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Language-in-education Policy Formation through a Consultation-based System: The Case of Multilingual Curricula in Cambodian Universities

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This paper elucidates the under-researched policy formulation process, using Cambodia as the case context. In the face of ASEAN regionalisation, foreign language education (FLE) in Cambodian universities has become a battlefield of different stakeholders representing varied interests. With languages playing significant roles in economic and political competition among ASEAN countries, scholars (e.g., Andy Kirkpatrick) called for research to investigate the negotiation process of language-in-education policies (LEP). Cambodian FLE in higher education makes a unique case for LEP formation as the process has little prescription on its content except for gaining a consensus among different stakeholders. This study captures the negotiation process, identifying the multiple stakeholders and their roles, and how key contextual features have contributed to it. Drawing on in-depth interviews with decision makers in a focal university at multiple levels of senior management (e.g., vice rectors), mid-leaders (e.g., heads of departments), and individual lecturers, as well as document research, the paper highlights how the attempt to incorporate the demands of numerous stakeholders may marginalise the needs of those taken for granted, i.e., students and university staff. It contributes to LEP debates by shedding light on the issues arising from a rare consultative system, an oft-hoped-for approach, for developing LEP.

Keywords: Language-in-Education Policy (LEP), consultative policy formation, tertiary education, multilingual curriculum, Cambodia

Introduction

In increasingly more countries, English is adopted as a medium of instruction (EMI) rather than a subject of study (Dearden, 2014). In ASEAN countries, where other 'foreign' languages have already been exerting strong influence, this trend requires striking a new, delicate balance among competing languages (Kirkpatrick, 2016, 2017). There have been calls for research on the process behind this calibration, with languages playing significant roles in determining the political and economic competitiveness of a country, especially in the ASEAN context where countries are torn between diverse hegemonies and pragmatism (Clayton, 2000; Kirkpatrick, 2014, 2016, 2017).

Striking a new balance not always being successful, it is imperative to understand the factors that shape the language-in-education policies [1] (LEP) and their contribution (Tsui, 2004, p. 22; Wang, 2016). Cambodia makes a good case for such research. With lessons learned from neighbours such as Myanmar where policies have been less than successful (Kirkpatrick, 2017), and with its ambition to successfully integrate into ASEAN, the Cambodian government has recently adopted a new approach for LEP – a consultation-based system. The government allowed autonomy for universities in deciding the content of language education as long as this represented a consensus among stakeholders identified by the government. Cambodia is a rare case, as such a seemingly idealistic consultative system is seldom adopted, although language education policy scholars often present establishing the relevance of LEP from the perspectives of all significant stakeholders as an ingredient for a successful LEP (e.g., Choi, 2016, 2018; Liddicoat, 2016).

A number of studies have already been conducted in the Cambodian context (Chan, 2018; Clayton, 2000, 2002, 2006; Igawa, 2008; Moore & Bounchan, 2010; Sothy, Madhur, & Rethy, 2015; Tweed & Som, 2015). Some focused on identifying issues with this new approach, including the poor quality of teaching and learning materials, the mismatch between curriculum content and learners' abilities, and between the foreign language skills obtained by university graduates and those needed in the workplace (Chan, 2018; Igawa, 2008; Moore & Bounchan, 2010; Sothy et al., 2015; Tweed & Som, 2015). Only a handful have examined foreign language education (FLE) as a whole, including the dynamics among various languages, and the factors shaping policy, such as Clayton's studies (2000, 2002, 2006). However, the work deals with the period when ASEAN had not yet exerted its influence on the linguistic landscape, and thus, before the country deals with multiple languages.

Against this background, this study documents the process of negotiating an LEP in the form of a FLE curriculum, after the launch of recent educational policies, including the new approach to the LEP (e.g., Ministry of Education, Youth and Sport [MoEYS], 2004, 2016) in the context of a rising ASEAN block. It will identify how the multilingual LEP in a Cambodian university is shaped, and why, by diverse policy actors within and outside of university (e.g., staff from the university at different levels; donors) and constrained and enabled by the local contextual features (e.g., the legal system, competition in the job market, changing status of languages, and resources).

Guided by an analytical framework on LEP processes (Choi, 2018) and drawing on a qualitative case study involving document research and in-depth interviews with decision makers at 'multi-levels' (Ricento & Hornberger, 1996; see also Johnson, 2013), the study sheds light on the negotiation among different demands (or lack thereof). It presents theoretical and practical implications of the findings on the LEP formation process.

