



Ex-ante impact assessment of policy options

Supporting the success of young people – developing capacities for integrating non-formal learning into formal learning (REFORM/SC2021/066)

A report prepared by ICF, Praxis, Tallinn University and Civitta Estonia¹

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1 Introduction

Policy-making typically starts with the identification of the problem, the acknowledgement of the need to solve it and the formulation of the objective, i.e. the desired situation (Figure 1). Since there are usually various options for achieving an objective, it is appropriate to carry out a preliminary assessment of the impacts of policy options before making a decision and thereby consider the advantages and disadvantages, potential consequences and effectiveness of the planned policy options on the basis of evidence. The preliminary assessment of impacts helps to make informed decisions and avoid unnecessary intervention and unwanted consequences.²

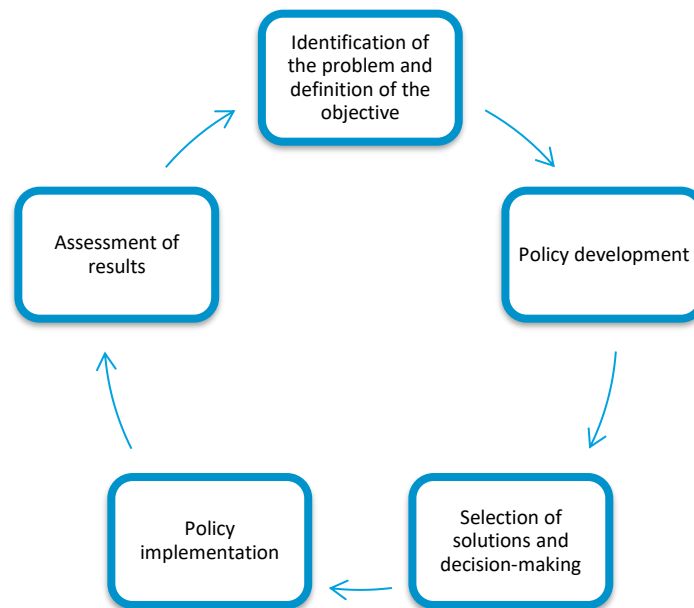


Figure 1. Process of policy-making³

The preliminary assessment of impacts is based on the idea that the implementation of a policy option (intervention) makes it possible to resolve or alleviate a previously identified problem and get closer to the desired situation. Each policy option may have an impact on resolving or alleviating the problem, but the magnitude and extent of the impact may vary.

The aim of the preliminary assessment of impacts carried out in the current, i.e. the fourth stage of the project ‘Supporting young people to succeed – building capacities to better integrate non-formal and formal learning’ was to analyse the efficiency and effectiveness of the possibilities of recognising the knowledge and skills acquired in non-formal learning in formal learning with respect to the achievement of the desired objective. The preliminary assessment of impacts revealed that in order to reach the goal of the policy change, the parallel implementation of three policy options should be systematically supported.

In the following, we highlight specific issues which are the focal point of the assessment and analyse the implementation of policy options based on them.

² Ministry of Justice and Government Office. (2021). Mõjude hindamise metoodika. Available at: <https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/mojude-hindamine>

³ Anderson, J.E. (1974). Public policy-making.

2 Starting points: problem and objective of the policy change

Within the framework of this project, a solution for integrating non-formal and formal learning in Estonian general and vocational education will be developed, taking into consideration the local context and the needs of stakeholders as well as international practices. The project thereby supports the following activity determined in the action plan Estonia 2035: “taking into consideration knowledge and skills acquired outside formal education (e.g. in youth work, hobby education and the Defence Forces) in formal education”.⁴ It also makes a contribution to the strategic objective of the Education Strategy 2021-2035, according to which “learning opportunities are diverse and accessible and the education system enables smooth transition between levels and types of education”.

Non-formal learning supports the development of students’ talents, general competences and agency, enriches their learning pathway, supports their preparation for working life and provides opportunities for personal fulfilment and stress relief. In addition to these strengths, the systematic integration of non-formal learning with formal learning contributes to the implementation of a learner-centric approach and personalised learning pathways. Integration increases students’ motivation to learn and reduces their excessive burden, while also providing young people with more diverse competences for getting on in life.⁵

In the first stage of the project,⁶ the study objective formulated by the European Commission and the Estonian Ministry of Education and Research was analysed in more detail and, based on this, the following problems were identified in the Estonian education system, which could be solved by means of a more systematic integration of non-formal and formal learning:

- There is often a lack of awareness of the knowledge and skills acquired in non-formal learning and they are invisible to formal learning institutions and are not taken into consideration in the completion of the formal learning curriculum.
- Students participate in non-formal learning to a small extent, particularly at the level of upper secondary education and thus do not benefit from non-formal learning.⁷
- Simultaneous participation in formal and non-formal learning, while achieving similar learning outcomes (e.g. in music, art, physical education), increases students’ academic load and leads to an inefficient use of time.

The analysis of documents and interviews with parties in the Estonian education system carried out in the first stage of the project⁸ revealed that, among these problems, the lack of awareness, invisibility and lack of

⁴ Government of the Republic, (2022). Estonia 2035. Action Plan of the Government of the Republic (28 April 2022). Available at: <https://valitsus.ee/strateegia-eesti-2035-arengukavad-ja-planeering/strateegia/materjalid>

⁵ Murasov et al., (2022). Mitteformaal- ja formaalõppe lõimimise praktikad Eestis. Noorte edu toetuseks – võimekuse arendamine mitteformaalõppe lõimimiseks formaalõppega.

⁶ See 2.1 Lähteülesanne - Murasov et al., (2022). Mitteformaal- ja formaalõppe lõimimise praktikad Eestis. Noorte edu toetuseks – võimekuse arendamine mitteformaalõppe lõimimiseks formaalõppega.

⁷ There are no exact data on the participation of students in non-formal learning. According to EHIS, approximately half of basic school students and a little more than a third of upper secondary school students participate in hobby groups or attend hobby schools.

⁸ Murasov et al., (2022). Mitteformaal- ja formaalõppe lõimimise praktikad Eestis. Noorte edu toetuseks – võimekuse arendamine mitteformaalõppe lõimimiseks formaalõppega.



recognition of the knowledge and skills acquired in non-formal learning is of key importance.

The current legislation has provided sufficient freedom to apply various ways of recognising knowledge and skills acquired through non-formal learning in completing the formal curriculum, but their use is uneven among schools and there is no systematic approach, which means that not all students can apply for the acceptance and recognition of knowledge and skills obtained in non-formal learning on a similar basis. The experience of students shows that many of them give up their hobby activities or participation in hobby education because of the heavy academic load in upper secondary school. At the same time, young people feel that the recognition of extracurricular activities, such as youth projects or volunteering, in formal learning would significantly increase their motivation to participate in various non-formal learning activities.⁹

Taking into consideration the overall objective of the project and the results of previous stages, the preliminary assessment of impacts will focus on the acceptance and recognition of knowledge and skills acquired through non-formal learning in formal learning and the policy options related to its implementation. We see this as an overarching problem, since based on the above it can be said that the low level of participation in non-formal learning, the high weekly workload of students and their inappropriate use of time are largely caused by the insufficient awareness, acceptance and recognition of non-formal learning outcomes in formal education. Therefore, the acceptance of the knowledge and skills acquired in non-formal learning and their recognition in the formal curriculum is key to the systematic implementation of the integration of non-formal and formal learning, which supports the smooth movement of students between levels and types of education.

In view of the above, the **main objective of the policy change** subject to preliminary assessment **is to create a situation where there is an awareness of the knowledge and skills acquired by students through non-formal learning and these are accepted and taken into consideration in the completion of the curriculum in formal learning.** This contributes to the wider goal of supporting the talents, strengths and all-round development opportunities of all students. Therefore, students benefit the most from the integration of non-formal and formal learning, but systematic integration also contributes to the optimal use of resources (time, funds, staff, infrastructure) in the education system.

In the preliminary assessment of impacts, the impact of each policy option is analysed, in particular with respect to the achievement of the main objective indicated, but possible related effects are also identified.

⁹ *Ibid.*



3 Policy options

3.1 Selection of policy options

In the first stage of the project, the four main ways in which schools are currently integrating non-formal and formal learning were mapped: completion of an elective basic school subject or elective upper secondary school course outside the school; completion of the compulsory creative work of school stage III outside the school; consideration of the knowledge and skills acquired in non-formal learning as part of the compulsory school curriculum; or implementation of the compulsory school curriculum in a non-formal learning environment.

Compulsory creative work and school lessons conducted in a non-formal learning environment in their essence also indicate the recognition of non-formal learning as part of the compulsory curriculum of the school, so we do not address them as separate policy options here. Based on the problem defined and the purpose of the preliminary assessment of impacts, when carrying out the assessment, we focus on integration practices directly related to the recognition of the results of non-formal learning. The impact of the following policy options is thus subject to preliminary assessment here:

1. Recognition of non-formal learning as part of a compulsory subject or module
2. Recognition of non-formal learning as an elective subject, module or course
3. Recognition of non-formal learning as an optional subject

Besides the first two types of integration, which are already implemented by schools to some extent, the third policy option assessed – recognition of non-formal learning as an optional subject – is a completely new concept in the formal learning curricula of general and vocational education.

The policy options primarily differ with regard to the following: 1) **the extent of the impact**, i.e. the proportion of students potentially affected by a policy option; and 2) **the degree of flexibility of the formal learning curriculum**, i.e. the extent to which the content of knowledge and skills which have been obtained in non-formal learning and can be taken into consideration in the completion of the formal curriculum have been determined in the school curriculum (Figure 2. [Differences in policy options in terms of their scope of impact and their degree of flexibility](#)²).

The recognition of non-formal learning as a part of the compulsory curriculum of a school only impacts the students who participate in non-formal learning where the knowledge and skills acquired match the learning outcomes set in the school syllabus. Thus, both the scope of the impact and the degree of flexibility of the formal curriculum remain significantly smaller in the case of this option when compared to others.

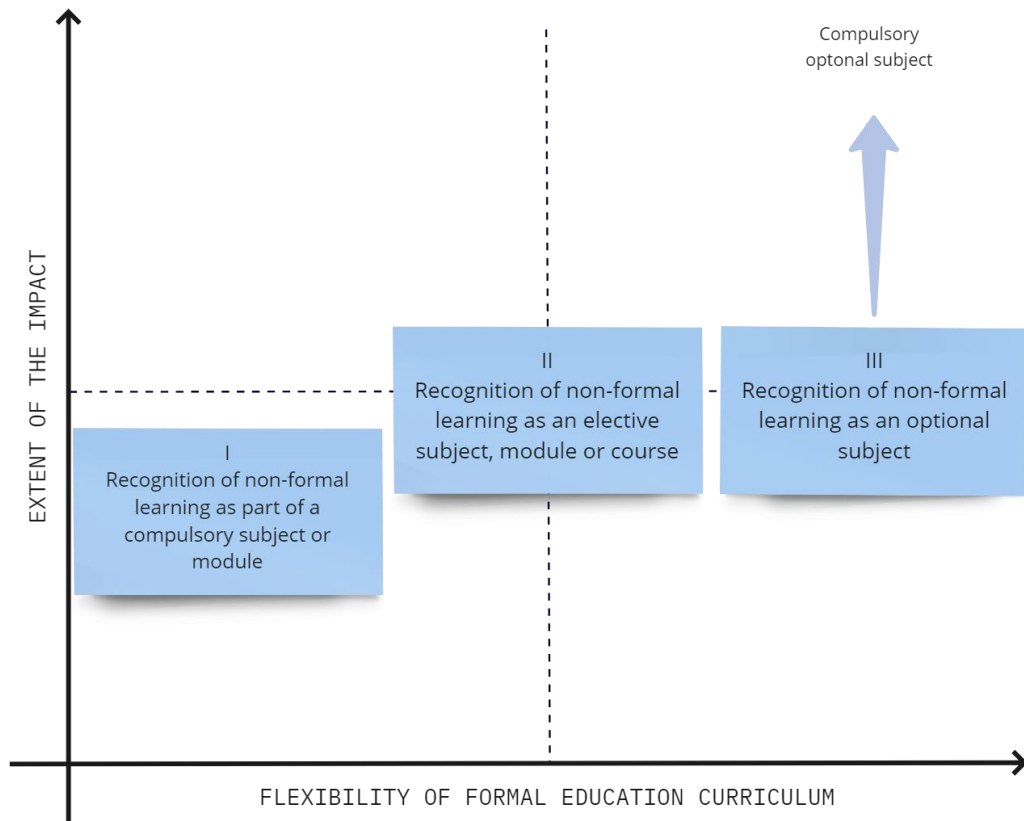


Figure 2. Differences in policy options in terms of their scope of impact and their degree of flexibility²

Both the scope of the impact and the degree of flexibility of the formal learning curriculum are higher upon the recognition of non-formal learning as an elective subject or course, since the opportunities of non-formal learning can be used to a much greater extent in elective subjects or courses than in the case of the first policy option (not limited to compulsory subjects). This also leads to an increase in the number of students who can complete an elective subject or course through non-formal learning.

