. Qualification systems are part of the society in which they operate and hence to understand them, the political, cultural, social, and historical contexts are very important.

5.3 Conclusion

This research aimed to understand the how the intended purposes of an NQF can be best achieved, through a comparative study of three countries, using a policy lending and borrowing lens. This research has looked at the way in which the UAE, Bahrain, and Oman have developed and implemented a National Qualifications Framework (NQF), the design features of each having been influenced by some of the early developers including Scotland, Ireland, and Australia. The UAE and Bahrain have been in the implementation stage of their respective NQFs for more than five years and is yet to achieve many of the intended benefits of an NQF such as to recognise lifelong learning, achieve parity of esteem of different types of qualifications and enhanced consistency, mobility, and portability of national qualifications. This study has shown that although all three countries have satisfactorily contexualised some of the design elements of the framework to their national contexts they face challenges in embedding NQFs within the wider sociopolitical and sociocultural contexts due to uncritical policy borrowing from other contexts.

The policy lending and borrowing lens in this research indicates how policy proposals are mediated by government and how they take shape to accomplish intended objectives. The research has shown that key groups of people such as policymakers try to promote and align policies with what they see as their policy benchmarks. And this process is mediated through foreign consultants who sell their own knowledge resources to the borrowing country and also support in legitimising the borrowed policy. Results also indicated effective forms of policy borrowing in the form of policy learning which enabled adaptation

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of the policy within the local context. Embedding policy learning within the social structures however remains a challenge. To overcome this, the policy borrowing environment also needs to be evaluated in order to design context-based policies that can be feasibly implemented.

Borrowing and transplanting policies from different cultures requires reconciliation of sociocultural and sociopolitical contexts and this research shows that, such a reconciliation remains elusive. Results indicate that legitimising policies through such a borrowing process has led to unrealisable challenges in the implementation of these policies. The results therefore demonstrate that in order for a comprehensive/ integrated NQF to be effective a broader contextual consideration of factors in respect of the social, political, economic, and cultural contexts of both the lending and the borrowing country must be taken into consideration.

Consistent with previous studies, this research demonstrates that a comprehensive/ integrated framework will start to achieve the benefits of an NQF when all qualifications from schools, higher education, and VET have been placed on it. The research is in accord with the findings of Young (2009) and (Raffe, 2007) that a fully operational framework will therefore be the outcome of many different initiatives and reforms, that are developed over a number of years, and that this is a long process which is accomplished through several discrete policy steps. The findings show that the frameworks in the UAE and Bahrain are not yet fully populated with school, higher education, and vocational qualifications. Although the UAE and Bahrain have started to place higher

education and vocational qualifications on the framework, both countries have not yet started to place school qualifications on their framework registers.