Previous Research: Factors Affecting LEP Formation

LEP is also known as language acquisition planning, as it concerns how language should be taught and learned (Liddicoat, 2004). There has been a lot of research on the implementation and impact of the LEP, however, how the LEP is formulated has not received due attention (Choi, 2019). As noted by Howlett and Mukherjee (2017), policy formulation research is still "rudimentary and fragmented" in general (p. 4). Policy formulation refers to the process where the broad goal is translated into a detailed plan, which is subject to collective influence from dominant discourses, roles of different stakeholders, and the contextual features. There has been considerable research which identified the factors shaping LEP. Some have identified factors affecting it at the macro level (e.g., Hornberger, 2006; Spolsky, 2009) as well as at the micro (e.g., Hult, 2015; Johnson, 2009; Ricento, 2006). Macro-level studies point out the importance

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[1] Policy has both broad and narrow conceptions. For the former, the term refers to the force which mobilises specific discourses that constrain or enable, writing, speaking and thinking (Ball, 2013; Jones, 2013). In this paper, it is used in a narrow sense, referring to official documents published by different organisations, such as the government and its functional sub-units, and educational institutes.

of the historical and political backgrounds (Rubin & Jernudd, 1971); overt structures such as the government system and ministerial structure; and covert structures such as the power of regional authority (Kennedy, 1982; Liddicoat, 2004; Wiley & Garcia, 2016). Some micro-level studies emphasise the contributions from diverse individual actors, such as the attitudes and beliefs of students, teachers and officers in local authorities (Hult, 2015; Johnson, 2009), or of social and interest groups (e.g., religious organisations and industries) (Spolsky, 2007).

Aptly, some scholars have tried to synthesise the findings and presented frameworks that help systematically analyse LEP formation process. Spolsky (2004), for instance, suggested four factors that shape LEP: the sociolinguistic situation, the national ideology, the existence of English as the world language, and the language rights. Recently, the framework for LEP studies expanded its scope beyond linguistic phenomena (Wiley & Garcia, 2016) to include sociolinguistic factors (Goundar, 2017). Further expanding the scope of synthesis and incorporating general policy studies, Choi (2018) presented a framework that is relatively comprehensive. It divides the factors into three areas: policy features, policy actors, and contextual features, and lists possible factors that can shape LEP in each area (See Table 1 for the details). While the framework was developed mainly focusing on policy implementation and impact, it is deemed applicable for this study of policy formation and used for the design of the study and analysis of the data.

TABLE 1
Factors Affecting LEP Process

Factors	Sub-factors	Examples
Reform Features	Reform Specific	Relevance, complexity, feasibility, self-containability
	Relational	Alignment with other policies, maturity
Actors	Identification of Actors	Implementers in the specific context (e.g. officers in the regional educational offices, teacher trainers, teachers)
	Individual Readiness	Cognition (e.g., awareness, knowledge), attitude, skills
	Interpersonal Readiness	Communication channels, collaborative system
Contextual Features	Reform-Specific	Resources, legal preparation, educational system readiness, history (e.g., meaning attached to reform elements)
	Reform Culture	Motivation (e.g., political vs. educational); pace of reform (e.g., long-term vs. fast-paced issuance)

LEP in Cambodia

Cambodia's LEP has periodically changed mainly due to political shifts and colonisation. Back in the 7th century, under Indian influence, the FLE curriculum introduced Pali and Sanskrit, while only two centuries later, with Thais taking the control of the Angkor Empire, the Thai language became the language of education, literature, and administration (Thong, 1985). When Cambodia was later subject to French colonisation (1963-1954) and then under the regime of Prince Norodom Shihanouk (1960s), the French language was given official status along with the native Khmer language, as the French attempted to use the language as a means of establishing education systems and strengthening colonial power (Clayton, 2000). This was later replaced by Vietnamese in the 1970s, and then Russian in the 1980s, before the introduction of English and other ASEAN languages in recent years (Clayton, 2000, 2006).

To view the recent development in more detail, the Vietnamese had influence over the Khmer language as early as the First Indochina War (1946-1954), and strongly infiltrated the Cambodian education system after the collapse of the Khmer Rouge, whose policy was to abolish the post-government education system and to prohibit the use of any foreign language in Cambodia (Clayton, 2000). After 1975, the Vietnamese advanced their interventions and reinforced the use of their language in both formal and non-

formal education (e.g., military training) in order to transform Cambodia's political ideology and economic system. At the same time, the Russian language was politically introduced to Cambodia in order that Cambodia could gain financial assistance and diplomatic support from the Soviet Union/Russia. Thus, the Vietnamese and Russian languages were predominantly used as economic and political tools (Clayton, 2006). While these languages have sometimes functioned as tools for international influence and appropriation in Cambodia, these 'voluntary' switches may also reflect 'linguistic imperialism' (Clayton, 2000, p. 125).