The third policy option has the highest degree of flexibility with respect to the formal curriculum, i.e. the school only establishes the general principles and procedures for implementation, but the content of non-formal learning is not determined in detail in the school curriculum in the case of optional subjects. The extent of the impact depends on whether the completion of an optional subject in non-formal learning is compulsory for students. If it is compulsory according to the school's curriculum, the scope of the impact is at the maximum level, i.e. it influences all students; if it remains voluntary, the extent of the impact is smaller.

The starting points for the preliminary assessment of impact – the problems to be solved and their hierarchy, the objectives, i.e. the desired situation, and the intervention, i.e. the policy change consisting of three policy options – are summarised below (Figure 3. [Starting points of the preliminary assessment of the impact of policy options related to the recognition of knowledge and skills acquired through non-formal learning in formal learning³](#)). **In the next chapter, we will describe the three policy options in more detail and then analyse how they function together and supplement one another, establishing a systematic**

solution, a policy change, which allows for the parallel implementation of various integration practices.

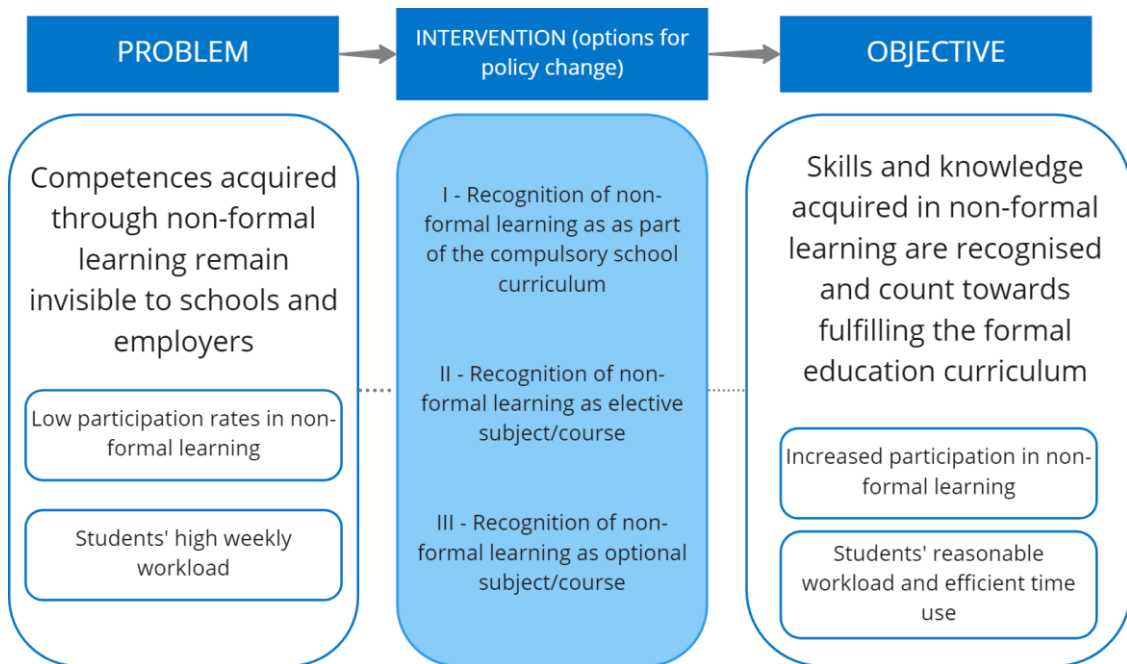


Figure 3. Starting points of the preliminary assessment of the impact of policy options related to the recognition of knowledge and skills acquired through non-formal learning in formal learning³

3.2 Description of policy options

This chapter describes three policy options for the integration of formal and non-formal learning: policy option 1, i.e. recognition of non-formal learning as part of the school's compulsory curriculum; policy option 2, i.e. recognition of non-formal learning as an elective subject or course, and policy option 3, i.e. recognition of non-formal learning as an optional subject or course. Based on the exact organisation of implementation, the second and third policy options are further subdivided into sub-options, which are explained in more detail in the following section. **Systematic support for the implementation of all three policy options constitutes a comprehensive policy change for improved integration of formal and non-formal learning.** Figure 4. [Policy options for the integration of formal and non-formal learning and organisational differences among them⁴](#) summarises all three policy options and also indicates the differences in the organisation of their implementation.

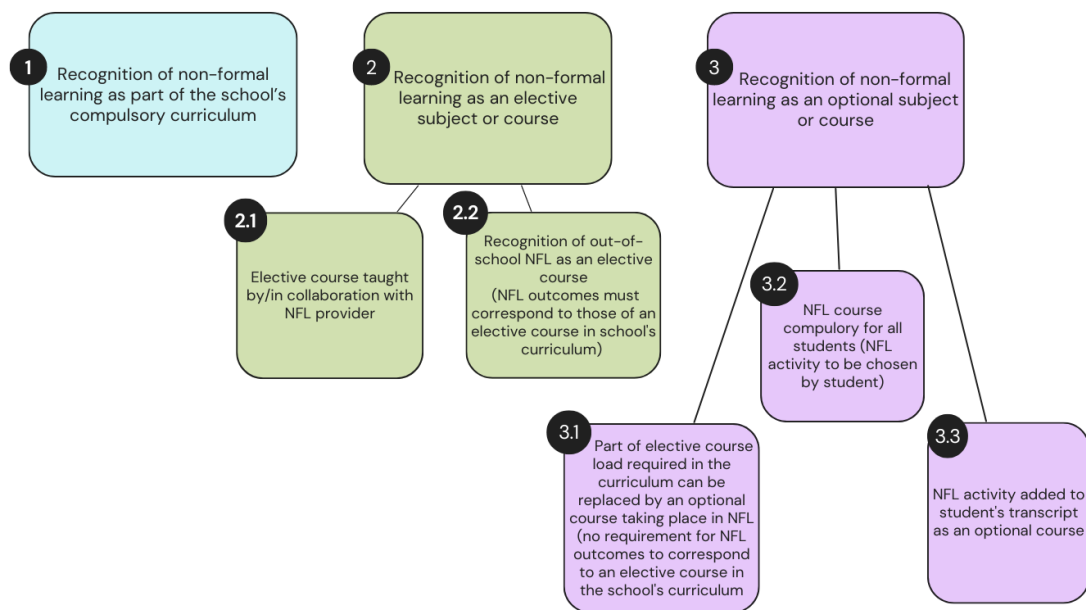


Figure 4. Policy options for the integration of formal and non-formal learning and organisational differences among them⁴

3.2.1 Policy option 1: Recognition of non-formal learning as part of the school's compulsory curriculum

Subsection 17 (4) of the Basic Schools and Upper Secondary Schools Act creates an opportunity for the implementation of the policy option. According to this Act, schools may take into consideration extra-curricular learning or activities if they enable students to achieve the learning outcomes defined in the school or individual curriculum. The solution can be implemented at all levels of general education schools. In addition, in vocational education, the Standard of Vocational Education allows for the recognition of subjects, topics or modules passed in a different environment (at work, in non-formal learning) as learning outcomes in the completion of the curriculum.¹¹

This approach allows for the recognition of, for example, knowledge acquired at music schools, in sports training, in youth projects, at science

For example, at the Tallinn Old Town Adult Gymnasium, it is also possible to recognise learning outcomes achieved independently, with a supervisor or in hobby education as general subjects of the school curriculum. In order to assess the existence and relevance of knowledge and skills, the applicant must compile a learning portfolio that includes, in addition to direct evidence (e.g. videos, objects made), an analysis of the learning experience, i.e. a self-analysis.¹⁰

¹⁰ Procedure for applying for recognition of prior learning and work experience (Estonian: VÕTA). Tallinn Old Town Adult Gymnasium. 25 January 2017. https://vtvg.ee/sites/default/files/pdf/V%C3%95TA_taotlemise_kord.pdf

¹¹ Standard of Vocational Education. RT I, 17 April 2019, 6, section 28.

schools or elsewhere in the completion of music, physical education or other subjects. Students can choose the non-formal learning activity that suits them and if the learning outcomes are compatible with the school curriculum, they can apply for the recognition of non-formal learning as a part of the compulsory curriculum based on the procedure established by the school.

In order for the significant benefits of this policy option to materialise, it is essential that the procedure laid down in the school curriculum for the recognition of non-formal learning allows for the exemption of students from the relevant part of lessons in the formal learning subject or course or from the requirement to do the corresponding written or practical work. Furthermore, when using this option, the procedure for taking into consideration learning that takes place outside the school and its communication needs to be carefully thought through to ensure quality and avoid unfairness.

3.2.2 Policy option 2: Recognition of non-formal learning as an elective subject or course

The national curriculum for basic schools¹⁵ enables schools to offer students a limited number of elective subjects. Basic schools have the right to determine in the curriculum how a certain number of weekly lessons is used at each stage of study (eight lessons per week in stage I, ten lessons per week in stage II and four lessons per week in stage III) with respect to subjects that are not compulsory, for example elective subjects. In schools with other languages of instruction, the volume of extra weekly lessons is generally spent on learning the Estonian language. The national curriculum for basic schools¹⁷ determines the syllabi of four elective subjects: religious studies, informatics, career studies and entrepreneurship studies. In addition, schools may set out other elective subjects in their curricula and prepare the corresponding syllabi.

For example, according to the curriculum of the basic school of Tartu Aleksander Pushkin School, the chosen subject at stage I is Estonian, at stage II (grade 4) mathematics, and at stage III a student can choose one of the following elective subjects: English, Russian history, Estonian literature, physical education, programming, art, music, career studies.¹²

As a general rule, the elective subjects offered are determined on the assumption that the given subject or course would provide added value in addition to the knowledge, skills, experience and values acquired in compulsory courses¹³. It is compulsory for students to take the elective subject(s) set out in the school curriculum. In school stage III, students can choose their elective subjects themselves if it has been set out in the school curriculum. Schools provide basic

school students learning opportunities in various elective subjects according to the number of lessons specified in the lesson division plan, 35 lessons per elective subject or course (subsection 17 (4) of the Basic Schools and Upper Secondary Schools Act).

Upper secondary schools can offer students a considerably wider range of options. According to the national curriculum for upper secondary schools (subsection 15

¹² Curriculum of Tartu Alexander Pushkin School. <https://www.apkool.ee/dokumentatsioon/oppekava/>

¹³ Liblik (2015). Lähtekohad valikkursuse või valikõppeaine kava koostamiseks. Available at: <https://oppekava.ee/lahtekohad-valikkursuse-voi-valikõppeaine-kava-koostamiseks/>

(6)),¹⁴ upper secondary schools must offer elective courses to the extent of the volume of at least 11 courses. These may be courses described in the national curriculum for upper secondary schools or elective courses arising from the school's curriculum. The results of a survey carried out in 2016¹⁵ reveal that 70% of upper secondary schools (81 schools) use a system of offering elective subjects where a part of the electives is defined by the field of study and the rest can be chosen by the student. Of the surveyed schools without fields of study, 22% (26 schools) used a system where the school determines the elective subjects and 8% (nine schools) allowed students to choose their elective subjects.

