Education Policy Consultation:
Round 1 Comments. 16/12/2013

This document contains the first round of responses to the Permaculture Association's consultation on education policy.

We have published comments in full, but they have been anonymised. If you wish make a counter comment in round 2, please state the number of the respondent whose comments you are referring to.

We would like to thank all respondents for taking the time to give us their thoughtful responses.

RESPONDENT 1

Background Questions

1. How do we record complaints about courses at the office?
2. How many have been received in the last 12/24/36 months?
3. How many PDC course places a year are there?
4. What is the percentage of complaints?
5. What is the intent behind this policy?
6. Where has the request to do this come from? (Vested interests?)
7. What alternatives have been discussed and discounted?
8. What feedback loop is in place to monitor the earlier effect of imposing ‘holding a diploma’ as a teaching restriction? What has been the result? Has it led to improvements? If not, how do we assess whether ‘imposing a qualification works, or whether it increases the number of teachers running unaccredited courses?
9. Who benefits?
10. Who loses out?

Comments

Negatives far outweigh the positives, and I think that we can get a better result, in line with our charitable objectives and ethos, by doing something different.
Negatives

There is nothing in our Charitable Objectives that hints at any form of control, regulation, or authority over the teaching of permaculture. In fact the hindering of potential teachers is more likely to be against our remit which is to educate the public. Reducing or restricting the number, type, or qualifications of permaculture teachers is potentially contrary to that objective.

It goes completely against the principle ‘apply self-regulation and feedback’. We should be regulating ourselves and setting up a mechanism that provides feedback. We should be enabling teachers to do the same. Imposing regulation would mean that we are promoting principles that we do not apply ourselves. Hypocritical.

Strife and schism.

Course attendees will suffer when any teachers who refuse and object continue to run courses. Students who later try and register for the diploma etc. will be told that they don’t have a valid qualification. The W.O.M impact of those unhappy people will spread the message that permaculture in the UK is splintered, and ineffective. Should you choose to allow them to register, you have removed the only sanction that you have available.

It is the student, not the teacher, who will suffer.

If more people choose to teach outside of our system, that is more likely to reduce new members, than to increase it. There is also a possibility that if enough people choose to teach outside of our organisation, that they consider setting up their own association.

Potential teachers will face an additional obstacle and expense. This follows the decision to include the diploma as an additional quality control. If you take me as an example, if I had wanted to teach, and been pretty pissed off with your decision to add the diploma as a requirement, having completed the diploma, I would have been incensed by you moving the goalposts again, and adding further hurdles and expense, especially when you don’t have any authority or mandate to do so. If adding the diploma as a requirement has not had the desired effect, why would adding anything else be any different? (same behaviour). How have you monitored the results of adding the diploma as a requirement, and have you allowed sufficient time for this to provide enough ‘survey’ material to reach a conclusion?

In terms of system, the ‘purposes are deduced from behaviours not from rhetoric or stated goals’ (Meadows. Thinking in Systems). The actual purpose of this would appear to be to protect the interests of a few established teachers. That is particularly pertinent when you are specifying that all potential teachers attend a course only run by a single group of influential teachers. Taken in conjunction with the diploma requirement (they are all senior/standard diploma tutors), and the new diploma tutor training requirements, this just adds to the viewpoint that the
association exists to protect the interests of a few. This appearance is made worse by the fact that the Designed Visions website lists board members, CEO, and one staff member as guest tutors on their website. The sad thing is that the folks at Designed Visions are talented and established enough not to need any more help. Irrespective of whether this policy is intended to put money their way or not, that is how it could be perceived.

This equates to something like a tax. The extra expense of this, and of the diploma, is to make it even harder for people with a low income to become teachers.

It will stifle creativity and innovation, and reduce diversity. This is contrary to permaculture principles, principles of the Blue Economy, and Systems Thinking.

It is more likely to create a cadre of ‘academic’ teaching professionals, and side line those with practical experience.

**Improvement**

If we are genuinely trying to create a highly efficient system, then we need to use systems thinking in our decision making, and the way to do that, with the most additional benefits is to create a positive reinforcing feedback loop. By creating a system for obtaining and making available feedback from course attendees, we can show which teachers are providing the most satisfaction to students, and which are not meeting expectations. We can provide independent feedback to specific teachers about what their students have said, and to all teachers about trends, content, student expectations etc. It can also help us to find out what members of the public want to learn, or expecting to be taught, allowing us to use that feedback to ‘tweak’ what is taught. Linked with a teacher list that includes qualifications and experience, this should provide the following benefits.