After a national election in 1993, and with the move to the free market and a membership of the ASEAN Economic Community, Cambodian foreign language education faced yet another batch of languages, i.e., English, the official language of ASEAN, and the languages of the Asia-Pacific's three largest powers (Chinese, Korean, and Japanese). The policy-makers of the Royal Government of Cambodia (RGC), the employment market and development partners, as well as Cambodian learners, alike, have recognised the proficiency in these newcomer languages as essential for economic development of society and for individual social mobility (e.g., Clayton, 2006; MoEYS, 2014a).

As there is no separate department that solely governs LEP, LEP in higher education institutions (HEIs) in Cambodia is governed by policies covering all aspects of education. Three levels of actors are involved in the policy processes: macro, mezzo and institutional levels. As prescribed in Education Law 2007, the process is rather top-down. At the macro government level is the Supreme National Council of Education, chaired by the Prime Minster of the Kingdom of Cambodia (Kingdom of Cambodia, 2007). It formulates 'long-term policy and strategy', assesses the overall education progress, and allocates resources for implementing policies (Kingdom of Cambodia, 2007). At the mezzo level – where actors coordinate policy implementation between the national level (macro level) and micro level (Liddicoat, 2016) – is the Technical Working Group of Higher Education, which promotes aid effectiveness and development partnerships in support of the achievement of higher education policy (MoEYS, 2014b), as well as ministries, agencies and committees. They refer to policies such as the Cambodia Qualifications Framework and the Minimum Quality Standards of the Accreditation Committee of Cambodia (Kingdom of Cambodia, 2007). At the micro level, which is the focus of this research, HEIs interpret and implement the policies as stipulated and translated at the macro and mezzo levels. The LEP as practiced at this level is influenced by local stakeholders such as parents and students, as well as local developmental partners who are trusted with improvement of education quality and provide financial support to local universities.

Current LEP recognises the revitalising role of the English language in both the ASEAN region and wider global community. Thus, the Curriculum Framework for General and Technical Education 2015 mandates two compulsory foreign languages, French and English, in the national curriculum (MoEYS, 2016). For basic schooling, FLE follows guidelines in the Policy for Curriculum Development for General Education (2005-2009) (MoEYS, 2004) and the Curriculum Framework for General and Technical Education 2015 (MoEYS, 2016). In contrast, there is no guideline for FLE in higher education. While several policies and plans, e.g., Policy on Higher Education 2030, Education Strategic Plan 2014-2018, as well as the Minimum Standards for Accreditation of Higher Education 2010, have mandated teaching English and French as foreign languages in Cambodian HEIs, they do not provide any clear guidelines on the what and how of teaching these languages. They do provide the standard of achievement. The ultimate proficiency aimed at for foreign languages through the three levels of education is somewhat ambitious, considering that it encompasses not just daily communication, but also other advanced areas such as research and work, and even seeks to develop critical thinking and creativity (MoEYS, 2016, p. 7). Considering the proficiency and other goals, the study hours for the English subject in a three-year programme are rather limited, only 76 hours annually, and 228 hours in total (MoEYS, 2016, pp. 15-16). For bachelor's programmes, time allocation is more realistic, with 450 hours annually and 1,800 hours for the three years (Kingdom of Cambodia, 2012, p. 36).

Without clear guidelines on what and how to teach, FLE practice varies across HEIs and different units within a single institute. For example, some universities require students to sit for state exams in order to graduate, while others stipulate that students do a practicum or thesis. The community practices of FLE

have been left to the perceived features of the contexts and people's needs therein (Chan, 2018). Within the case university, English and French have been used as the medium of instruction (MOI) in some departments and/or institutes, e.g. the Institute of Foreign Languages, Department of International Studies, and Department of Media Communication. Others offer lessons on them through a flexible time frame, e.g., three months, six months and/or one year, and still others, through a fixed-length programme[2]. There is also 'policy misalignment' among different elements of curriculum, e.g., assessment, teaching methodology, and the nature of programmes (Ros & Oleksyenko, 2017). Thus, Clayton (2000) fittingly describes LEP in Cambodian HEIs as highly 'flexible' (p. 118).

This complexified backdrop raises a question about how the LEP is actually formulated negotiating with all demands when maximal flexibility is given. In seeking answers to the question, the research was guided by the following research questions (RQs):

1. Who was most influential in shaping the LEP formulated through the consensus system in Cambodian universities and why?
2. How have the contextual features shaped the LEP formulated through the consensus system in Cambodian universities and how?

