1
2   EAC-EASQ-CONSULTATION-A3@ec.europa.eu
3
4   European Commission
5   Directorate General for Education and Culture
6   A3 - Skills and qualifications Strategies; Multilingualism policy
7   J 70 03/125
8   B-1049 Brussels
9   Belgium
10
11
12   OPINION ABOUT EUROPEAN AREA OF SKILLS AND QUALIFICATIONS
13
14   First of all, a lot of thanks to the commission of organising this important consultation about
15   European Area of Skills and Qualifications.
16
17   This opinion represents an opinion of an individual citizen, not any legal entity.
18
19   This opinion does not contain:
20   –   any business secrets
21   –   any trade secrets
22   –   any confidential information.
23
24   This opinion is public.
25   European Commission (Directorate General for Education and Culture) can add the PDF file of this
26   opinion to a relevant web page.
27
28
29   Annex 1 holds information about previous opinions in the EU level.
30   Annex 2 holds information about disclaimers and copyright.
31
32
33   Best Regards,
34
35
36   Jukka S. Rannila
37   citizen of Finland
38
39   signed electronically
40
41
42
43   [Continues on the next page]
44

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45
46   **1. General: Previous consultations**
47
48   In the Annex 1 is a list of my previous opinions, which are mostly addressed to different
49   Directorate-Generals of the European Commission. Some parts of the previous opinions can be
50   used in this opinion.
51
52   **2. Two previous opinions (2, 42)**
53
54   There has been previously two consultations related to the learning and education.
55
56   EN: Opinion 42: Opening up Education
57   http://www.jukkarannila.fi/lausunnot.html#nro_42
58
59   EN: Opinion 2: Schools for the 21st Century
60   http://www.jukkarannila.fi/lausunnot.html#nro_2
61
62   Parts of the previous consultations (Opinion 2 and Opinion 42) can be referred here.
63
64   However, there are clear differences between this opinion and the previous opinions.
65
66   **3. Problems with formal education?**
67
68   Interestingly there is a movement, which advocates actual learning without college degrees. This
69   movement is called "UnCollege", and the official webpage is following:
70
71   UnCollege
72   http://www.uncollege.org/
73
74   From that page there are different resources (especially books) referred.
75
76   There are several problems with the education in some levels:
77
78   * (possible) degree inflation
79   * huge student debt / loan
80   * mismatch between formal education and actually needed knowledge
81   * several skills can be learned without formal education.
82
83   **4. Amount of background material**
84
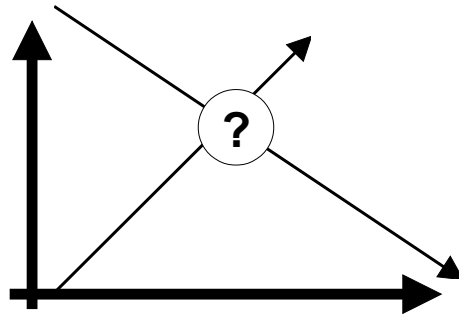85   There are a lot of references / resources referred on the consultation web page.
86   In this Opinion all referred references / resources are not used.
87
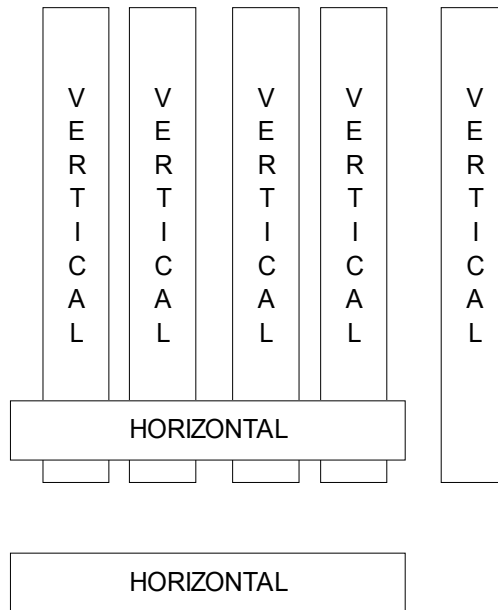88   **5. General knowledge and specific knowledge**
89