A number of schools have found ways to work more efficiently with various providers of non-formal learning or companies and thereby increase and diversify the variety of elective subjects or courses at school.

In secondary vocational education, the volume of elective modules generally ranges from 27 to 53 vocational education credit points and these determine learning outcomes in the school's curriculum, which support and extend professional skills, are related to an additional professional qualification or a partial qualification or complement the acquisition of key competences. Students may choose elective modules from other curricula of the school or from the curricula of other educational institutions in accordance with the procedure laid down in the school's rules of organisation of studies.²¹ Studies completed at another educational institution are taken into consideration on the basis of the school's procedure for the recognition of prior learning and work experience.

In summary, this policy option can be implemented in two ways (see Figure 4. [Policy options for the integration of formal and non-formal learning and organisational differences among them4](#)): (1) an elective subject or course in formal education

For example, Pärnu Adult Secondary School¹⁶ in cooperation with Pärnu Maritime Centre offers students training as a leading seaman, consisting of five courses (240 hours, fees applicable) and containing both theory and practice. Upon successful completion of the course, students obtain the certificate of a maritime helmsman.

which has been determined in the school curriculum and is provided by a provider of non-formal learning; or (2) the recognition of knowledge acquired in non-formal learning as an elective subject or course which has been determined in the school curriculum but is completed using a provider of non-formal learning (i.e. outside the school). In the first case, the school has decided in

advance that it will recognise the given elective subject or course as part of formal learning; in the second case, it may be necessary to determine in advance whether and to what extent the subject or course taken matches the learning outcomes of the school's elective subject or course (e.g. if a similar assessment process has not been carried out before).

¹⁴ National curriculum for upper secondary schools, RT I, 14 January 2011, 2.
<https://www.riigiteataja.ee/akt/123042021011>

¹⁵ Lamesoo, K. and Ader, A. (2016). Muutunud õpikäsituse rakendamise ja selleks erinevate valikute pakkumise seire korraldamine, sh gümnaasiumis valikkursuste rakendamise osas. Projekti raport.
<https://core.ac.uk/reader/83597300>

¹⁶ Homepage of Pärnu Adult Secondary School: <https://www.ptg.ee/about/opportunities>

3.2.3 Policy option 3: Recognition of non-formal learning as an optional subject or course

Optional subjects involve learning that takes place within the limits of weekly lessons (basic education), courses (secondary education) or vocational education credit points (secondary vocational education) set in the curriculum, the objectives and content of which can largely be determined by students by choosing the extra-curricular option of non-formal learning that best suits their interests.

The policy option pertaining to optional subjects differs from the previous two policy options in terms of the extent of individuality. Schools recognise students' participation in non-formal learning as an optional subject if the school itself does not offer it as an elective subject or course and it does not match the learning outcomes of compulsory subjects in the national curriculum, but it may be consistent with the general competences in the curriculum.

In the case of optional subjects, the specific learning objectives are not set by the school – the learning objectives are determined and the input needed for validation is agreed on in partnership with all participants in order to support the individual needs of students and allow them to play a key role. Providers of non-formal learning (e.g. higher education institutions, vocational education institutions, hobby schools, continuing education institutions, youth workers) facilitate the process by supporting the identification and formulation of learning outcomes acquired in non-formal learning. The completion of optional subjects is indicated on the graduation certificate.

For instance, at Tartu Jaan Poska Gymnasium, the courses of the University of Tartu Youth Academy and courses of art, music and sports schools whose curricula have been approved in the Estonian Education Information System are recognised as elective courses. The conditions and procedure for their recognition are decided by the head of studies in the relevant subject area in cooperation with the subject teacher.¹⁷

At present, there is no such concept of the definition and treatment of optional subjects in the national curricula at any level of education. However, there are some upper secondary schools where this approach is being implemented and non-formal learning provided by vocational schools or higher education institutions is taken into consideration as an elective course.

There are also some upper secondary schools in Estonia that use the concept of optional subjects in their curricula, but in its essence, an optional subject primarily refers to an elective course offered by the school and selected by the student; however, apart from that, studies carried out in higher education and vocational education institutions are also recognised.

There are a number of ways to implement an optional subject, depending on the volume of the curriculum set out in legislation and students' academic load at different levels of education (see also Figure 4. [Policy options for the integration of formal and non-formal learning and organisational differences among them4](#)):

1. The optional subject is voluntary for students but is included in the school curriculum – students substitute an elective subject offered by the school with an

¹⁷ Curriculum of Tartu Jaan Poska Gymnasium (clause 2.2). <https://jpg.tartu.ee/wp-content/uploads/2021/08/2021-aasta-oppekava.pdf>



- optional subject in basic education, an elective course in upper secondary education and a module of elective studies in part or in full in secondary vocational education (example of Tartu Jaan Poska Gymnasium).
2. The optional subject constitutes a compulsory part of the curriculum for all students – everyone must participate in non-formal learning to the extent determined in the curriculum by taking an optional subject (not implemented at any school at the moment, as far as we know).
 3. The school recognises the completion of the optional subject and indicates it on the graduation certificate, but the volume of the compulsory curriculum of the school does not change for the student (example of Hugo Treffner Gymnasium).

The examples provided for the implementation of the concept of optional subjects so far concern the upper secondary level, but optional subjects should also be available to students at all levels of basic education where they would support the development of students' individual learning pathways, their choices in relation thereto and their responsibility for their studies from the first year of school.

At basic schools, the introduction of optional subjects is simplified by the fact that at least half of the students already participate in hobby activities or hobby

education and the recognition of non-formal learning as an optional subject would direct primarily those students who are currently excluded and who do not participate due to the fact that such activities are not taken into consideration in the curriculum to hobby activities or hobby education and youth work.

For example, Hugo Treffner Gymnasium (HTG) offers students optional courses, participation in which is voluntary. In addition to more than fifty subjects offered by the school, students can take part in courses offered by higher education institutions. Courses taken at schools supporting the HTG curriculum (e.g. Tartu Vocational College, University of Tartu Youth Academy, Heino Eller Music College, University of Tartu, Tallinn University of Technology and Estonian University of Life Sciences) are taken into consideration upon graduation.¹⁸

¹⁸ Curriculum of Hugo Treffner Gymnasium (clauses 4.1 and 4.8). <https://www.htg.tartu.ee/oppekava#tunnijaotus>



4 Intervention logic of the policy change

In this chapter, we will explain in more detail why the policy options related to the integration of non-formal and formal learning, as described above, should not be considered alternatives, but rather a single policy change supporting the implementation of all three options. Such a systematic policy change will help achieve the goal set in the study objective: establish a situation in the Estonian education system where the knowledge and skills acquired by students in non-formal learning are acknowledged and recognised in formal learning and taken into consideration in the completion of the curriculum (see more about the study objective in chapter 0). Figure 5. [Intervention logic of the policy change](#)⁵ illustrates the links in the intervention logic of the policy change, i.e. on the scheme that shows how the inputs of the policy change contribute to the activities and how the activities should lead to the impacts that meet the set objective.

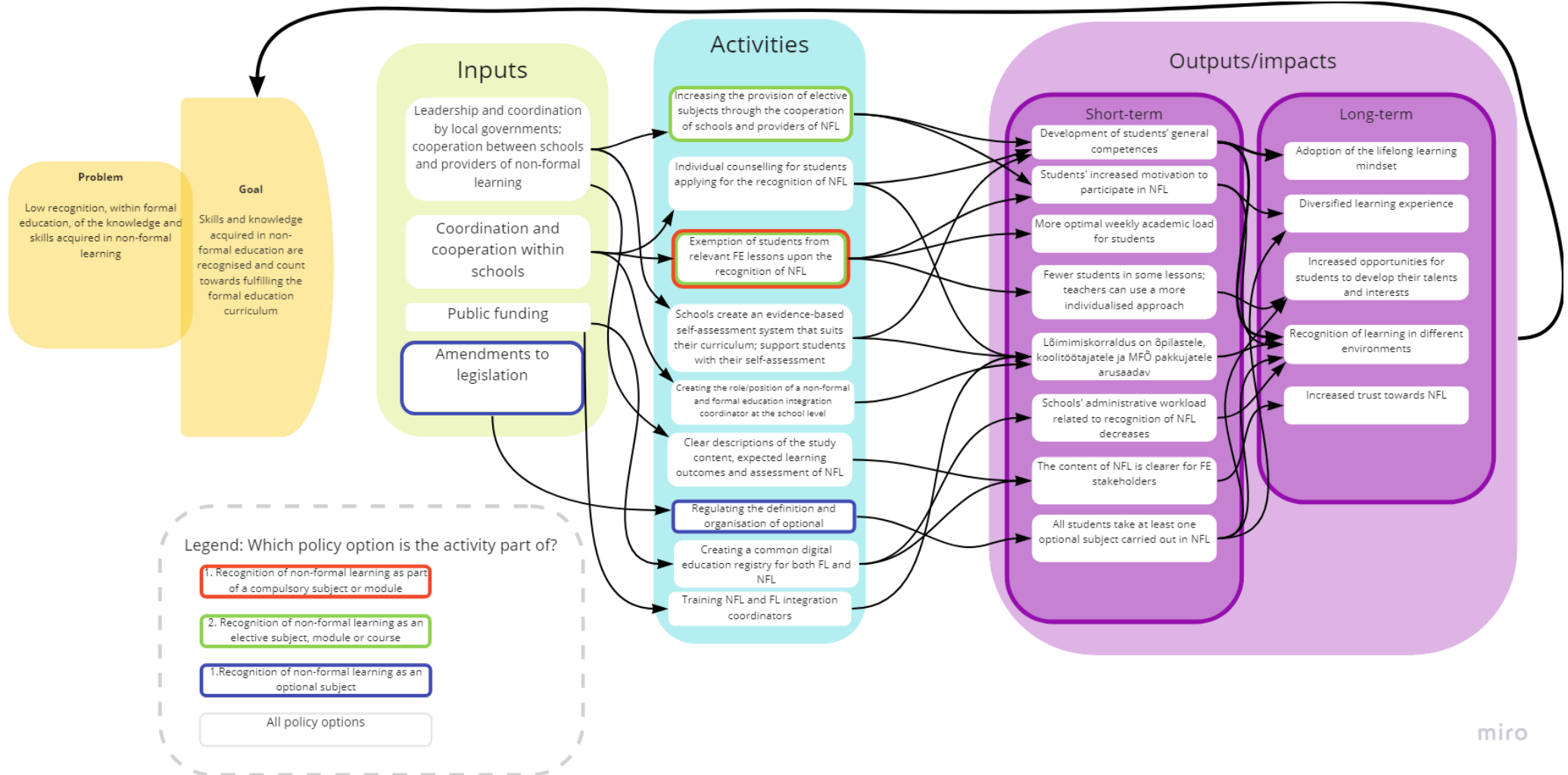


Figure 5. Intervention logic of the policy change5

4.1 Inputs of the policy change

Leadership and coordination by local governments; cooperation between schools and providers of non-formal learning. In order to implement the policy change, local governments need to plan their time and funds to map the situation in their area of administration, analyse opportunities and set up a suitable system in cooperation with providers of non-formal learning and schools in the region. It is also necessary to think about how the completion of elective subjects or courses in non-formal learning is financed, as the elective subjects or courses offered by the school are free of charge for students, but fees are usually applied to participation in non-formal learning. In particular, the recognition of non-formal learning as an optional subject requires a consensus among the parties of the education system with respect to the fact that every student should have the opportunity to make choices about their own studies from school stage I and that participation in non-formal learning is an important part of students' learning pathway, which is also recognised in formal education.

Coordination and cooperation within schools. Schools need to be prepared to cooperate both within the school and with other parties. This provides an input for activities that are essential to the implementation of the policy change, such as the appointment of an integration coordinator and advising students with regard to the recognition of NFL, etc. (see Figure 5. [Intervention logic of the policy change5](#)). In addition, for integration to be successful, schools need a suitable physical environment so that students can safely engage in activities that suit them during lessons they do not need to attend. Another important input is the organisation of the school day so that students who are not attending lessons can use that time purposefully to acquire required knowledge and skills, to rest or to carry out other activities of their choice.