Frameworks that are not populated with qualifications can lead to '*empty NQFs'* or '*zombie NQFs'* (Keevy and Chakroun, 2015, p.91). Although these terminologies can seem unpromising after all the efforts put in during the development stages, initially, when the skeletal framework gets developed, it can serve only limited purposes such as in developing new qualifications or for licensing purposes or for listing qualifications on the register. This initial implementation however, is often followed by a prolonged implementation period where many countries face difficulties in placing quality assured qualifications onto the framework. This is because the country-specific contextual disparities create different problems and challenges during policy implementation. This research has shown that development of NQFs is not about fulfilling policy learning on paper but in understanding the contexts under which each national educational system operates in. This research set out with Sadler's (1900) saying, *"We cannot wander at pleasure among the educational systems of the world, like a child strolling through a garden, and pick off a flower from one bush and some leaves from another, and then expect that if we stick what we have gathered into the soil at home, we shall have a living plant. A national system of education is a living thing..."* and confirms this a century later. This research has built upon this basic understanding and further explains this borrowing process through the two contextual pillars on which effective NQF implementation is positioned – sociocultural and sociopolitical contexts. This is shown diagrammatically at Figure 5.1.
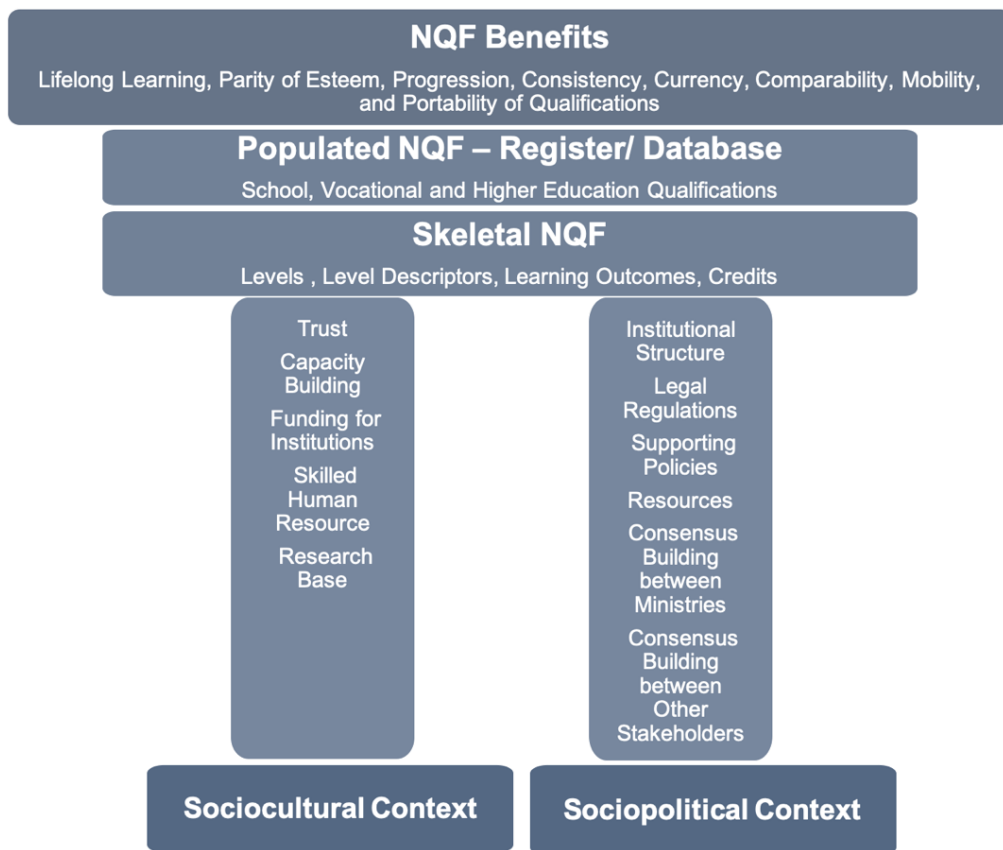
Figure 5.1: The two contextual pillars – sociocultural and sociopolitical contextual pillars for effective implementation of an outcome-based integrated or comprehensive NQF (Figure created by the author).

The figure above shows the two contextual social pillars representing the sociocultural and sociopolitical contexts that holds both the skeletal NQF and the populated NQF on which the NQF benefits depend on. The various categories shown in this figure have varying weightage compared to each other. Findings show that the skeletal NQF that includes developing levels, level descriptors, learning outcomes and credits are comparatively quicker to develop compared to populating the NQF with quality assured qualifications. This is because populating the framework requires the support of social structures such as trust and capacity building to enable these design features.

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Building trust, building capacity, ensuring consensus between each of the stakeholders involved in the NQFs and building a strong research base will require more time to develop as NQFs are social constructs and require cooperation and coordination between and among the various stakeholders that includes the different ministerial and/or governmental bodies. Often countries are seen to develop the skeletal NQF with sporadic support of the sociocultural and sociopolitical contexts. This does not result in the effective implementation of the framework despite the time and effort invested in the framework development. This research has shown these social issues within the two pillars – sociocultural and sociopolitical contexts. These two pillars although may require more time to develop, are essential to hold the other structures together. The practical challenges in embedding these categories socially within a country's context is explained below.

Sociocultural Context:

The findings suggest that one of the keys to understanding the challenges faced during implementation is recognising the importance of context in sociocultural settings. This research has shown that the main limitation in all the three countries stems from the fact that the broader aspects of contextual interactions between the lending and the borrowing countries were not included during the policy learning process. For instance, the lending countries had an incremental approach to NQF development, they have a stronger economy, they were highly resourceful, and have stronger education systems. In contrast, the development process in the UAE and Bahrain was hurried, all three countries have weak education systems and lack capacity and resources compared to their lending

countries. This resulted in a substantial underestimation of several elements that are essential to shift the existing qualification systems from a traditional approach to an outcome-based approach.

In addition to these issues, there are challenges with capacity building, funding, and recruiting staff with the right expertise in all the three countries. In the experience of the research participants, these were found to be a commonly underestimated aspect during the developmental stages. As a result, findings show that the policy objectives are highly ambitious with respect to the scale of this policy intervention.