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Jukka S. Rannila

OPINION

3 (13)

www.jukkarannila.fi

1 April 2014

Public / WWW

GENERAL KNOWLEDGE

SPECIAL KNOWLEDGE

90
91
92 There are always the problem of mismatch between general knowledge and specific knowledge.
93 Therefore, we have both experts of some specific domain and generalists of some domain. It can be
94 noted, that several generalist knowledge (horizontal) can be applied in several specific domains
95 (vertical).
96

97
98
99 **Opinion 1: The general knowledge areas and specific knowledge areas could be differentiated.**
100
101 **6. Body of Knowledge (BOK) documents / handbooks**
102
103 With some basic web search there are several Body of Knowledge document / handbooks available.
104
105 **Opinion 2: The Commission could gather together different Body of Knowledge (BOK)**

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106   **documents / handbooks for assessment.**
107
108   **Opinion 3: Some of Body of Knowledge (BOK) documents / handbooks could be used in the**
109   **European level.**
110
111   **Opinion 4: There could be a general framework to create (possible) new Body of Knowledge**
112   **(BOK) documents / handbooks (the European level).**
113
114   One example is the difference between software engineering body of knowledge and software
115   testing body of knowledge. Both are related to software engineering, but the scope is different;
116   more general software engineering knowledge and more specific software testing area.
117
118   It can be said, that in the future there will be more Body of Knowledge (BOK) documents /
119   handbooks in several different knowledge areas.
120
121   **Opinion 5: The Commission could follow the development of new Body of Knowledge (BOK)**
122   **documents / handbooks in different knowledge areas.**
123
124   **7. National IDs, EU-wide IDs and global IDs.**
125
126   The question of different identifiers (IDs) has been in the core of some previous opinions. Like said
127   in the previous opinions, there will be more and more identifiers (IDs) in several areas. The problem
128   is then consolidating different identifiers (IDs) in several layers.
129
130   The problem is with private identifiers (IDs) and with public identifiers (IDs). In practical reality,
131   some of private identifiers (IDs) have caused some serious problems, since some of private
132   identifiers (IDs) are in the core of some systems. In some cases, the private identifiers (IDs) have
133   caused questions of market dominance and possible misuse of the market dominance.
134
135   **Opinion 6: The Commission could gather together all identifiers (IDs) (member states, EU-**
136   **wide and global) for skills and qualifications – both private identifiers (IDs) and public**
137   **identifiers (IDs).**
138
139   The following figure has been presented with previously done opinions. There are following issues
140   with the identifiers (IDs):
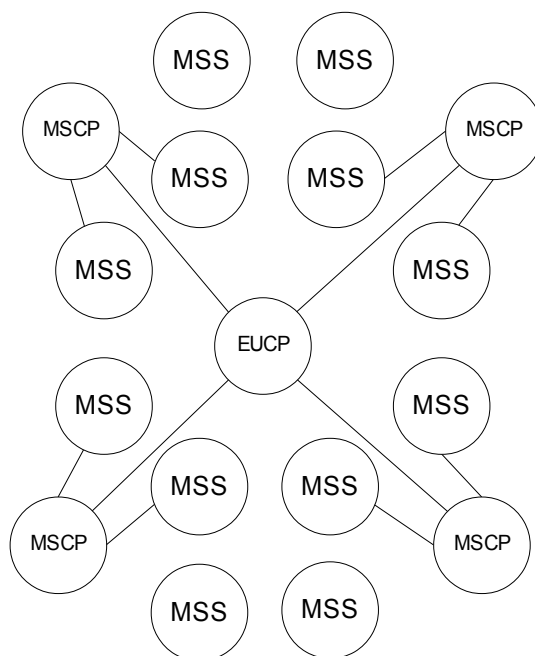141
142   * member states have their own systems (MSS: Member State System)
143   * member states have their own contact points (MSCP: Member State Contact Point)
144   * there is cooperation in the EU level (EUCP: European Union Contact Point)
145