1. Give students an opportunity to provide feedback on teachers, content, facilities, and the meeting of expectations.
2. Provide prospective students with a way of assessing the relative merits of teachers and their courses.
3. Provides feedback to individual teachers about their own courses.
4. Provides information across the network on student expectations and needs.
5. Maintains diversity of experience and approach. ‘Self –organisation produces heterogeneity and unpredictability. It is likely to come up with whole new structures, and whole new ways of doing things. It requires freedom and experimentation, and a certain amount of chaos’ (Meadows).
6. Keeps the cost to prospective teachers down, and therefore less exclusive to people on low incomes.
7. Avoids alienating current and prospective teachers.

8. Stops any accusations of favouritism, or of helping an ‘inner circle’.

9. It is fully in line with our charitable objectives. It is fulfilling our aim of creating research into permaculture. Specifically what people expect from a permaculture course, and how well we are meeting those expectations. In that respect this is also a bottom up approach, rather than a top down one.

As this is probably what we should already be doing, and would need to put into place before making any other change to monitor how well our ‘end’ is being met, there seems little harm in putting something like this into place first, and then to give it time to see if it’s enough.

It may be that somebody else can come up with a better idea, or tweak this to make it better, but I hope that it breaks us out of the box that we seem to have locked ourselves into, and gives us an opportunity to have a rethink.

**Steps.**

1. New format for tutors and course advertising, containing tutor’s experience, expertise, and qualifications. All of their upcoming courses to be listed there.

2. Association feedback forms. To be completed by individuals, in pen, sealed without teacher reading.

3. PDC ‘official certificate’ sent in post to address on feedback form. (Note there should be an option for somebody to put their address etc. in, but to not supply feedback.) Not essential but may make it more likely that feedback is encouraged and given.

4. Results collated, sent to teacher, entered/updated under tutor listing. A five star rating system, for a small number of fields, plus an overall rating.

5. All results collated and made available across network.

6. First year of association membership at a reduced rate.

7. I guesstimate about five hours of work per course at 15 minutes per feedback form, and twenty students per course. Potentially significantly less where people are just ticking boxes. Total cost depends on the number of courses, and the actual number of students. An additional cost of postage for certificates, if that is the method chosen. By charging the teacher around £65 for the service and provision of certificate, the overall cost should be negligible. I don’t know what the current fee is.
1) Every lead teacher must hold the diploma - no exceptions

2) Assistant teachers must hold their PDC (but do not need to be signed up for diploma) - I regularly employ PDC holders to teach on my courses, but not all of them are signed up on the diploma. Demanding they must be signed up to the diploma is too restrictive and would greatly reduce the quality of my courses. Someone who has just started their diploma is no more qualified than someone who hasn't signed up - they have just given PAB more money! I think some trust still needs to be given to the Lead teachers about who else they get to teach on courses.

3) I would be clearer about the "accredited" PDC lead teachers - I am presuming this means accredited through the OCN? The term "Accredited PDC" normally means PAB accredited in my neck of the woods.

4) How are the qualifications of every teacher on every PDC in the UK going to be monitored? Demanding qualifications is one thing - verifying that everyone's got them is another job all together.

I was also wondering whether an "honoury" diploma could be awarded to individuals who have demonstrated knowledge and experience way beyond that of the diploma - this could get round the slightly sticky situation Andy's in - teaching a lot but not holding his diploma. It would be one way of making sure everyone who is fit to be a lead teacher has the diploma.

RESPONDENT 3

Looks good and there is nothing I would quibble with as regards the requirements for teaching intro, pdc and diploma.

What is missing is anything to do with teaching of specific skills outside of these settings, things that may be included in an intro or pdc as some of the non-
mandatory topics. This could be bee-keeping, grafting, hedge laying or even home energy. I have been involved in teaching the first three from a permaculture perspective. Is there a way to support some of this teaching which I am sure many diploma students seek out as part of learning skills they need for their designs? Clearly this type of teaching can be done at many different levels and is going to be used by many to develop their permaculture practice.

**RESPONDENT 4**

the document looks sensible..One question is who appoints the education working group/how are they accountable/what are their qualifications etc.

**RESPONDENT 5**

This document looks clear and fair to me and gives a comprehensible account of registration.

Some bits I feel could be added for further clarity:

1) **Status of non-UK/non-PA certificated qualifications**

This point could relate to all the qualifications listed, but I'm specifically interested in PDC and Diploma. I am left wondering if registration on the Permaculture Association Teachers' Register is:

1) available only to those with Permaculture Association (UK) certificated qualifications at the appropriate level/who have provided suitable evidence of competence

2) available to those with qualifications at the appropriate level certificated by specific organisations recognised by Permaculture Association (UK)

3) available to those with qualifications at the appropriate level certified by any institution

4) some other criteria?