The results clearly indicate that policymakers in all three countries were aware of these challenges and there were attempts at policy learning. This was evident from both interviewees and from the range of public documents available on the websites of the qualification authorities. Although information including what resources are required; how much capacity is needed; how long will it take; and how much research is needed is available, results show that this has been grossly miscalculated. This proves that studying successful systems alone may not be the best way to design a policy as it will not reveal the practical issues or show the things that can go wrong. Encouraging critical research and building a local knowledge base of NQF can support policymakers in policy learning lessons and help in overcoming *policy amnesia* and *policy busyness.*

Sociopolitical Context:
Another key element is the sociopolitical factors that influence the effectiveness of NQF policy intervention. Political function of a framework does not relate to

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politics but rather relates to the various coordinating functions that evolve during the development and implementation of the framework (ETF, 2011). The study has shown that NQF is not a single policy instrument that can be implemented only by the qualification authorities. Embedding the various elements of a framework requires the trust and support of the institutions and society into which it gets implanted. In all the three countries, stakeholder buy-in is a challenging issue. Findings show that there are challenges in the UAE and Bahrain in getting consensus between the stakeholders of the higher educational and vocational sectors. Comparatively in Oman, where the framework is being developed in isolation of many of its stakeholders, in particular, the industry sectors identified for diversification, stakeholder buy-in may prove challenging when implementation begins.

The evidence from this research suggests that the domination of the higher education sector in all the three countries lead to weaker positions for the school and vocational sectors on the framework. In the UAE, an implication for the still ongoing development process of some of its supporting policies, including the NQF register, cause overlaps between the development and implementation stages of the QF*Emirates* framework that adds to the challenges in its implementation. In Bahrain, evidence suggests that the change in the responsibility of the framework governance to BQA has solved some of the contextual issues and Bahrain has started to place qualifications on its qualification register albeit slowly. However, in order to fully achieve the benefits of a framework, this study suggests that countries should also go beyond the technical aspects of their quality assurance systems and not restrict themselves to quality assuring and placing qualifications on the framework as the value of

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a framework depends on its ability to embed in its social contexts and to harness the partnership and power of stakeholders and organisations that produce and use those qualifications (Chakroun, 2010). Similarly in Oman, although the Oman Qualifications Framework is yet to be implemented, this study identified that the contextual environment presents a number of difficulties for its effective implementation. For instance, the current institutional structure of the qualification authority in Oman does not lay a stable foundation for an effective comprehensive implementation of the framework as it is situated within an academic body. Although policymakers may have a genuine desire to apply lessons learnt from other experiences, its applicability can get limited due to political settings and contextual milieu.

This research has shown serious limitations in trying to solve policy challenges by a borrowing process. Instead, the success or failure of a policy, however well-formulated, will rest on a well-conceived, context-oriented and adequately resourced strategy. Sadly, the study has shown that in each case this is missing from the borrowed and adopted NQF policies. These findings illustrate that NQFs call for a change in all aspects of education from classroom practice to building trust and strengthening relationships within the society; NQFs also replace established traditional education systems with learning outcome-based systems. This massive and therefore high-stakes restructuring can be implemented effectively only through a precise and detailed integration and transformation of the traditional systems and this implies potential for conflicts and compromises which in turn calls for recognising all aspects of a given national context, inclusive of, for example, religious, regional and transnational aspects.

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In response to the weaknesses outlined above, in particular, the prolonged implementation period, due to an overlooking of the complex sociocultural and sociopolitical issues, this thesis makes two additional contributions to the current literature. These contributions, which are elaborated below, are solutions for a practical framework that address the current challenges faced by the UAE, Bahrain, and Oman in their efforts to implement effective NQFs. These practical solutions are potentially applicable to other GCC countries, Arab countries and other developing countries engaged in developing their comprehensive NQFs.

5.4 Research Contribution

This research contributes to knowledge by identifying the challenges in developing and subsequently implementing a borrowed policy when the contextual factors of the lending and the borrowing countries are not taken into account sufficiently. It further contributes to the policy borrowing studies by identifying how educational policy borrowing reflects the struggle between the developing countries and their aspiration to align with the international community. This research also highlights how policy learning occurs during the policy borrowing process and the role of consultants in legitimising this process. This study contributes to new knowledge by demonstrating the understanding of context through two contextual pillars – sociocultural context and sociopolitical context, illustrated at Figure 5.1, and explained in the previous section. This thesis thus addresses the research gaps identified in the literature review and also adds to the growing body of knowledge on NQFs.