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3

146
147
148   Like the figure indicates, there will be more systems in the member state level, and those systems
149   could have a single contact point in the member state level (MSS).
150
151   Then there is the question of global identifiers (IDs). There will be more and more identifiers (IDs),
152   and some of those identifiers (IDs) will be global.
153
154   Some of those identifiers (IDs) are private, and usage of the private IDs depends on the selected
155   licence(s).
156
157   **Opinion 7: The Commission could have some cooperation with the owners of the private**
158   **identifiers (IDs).**
159
160   **Opinion 8: Possibly the owners of the private identifiers (IDs) can agree on the public usage of**
161   **private identifiers (IDs).**
162
163   It depends on the nature of the identifiers (IDs), what kind of cooperation there is needed. For
164   example, adding data to a private system can mean paying some fees, but retrieving information
165   from a private system may be free. This depends on the specific system.
166
167
168   **8. Part 1 of questionnaire: How to place a stronger focus on higher and more relevant skills?**
169
170   **Question 1:** Should curricula and assessment practices be more focused on boosting transversal

171   skills such as digital, language and entrepreneurial competences?
172
173   **Note: Like said before, there is the difference between special knowledge and general**
174   **knowledge.**
175
176   **Opinion 9: It is easier to start working with transversal skills.**
177
178   **Opinion 10: Global, EU-wide and national systems can be consolidated first with**
179   **transversal skills.**
180
181   **Opinion 11: Afterwards there can be more work with special knowledge areas.**
182
183   **Question 2:** Would it be useful to develop reference frameworks describing learning outcomes per
184   level per competence, following the example of the language competence framework?
185
186   **Opinion 12: Levels of competences can be part of the solution.**
187
188   **Note: Naturally, testing of knowledge in different levels means more complex systems.**
189
190   **Question 3:** Would it be useful to have more hands-on experts from the employers´ side involved in
191   the design of the curricula?
192
193   **Opinion 13: Employers could help creating some practical means of assessment for**
194   **some competencies.**
195
196   **Opinion 14: There should be a general framework, which employers can use for**
197   **explicating some knowledge area.**
198
199   **Question 4: No opinion.**
200
201   **Note: I have not used the European Key Competences Framework previously.**
202
203   **Question 5:** Could other European initiatives than the European Key Competences Framework be
204   more effective? If yes, which ones?
205
206   **Opinion 15: Like said before, the usage of identifiers (IDs) of different frameworks**
207   **could be consolidated.**
208
209   **Opinion 16: Like said before, there will several identifiers (IDs) in different systems.**
210
211
212   **9. Part 2 of questionnaire: Further strengthening links between education/training, mobility**
213   **and the labour market**
214
215   **Question 6:** To help individuals take advantage of available opportunities in a wider and more open

216 context, career guidance policies and practices are crucial. Are you aware of the European policies
217 on career guidance?
218
219   **Opinion 17: I am not aware of the European policies on career guidance.**
220
221 **Question 7:** Is it useful to be able to use a common multilingual European terminology (such as
222 ESCO) to support describing learning outcomes of education and training programme in terms of
223 knowledge, skills competences relevant to the labour market?
224
225   **Note: I browsed casually on the ESCO webpages.**
226
227   **Opinion 18: multilingual European terminology can be useful.**
228
229 **Question 8:** Should forecasts on skills supply and needs be better integrated into the education and
230 training strategy in order to reduce skills mismatches?
231
232   **Opinion 19: This is a good proposal!!**
233
234   **Opinion 20: Forecasts on skills supply and needs should be used extensively.**
235
236 **Question 9:** Several sectoral skills and qualification passports have been developed that promote
237 the recognition of skills, experiences and qualifications, facilitating transnational mobility within
238 the same sector. They can play a role in the phase of identification and documentation of skills. Do
239 sectoral skills and qualifications passports or cards have added value compared to more general
240 European documentation tools such as Europass, e.g. for cross border mobility of learners and
241 workers?
242
243   **Opinion 21: The sectoral qualifications should be developed with stakeholders in some**
244   **sectoral knowledge area.**
245
246   **Opinion 22: Creating new EU-wide sectoral qualification methods should be done after**
247   **some serious considerations.**
248
249   **Opinion 23: There might be sectoral qualification methods, which are organised by**
250   **several communities (e.g company, association or foundation).**
251
252 **Question 10:** Is better integration between these passports and the Europass framework needed?
253
254   **Opinion 24: Like said before, there will be several systems with their own identifiers**
255   **(IDs).**
256
257   **Opinion 25: Like said before, usage of different identifiers (IDs) should be**
258   **consolidated.**
259
260 **Question 11: No Opinion.**