Methodology

Data Collection and Analysis

This case study aims to identify the shapers of LEP in the form of a HEI multilingual curriculum when there is no prescription as to its content but for the requirement to reach for a consensus among different stakeholders. This study employed a qualitative research approach, which allows for an in-depth investigation into a phenomenon as experienced by participants and captures the complexities within (Creswell, 2003). The framework discussed above (Table 1) informed the design of the research and the analysis of findings, since it contains systematic parameters for observing different actors and for investigating emerging issues of LEP. First, actors at multi-levels, e.g., senior management, mid-level management and the classroom level (see the section below for further details) were identified, and their respective characteristics (their beliefs, motivations and priorities), individual roles and involvements, and collective actions (e.g., communication, conflicts and power relations) were analysed. The contextual features were explored (e.g., the legal system, competition in the job market, changing status of languages, and resources), to see how they enabled and restricted the intentions of actors at each level.

The data consists of documents (e.g., university documents, national policy texts) and in-depth interviews. Policy documents published by different entities at different levels were collected and trawled through (see Table 2 for the list and description of main documents). Although these are not specific to language education, they provide the principles that govern the LEP formation. The university documents such as foreign language curricula and programmes were also obtained from the university academic affairs office and the Institute of Foreign Languages in order to understand the context and practiced LEP. Government documents were published in both Khmer and English, while the university documents were available in English.

In-depth, semi-structured interviews (see interview questions in Appendix) were mostly conducted in Khmer, a mother tongue. Some key words such as language policy, policy actors and stakeholders, were used in English after the initial introduction in both Khmer and English to reflect the local practice of code-switching and to grasp the participants' attention. Using mother tongue allowed the participants to express their ideas freely. Ethical clearance was made in the university where the first author works, and

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[2] Some variance is prescribed by the government, for instance, discipline specific hours. To illustrate, 76 hours are allocated per year for teaching English as a general knowledge subject, while for English majors, from 749 to 469 hours for the whole academic year.

interviewees' written consent was obtained before the interview. The questions for in-depth interview were developed drawing on the research framework presented above, and in consultation with local experts who have extensive knowledge of Cambodia's education policy and foreign language education and an international scholar who researches LEP. The question protocol was trialled for its clarity and finalised before the main interviews. The recorded interviews were transcribed, and translated into English before analysis. To ensure accuracy, the translation was conducted by two bilinguals, and any discrepancy was discussed and agreed upon. The iterative data analysis involved the following phases drawing on Clarke and Braun (2013) and Creswell (2003) – (1) familiarisation with the data, (2) descriptive coding, (3) searching for themes, (4) reviewing, defining and naming themes, and (5) identification of data patterns and relationship among the themes.

The interview data was first analysed. There were some seeming contradictions in it, for instance, different views between senior management and other staff on whether the curriculum addresses the needs of students. In such cases, the researcher returned to the relevant informants to clarify or further understand the reasons behind the contradictions. University documents (FLE curriculum, course outlines, and assessment guidelines) and other policy texts (see Table 2) were used for triangulation. Data was then synthesized through constructing narrative texts, which were refined through discussions between the authors.

Research Site and Participants

The study was conducted in a public university, in a town where the services of FLE have been widely provided due to the expansion of tourism, and the rapidly growing needs due to multinational companies recruiting candidates with foreign language skills. The case university is a highly suitable example that can capture the complex and continuous changes, which typically occurred through historical transitions, and the current context around LEP and FLE in Cambodia. The case university, for example, had undergone vigorous changes, including role changes since the 1960s (e.g., a higher learning institute in 1968, closure to be a meeting room for Pol Pot's cadres from 1975 to 1979, a dormitory and military training camp in the 1980s, and a teacher training centre in the 1990s. It was converted to a university in 2007. Despite its long history, overall, it has a relatively short history as a tertiary institute. All foreign language programmes have been under the management of the Institute of Foreign Languages. Initially, the institute offered English, Korean, Chinese and Japanese. More recently, French and Thai have been added.

Ten participants at three levels of the policy flow were purposively invited for interview. The participants were chosen while considering the characteristics identified in the literature as relevant for LEP formation process, such as position, power and expertise. The chosen participants represented i) senior management (i.e., vice rector); ii) middle-level management (i.e., Head of Research and Development, Chief of Internal Quality Assurance, Director of the Institute of Foreign Languages, heads of departments and institutes; and iii) course coordinators and lecturers. Additionally, two part-time lecturers were also recruited, as they had relevant experience in developing language programmes elsewhere, who could compare the practice of the case university with that of other universities.