Furthermore, this thesis also contributes to the literature on NQFs by making two empirically-based and theoretically-informed propositions with the potential to support developing countries complete the implementation stage and review stage of NQFs in order to fully achieve the purposes for which their NQF is being developed. These are elaborated in Sections 5.4.1 and 5.4.2.

5.4.1 Make explicit reference to populating NQFs by adding an additional stage to the development and implementation stages

One of the main findings for the delay in achieving many of the intended purposes of the comprehensive NQF is the lack of a fully populated qualifications register or database in the UAE and Bahrain. This led to the finding that many of the processes that leads to placing qualifications on the framework were underestimated. In order to emphasise the operational aspect of the comprehensive framework, this research suggests adding two additional steps to the stages of NQF development proposed earlier by Deij (2009a) namely - the **qualifications placement stage and an impact evaluation stage.**

The six stages in NQF development and implementation proposed earlier that is discussed in the literature review chapter and shown at Table 2.3 are: the exploration stage, conceptual stage, design stage, testing stage, implementation stage, and review stage (Deij, 2009a). This research suggests dividing stage five, the implementation stage into two stages; primary implementation stage and secondary implementation stage, in order to include the **Qualifications Placement Stage,** shown diagrammatically at Figure 5.2. A two-way arrow between the primary and secondary implementation stages

interconnects them to denote that the two stages are not discrete. Primary implementation refers to tasks at the institutional level. Secondary implementation refers to the requirement that qualifications need to be quality assured and placed on the comprehensive framework. Making the qualifications placement stage explicit can facilitate more awareness in countries developing a framework and increase focus on the end result required to make an NQF operational.

The next suggestion is the addition of **impact evaluation** to stage six, that is the review stage. Both the review and impact assessment are quality assurance processes to evaluate contextual implementation but, they vary in their roles. Review is a self-assessment which is the ongoing reflective process that provides an inside view of the process and is conducted by the people implementing the intervention. Impact evaluation provides an external perspective on the intervention and supports in assessing the outcomes of an NQF. The diagram illustrated below at Figure 5.2 represents these additions.
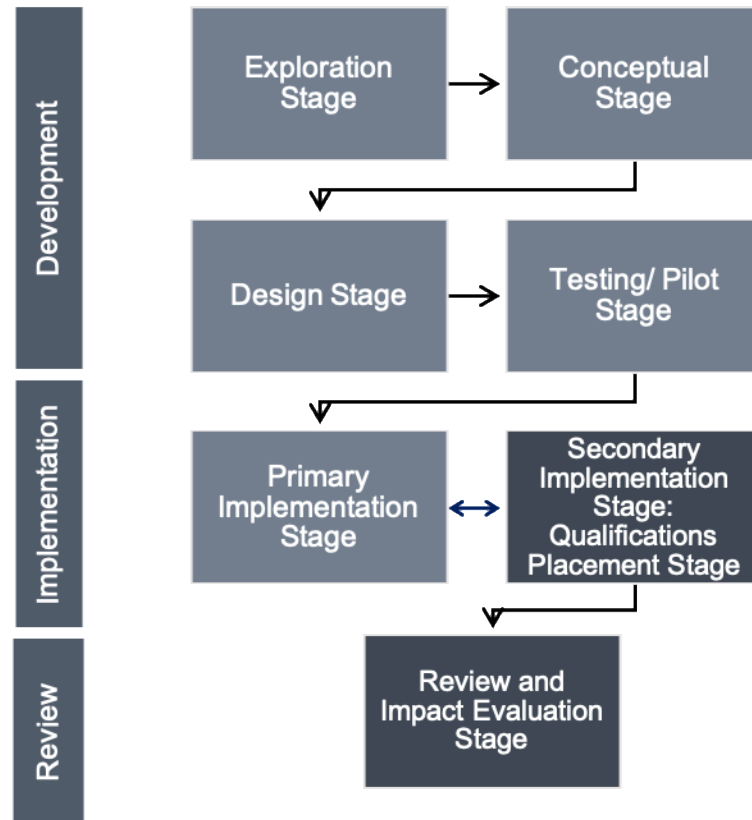
Figure 5.2: Proposed stages for NQF development and implementation – addition of Qualification Placement Stage and Impact Evaluation Stage (Figure created by the author).

Together, the suggested six stages are;

1. Exploration Stage – This is a stage during which a country starts to consider developing a framework.

2. Conceptual Stage – In this stage, a country discusses and defines the rationale for a future framework.

3. Design Stage – This is the actual development stage where the skeletal framework and supporting policies to enable it, including a national register are designed and developed in consultation with all stakeholders and approved by a legal body.