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OPINION

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261 **Question 12:** **No Opinion.**
262 **Question 13:** **No Opinion.**
263
264
265 **Part 3 of questionnaire: Adapting to internationalisation trends**
266
267 **Question 14:** **Answered already in the previous opinions (Identifiers).**
268 **Question 15:** **Answered already in the previous opinions (Identifiers).**
269
270 **Question 16:** **No Opinion.**
271 **Question 17:** **Answered already in the previous opinions (Identifiers).**
272 **Question 18:** **No Opinion.**
273 **Question 19:** **No Opinion.**
274
275
276 **10. Part 4 of questionnaire: Ensuring overall coherence of tools and policies and further**
277 **implementing the learning outcomes approach**
278
279 **Question 20:** **No Opinion.**
280 **Question 21:** **Answered already in the previous opinions (Identifiers).**
281 **Question 22:** **No Opinion.**
282 **Question 23:** **No Opinion.**
283 **Question 24:** **No Opinion.**
284 **Question 25:** **No Opinion.**
285
286
287 **11. Part 5 of questionnaire: Ensuring clarity of rules and procedures for the recognition of**
288 **skills and qualifications for further learning**
289
290 **Question 26:** **No Opinion.**
291
292 **Question 27:** To which extent are validation systems and credit systems suitable to recognise the
293 outcomes of new forms of learning such as digital learning (e.g. Massive Open Online Courses,
294 MOOCs)?
295
296   **Opinion 26: Theoretical test are easier to organise.**
297
298   **Opinion 27: There could be (EU-wide) solution for conducting theoretical tests.**
299
300   **Opinion 28: Practical tests are harder to organise**
301
302   **Opinion 29: Some theoretical tests should passed before applying for practical tests.**
303
304 **Question 28:** **No Opinion.**
305 **Question 29:** **Answered already in the previous opinions.**

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306 **Question 30:** No Opinion.
307
308
309 **11. Part 6 of questionnaire: Increasing the focus on quality assurance**
310
311 **Question 31:** No Opinion.
312 **Question 32:** No Opinion.
313 **Question 33:** No Opinion.
314
315
316 **12. Part 7 of questionnaire: Providing learners and workers with a single access point to**
317 **obtain information and services supporting a European area of skills and qualifications**
318
319 **Question 34:** Could learners and workers benefit from a one-stop shop providing integrated
320 services - including their supporting platforms - covering the full range of European services on
321 learning opportunities, career guidance and recognition of qualifications for employment purposes
322 or further learning.
323
324   **Opinion 30: One-stop shop as an idea can be supported.**
325
326 **Question 35:** No Opinion.
327 **Question 36:** No Opinion.
328 **Question 37:** No Opinion.
329 **Question 38:** No Opinion.
330 **Question 39:** No Opinion.
331
332
333 **13. Good luck !!!**
334
335 This opinion is quite limited. Hopefully, there are other constructive ideas presented in other
336 opinions. This remains to be seen.
337
338
339 [Continues on the next page]
340