Public funding. The successful implementation of the entire policy change requires the compilation of guidelines and good practices at the national level in cooperation with providers of non-formal learning and schools, the training of school staff coordinating integration and the development of a digital register of education (read more about the register in chapter 4.2). The practice of integrating non-formal and formal learning in foreign countries shows that local governments should be given sufficient flexibility to organise integration, but at the same time success is guaranteed by the provision of the necessary high-quality support and guidance at national level.¹⁹

The role of the integration coordinator at schools prevents the creation of a significant additional burden on subject teachers. Integration coordinators with similar competences and training and the national organisation and funding of their training will contribute to the harmonisation of integration principles and the dissemination of best practices, preventing an increase in inequalities between students from different regions.

The third policy option, i.e. the recognition of optional subjects, requires the creation of a funding scheme for this and additional funding for non-formal learning. According to section 37 of the Constitution, students must be provided with opportunities for free basic education, which means that optional subjects as a part of the basic education curriculum should be free of charge for them. Fees are currently applied to a large part of non-formal learning, but in order to provide non-

¹⁹ Wihlborg, M., Souto-Otero, M., Roosalu, T. (2022). Report from online peer Exchange. Supporting young people to succeed – building capacities to better integrate non-formal and formal learning. <https://www.hm.ee/et/mitteformaalse-oppimise-loimimine-formaalharidusse>

formal learning opportunities as optional subjects, the range of options that are free of charge must be significantly expanded and their regional accessibility needs to be increased, including through digital platforms. In order to reduce socio-economic inequalities, free non-formal learning opportunities should also be made available to young people in general and secondary vocational education.

Amendments to legislation. In order to increase the volume of elective subjects or courses and add optional subjects, corresponding legislative amendments must be made in the national curricula for basic and upper secondary schools and subsequently in the curricula of schools. There is a need to develop common principles and a common organisation of recognition (including documentation). Vocational and higher education with their well-functioning system of recognising prior learning and work experience set a good example.

When it comes to the recognition of non-formal learning as a compulsory subject, the legal framework does not prevent schools from taking into consideration learning that takes place outside the school but corresponds to the learning outcomes defined in the school curriculum. Furthermore, there are no statutory obstacles to the recognition of non-formal learning as an elective subject or course, provided that such learning corresponds in terms of both learning outcomes and volume to the learning outcomes of the subject defined in the school curriculum. However, for an increase in the volume of elective subjects or courses which students can complete in non-formal learning, relevant amendments must be made to the Basic Schools and Upper Secondary Schools Act and the conditions and basis for the organisation thereof must be set out in the national curricula for basic and upper secondary schools and specified in school curricula.

As the concept of optional subjects has not been included in the national curricula at present, its systematic implementation requires changes in legislation. The definition of optional subjects, the students' right or obligation to complete them and the conditions related to the organisation thereof, including the obligations of the parties, funding, etc., must be regulated. The conceptual framework of optional subjects must be precisely established and described before preparing the draft act. Herein lies the main risk of the third policy option, namely the unsuccessful amendment of national curricula and in particular the national curriculum for basic schools, since changes to students' academic load and the volume of compulsory subjects require a very strong political will.

In addition, legislative changes may be necessary upon the creation of a common digital register for non-formal and formal learning, if the existing Estonian Education Information System is redesigned for this purpose, the objectives, structure and procedure of data submission, etc. of which have been defined in legislation.²⁰

4.2 Activities required for the implementation of the policy change

As illustrated by the intervention logic scheme for the policy change (Figure 5. [Intervention logic of the policy change](#)), most of the activities needed to implement the policy change are common to all three policy options. This section provides a general explanation of the most important activities which help to achieve the desired situation where the knowledge acquired in non-formal learning is acknowledged, accepted and taken into consideration in the completion of the

²⁰ Establishment of Estonian Education Information System and statutes. RT I, 31 July 2019.
<https://www.riigiteataja.ee/akt/12863550?leiaKehtiv>

formal learning curriculum. The report on the next stage of the project²¹ will outline policy recommendations for parties involved in the implementation of the policy change, based on these activities and the results of the previous stages of the project.

1. Creating a common digital education registry for both formal and non-formal learning²²

A common digital registry of education for non-formal and formal learning or an education passport (see, for example, Youthpass in youth work at EU level²³) would considerably simplify the recognition of knowledge acquired in non-formal learning in formal learning and save resources for schools and providers of non-formal learning in the long term. For example, the same provider of non-formal learning activities would not have to describe an activity separately for all students – the general data concerning that activity would be automatically available to the schools of all participating students, which could be complemented by the students' self-assessment process, depending on the school's instructions. In addition, appropriate information about the qualifications/professional certificates of providers of non-formal learning in the register may be useful for the parties related to formal learning upon the recognition of non-formal learning.

Thus, the functionality of this common digital register for the field of education and youth should include at least a portfolio/education passport function, i.e. an overview of students' learning pathway in both formal and non-formal learning, and the function of a common register for the field of education and youth, i.e. an overview of the qualifications of the providers of non-formal learning, the content of activities and expected learning outcomes. This can give schools a better overview of and certainty about the quality of non-formal learning.

The actual convergence of the competences of youth workers and providers of hobby education would also contribute to the policy change. This could be facilitated by the implementation of a professional qualification system in hobby education and the establishment of a qualification requirement for youth workers. However, both processes need to be carefully analysed and these may also require an increase in the state-commissioned training of qualified youth workers or the development and provision of relevant micro-credit programmes by higher education institutions.

2. Creating the role/position of a non-formal and formal education integration coordinator at the school level, individual counselling of students with regard to the recognition of NFL

Integration coordinators support students in completing the documentation necessary for the recognition non-formal learning at school and advise them on how to apply for this. In addition, it may be determined by the school that the integration coordinator (in cooperation with subject teachers, similar to the coordinators of the system of recognising prior learning and work experience in vocational and higher education) must evaluate applications for the recognition of non-formal learning and also coordinate cooperation with providers of non-formal learning in the development of elective subjects.

In order to ensure that the organisation of integration at schools is equally based on the best knowledge and systematically supported and that it is understood by all

²¹ Kendrali, E., Teppo, M., Murasov, M., ja Mägi, E. (2022). Initial policy recommendations. Noorte edu toetuseks – võimekuse arendamine mitteformaalõppe loomiseks formaalõppega.

²² See also digital education history in the Education Strategy 2021-2035:

https://www.hm.ee/sites/default/files/eesti_haridusvaldkonna_arengukava_2035_seisuga_2020.03.27.pdf

²³ Cedefop, 2022. Youthpass. <https://www.cedefop.europa.eu/sv/tools/vet-toolkit-tackling-early-leaving/resources/youthpass>

parties at schools, various development activities need to be carried out at the national level, including training, information seminars, networking events for integration coordinators in various regions, the compilation of precise guidance materials and the continuation of the collection of good practices.

The establishment of the role of an integration coordinator at schools and the clear allocation of responsibilities helps to avoid a situation where only those students who are already active outside school and who can reduce their overall academic load upon the implementation of the policy option benefit from integration. Therefore, the integration coordinator's tasks should also include awareness raising in the wider school community, including among students and parents, so that there is an understanding of the possibility of taking learning outside school into consideration.

3. Specifying clear procedures for the recognition of non-formal learning in school curricula, including the exemption of students from the relevant FL lessons upon the recognition of NFL and the creation of a self-assessment system.

For non-formal learning to be recognised in formal learning, clear and fair conditions must be formulated so that the recognition of learning that takes place outside the school does not depend on the willingness of individual teachers or on the relationship with the student, parents or a particular provider of non-formal learning. It is fair with respect to students for the knowledge acquired by them in non-formal learning to be accepted and recognised on the same basis. The current organisation of the recognition of non-formal learning includes, for instance, written self-analysis (practical training journal in the case of recognising community-based practical training in social studies), the Youthpass²⁴ in international youth work, oral self-assessment regarding the results of non-formal learning and a certificate of participation from the provider of non-formal learning or a parent.

4. Close cooperation between schools and providers of non-formal learning

The school, students/parents and providers of non-formal learning must agree on the substitution of an entire subject with non-formal learning at the beginning of the course – otherwise the students do not benefit from the reduction of their academic load. In addition, cooperation between the school and providers of non-formal learning in the same area is also important in organising the integration in a suitable manner (see point 1). Based on the overview of existing integration practices,²⁵ it can be said that, for example, in the city and rural municipality of Pärnu, intensive cooperation involving all parties in the creation of a comprehensive integration system ('The city of Pärnu as a learning environment') has proved to be successful, but it may not be suitable for all regions. For example, in the rural municipalities surrounding Tallinn, a similar process may turn out to be very difficult because a large proportion of young people from these municipalities also participates in non-formal learning in Tallinn and thus both the schools and providers of non-formal learning in the rural municipality and the providers of non-formal learning in Tallinn should be gathered around the same table.

5. Increasing the provision of elective subjects through the cooperation of schools and providers of non-formal education

In order for the recognition of non-formal learning as an elective subject or course to have long-term benefits for students, such as the diversification of learning experiences and improved opportunities to develop their interests and talents,

²⁴ <https://europanoored.eu/kvaliteet/noortepass/>

²⁵ Murasov et al., (2022). Mitteformaal- ja formaalõppe lõimimise praktikad Eestis. Noorte edu toetuseks – võimekuse arendamine mitteformaalõppe lõimimiseks formaalõppega

schools also need to broaden the range of elective subjects available to students within schools in cooperation with providers of non-formal learning.

6. Clear descriptions of the study content, expected learning outcomes and assessment of non-formal learning

In order to foster trust-based cooperation between non-formal and formal learning, providers of non-formal learning should clarify more precisely the content of their activities, the expected learning outcomes and the assessment of their achievement. This information is an essential prerequisite for schools to recognise non-formal learning activities as a compulsory part of formal learning and a digital register of education would help to gather, systematise and make available such information.

7. Regulating the definition and organisation of optional subjects/courses

The concept and organisation of optional subjects is currently unregulated and definitions vary from school to school. In order to provide students with the opportunity to complete their education through non-formal learning to a greater extent than before, the corresponding changes must be made in the Basic Schools and Upper Secondary Schools Act and set out in the national curricula for basic schools and upper secondary schools. The definition of optional subjects, the students' right or obligation to complete them and the conditions related to the organisation thereof, including the obligations of the parties, funding, etc., must be regulated. The conceptual framework of optional subjects must be precisely described before preparing the regulation. A compulsory optional subject to be taken by students in non-formal learning would significantly increase the extent of the impact of the diversification of the learning environment. It is important to keep in mind that the total workload of students should not change, but the scope of individual choices and decision-making should increase with the existing workload.

8. Recognising learning outside the school, taking into consideration the values, nature and strengths of non-formal learning^{26,27}

If a student is fully exempt (full recognition of the content of studies) or partially exempt (recognition of some learning outcomes) from attending lessons in formal learning due to participation in non-formal learning, they should not be required to take the corresponding tests or complete other assessments in that subject, since it would still double the student's workload and would mean that non-formal learning is essentially not recognised as a part of the compulsory curriculum.

Since compulsory subjects are graded, but non-formal learning activities tend to be characterised by self-assessment or formative assessment and requiring providers of non-formal learning to assess students in a manner that is characteristic of formal learning is not consistent with the nature and values of non-formal learning,²⁸ non-differentiated assessment along with students' self-assessment (passed/failed) should be used upon the completion of a whole subject in non-formal learning.

9. Informing, encouraging and directing students to participate in non-formal learning

²⁶ Põlda, H., Reinsalu, R., Karu, K. (2020). Mitteformaalõpe praktikute keelekasutuses. The Yearbook of the Estonian Mother Tongue Society, 66 (2020), 238-260. <http://dx.doi.org/10.3176/esa66.10>

²⁷ Põlda, H., Roosalu, T., Karu, K., Teder, L., & Lepik, M. (2021). Üldpädevuste kujundamine ja osaliste agentsus mitteformaalõppes. *Eesti Haridusteaduste Ajakiri*. Estonian Journal of Education, 9(1), 60-87. <https://doi.org/10.12697/eha.2021.9.1.03>

²⁸ ICF, Praxis, Tallinn University and Civitta Estonia. (2022) Analytical report on relevant examples of policy and practice from other countries. Supporting young people to succeed – building capacities to better integrate non-formal and formal learning (REFORM/SC2021/066). <https://www.hm.ee/et/mitteformaalse-oppimise-loimimine-formaalharidusse>

In addition to the elective subjects or courses set out in the national curriculum and offered by the school, students should be encouraged and directed to choose subjects from providers of non-formal learning outside the school (e.g. hobby schools, nature houses, science centres).