4. Testing Stage – The draft framework is tested before implementation to enable contextual amendments.

5a. **Primary** Implementation Stage – This stage involves tasks at institutional level.

5b. **Secondary Implementation Stage: Qualifications Placement Stage – this stage, involves quality assuring and placing qualifications on the framework.**

6. Review **and Impact Evaluation** Stage – This stage is to review the progress and assess impact of the framework.

Evaluating the impact is further discussed in the next suggestion.

5.4.2 Determine impact measurements at various intervals to evaluate the changes in systems and changes in practices

As a second practical contribution I suggest that the NQF impact is assessed at regular intervals in a systematic and objective manner in order to evaluate the changes in systems and changes in practices. This can show progression in results from a rhetoric change to a concrete change, and to evaluate the effectiveness of existing interventions and to explore potential future interventions. The proposed impact measurement is built upon suggestions provided by Cedefop (2010a) and Taylor (2010 in Cedefop et al., 2017).

This research suggests to evaluate impact of the policy intervention initially two years after the start of implementation. During the very early years of implementation, particularly during the initial two years, change will likely be rhetorical in nature and there will be no observable change as only the architectural elements can be evaluated during this period. There will not be

much impact during the first five years and an assessment at this point can provide an opportunity to act on critical issues before it is too late. This can also be a good time to assess the popularity of actions with stakeholders responsible for implementation, and stakeholders directly and indirectly affected by the NQF. During the later years, which is after around ten years, concrete change will likely start to take place. And after twenty years, the framework can be expected to start to achieve most of its intended benefits. These steps are illustrated at Figure 5.3 below.

After two years – Early Impact Assessment

Five to ten years – Initial Impact Assessment

Ten to fifteen years – Actual Impact Assessment

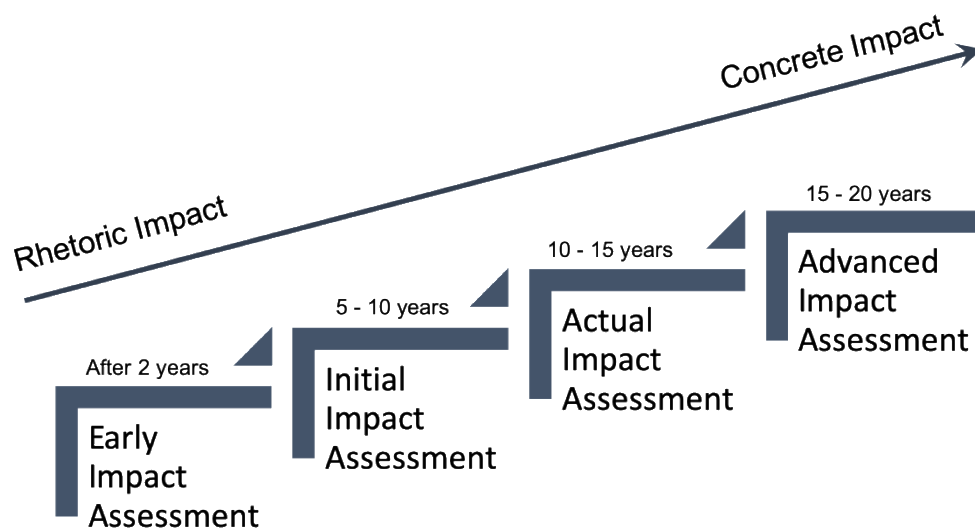Fifteen to twenty years - Advanced Impact Assessment

Figure 5.3: NQF Impact Measurement - Rhetoric Impact to Concrete Impact (Figure created by the Author).

The strength of this model is that it legitimises the length of time it might take for the NQF project to develop and become successful – allows for time to pause and assess and, if necessary, propose changes in direction or make adjustments. This model takes account of the fact that governments should not really be expecting to see real change during the initial five years. An NQF is a long-term strategy and usually make full sense only at a more advanced stage. During the course of this period, priorities of governments may change, and other contingencies can happen however, this categorisation provides insights for policymakers and implementers to be conscious of the different maturity stages of an NQF. Crucially, it also communicates to the governments of developing countries not to expect a quick solution and drives the point that a long timescale is required for NQFs to mature and hence they should not be hurried.

5.5 Policy Implications

Implications for theory – This research identified that the policy objectives are highly ambitious, and the scale of policy intervention required to achieve these presents enormous challenges in each of the three countries. NQF involves a number of political stakeholders and a lack of clarity on the scope and timelines is a major risk to effective implementation. Factors that include overoptimism, underestimation, vested interests, administrative silos, complexity, insufficient knowledge of the implementation process and overlooking critical aspects of implementation during the development process can be detrimental to effective implementation and cause significant challenges in quality assuring and placing qualifications on the framework register, thereby delaying anticipated benefits.