341
342   **ANNEX 1**
343
344
345 My opinions to the previous and relevant consultations – there consultations were mostly organised
346 by the Commission of the Europan Union. General page to all consultations – both in English and
347 in Finnish: http://www.jukkarannila.fi/lausunnot.html
348
349
350 EN: Opinion 1: Review of the rules on access to documents
351 http://www.jukkarannila.fi/lausunnot.html#nro_1
352
353 EN: Opinion 2: Schools for the 21st Century
354 http://www.jukkarannila.fi/lausunnot.html#nro_2
355
356 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
357 Safe and Innovative medicines
358 http://www.jukkarannila.fi/lausunnot.html#nro_3
359
360 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
361 http://www.jukkarannila.fi/lausunnot.html#nro_5
362
363 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
364 http://www.jukkarannila.fi/lausunnot.html#nro_6
365
366 EN: Opinion 8: European Interoperability Framework, version 2, draft
367 http://www.jukkarannila.fi/lausunnot.html#nro_8
368
369 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
370 proposal for comments
371 http://www.jukkarannila.fi/lausunnot.html#nro_9
372
373 EN: Opinion 15: Collective Redress
374 http://www.jukkarannila.fi/lausunnot.html#nro_15
375
376 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
377 http://www.jukkarannila.fi/lausunnot.html#nro_17
378
379 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
380 http://www.jukkarannila.fi/lausunnot.html#nro_18
381
382 EN: Opinion 19: Official Acknowledgement by the Commission
383 http://www.jukkarannila.fi/lausunnot.html#nro_19
384
385

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386   EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
387   http://www.jukkarannila.fi/lausunnot.html#nro_20
388
389   EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
390   http://www.jukkarannila.fi/lausunnot.html#nro_21
391
392   EN: Opinion 23: Public consultation on the review of the European Standardisation System
393   http://www.jukkarannila.fi/lausunnot.html#nro_23
394
395   EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
396   http://www.jukkarannila.fi/lausunnot.html#nro_27
397
398   EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
399   http://www.jukkarannila.fi/lausunnot.html#nro_28
400
401   EN: Opinion 30: Internet Filtering
402   http://www.jukkarannila.fi/lausunnot.html#nro_30
403   NOTE: Organised by the European Committee for Standardization (CEN) [1]
404
405   EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
406   http://www.jukkarannila.fi/lausunnot.html#nro_32
407
408   EN: Opinion 34: REMIT Registration Format
409   http://www.jukkarannila.fi/lausunnot.html#nro_34
410   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [2]
411
412   EN: Opinion 35: Exploiting the employment potential of the personal and household services
413   http://www.jukkarannila.fi/lausunnot.html#nro_35
414
415   EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
416   http://www.jukkarannila.fi/lausunnot.html#nro_37
417
418   EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
419   http://www.jukkarannila.fi/lausunnot.html#nro_39
420
421   EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
422   http://www.jukkarannila.fi/lausunnot.html#nro_40
423
424   EN: Opinion 41: AT.39398: observations on the proposed commitments
425   http://www.jukkarannila.fi/lausunnot.html#nro_41
426
427   EN: Opinion 42: Opening up Education
428   http://www.jukkarannila.fi/lausunnot.html#nro_42

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1   http://www.cen.eu/ (Accessed 2 July 2012)
2   http://www.acer.europa.eu/ (Accessed 2 July 2012)

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429
430   EN: Opinion 43: Publication of extracts of the European register of market participants
431   http://www.jukkarannila.fi/lausunnot.html#nro_43
432
433   EN: Opinion 44: Evaluation policy guidelines
434   http://www.jukkarannila.fi/lausunnot.html#nro_44
435
436   EN: Opinion 45: About ICT standardisation
437   http://www.jukkarannila.fi/lausunnot.html#nro_45
438
439   EN: Opinion 46: Review of the EU copyright rules
440   http://www.jukkarannila.fi/lausunnot.html#nro_46
441
442
443   My opinions to the previous and relevant consultations – there consultations were mostly organised
444   by the Commission of the Europan Union. General page to all consultations – both in English and
445   in Finnish: http://www.jukkarannila.fi/lausunnot.html
446
447
448   [Continues on the next page]
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450
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452   DISCLAIMERS
453
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491   The English explanation is on the following web page:
492   http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode
493

495

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3   Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011
     parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally
     as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested
     about this new development in Finland.

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