4.3 Outcomes of the policy change

Development of students' general competences

The development of students' general competences is influenced by the three policy options and decisions concerning the specific organisation of recognising non-formal learning as an elective or optional subject to a varying extent. As is the case with integration arrangements in place at a number of schools, analysis of and reflection on learning outcomes by students is an important part of the process of recognising learning outside the school. These are a part of self-assessment, the use of which can improve learning outcomes, the ability to learn how to learn and self-directed learning,²⁹ which constitute an important part of general competences. In the longer term, the habit and skill of self-analysis and reflection on learning outcomes contributes to the **adoption of the mindset of lifelong learning**, i.e. attitudes associated with the acceptance of learning in different forms and in various places throughout life.³⁰

Policy option 1 only allows for the recognition of a very limited selection of all non-formal learning activities – only those with learning outcomes corresponding to compulsory subjects or parts of them. Thus, only those students who have access to or are interested in such non-formal learning activities can benefit from the development of general competences related to reflecting on learning outcomes, which is required for recognition. Therefore, compared to the other two policy options, this policy option has a smaller impact on students' autonomy and freedom to shape their own learning pathway and develop their interests and talents.

In the case of policy option 2, i.e. recognition of non-formal learning as an elective subject, students do not necessarily have to go through the procedure of applying for the recognition of learning that has taken place outside the school and analysing their learning outcomes. If the school's curriculum sets out elective subjects or courses that are completed using a provider of non-formal learning, students do not need to apply for the recognition of their learning outcomes separately. However, in order to support the development of general competences, it would be important to use self-analysis carried out by the students also with this arrangement. If the recognition of non-formal learning as an elective subject has been organised so that the school offers elective subjects in accordance with its curriculum (not necessarily in cooperation with providers of non-formal learning) and students can apply for the recognition of non-formal learning that takes place outside the school if their learning outcomes are appropriate, students need to analyse the knowledge acquired in non-formal learning in any case.

In the case of policy option 3, i.e. recognition of non-formal learning as an optional subject, the impact on the development of students' general competences depends on the specific organisation of integration. If the recognition of non-formal learning as an optional subject is implemented so that a compulsory optional subject which students have to complete in non-formal learning is introduced in national curricula, an extensive impact on the development of students' general competences can be

²⁹ Andrade, H. L. (2019). A Critical Review of Research on Student Self-Assessment. *Frontiers in Education*, 4, 87. <https://doi.org/10.3389/educ.2019.00087>

³⁰ Murasov et al., (2022). Mitteformaal- ja formaalõppe lõimimise praktikad Eestis. Noorte edu toetuseks – võimekuse arendamine mitteformaalõppe lõimimiseks formaalõppega.

expected, as it would influence all students, i.e. the benefits of participating in non-formal learning would reach more students than before. The recognition of non-formal education as an optional subject at school can also be organised so that students can substitute a part of the volume of elective subjects set in the curriculum with an optional subject, the learning outcomes of which do not have to correspond to the elective subjects in the school curriculum and which students can complete in non-formal learning outside the school. In this case, the impact on the development of general competences is expected to be with the same extent. Furthermore, if the recognition of students' non-formal learning is organised so that it is not taken into consideration in the completion of the school curriculum but is added as an extra line to the results report, a supported self-assessment process could also be considered in order to develop the students' ability to reflect on learning to the greatest extent.

Motivation to participate in non-formal learning

Policy option 1, i.e. recognition of non-formal learning as part of the school's compulsory curriculum, could have a positive impact on students' **motivation to participate in non-formal learning**. This policy option leaves more time for students to participate in non-formal learning and to acquire the knowledge and skills they are pursuing there because the relevant compulsory subject or a part thereof is completed in non-formal learning and there is no need to repeat the corresponding part in formal learning (avoidance of duplication).

The wider implementation of policy option 2, i.e. recognition of non-formal learning as an elective subject or course, can support students' motivation to participate in non-formal learning in at least two ways.

Firstly, if schools offer elective subjects set in the curriculum in cooperation with providers of non-formal learning, **this diversifies the learning environment** and experience **for students** and allows them to benefit from the specific expertise and resources of providers of non-formal learning (e.g. robotics equipment, musical instruments, audio or photographic equipment, laboratories), which, according to the assessment of various target groups, would increase students' motivation to participate in non-formal learning.³¹ In addition, through the school's elective subjects, students are more exposed to the opportunities of non-formal learning, which can generate interest and motivation to continue with a new activity after completing the elective subject or course. This will also diversify the learning pathway of students in the long term.

Secondly, this policy option can influence motivation to participate in non-formal learning through students' more rational use of time and avoidance of duplication. This is primarily possible if the recognition of an elective subject or course has been organised so that students can apply for the recognition of non-formal learning that takes place outside the school as an elective subject offered in the school curriculum. Similarly to the recognition of non-formal learning as a compulsory subject of the curriculum, this policy option leaves students more time for non-formal learning activities. The students interviewed for this project highlighted time constraints caused by their heavy workload in formal learning as an important obstacle to participation in non-formal learning.³²

In the case of policy option 3, i.e. recognition of non-formal learning as an optional subject or course, it can also be expected that students' motivation to participate in non-formal learning increases. Even if optional subjects are recognised so that non-

³¹ Murasov et al., (2022). Mitteformaal- ja formaalõppe lõimimise praktikad Eestis. Noorte edu toetuseks – võimekuse arendamine mitteformaalõppe lõimimiseks formaalõppega.

³² *Ibid.*

formal learning does not contribute to the completion of the curriculum and is merely added to the results report as an extra line, it may increase students' motivation, as this form of recognition is also perceived by students as an acknowledgement of their extracurricular activities.³³ However, we predict a greater impact on students' motivation to participate in non-formal learning with the two other options for recognising non-formal learning as an optional subject: a compulsory optional subject completed in non-formal learning and the substitution of a part of the volume of elective subjects with an optional subject completed in non-formal learning. With these types of organisation, non-formal learning contributes to the fulfilment of the compulsory curriculum.

More optimal weekly academic load for students

Among the three policy options, policy option 1, i.e. recognition of non-formal education as part of the school's compulsory curriculum, has the clearest impact on **reducing the overall weekly academic load of students**. Upon the recognition of non-formal learning, it is possible that students do not need to attend all the lessons in the school timetable. This means that there are **fewer students in some lessons and teachers can use a more individualised approach with other students**, which in turn ensures them more appropriate support to develop their talents and interests.

Policy option 2, i.e. recognition of non-formal learning as an elective subject or course, only reduces the overall weekly academic load of students if they apply for the recognition of a non-formal learning activity in which they were already participating and this extracurricular activity is thus accepted by the school as an elective subject. This means that students have to take fewer elective subjects or courses.

In the case of policy option 3, i.e. recognition of non-formal learning as an optional subject or course, the impact on students' weekly academic load depends on the specific arrangements related to the policy option. If an optional subject is not compulsory, its completion will be indicated in the results report, but it will not be included in the compulsory part of the curriculum and in this case it will not reduce the academic load of students. If an optional subject is made compulsory for students, it constitutes a part of the compulsory curriculum and the students' academic load is only reduced if they apply for the recognition of a non-formal learning activity they were already participating in as an optional subject (as in the case of recognising non-formal learning as an elective subject).

Based on the above it can be said that, when integrating formal and non-formal learning, a combination of all three policy options is essential to achieving the objective set out in the study objective. Firstly, in comparison with the other two policy options, the recognition of non-formal learning as part of the school's compulsory curriculum (policy option 1) can considerably more clearly alleviate students' academic load by avoiding duplication. On the other hand, the recognition of an elective (policy option 2) or optional (policy option 3) subject or course has a greater impact on the development of students' talents and interests because these policy options also recognise and acknowledge non-formal learning that is less explicitly linked to the compulsory subjects in the school curriculum and give students greater freedom in shaping their learning pathway.

³³ *Ibid.*

5 Schedule of implementation

Although examples of the implementation of all the policy options analysed in the preliminary assessment can already be found at Estonian schools, none of them has taken root or become a common practice in most schools.

For each policy option to be implemented systematically and effectively, additional action is required from the state, the local government, educational institutions and providers of non-formal learning (see chapter 4.2).

It is important to keep in mind that most of the activities (with the exception of the development of regulations and legislation related to optional subjects) are necessary for the implementation of any of the policy options and therefore the schedule for their implementation does not have a distinct impact on the schedule of implementation of any of the policy options.

Communication and training activities for local government managers and specialists in the field of education, integration coordinators and the staff of schools as well as providers of non-formal learning are a prerequisite for the implementation of each policy option. The time devoted to communication and training activities starting from the development of the training programme until the completion of activities is estimated to be up to nine months. The training itself cannot start before the preparatory activities (e.g. amendments to legislation, compilation of guidance materials.) have been completed.

5.1 Policy option 1: Recognition of non-formal learning as part of the school's compulsory curriculum

The implementation of policy option 1 is the least time-consuming as it does not require any amendments to legislation and many schools already have experience in implementing this type of integration (including assessment of the learning outcomes of non-formal learning and systematic cooperation with providers of non-formal learning). The opportunity to share good practices both at the state and local level encourages and supports the schools that are not yet systematically implementing integration in this manner.

The recognition of learning outcomes is simplified for both schools and providers of non-formal learning by guidance materials; it is estimated that the compilation and introduction of these at schools could take up to nine months in total (including six months for compilation and three months for introduction).

At the level of the school, its implementation requires the amendment of the school curriculum, which is estimated to take up to three months.

5.2 Policy option 2: Recognition of non-formal learning as an elective subject or course

The schedule of the implementation of policy option 2 varies greatly in basic schools, upper secondary schools and secondary vocational education institutions.

The recognition of knowledge acquired through non-formal learning as an elective subject or course at upper secondary schools does not require amendments to legislation. In order to broaden the variety of options, it is necessary to change the school curriculum and, where necessary, to develop the syllabus of an elective subject or course in cooperation with providers of non-formal learning, which is estimated to take up to nine months in total.

It is also not necessary to amend the legislation in order to take into consideration all or a part of the learning outcomes of the elective module achieved in non-formal learning in secondary vocational education, since the principles and procedure for this are laid down in the rules of organisation of studies of secondary vocational education institutions.

At basic schools, the introduction of the recognition of knowledge obtained in non-formal learning as an elective subject is an undertaking that takes a significantly longer period of time: it may require amendments to legislation in order to first create a legal framework for schools to be able to offer students elective subjects in their curriculum, among which students can make a choice based on their own wishes and interests. It takes a minimum of three years to introduce this change and implement it in schools. The drafting and passing of regulations, including draft legislation, will take a year and the preparation of the effective implementation of the change in educational institutions two years (including training of integration coordinators, modification of school curricula, entry into cooperation agreements with providers of non-formal learning, development the syllabi of elective subjects or courses, etc.).

5.3 Policy option 3: Recognition of non-formal learning as an optional subject or course

Policy option 3 is the most innovative and the least common solution and therefore has a significantly longer schedule of implementation compared to the other two policy options.

In order to determine the schedule, it is first necessary to make a choice from a number of alternatives (e.g. whether the policy option will also be implemented in basic education or only in general secondary education and secondary vocational education as well as whether the selection of an optional subject is compulsory for all students).

The implementation of optional subjects at upper secondary level requires the shortest period of time because the current legal framework does not prevent the recognition of non-formal learning that takes place outside the school as an elective course and some upper secondary schools already implement it, taking courses offered by other educational institutions into consideration as electives. The wider implementation of the type of integration requires leadership and more conscious cooperation between educational institutions and providers of non-formal learning.