Implications for policy – Policies get borrowed from countries having well-developed and established policymaking contexts and are implemented in local contexts that have underdeveloped capacity for policymaking and policy implementation. Therefore, greater attention should be directed towards a thorough understanding of the context of the home country and its realities in order to develop appropriate policies. Policies developed should also be flexible enough to accommodate the diversity in contexts.

Implications for practice – Garnering support and engaging all stakeholders related to the policy to forge a common agenda can play a significant role in the effectiveness of policy implementation. New policies in particular, require continuous support from the government and in this regard, managing the expectations in meeting the colossal targets that were set is important to provide confidence to all stakeholders. The more the stakeholders of school, higher education and VET understand their interdependency in implementing NQF, the more their collaboration will evolve and strengthen this intervention and this can positively affect the policy effectiveness. Evaluating the policy at periodic intervals from an early stage can support to identify issues quickly in order to take timely action. Both review and impact evaluation can support in continuous improvement in the implementation of the policy initiatives.

5.6 Strengths and Limitations of this Research

A key strength of this research is that it can benefit policymakers and policy researchers to see their framework in a comparative context. This research has focused on the comprehensive aspects of an NQF and not on the sectoral

aspects. However, as Raffe (2009) explains, many of the conceptual models of comprehensive frameworks can also apply to sectoral frameworks.

NQF itself started in 1990's and is quite young, hence international research in this area is less. Most of the existing research on international NQFs are contracted research for CEDEFOP, ETF, ILO and EU with a small group of researchers and there is less debate on the subject globally (Markowitsch, 2017). In the GCC region, there is currently very minimal critical literature or analysis on qualifications framework development, and the main sources of information for literature were the handbooks and reports found on the NQF authority websites. Hence there is very less critical data or literature on the three countries taken for this study. Another limitation of this study was that the sample size among the three countries were not evenly spread. This is because two countries, the UAE and Bahrain were in the implementation stages and Oman is in the development stage. The scope of this comparative case study research was limited to those participants who were involved in the development and implementation of NQFs in the UAE, Bahrain, and Oman. This study did not include the end users of the framework such as the institutions, employers or learners.

NQFs like any other public policy documents are dynamic in nature and operate in real time (Raffe, 2009). Policies also have different stages of growth and development. Hence during the course of this research, the NQFs in the UAE,

Bahrain, and Oman could have advanced in its stages[6]. And what has been captured through this process can differ from the current real time situation.

5.7 Future Research

In terms of directions for future research, this study suggests that further research be undertaken in five areas. First, this study was viewed through educational policy borrowing lens. Further research in this area can be undertaken to identify the problems with a borrowed policy from the lending country perspective. Secondly, policy borrowing also goes through a process of policy learning and future research can focus on the policy learning process to understand the pressures affecting the policy learning system in particular, the role of consultants in the policy learning process. Effects caused by NQFs is another area that can be explored through future research. As more countries are developing NQFs and as the current NQFs will start to mature, this is a critical area for future research, and this research contribution provides an initial step towards this goal. Fourth, further research can explore the capacity of NQFs to accommodate new credentialing methods such as micro-credentials and digital credentials. A fifth area that has become apparent in recent times is the sudden disruption and crisis caused by Covid-19. The capacity of NQFs to

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[6] During the course of this research, there has been changes to the institutional structures of the qualifications authorities in the UAE and Oman.

The UAE – In July 2020, the National Qualifications Authority (NQA) was merged with the Ministry of Education (Nagaraj, 2020)

Oman – In January 2021, OAAA's mandate was expanded to include the quality of school education in addition to implementing the Oman Qualifications Framework and its name has been changed to Oman Authority for Academic Accreditation and Quality Assurance of Education (OAAAQA). Source: http://www.oaaa.gov.om/About.aspx#Establishment, accessed on 16 April 2021.

be flexible to such disruptions is an important area of future research. Finally, it is important to state that NQF's are dynamic in nature and hence at every period in time, new challenges will arise that can necessitate new research.