Findings and Discussions

Findings from the study are presented around the two research questions. First, the study identifies policy actors and analyses their roles in shaping the multilingual curriculum as an LEP (RQ 1). This is followed by discussion of the contextual features (RQ 2). The paper concludes by analysing the issues identified and implications for LEP theorisation and practice.

RQ 1: Policy Actors and the LEP: Differential Power in a Hierarchical System

In the case university, both internal and external stakeholders participated in the decision-making processes. The Head of Research and Development and the Chief of Internal Quality Assurance briefly described the committee organised for developing the foreign language education curriculum, and the lengthy process of consultation involving both internal actors (i.e., the rector, vice rectors, faculty deans and vice deans, heads of departments and lecturers) and external stakeholders (e.g., graduates and representatives from local authorities and employers):

The university designed and implemented the language programmes based on the direction of MoEYS, Department of Higher Education and the ACC [Accreditation Committee of Cambodia]. It follows the Cambodia Qualifications Framework and a Royal Decree on ACC. It first formed technical teams to draft the language curriculum or programme, and then the teams proposed the draft to the university management. The top management invited outsiders, such as officers and authorities from relevant departments, local/international development partners or NGOs, employers, parents and students, to attend a one-day consultative meeting to discuss the drafted curriculum and give input. The university curricula development team revised the curricula contents based on their feedback. Finally, the university organised a meeting to prepare the final draft of a language curriculum and submitted it for endorsement by the university board.

The consultation involved all stakeholders as identified by Cambodia's Education Law 2007. However, different stakeholders had differential powers. The internal actors did have opportunity to integrate their views and expertise during their initial drafting of the curriculum, but when outsiders demanded changes, they had to incorporate them all, which illustrates that the opinions of outsiders were more valued. It is desirable that the system has clearly integrated communication channels between stakeholders both outside and inside of the university, thus equipping itself with 'interpersonal readiness' (Choi, 2018), and ensuring 'relevance' in the eyes of all stakeholders (Liddicoat, 2016). However, the process seemed to have sometimes unduly marginalized the view of the in-house staff, as noted by the Director of the language institute as well as others:

> The roles of internal actors were limited to deciding 'technical aspects and contents of language curriculum', while external actors such as local private companies or public institutions alike made fundamental decisions such as the subjects to be included in the language curriculum.

This may have resulted, in part, from the power structure where the voices of stakeholders such as employers and donors outweighed internal staff's and students' voices due to a context where resources are scarce, as discussed in the following section, and when the employment rate of graduates decides the very survival of the university. The lecturers pointed out the limitation of the procedure, in particular, the fact that students' views were not likely to be reflected. To illustrate, while a considerable number of students aspire to work in other areas besides teaching and, thus, wanted to see more diversity in provision of subjects (e.g., translation, international relations, tourism), the resultant programmes focused only on language teaching, limiting their career options. As lamented by the head of the English department, 'some courses do not match and respond to students' abilities and needs'. The voices of teachers who have 'expertise in developing or selecting the right textbooks' were not heard, negatively affecting the quality of teaching. The end-result is that LEP, in the words of mid-leaders, has driven the curriculum 'away from meeting students' needs'.

While the system ensures the lateral communication among different stakeholders, the vertical communication channel within a university seemed not as effective as it should be. Sharing beliefs and views between the management and teachers is important, because the management has the authority to set the direction of an institute and mobilise required resources (Choi, 2019; Spolsky, 2004), while teachers are the gatekeepers for any reforms to filter through to individual classrooms and have practical knowledge (Choi & Walker, 2018). However, in the focal university, communication breakdown between

the management and the frontline teachers is observed. For instance, the vice rector presents a very positive outlook of the university, and how it addresses the needs of students:

> In general, our language programmes have been popular – the number of students who enrolled in language studies has been increasing. The language institute has offered more language programmes such as French and Chinese in order to meet the needs of students and society.

Mid-leaders or individual lecturers, however, mostly shared their concerns when discussing the multilingual curriculum. The lecturers, for instance, discuss how it is difficult to address students' needs:

> We do not have enough sources, even textbooks. There has been a lack of expert checks of the quality of available textbooks. Also, there are no standardised tests such as IELT/TOEFL to help diagnose students' abilities in our university.