Vocational education institutions also have a high degree of autonomy in the implementation of optional subjects and there is no direct need to amend the legislation.

At present, optional subjects are not offered at basic schools, so their introduction is the most time-consuming process and will require legislative amendments. Similarly to policy option 2, the first step here is to ensure that students have the freedom to design a small part of their own curriculum by making various choices. Given the complexity of the topic, it will take a minimum of three years to introduce such a change and implement it in schools.

6 Ex-ante impact assessment of policy options

6.1 Stages and criteria for ex-ante evaluation

To carry out the preliminary assessment of impacts, the content of each policy option was first briefly described (see chapter 3), followed by the intervention logic of the entire proposed policy change (chapter 0), i.e. the chain of influence from the inputs required for the policy change to the activities and impacts that correspond to the stated objective. Subsequently, a preliminary assessment of impacts was carried out based on the five criteria set out in the study objective of the project:

1. **Access to education** refers to the impact of the option on equal opportunities in education – the availability of opportunities to access education at the most basic level. This includes the infrastructure, funding, materials and providers needed to offer both formal and non-formal learning as well as sufficient funding for their work.^{34,35}
2. **Accessibility** refers to the impact of a given policy choice on the accessibility of education in its different meanings: both legally and in practice. Accessibility means the absence of discrimination, physical and safe accessibility and economic accessibility – whether everyone can afford education.³⁶
3. Under the **relevance** criterion, the impact of the policy option on the achievement of the policy objective is analysed: on the acceptance of non-formal learning outcomes in formal learning and their recognition in the completion of the curriculum.
4. The **quality of studies** refers to the impact of the policy option on the achievement of learning outcomes and the correspondence of learning opportunities to the learners' abilities and needs.³⁷
5. The **resilience of the education system** reflects the extent to which the education system can adapt to societal changes and respond to the various needs of students in the changing world, including in crisis situations. It also includes the ability to raise the level of and improve the skills of both learners and teachers in a significantly changed societal context in order to cope with unconventional learning conditions.^{38,39}

The preliminary assessment is based on the analysis already carried out and the data and materials collected with regard to the policy options and related activities as well as on discussions held with various parties in a workshop organised in April 2022 within the framework of the project. These are supplemented with expert assessments, where necessary. As the last step, a cost-benefit analysis of the policy options (chapter 8) was carried out to estimate the costs of implementing the policy options.

The impact of the policy options, taking into consideration different criteria, is summarised below (Table 1 **Error! Not a valid bookmark self-reference.**). The table illustrates the criteria where the impact of policy options has a similar magnitude (e.g. quality) and the criteria where the degree of the impact tends to

³⁴https://www.right-to-education.org/sites/right-to-education.org/files/resource-attachments/Tomasevski_Primer%203.pdf

³⁵ <https://www.refworld.org/pdfid/4538838c22.pdf>

³⁶ <https://www.refworld.org/pdfid/4538838c22.pdf>

³⁷ Education Strategy 2021-2035.

https://www.hm.ee/sites/default/files/eesti_haridusvaldkonna_arengukava_2035_seisuga_2020.03.27.pdf

³⁸ Naidu, S. (2021) Building resilience in education systems post-COVID-19, *Distance Education*, 42:1, 1-4, DOI: 10.1080/01587919.2021.1885092

³⁹ <https://www.refworld.org/pdfid/4538838c22.pdf>

differ (e.g. accessibility). The following sections elaborate on the impact of all the policy options in the context of each criterion.

Table 1. Overview of the ex-ante impact assessment of policy options – strength of the impact

Criterion	Policy options		
	1	2	3
Availability	+	++	++ / +++
Accessibility	++	++	++
Relevance	++	++	+++
Quality	+++	+++	+++
Resilience	++	++	+++

Note. "+" - weak impact, "++" - medium impact, "+++" - strong impact

6.2 Policy option 1: Recognition of non-formal learning as part of the school's compulsory curriculum

Access to education

This policy option has a modest impact on students' access to education. The situation could be positively influenced by the improved accessibility of non-formal learning through the work of integration coordinators, whose awareness-raising activities make information about non-formal learning opportunities more accessible to young people who would otherwise not have access to it. At the same time, the recognition of non-formal learning as a part of the compulsory curriculum does not directly support the provision of equal opportunities: young people who otherwise benefit from fewer non-formal learning opportunities due to regional inequalities are unlikely to have better access to non-formal learning thanks to this policy option. In the case of this policy option, it is important to make sure that its implementation does not lead to even greater inequality. The education path must also be diversified for students whose families cannot afford (paid) non-formal learning opportunities or who live in areas with fewer non-formal learning opportunities.

For providers of formal learning, it is estimated that the same number of specialists will be needed to teach compulsory subjects as is needed currently. However, teachers' workload may be reduced somewhat because groups have fewer students if some of them have replaced an entire subject with non-formal learning activities. This policy option does not directly create better conditions for providers of non-formal learning in regions which currently have less funding or poorer infrastructure. However, the recognition of non-formal learning as a part of compulsory subjects can direct more young people to non-formal learning, which in turn brings additional funding to providers.

Accessibility

If students get the opportunity to complete a part of compulsory subjects of formal learning in another way, at a different pace or in a different environment (which non-formal learning often allows), it will improve the accessibility of learning for students with different needs. At the same time, even with this policy option, accessibility is still limited in areas where non-formal learning is available, but there are fewer specialists, suitable infrastructure and funds. If the state and local governments do not ensure sufficiently diverse free opportunities for non-formal learning through this policy option, groups that are already vulnerable will not be able to create a learning pathway that better suits their needs.

It should also be kept in mind that students may be placed in an unequal position when entering higher education because the average grade of compulsory courses on the student's graduation certificate is taken into consideration upon admission to a number of programmes. If a student has substituted an entire compulsory subject with non-formal learning and as a result the compulsory course has been assessed in a non-differentiated manner, this subject will not contribute to the average grade on the graduation certificate and, in the case of a good result, will not raise the average grade. As a result, students' previous work and efforts may not help them get admitted to the speciality of their choice.

Relevance

This policy option has a strong impact on the acceptance of non-formal learning outcomes in formal learning and on the recognition thereof in the completion of the curriculum because it creates specific mechanisms that address the current concerns expressed by various parties with respect to the perceived trust and quality issues of non-formal learning and the assessment of non-formal learning outcomes in formal learning. The organisation of the recognition of non-formal learning is clearly established in the school curriculum: the persons responsible for the procedure, the organisation of the assessment of knowledge acquired through non-formal learning in the case of compulsory subjects, subskills and individual learning outcomes. A common digital register of education for non-formal and formal learning provides schools with information about the activities and qualifications of providers of non-formal learning, which in turn simplifies compliance with the conditions set by the school for the recognition of non-formal learning (e.g. the recognition of non-formal learning only in the case of registered instructors/institutions) and establishes the preconditions for ensuring the quality of studies.

However, the extent of the impact is limited to students participating in non-formal learning activities whose objectives and learning outcomes are essentially aligned with those of the compulsory subjects in the school curriculum. In the case of this solution, non-formal learning remains unrecognised in fields where the subjects have no clear link to the compulsory subjects of the curriculum.

Quality of studies

The recognition of non-formal learning as a part of the compulsory curriculum improves the quality of studies for students in a number of ways. In the context of the assessment of the learning outcomes of non-formal learning, especially if it involves students' self-assessment, there is a deeper reflection on the knowledge obtained. The policy option supports the development of the learning to learn competence, as it not only requires students to be able to analyse their knowledge and skills and to find links between different forms of learning, but also creates a support system for its development (integration coordinators, clear criteria for recognising non-formal learning in formal learning).

In addition, it should be kept in mind that in the case of this policy option, some students take some compulsory subjects in non-formal learning and do not participate in all lessons together with their class. As a result, they spend less time with their class than other students and schools should therefore pay particular attention to developing a sense of belonging.

This policy option enables providers of learning to offer higher-quality learning: if there are fewer students in compulsory lessons because some students complete the subject partially or fully in non-formal learning, teachers will also be able to use a more individualised approach with the students. In addition, the learning environments and learning methods of compulsory subjects in formal learning are generally enriched.



Resilience of the education system

From the students' point of view, the recognition of non-formal learning as a part of the compulsory curriculum supports their resilience as individuals – the education they get with this policy option will help them to better cope with a changing society. For example, the conditions of funding rounds for project-based non-formal learning activities change according to focus topics that reflect the most recent societal developments and challenges. In this way, students have the opportunity to have their learning experience, where the content of studies and the approaches to the subject are in line with the latest developments, recognised within the framework of compulsory subjects. However, this is only the case if the content of studies and the learning outcomes of non-formal learning correspond to the compulsory content of studies determined in the school curriculum. In this way, a curriculum that is not the most progressive or is inflexible may still limit the contribution of the policy option to the resilience of the education system.

From the labour market perspective, however, this policy option is not very resilient to changes in the number of professionals in the field of education. As the number of specialists drops, the opportunities for students to substitute compulsory subjects of formal learning or parts of them with non-formal learning will also decrease because there are fewer suitable providers of non-formal learning. Even if we take into consideration the emergence of educational technology solutions that alleviate the shortage of educational professionals (e.g. virtual activities for learners from various regions), participation in non-formal learning will remain voluntary. As a result, not all students will use the opportunities of non-formal learning created by this policy option and this option cannot be given too much credit for ensuring the resilience of the education system.

This solution has a limited impact on alleviating social inequalities. As mentioned above, with this option, the primary focus must be on avoiding a situation where the main strengths of the solution – the diversification of learning pathways, reduced overall workload for students – only apply to already privileged young people. With respect to the compliance of learning with the needs of the labour market, this policy option helps students intensively develop specific and more practical skills, for which formal learning alone may not provide sufficient opportunities, already within the framework of the compulsory general education curriculum. As this option supports participation in non-formal learning, providing students extra time, it facilitates the earlier discovery of their interests, which can help students shape their future learning pathway and choices (related to their specialty).

6.3 Policy option 2: Recognition of non-formal learning as an elective subject or course

Access to education

The impact of this policy option on learners is more significant if they can make choices based on their own interests and preferences. In the current situation, not all students (e.g. SEN students, students in rural areas) have equal opportunities to take elective subjects or courses in non-formal learning (lack of resources, options or time), so schools need to offer students more in-school options that diversify learning opportunities in that area. In this case, providers of formal education need to find additional resources to increase the variety of options (e.g. further training for teachers in teaching elective subjects) or work more closely with local providers of non-formal learning or companies to increase access to a diverse education. For example, companies in the region could take the initiative and also offer elective courses (including company visits) to students of general education schools, as vocational schools and companies have already established close cooperation.

Accessibility

The provision of a wider range of options in formal learning allows a larger number of students to have access to education. For upper secondary school students, accessibility would be enhanced by more conscious cooperation with providers of non-formal learning in offering elective subjects or courses. For example, the provision of online or hybrid courses by providers of non-formal learning would increase the accessibility of interesting elective subjects or courses for students in various regions. This solution would also motivate providers of non-formal learning to develop innovative elective subjects or courses to be offered to students in general education schools in various ways, thereby increasing the accessibility of education for all students, provided that the activities of providers of non-formal learning are funded. From the point of view of providers of formal learning, the impact of this policy option is positive if it can alleviate the lack of teachers or reduce their workload.

Relevance

In the context of the relevance of the second policy option, the two distinct impacts of this policy option on students become clear. The positive impact primarily manifests itself through the development of motivated students who value personal development and who can shape their own learning and career paths by choosing the education that suits their interests. However, in order to increase students' autonomy, it is necessary to change the legal regulations and the school curriculum so that students have more options to participate in non-formal learning and can be certain that their learning outcomes will be taken into consideration in formal learning. Although schools offer a wide range of elective subjects or courses to students (at upper secondary schools), it is difficult to recognise very specific courses (e.g. horse riding) because these require additional resources which schools are not willing to compensate (except in certain circumstances on account of compulsory subjects). Therefore, from the point of view of providers of formal education, the lack of regulations for the implementation of the policy on a wider scale constitutes the bottleneck, including in stage II and III of basic school. In order to achieve the objective of this policy option, providers of formal learning are also required to have competent integration coordinators and to train them in advance, which implies the need for additional funding.