5.8 Methodological Lessons and Reflection

As a researcher this research taught me to be open to looking at research outcomes from different perspectives and to be unbiased to outcomes that may not be expected. Through this research I set out to understand the challenges in the developmental process of NQF and selected policy lending and borrowing as the theoretical lens to study this process. Having worked with the NQF experts in Oman, I had some understanding of NQFs and I was concerned that countries were ticking all the right boxes specified in literature and other NQF policy documents and yet facing enormous challenges. During the process of doing this research, I realised that the colossal scale of the NQF policy intervention has not yet been fully comprehended by these countries during the development phase. Although there is evidence of policy learning, developing countries grossly miscalculate the magnitude and complexity of this policy intervention and as a result, effective implementation becomes an unattainable aspiration.

The potential risks of borrowing foreign models without having their infrastructure and resources has been highlighted through this research. I realised that although policy borrowing as a term may not be explicitly acknowledged by bureaucrats, the phenomenon of policy borrowing will continue despite its challenges in contextualisation to local context. GCC

countries expend extensive resources to employ foreign consultants in order to develop and legitimise borrowed policies, however, the infrastructure, capacity building measures and resources apportioned to implement these polices at the local context are inadequate and once again grossly miscalculated.

Reviewing literature on NQFs indicated that NQFs in the GCC region have been less empirically explored. This makes this research as one of the first research studies on NQFs in this region and hence makes this study a relevant area of interest. Personally, I am happy to have made a contribution to this area and hope that my research can be a basis for more useful research on NQFs in the GCC region.

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Appendix 1a – The UAE Qualifications Framework Diagram

Appendix 1b – Bahrain Qualifications Framework Diagram

Appendix 1c – Oman Qualifications Framework Diagram

Level	Band	Professional Pathway	Academic Pathway	Technological Pathway	Vocational Pathway	RPL[1]
10	Higher Education (Post – school)	Professional qualification 5	Doctorate	Doctorate of Technology	[New qualifications may be developed]	N/A[2]
9		Professional qualification 4	Master PG Diploma	Master of Technology	[New qualifications may be developed]	
8		Professional qualification 3	Bachelor Graduate Diploma	Bachelor of Technology	[New qualifications may be developed]	
7		Professional qualification 2	Advanced Diploma	Advanced Diploma of Technology	[New qualifications may be developed]	
6		Professional qualification 1	Diploma	Diploma of Technology	Vocational Diploma	
5		Introductory Professional qualification	Certificate	Certificate of Technology	Certificate of Vocational Competency 3	
4	Schooling	General Education Diploma			General Vocational Diploma Certificate of Vocational Competency 2	
3		General Certificate of Basic Education			General Vocational Certificate Certificate of Vocational Competency 1	
2		[New qualifications to be developed]			[New qualifications to be developed]	
1	Literacy	Access				

Appendix 2 – Interview Guide to Semi-structured Interviews

1. Benefits/Purpose
   i. What is the problem in UAE/ Bahrain/ Oman that the NQF was aiming to solve?
   ii. Why is your country developing/ implementing NQF?

2. Policy benchmarking
   i. What factors were considered during the process of policy selection? (Prompt – a variant pool of countries are available for policy borrowing)
   ii. Employment of foreign consultants - What issues did you face and how did you overcome it?
   iii. Were the consultants able to produce documents that met the cultural requirements of your country? What were the challenges?
   iv. Examples of contextualisations done

3. Stakeholder Involvement
   i. Different stakeholders hold different views during the development of the framework. How was common understanding of the framework achieved?
   ii. What challenges did you face?
   iii. One of the benefits of developing NQFs is that it leads to wider consultation processes and hence leads to greater ownership. How was this strength utilised in the development of the framework?

4. Other Challenges
   i. What are the other practical challenges and difficulties that you faced during the development of the framework? (Prompt – in terms of human resources, finance, capacity building, cultural factors, expectations of stakeholders, availability of expertise)
   ii. What unexpected challenges did you face during the development of NQF?
   iii. Research shows that considerable investment is required as the operating costs can be high challenges. How well were you prepared for these challenges? (Prompt - assessment arrangements, quality assurance of qualifications, capacity building and coordinating stakeholders are inevitable expenses for a country and cost money)

5. General
   i. What advice will you give to countries similar to yours? (For example, Oman and other countries)
   ii. Looking back at the development stage, what would you have done differently?
   iii. Anything else you would like to add that might be useful?