While the disparity in stance may have derived from different foci of attention due to their dissimilar roles, it may partly be attributed to the culture of high power distance. In high power distance societies, such as Asian countries, it is common that staff do not share their concerns with their supervisors (Anderson & Rasmussen, 2014). To work with such culture, effective vertical communication channels and a safe environment to share views need to be incorporated in the LEP formation process (Kirkpatrick, 2016; Liddicoat, 2016; Tsui, 2004). This breakdown of communication resulted in practical problems in ensuring the quality of the programmes, such as a misalignment between university programmes and the national qualification framework, which could have easily been noticed if there was information gathering from mid-level managers. Such unanticipated blunders were found only after a programme evaluation, which led to another round of revision of the programme. The comment from a lecturer who is also in charge of an English program is pertinent:

> Departments need to gather opinions from lecturers in making decision, which will enable developing a stronger curriculum, rather than the departments simply drop the curriculum to lecturers. All people need to have the same say in making curricular decision.

Involvement of numerous parties in designing and implementing policies and curricula has, not surprisingly, resulted in several challenges. The greatest challenge has been ensuring the quality of the consultation process. The Director and Deputy Director of the Institute of Foreign Languages both noted the 'ad-hoc' nature of the process: 'The communicative channel is ad-hoc,' shared by the Director. 'There is a lack of consistency to formulate the language programmes, and there are conflicts of interests and mismatches between decisions across levels and different units', said the Deputy Director. Once again, however, senior management (Vice Rector) perceived the process differently, describing the process as 'without any tension'. The lack of feedback channel is acutely felt during curricular implementation as well, as one lecturer notes:

> The communicative channel is sometimes created ad-hoc only when there are urgent needs for curricular revision. However, there should be a regular communication channel; otherwise, it is not possible to make timely adjustment to address student needs.

While acknowledging the complexity of formulating policy reconciling the demands from all relevant policies, available resources, and the wants and needs of people from both within and outside the university, the finding points at the foremost need to improve individual and intrapersonal readiness. The readiness of the stakeholders can be the crucial element to determine whether an LEP is to be successfully integrated into a tertiary educational institute (Choi, 2018; see also Cho, 2012 as a case in point). The mid-level leaders reported their lack of knowledge and skills in relation to LEP or FLE, including

curricular and material development, or designing necessary teacher education, but they were given more voice during the LEP formation process. Meanwhile, teachers did not voice their concerns, despite their understanding of the implications of decisions on daily programme operations, e.g., the difficulties in ensuring the validity and reliability of assessment which was suggested by the privileged members. This has occurred partly due to a 'deficit mind-set', as argued by Lim (2019), of Cambodian English teachers who viewed themselves as inferior to other stakeholders. Perhaps recognising the issues, the MoEYS has recently approved a co-funded project (total value US$90 million), under the World Bank-Higher Education Improvement Project (HEIP) (MoEYS, 2019).

RQ 2: Contextual Features and the LEP: Superficial Guidelines and Limited Resources

Although various sets of laws and regulations govern Cambodia's education in general, when they come to FLE in HEIs, these provide only a surface-level guidance, as noted earlier. To illustrate, the Education Law 2007 merely states on FLE:

> Foreign languages, which are international languages, shall be specifically determined as subjects for the fundamental educational programmes of general education in accordance with the learners' needs. (p. 10)

All of the guidelines simply mention the role of languages, the direction of the curriculum (e.g., meeting the needs of the market) or the ultimate outcome level only (see Table 2 for a summary of all relevant prescriptions in the applicable regulations and laws). Curriculum Framework for General and Technical Education (2015), for instance, designates English as the most important foreign language, with it being the official language of ASEAN (MoEYS, 2014a). French is the other mandatory language to be taught in HEIs (e.g., Royal Decree on Accreditation of Higher Education 2010). The ultimate outcome from learning is made in reference to the standard indicators from outside of the country, of the ASEAN (e.g., Education Strategic Plan 2014-18). It is therefore understandable for the Head of Internal Quality Assurance to feel that 'there is no systematic framework for language curriculum among Cambodia's local universities'.

Resource scarcity, both financial and human-resources related, has been identified as the single most important contextual factor that compromised the quality of the final, implemented FLE curriculum, along with the vagueness of the guidelines. As a deputy director of the Institute of Foreign Languages observed:

> There have been insufficient resources, for example, language labs, language library, LCD projectors, teaching and learning materials (books, online resources), qualified teaching staff, professional training programmes, and supports from all relevant parties (university management, external stakeholders, especially the government actors, which all affected the final quality of FLE.

The limiting circumstance has been repeatedly noted by scholars. Tweed and Som (2015), for instance, highlighted the resource shortages (mainly teaching facilities and textbooks) in the Cambodian FLE context as the factor that potentially debilitates the country in competing with other ASEAN nations. Typically, resource shortage issue is heightened in a new university during innovations (Stensaker & Benner, 2013), which was also applicable to the case university without strong alumni to contribute extra resources other than those provided by the government and donors.