Quality of studies

The recognition of knowledge acquired in non-formal learning as an elective subject or course has a positive impact on students' learning outcomes if they can develop



themselves in a field that interests them and at a time that suits them. Research confirms that interest and motivation play an important role in students' educational performance.^{40,41} In addition, the possibility of using non-formal learning options increases students' sense of autonomy and interest in the given field. From the perspective of the local level (both providers of formal and non-formal learning), having an increasing number of learners who are highly motivated to learn has a strong impact on the achievement of the best results. The quality of studies can also be improved if providers of formal and non-formal learning offer more in-depth learning and a wider range of options to those who request it and are interested. Available resources can be used to help and support students who need additional assistance and a personalised approach when it comes to learning.

Resilience

The implementation of this policy option will strongly support adjustment to changes, both in society and on the labour market. Resilience is enhanced if graduates have the opportunity to continue their education and to put their talents into practice in a position that matches their interests and abilities. A broad-based education and a learning environment that supports the modern approach to learning will help young people to better cope with future changes in society and on the labour market and to find a new opportunity on the labour market by completing further training, where necessary. From the point of view of providers of formal and non-formal learning and the labour market, resilience is not supported by a lack of qualified staff (teachers) and poor infrastructure, which in turn does not facilitate the provision of high-quality education. Students and teachers go to other areas, so-called hubs, to study or teach and as a result, more and more rural educational institutions are closed or their activities are reorganised. However, this does not support the sustainable implementation of this policy option, nor does it ensure that all students can learn based on their abilities and interests.

⁴⁰ Pintrich, P. R., & Zusho, A. (2002). The Development of Academic Self-Regulation: The Role of Cognitive and Motivational Factors. In A. Wigfield & J. S. Eccles (Eds.), *Development of Achievement Motivation* (pp. 249-284). Academic Press.

⁴¹ Schunk, D. H., Meece, J. L., & Pintrich, P. R. (2014). *Motivation in education: Theory, research and applications* (4th ed.). Pearson Education Limited.

6.4 Policy option 3: Recognition of non-formal learning as an optional subject or course

Access to education

Compared to the current situation, the policy option related to optional subjects creates more diverse possibilities for access to education, allowing students to shape their learning pathway based on their interests and preferences, with its content and outcomes reflected as an integrated whole in a digital register that is continuously updated in the course of lifelong learning.

The impact on students' access to education depends on the specific solutions chosen from the possible alternatives (see organisational differences in chapter 3.2) when creating and shaping the policy option related to optional subjects. If the aim is to integrate the recognition of knowledge acquired in non-formal learning as an optional subject into the learning pathway of all learners, the policy option will have a strong impact on access to education. If the policy option is designed on the basis of the principle that only students who request it can exercise the freedom of choice, it will have a medium impact on access to education. At the same time, it is important to ensure that the implementation of this policy option does not increase inequalities due to the diversification of the learning pathway of students whose families can afford paid non-formal learning opportunities or who live in an area where non-formal learning opportunities are significantly more diverse than, for instance, in rural areas.

Optional subjects may also be organised as hybrid learning or from school stage III entirely as online courses, which would greatly expand the learning opportunities available to students so that they are not limited to those offered close to their home. Also, many (international) youth work opportunities are organised in a manner very different from the regular activities in hobby education (clubs or classes where weekly attendance is expected): youth projects often bring together young people from different regions for a longer fixed period of time and also take place in summer. Therefore, they may also be more accessible to young people in areas where it is otherwise difficult to participate in regular non-formal learning activities, for example due to the lack of suitable transport connections.

Depending on the solution chosen from the range of alternatives, the impact of this policy option on providers of learning is either strong or medium. If the solution involves the redistribution of tasks among current teachers and instructors in order to coordinate integration, the impact is more modest but still considerable. The impact is stronger if a new position is created for integration coordinators who have completed training. If all students start to use this solution, a significant increase in their participation in non-formal learning activities can be expected, which in turn will require providers of non-formal learning to change their work patterns and probably also the range of opportunities available, which will bring them additional funding and require additional resources from the state.

Accessibility

Similarly to previous policy options, this option improves students' access to education and allows them to direct their studies according to their preferences and interests. Thus, accessibility also increases for students with different needs. As with access to education, there is a risk related to accessibility in regions with a limited diversity of non-formal learning options and where the infrastructure and resources, including funds, are more modest compared to other regions. In this case, the local government, the school(s) and the community are expected to find smart solutions to ensure the accessibility of more diverse non-formal learning opportunities for students.



In Estonia, there are no data with regard to the (physical) accessibility of non-formal learning environments or the competences of providers of non-formal learning in supporting students with special educational needs. Upon the implementation of an arrangement where students have to complete an optional subject in non-formal learning, the impact on the accessibility of education is not clear and it must be considered that there is a risk that the competences of the providers and the physical conditions of the environments may limit accessibility.⁴²

Relevance

This policy option will have a strong impact on the achievement of the education policy objectives set out in the Education Strategy and the development documents. Compared to alternative solutions, the policy option related to optional subjects recognises a wide variety of types of non-formal learning and this is reflected in learning outcomes throughout lifelong learning, influencing labour market and broader societal developments.

Quality of studies

This policy option has a strong impact on the quality of studies, particularly through the consistent development of general competences and self-efficacy, in particular if the results of non-formal learning are taken into consideration as optional subjects as early as in school stage I. A positive impact is expected on students' learning competence, self-determination and entrepreneurial competence as well as other general competences, depending on the objectives and content of non-formal learning.

Resilience of the education system

The policy option has a strong impact on the resilience of the education system because learning takes place in different environments, which means that students' learning experiences are significantly more varied. It supports the students' ability to adapt and cope in various situations. During their studies, students have the opportunity to participate in a variety of non-formal learning activities based on changes in their interests or opportunities, broadening their horizon and knowledge of various fields.

As this policy option potentially increases the provision of non-formal learning opportunities (especially in the case of compulsory optional subjects), it also creates novel learning options for students. Providers of non-formal learning can react to changes in society much more quickly and flexibly and adopt innovative solutions in terms of both the content and organisation of learning and such innovations are taken on in formal education more quickly through optional subjects.

⁴² Working group discussion. April 2022.

7 Beneficiaries

In this chapter, we summarise and compare the main benefits of the parts of the policy change, i.e. the three policy options (Table 2).

Table 2. Benefits of the policy change¹

	Policy option 1: Recognition of non-formal learning as part of the school's compulsory curriculum	Policy option 2: Recognition of non-formal learning as an elective subject or course	Policy option 3: Recognition of non-formal learning as an optional subject or course
Students			
The recognition of non-formal learning as a part of compulsory subjects at school allows them to develop their talents more by creating extra time for it	X		
Using self-assessment to recognise knowledge acquired in non-formal learning can develop the ability to learn how to practise self-directed learning as well as improve learning outcomes. ⁴³	X	X	X
The discovery of students' talents and the design of personalised learning pathways is supported by integration coordinators.	X	X	X
Students are able to acquire a broader range of general competences to get on in life.	X	X	X
The possibility to complete elective subjects or courses at a more individual pace using a suitable provider of non-formal learning.		X	
There is more freedom to select activities which they like and find interesting and which support learning and development but have not been set in the school curriculum. ⁴⁴		X	X
Students develop the habit of making choices related to learning starting from primary school, taking responsibility and shaping their own personal learning pathway.	X	X	X

⁴³ Andrade, H. L. (2019). A Critical Review of Research on Student Self-Assessment. *Frontiers in Education*, 4, 87. <https://doi.org/10.3389/educ.2019.00087>

⁴⁴ Working group discussion. April 2022.

	Policy option 1: Recognition of non-formal learning as part of the school's compulsory curriculum	Policy option 2: Recognition of non-formal learning as an elective subject or course	Policy option 3: Recognition of non-formal learning as an optional subject or course
There are better opportunities to experiment with activities in different fields and to find a direction that supports career choices at an early age.	X	X	X
Teachers			
Their workload decreases because some students complete at least a part of the subjects in NFL, so teachers have fewer students in some lessons – less feedback to give and fewer assignments to grade.	X	X (if some students complete an elective in NFL)	
It is easier to pay attention to students who need support (including gifted students) because the number of students is smaller in some lessons.	X	X (if some students complete an elective in NFL)	
Support provided for their work is more purposeful through clearer implementation of the modern learning approach and the smooth functioning of structures supporting a learner-centric approach (e.g. integration coordinators at schools, clear organisation and definition of optional subjects).	X	X	X
The possibility to increase their professional competence using ways of giving feedback to students that differ from those used before, e.g. instructing them in carrying out a self-assessment.	X	X	X
Subject teachers are less involved in the development, preparation and teaching of elective subjects, as students take elective courses in non-formal learning to a greater extent.		X	
School leaders/school administrators			
Integration provides the personalisation of learning pathways with a concrete form and application, which is part of	X	X	X

	Policy option 1: Recognition of non-formal learning as part of the school's compulsory curriculum	Policy option 2: Recognition of non-formal learning as an elective subject or course	Policy option 3: Recognition of non-formal learning as an optional subject or course
the modern approach to learning.			
Integration supports the school in carrying out the tasks assigned to it, i.e. to help students grow into creative, versatile personalities who are able to fully realise themselves in various roles – in the family, at work and in public life – and who can choose a learning path that matches their interests and abilities. ⁴⁵	X	X	X
Integration helps to optimise the use of both time and money and to make better use of the existing infrastructure (laboratory, stadium, music school, etc.) in the school or region.	X	X	X
The shortage of subject teachers is alleviated to some extent: since elective subjects are offered in cooperation with providers of non-formal learning, schools need fewer teachers to teach specific subjects. It is possible to reduce the workload of existing teachers on account of elective subjects.		X	
Non-formal education providers			
Alleviation of students' lack of time: students have more time available as their academic load decreases.	X	X	X
Alleviation of students' lack of motivation and interest: the recognition of non-formal learning activities in formal learning may also increase students' interest in non-formal learning. ⁴⁶	X	X	X
For NFL, this policy option prevents the risk of overshadowing the distinctive	X		

⁴⁵ Basic Schools and Upper Secondary Schools Act, RT I, 16 April 2021, 7, subsections 4 (1) and 5 (1) <https://www.riigiteataja.ee/en/eli/509112022002/consolide>

⁴⁶D1, student focus group interview

	Policy option 1: Recognition of non-formal learning as part of the school's compulsory curriculum	Policy option 2: Recognition of non-formal learning as an elective subject or course	Policy option 3: Recognition of non-formal learning as an optional subject or course
nature and specific impact of NFL, distinguishing it from formal learning. The possibility of recognising NFL as a compulsory part of the school curriculum still implies that students participate in NFL based on their own free will (not, for example, because a certain number of elective subjects must be taken to complete the school curriculum). In addition to participating in NFL, students simply get the opportunity to undergo the process of consciously linking the knowledge acquired there to the learning outcomes set in the school curriculum, thereby reducing their overall academic load.			
It is possible to offer a larger number and variety of learning activities to more participants.		X	X
It is possible to cooperate with other providers of non-formal learning in sharing infrastructure and staff.		X	
Non-formal learning becomes more visible and recognised for all parties – especially if the arrangements under policy option 3 are implemented so that optional subjects are made compulsory for all students. ⁴⁷			X
The number of young people participating in non-formal learning increases, which may improve the financial situation of institutions providing non-formal learning and possibilities for raising wages	X	X	X

⁴⁷ Read more about the organisational differences between policy options in chapter 3.2

8 Analysis of the costs associated with the policy options

The following aspects are taken into consideration in the preliminary estimation of costs:

1. Costs have been assessed at different levels, including the level of the state, local governments, schools and providers of non-formal learning
2. Where possible, a distinction is made between permanent (regular) and one-off costs
3. The resources needed for the activities are taken into consideration in the preliminary estimation of costs:⁴⁸
 - Personnel costs (including teachers, support staff, management, non-formal learning instructors, etc.)
 - Administrative costs (including utilities, costs related to the management of information systems, etc.)
 - Learning tools and materials
 - Other costs
 - Non-monetary or uncompensated contributions, e.g. the time devoted to an activity by teachers, students, parents

Due to data constraints, the costs have not been subject to a quantitative assessment. The aim is rather to describe the circumstances that lead to the occurrence of costs. The amount of costs in euros is not estimated. Since there are many possibilities and options for implementing policy options as well as details that emerge upon the piloting of policy options and influence their cost estimates, the cost analysis can be specified after the piloting (e.g. what are the practical solutions for implementing policy options).