Appendix 3 – Research Questions and Themes

Research Question 1: What benefits do the UAE, Bahrain and Oman, think a qualifications framework will bring?	Research Question 2: How do the challenges during the development of the NQF differ between the three countries - the UAE, Bahrain and Oman?			
Theme 1 Synergistic Potential	**Theme 2** Embedding in Local Context	**Theme 3** Sociopolitical Considerations	**Theme 4** Sociocultural Considerations	**Theme 5** Outcomes
Sub-themes 1. Synergy Created due to Anticipated Benefits of NQF 2. Synergy Created by the Drivers of NQF	*Sub-themes* 1. Levels and Level Descriptors 2. Learning Outcomes 3. Credit Framework 4. Recognition of Prior Learning	*Sub-themes* 1. Legislations and Regulatory Requirements 2. Policy Breadth 3. Structural Arrangements 4. Resource Constraints	*Sub-themes* 1. Policy Borrowing and Role of Consultants 2. Stakeholder Consultation 3. Bridging the Higher Education and Vocational Space 4. Vocational Qualifications and National Occupational Standards	*Sub-themes* 1. Bahrain - Slow Progress 2. The UAE – Coordination 3. Oman – Underestimation

Appendix 4 – Final Codebook extracted from NVivo^{TM}

Name	Description	Files	References
1 Synergetic Potential of NQF	Managing multi stakeholders and bringing them together, Power Dynamics, Multilevel and Multi actor governance. government Industry Education (School, HE, Vocational and training providers)	14	34
Benefits	Benefits that can be got from NQF as stated by participants. Are they same coz NQF is borrowed?	11	23
Drivers	Why - what made them borrow? Reason for development is because neighbours and other countries have it or is there a need?	5	7
2 Embedding in Local Context	Intrinsic Logics - how are they embedded into local context. Contexualisations? Features of the framework, Nature and Purpose, Number of levels, Learning Outcomes, Level descriptors Policy learning?	13	33
Credit Framework	Issues in developing and implementing credit framework How was it contextualized	3	3
Learning Outcomes	Issues during development and implementation of LO How was it contextualized	6	7
Level Descriptors	Issues during development and implementation of level descriptors How was it contextualized	2	3
Levels	Issues during development and implementation of levels How was it contextualized	4	9
RPL	Issues during development and implementation of RPL How was it contextualized	3	6
3 SocioPolitical Considerations	Infrastructure of Qualification System Operational Arrangements Legislations Stakeholders Quality Assurance Did policy borrowing affect these?	17	63
Legislations and Regulations	Royal Decree Mandates Issues faced?	8	11
Policy Breadth	Supporting policies? Responsibilities of the different regulatory bodies QA of Qualifications - Processes/ policies QA of Framework - Process to include qualification in the database/ register	5	9
Resource Constraints	Human Resource, Staffing, Finance, Funding bodies, funding arrangements, funding mechanisms Did policy borrowing affect these? Policy learning?	14	29
Finance	Cost as an issue? Cost for implementation bodies? Resource strategies? Policy learning?	7	7

Name	Description	Files	References
HR	Expertise? Staff? Policy learning? Other issues	11	16
Structural Arrangements	Who is the governing body Who is the overseeing body Who are the listing bodies Location of the authority Policy learning?	9	14
4 SocioCultural Considerations	Act of policy borrowing Consultants and their roles Higher Education/ Vocational Conflicts NOS development and challenges in implementation What was learnt - policy learning?	19	107
Consultants	Pros and Cons of employing consultants Policy learning? Policy borrowing? Blame	11	13
NOS	Challenges with national occupational standards? Are there sectoral bodies? Converting NOS into qualification? Competence?	6	30
Policy Borrowing	Was the NQF borrowed? Issues faced coz of borrowing? Lending issues? Economic gains?	10	20
Stakeholder Consultation	Individual stakeholders issues Ministry of Education Ministry of Manpower Ministry of Higher Education Providers (HE and VET) Oman Academic Accreditation Authority Bahrain Qualifications Authority National Qualifications Authority, UAE, Was it successful? Problems…. Policy learning	12	32
Pilot	Was pilot testing done If so when How many participated Were changes made What was learnt	4	6
Voc vs HE gap	Parity of esteem Coordination Why is there a gap What can be done Policy learning?	8	12
5 Outcomes	Empty Qualifications or very less qualifications on the register. Inability to upload qualifications on the register. Why? reasons School qualifications? HE quals? Vocational Qualifications? Integrated angle?	18	40
Bahrain	Bahrain has 700 qualifications out of which, around 50 are on the framework. 5 years into implementation - why	6	12
Oman	Oman is still in the development stage and so yet to upload qualifications. Are there plans for implementation? Are they aware of the uploading problem faced by their neighbours? What other experiences that Oman can learn from?	9	15
UAE	UAE does not have a policy register. Why. 5 years into implementation. Coordination issues.	3	13

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