TABLE 2
Policies by Level, and their Descriptions

Policy	Description
Royal Cambodia's Education Law 2007	**Article 24.** The Khmer Language is the official language and a subject of the fundamental curricula at public schools providing general education. Foreign languages, which are international languages, shall be specifically determined as subjects for the fundamental educational programmes of general education in accordance with the learners' needs (p 10).
Royal Degree on Accreditation of Higher Education 2010	**Article 34:** The subjects below shall be included in the foreign language sector: English, French and other languages.
Education Strategic Plan (ESP) 2014-2018 (national level)	Cambodia's HEIs' curriculum development and instructional design must align to labour market needs and focus on analytical skills, problem solving, group work, communication, etc. and indicators for ASEAN priority curriculum standard, while foreign language programmes at all HEIs are offered to strengthen students' ability to understand foreign languages. (pp 35-36).
Policy on Higher Education Vision 2030	**Strategy 5.6.2** HEIs will ensure that courses and skills development programmes within the curriculum of all departments will include practical applications, which relate to market needs (p 4).
Cambodia Qualifications Framework (CQF) 2012	**HEI Bachelor Programmes:** Students shall meet the entry-level requirements (completion of high school); HEI's bachelor programmes comprise of 120 credit hours in four years; [students shall] develop comprehensive understandings of broad fields and obtain practical and theoretical knowledge and skills, and skills for research.
Curriculum Framework for General and Technical Education 2015	Khmer Language and Khmer Literature represent the cultural and national identity of Khmer. Khmer language is the official language and a language of instruction, teaching and learning. Khmer Language and Khmer Literature benefit study, research and daily lives. Foreign Languages are subjects for communication, research, work, critical thinking development and creativity in response to changing society and rapid development of science and regional and global technology. Foreign Languages have wide uses for study, work and daily living.

Also pointed out was the need to build the capacity of teachers and teacher educators. As noted by the Director and the Deputy Director of the Language Institute:

> While there were teachers who were qualified and nominated by the MoEYS, there were others who had not been through an official recruitment process. Teachers did not have a place to turn to when they needed development for a new curriculum, due to the lack of experts to conduct teacher professional training, both locally and nationally. We observed there is the need for sustainability in teacher education. Reliant on external aid, for instance, Australian volunteers or Fulbright scholars from the US, teacher education has been intermittent.

To build local Cambodian expertise, Lim (2019) suggests the need for a widening of support and empowerment of all stakeholders, including policymakers, industry and students' parents. Other contextual features, such as large class sizes (from 35 to 45 students, and even larger in some academic years) and the wide spectrum of students' language proficiencies, were also noted as barriers for the chosen communication-oriented pedagogy (Chan, 2018; Tweed & Som, 2015). This raises the question of taking a balance between future-and present-orientation in constructing an LEP. As Kirkpatrick (2016) and Wang (2016) noted, foreign language education policy cannot simply be referenced on an ideal state, but should be relevant for the current local context, including the resources available.

Conclusion and Implications

The paper analysed the process of formulating an LEP in a Cambodian university, without any prescription of curriculum content or guiding principles – except for reaching for a consensus among

stakeholders. Hence, the LEP is entirely subject to the demands of stakeholders, as well as the constraints and enablement of the contexts. The incorporation of 'flexibility' and consensus with various stakeholders has been considered an ideal LEP formation process (e.g., Choi, 2018; Liddicoat, 2016). However, the resultant LEP was less than ideal. In addition to the issue of quality, even some basic requirements (e.g., quality assurance standards) were not met. The end-result, paradoxically, has driven the curriculum away from meeting students' needs.

This rather unexpected outcome might have resulted from the fact that the system was not fully utilized. Leaving the decision-making process completely to the members, the system was not ready for the micro-politics among the committee members. The senior management gave more voices to the donors and employers, who can affect the very survival of the institute. They made decisions without drawing on the contextual knowledge of the mid-leaders, teachers or students who did not express their concerns, in fear of threatening the face of senior management. The finding echoes previous research in terms of the role of power and the critical role of local decision-makers in LEP landscapes (Johnson, 2004; Levinson, Sutton, & Winstead, 2009). The resources, both financial and personnel, were not considered seriously. While it is to the credit of the government to reach out to donors in order to secure necessary resources to suit the newly developed, state-of-the-art curriculum, perhaps the changes should also involve viewing the matter from the other way around, that is, developing a sustainable curriculum firmly grounded in local context (Kirkpatrick, 2016).