In the following, the expected related costs by target group are described. Where possible, an assessment is provided as to which policy options have higher/lower costs compared to others.

School-level costs

As in the case of policy option 1, the extent to which non-formal learning outcomes comply with the school curriculum is assessed for each student separately, the **burden related to the implementation of policy option 1 (and the time spent and associated costs) is the greatest for schools** because the learning opportunities of each student need to be considered on an individual basis. The larger the number of students wishing to have the results of non-formal learning recognised, the higher the costs. As it is not possible to predict the behavioural changes of students, the increase in the number of students who apply for the recognition of non-formal learning upon the implementation of the policy option cannot be estimated. It should also be kept in mind that this can also vary significantly from school to school (in some schools the burden of recognising non-formal learning increases, while in others it does not).

The implementation of policy option 2 could widen the variety of elective subjects or courses for students if these can also be taken outside school. In schools where there are no procedures for recognising elective subjects or courses, such procedures should be established. There are positive examples that could be taken as the basis to simplify the development of solutions for schools. **In the case of policy option 2, the additional burden for the school and the additional need**

⁴⁸ Levin, H., McEwan, P.J. (2001) Cost-effectiveness analysis: Methods and Applications. Sage Publications.

for resources is smaller than with policy option 1, but it also depends on the manner of implementation. The policy option can be implemented in two ways (see Figure 4. [Policy options for the integration of formal and non-formal learning and organisational differences among them4](#)), with varying associated costs. In the case of policy option 2.1, the elective subject or course to be completed has been determined by the school so that all students can complete the optional subject or course on the same basis. For schools, the inclusion of an elective subject or course in the curriculum is a one-off cost. In the case of policy option 2.2, the process of recognising the elective subject or course must be completed, which requires more resources on the part of the school. The greater the need to assess the subjects or courses of various providers of non-formal learning, the greater the need for resources.

Since policy option 3 primarily complements the curriculum and elective subjects offered by the school and is based on the individual interests of students, **policy option 3 requires additional resources from the school to the smallest extent.**

For the implementation of policy options, schools must have the following resources:

- **School management:** development of the principles of and procedure for recognising knowledge acquired in non-formal learning and introduction thereof in the school curriculum; increasing the volume of elective subjects or courses in the school curriculum, where necessary (the volume of work depends on the school's past practice and the selected policy option). It is a one-off cost, but it must be taken into consideration that it can take time to set up new systems and test and, where necessary, improve them.
- **Organisation of the school day for students who do not participate in the subject lesson (ongoing cost).**
- **Creation of the role of coordinator of the integration of non-formal learning:** ongoing cost, requires an increase in resources from the school in the form of one (or a part-time) position (depending on the volume of work of the coordinator, the number of students and the range of options offered, etc.). The coordinator's task is to inform and advise students and parents, develop guidelines where necessary and support the selection of learning activities. Depending on the expected workload of the coordinator, it may be appropriate to create a position for the coordinator at the level of the local government or for several schools.
- **Subject teachers (class teachers):** in the case of policy option 1, the assessment of the compliance of non-formal learning with the syllabus (including what part of the syllabus is covered by non-formal learning); the assessment of the completion of non-formal learning and, where appropriate, the recognition of the student's self-assessment in cooperation with the integration coordinator; in the case of policy option 2, where necessary, supporting students and parents in making choices, in cooperation with the coordinator of the integration of non-formal learning (ongoing cost, but the additional burden is small provided that cooperation with the integration coordinator is possible). For policy options 2 and 3, the role of subject teachers is smaller: supporting students in making the selection, where necessary, and taking into consideration their self-assessment in cooperation with the integration coordinator.

Costs of providers of non-formal learning

Most of the obligations of providers of non-formal learning arising from policy option 3 are related to the enabling of the recognition of learning; **therefore, policy option 3 requires more resources from providers of non-formal learning than the other policy options.** At the same time, it must be taken into consideration that

providers of non-formal learning may already have (partially) established the necessary procedures and descriptions.

For the implementation of the policy options, providers of non-formal learning must have the following resources:

- Describing learning outcomes of non-formal learning (one-off cost; policy option 3). The implementation of the policy options may also motivate the establishment of new curricula and greater coordination of curricula with providers of formal learning in order to offer schools suitable elective subjects or courses (one-off cost).
- The successful implementation of the policy options requires providers of non-formal learning to enter the subjects or courses they offer in a national register set up for this purpose. The cost is one-off and may not apply to all providers of non-formal learning.
- Wider implementation of self-assessment may require providers of non-formal learning to support students in carrying out the self-assessment.

Costs for local government

For the implementation of all policy options, local governments must facilitate cooperation between providers of formal and non-formal learning, involving both parties in the establishment of the precise organisation and conditions of the recognition of non-formal learning and the grounds for the refusal to recognise it. The role of the local government is to coordinate; depending on the workload and the number of parties involved, it may be necessary to appoint a coordinating officer or assign tasks to an educational advisor/specialist.

State-level costs

The implementation of policy option 3 requires the most extensive legislative amendment and therefore the largest amount of resources. Thus, policy option 3 also implies various changes to legislation, including the regulation of the concept of optional subjects, the conditions related to its organisation, etc. (for more details see chapter Inputs of the policy change).

Policy option 2 requires the development of funding principles to increase the volume of elective subjects or courses so that they are available to students free of charge. In order to increase the volume of elective subjects or courses students can complete in non-formal learning, it is necessary to introduce a corresponding amendment to the Basic Schools and Upper Secondary Schools Act and to set it out in the national curriculum for basic and upper secondary schools and in the school curriculum (one-off cost).

The implementation of all policy options requires the following resources:

- Training of people coordinating the integration and allocation of additional resources to schools for the creation of the position of an integration coordinator (ongoing cost).
- Implementation of qualification requirements for providers of non-formal learning and integration coordinators (one-off cost).
- Creating opportunities for applying for the professional qualification or partial qualification of a hobby school instructor (one-off cost; in cooperation with professional organisations).
- Creation and maintenance of a digital register of education: the amount of the cost depends on the possibilities for integration with existing developments (ongoing cost).



- Continuation of the compilation of instructions and good practices⁴⁹ in cooperation with providers of non-formal learning and schools, their dissemination at schools (constant cooperation with related parties).
- Increasing the provision of state-commissioned training of qualified employees in the field of hobby education and youth workers and the development of a micro-degree programme at higher education institutions.
- Development of the funding principles of non-formal learning to ensure diverse opportunities of non-formal learning free of charge.

Costs not incurred: the implementation of the policy options does not reduce the burden or the need for resources at the state or school level. If a school applies the recognition of non-formal learning to a larger group of students (e.g. a whole class), the teacher's workload may be partially reduced (it is possible to redirect the teacher's resources within the school, e.g. to giving lessons to other classes). In addition, the workload of teachers in formal learning may decrease if elective subjects and courses are offered outside the school. This may free up resources in the school in the form of teachers of elective subjects (or the need to offer some electives disappears altogether), but this primarily creates opportunities for reallocating resources within the school. If some students are exempt from attending lessons, teachers can devote more time to other students. While the need for resources is not expected to decrease at the level of the school, there may be an opportunity to reallocate resources.

Schools can also use the facilities of other educational institutions to offer elective subjects or courses and do not need to make additional investments (e.g. various technological solutions, sports facilities) to offer equivalent possibilities.

⁴⁹ See examples of cooperation between the fields of youth work and education previously compiled by the Education and Youth Authority (HARNO): <https://nopik.entk.ee/>

9 Summary and conclusions

There are different ways of recognising the knowledge and skills acquired in non-formal learning in the completion of a formal learning curriculum. The policy options analysed in this preliminary assessment differ in terms of the proportion of students covered by the option and the extent to which the content of the knowledge and skills obtained through non-formal learning and taken into consideration in the formal curriculum has been determined.

We analysed policy options where only non-formal learning that is aligned with the learning outcomes described in the syllabi of national curricula is accepted and recognised (policy option 1) or where non-formal learning that provides knowledge and skills which are not directly transferable as the learning outcomes of subjects described in the curricula is also taken into consideration (policy option 3). Policy option 2 stands between these two options, making optional subjects and courses available to students in cooperation with providers of non-formal education or providing the opportunity to replace elective subjects determined in the school curriculum with extra-curricular activities, the learning outcomes of which correspond to the elective subjects of the school.

The preliminary assessment of impacts revealed the main advantages and disadvantages of the policy change consisting of three policy options.

Advantages

- If the recognition of compulsory or elective subjects is organised so that it is possible to replace an elective subject in the school curriculum with non-formal learning, the weekly academic load is reduced for some students.
- Students' general competences are developed through increased participation in non-formal learning and a self-assessment process completed when applying for the recognition of non-formal learning.
- The implementation of the policy options increases students' motivation to participate in non-formal learning.
- Taking the students' interests as the basis in non-formal learning supports the development of students' talents and interests.
- The policy options provide clear mechanisms for schools to implement personalised learning pathways.
- The inclusion of non-formal learning activities on their graduation certificate gives students an advantage in further studies or employment, if they have acquired (initial) competences in a field or their motivation is formally recognised.

The policy options are not mutually exclusive and most of the above advantages are amplified if the implementation of all three policy options is systematically supported, i.e. if the policy change planned for the achievement of the project's objective is regarded as a combination of the three policy options. For example, the extent of the impact on students' motivation to participate in non-formal learning is the greatest when all three options are available, as students who are engaged in a non-formal learning activity at a (pre)professional level can – depending on whether the knowledge acquired matches the curriculum – have it recognised as a compulsory, elective or optional subject. At the same time, all students, including those who are not otherwise involved in non-formal learning, can discover new areas of interest through the elective subjects offered by the school in cooperation with non-formal learning (policy option 2), which may increase their motivation to continue with the activity.

Disadvantages

- Limited or inaccessible non-formal learning opportunities in various regions limit the extent of the positive impact of the recognition of non-formal learning as an elective subject or course.
- Upon recognition of non-formal learning as an optional subject, regional inequalities may increase because it leads to the diversification of education for those students whose families can afford paid options or who live in regions with a wider choice of (free) non-formal learning opportunities.
- In the case of the recognition of compulsory subjects, a relatively limited range of non-formal learning activities are recognised: only those non-formal learning activities that correspond to the learning outcomes of compulsory subjects.
- The inclusion of compulsory optional subjects in curricula requires a clear political will to implement the necessary legislative changes.

The disadvantages of policy options are also mitigated to some extent by the systematic implementation of a policy change containing all the options. Only a very limited number of non-formal learning activities can be recognised as compulsory subjects, but this is allowed according to current legislation. However, the recognition of the results of non-formal learning as an optional subject would significantly increase students' freedom in shaping their own learning pathway, but the concept and organisation of optional subjects is currently unregulated and the necessary legislative changes require strong political will. Key actions related to the policy change, such as the state-level training of integration coordinators or close cooperation between schools and providers of non-formal learning at the local level, significantly alleviate regional disparities in the availability of non-formal learning.

When focusing on the learner and their individual learning pathway, the shaping of which students should start to practise from school stage I, the preferred approach to the integration of formal and non-formal learning is one that systematically supports the implementation of all three options in educational institutions. Such a policy change would support both those students who have started to engage in preprofessional activities at an early stage and those who are still looking for a field of interest and exploring various options. Each of the three policy options has pros and cons, but the systematic implementation of all options would fulfil the stated objective, leading to a situation where there is an awareness of the knowledge and skills acquired by students through non-formal learning and these are accepted and taken into consideration in the completion of the curriculum in formal learning.