The findings have both theoretical and practical implications. In terms of theoretical implications, the framework (Table 1) indeed is helpful to systematically analyse the policy formation process. However, it is developed for the case where the features and content of the policy are clearly set. When these are left to the negotiation process, as the policy is no longer contained within a boundary, the features of the overall society strongly figure in and manifest themselves. In the focal case, the political need, both international and local, for instance, influenced the formation process first-hand. The donors from the Asia Development Bank and countries such as Korea sat in the university LEP committee, whose voice influenced the day-to-day teaching and learning fabrics. In this context, the high power distance culture silenced the less powerful as they do not have the negotiation power without the scaffold of policy items to refer to when sharing concerns. This affected the collaboration and communication among committee members. While physically together at the table, it is as if the less powerful are almost non-existent, which hindered the more powerful from making informed decisions. As such, the flexible policy approach existed in appearance, but not in reality. This points to the need for the framework to be extended to incorporate the contextual features which are beyond the immediate relevance to a particular policy. It also illustrates the need for an LEP formation process to consider deep level dynamics as well as superficialities, to learn how some actors and contextual features are more privileged and influential whereas others are disempowered.

The findings raise some practical questions about building in an absolute 'flexibility' in developing an LEP. Does the process require a degree of benchmarking, even though this is becoming increasingly unpopular against the global trends of imposing hyper-accountability upon education? What degree of flexibility is optimal? If a benchmarking framework is to be established, what aspects should be included to provide direction to relevant parties to help balance power difference but not be so rigid that it does not allow for room to be responsive to changing stakeholder needs? How exactly is the power negotiated or negotiation shut down, for instance, not just verbally but through non-verbal and other symbolic exchanges including turn-taking and body language? Seeking answers to these questions may help pre-empt undue domination of the negotiation process by 'the powerful', especially in high power distance societies including Cambodia. In view of findings, a consultative policy process should not be given too free a rein but, rather, be guided and principled so that the LEP process and outcomes can be kept on an appropriate track. We hope this research has made the first step to identifying a balancing point in LPP formation, which enables constructive opinion gathering but freedom to incorporate the demands and needs of all parties.

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Appendix

Interview Questions

Part I: Background

1. Could you please describe you work experience, in general?
2. Which university/institution do you work with? Is it public or private university/institution?
3. What role have you played in relation to development and management of the language programme and/or language policy?
4. What do you think of the relative importance of languages? To what degree are they important and why?
5. What languages do you speak? How did you learn them?
6. How do those languages affect your life?
7. How do you think students learn languages most effectively?
8. When you made decisions in relation to language teaching, were there any personal principles or considerations that guided your decision-making?
9. What are the typical procedures for decision-making on how foreign language curriculum/program is implemented (teaching and learning), in general?
10. In your university/institution? Why is such procedure used?

Part II: Policy

11. Any policies or regulations that govern language education?
12. What are their details? How do they affect programme design and management?

Part III: Policy actors

Individuals:
13. Who are involved in the process?
14. What are the key roles of university representatives (director/head of language department) in the process of curricular development?
15. Are there any external stakeholders (donors) and government actors? How have they involved?
16. Have potential employers of the graduates played any roles in curricular development or implementation process? If so, how?
17. What is the attitude of students toward the language(s)?
18. In your opinion, what are the overall effects/impacts of different actors on the practices of foreign language teaching and learning at the university?

Interpersonal:
19. Are there good communications among actors within the university? How about communication between the university staff and outside stakeholders?
20. Are the communicative channels systematic or ad-hoc? How can they be improved?
21. Are different actors' opinions compatible with each other? Are there any tensions among them?

Part IV: Contextual features

22. Can you describe a general situation of language curriculum/program in your university?
23. Do the contextual features affect the practice of language learning and teaching?

-        Are teaching materials available?
-        What are the teachers' abilities and beliefs?
-        What are the students' expectations?
-        How is the teacher development plan?

24. How is the job market for the students?

25. What resources are needed for the effective practices of teaching and learning? Can you identify them?

26. Who provides those resources such as trainings and materials? Are they stakeholders (donors) or internal actors (i.e., government officers)?

27. What methods of language instruction are advised for language teaching and learning?

28. Do you (to those in managerial posts: Do teachers) follow them? Why or why not?

29. In your opinion, what are the overall effects/impacts of the current situation on the practices of foreign language studies at the university?

Part V: Issues and Implications

30. Are there any arising issues in the process of making and implementing language curriculum/program (teaching and learning) in your university?

31. Why do these issues happen/ are happening?

32. Are different demands from policies, resources, and people from the university and outside, in harmony? How do they interact?

33. How can language education and language policy making be improved?

34. Any further comments or questions?