Option 1 could be qualified with a reference to the Education Working Group for those with qualifications certified by organisations other than Permaculture
If its Option 2 there would need to be a list of recognised awarding bodies - perhaps requiring a degree of international cohesion not previously existing in an anarchistic community...

I'd have concerns if it was Option 3, about the PA's ability to certify the quality of education now/into the future.

2) Permaculture Association PDC certificates

Carrying on from above, I wonder whether UK based teachers that have pursued a diploma from an organisation outside the UK, should actually award PDC certificates from that organisation rather than the Permaculture Association (UK)?

Limiting the ability to award Permaculture Association certificates to those who have chosen Permaculture Association (UK) certification would seem fair to those who have, to the Association and all those who have worked on Association certification. It would also build our national capacity and ensure quality of education by maintaining national oversight.

3) Ofqual-accredited statuses

The recent documentation relating to OCN accreditation (The Permaculture Association Handbook for OCNYHR credit-based awards) has another status/role not incorporated in this document: 'Internal Verifier'.

This seems to be a role on the level of 'Senior Diploma Tutor' but on a separate pathway requiring other qualifications. I suggest that this role should be incorporated into the structure, giving an open and comprehensible indication of how advancement to this 'rank' is achieved/approved.

4) Government Approved Qualifications to Teach

This is perhaps outside the remit of this document but does have some bearing on Point 3 Ofqual-accredited statuses. While the route to becoming PTLLS qualified is relatively simple for an independent permaculture teacher prepared to put in the time/expense to achieve the award, progression though the subsequent government approved qualification structure CTLLS, DTLLS, QTLS, ATLS etc. is difficult for those working outside a learning institution.
The Association might usefully consider how it could support teachers through the government approved qualification structure and *must* if the 'Internal Verifier' role is dependent upon it.

something else I think could do with a bit more explanation:

Under *Essential Qualifications for Accredited PDC: Lead Teacher*, one of the criteria is 'a credit-based assessment qualification', but I'm not sure what this means and the document doesn't appear to elucidate.

I believe that one of the earlier criteria, PTLLS, would be classed as 'a credit-based assessment qualification' - so its perhaps an unnecessary/tautological qualification - unless it's a qualifier that's only relevant to 'other teaching qualification' when that qualification was not credit-based.

**RESPONDENT 6**

the draft policy makes it clear what is required for each level of teaching and is a very helpful document. I think my only comments which may or may not be relevant to this consultation is that the way the tutor training is run means there is only one way to access that level and it has been very frustrating for me to try to progress. I'm not sure how this could be changed without affecting the quality of the training.

**RESPONDENT 7**

I think this is really important to define the edges of the PA teaching system & network and at the same time not treading on the toes of teachers who offer alternative approaches to teaching permaculture.

I attended a pdc with Geoff Lawton and at the end of the course he informed us all that we could now teach a pdc with the Aus PDcert, "but it might not be very good". If PDC certs and diplomas from other parts of the world support a pdc running then that's fine, at least there is something to compair the PAB system to. Which is good for us all, as the work that has been done is attracting lots of interest because we are effective.

I think it would be to the PAs advantage not to try and include everyone teaching
permaculture in the UK in this publication/listing or state the differences.
We can clarify about the system that we (the association) is forming, how to join and
what to do for anyone who wants to be a part of it.

When I teach I stress that permaculture is a practice, rather than an academic subject,
and in the practice is the learning.

If someone says they want to be a part of the system but can't be bothered to follow
the terms of conditions of being a listed teacher then why would they want to be a
part of it, and do we see this as acceptable?

I am crap at writing as I am another dyslexic permaculturist, I have looked at the pdf
and have noticed a few things that might be valuable to this process.

I have attended TOT and Pttls and I am afraid to say that I think I got a lot more from
the pttls course I attended at CityLit London that the TOT thrown at me a few years
ago, but I think that TOT course has been refined now and as far as I understand is
less like boot camp.

If someone has teaching experience and a pgce and wants to teach permaculture
then I would recommend they attend a pttls course as well but not necessarily TOT.
-So I think all teachers should be encouraged to attend a pttls whatever level of
experience they bring, I know Andy has made this clear about government
legislation, I think it could be more explicit and part of the edges of the doc.

I am not sure I agree with some of the points such as . Underlying the framework is
the principle that teachers should hold the qualification higher than the one they are
leading a course on: to lead an intro course, a teacher should have a PDC; to lead a
PDC, the teacher should hold the diploma and so on.
Some people will have lots experience and pttls but may have never attended a
pdc? i suppose the answer would be to direct them to a course!! But do you think
Patrick Whitfield should do a pttls? I don't.
Exceptions; point 1, I think the minimum no of implemented designs could possibly be
the same as the Diploma so change 5 to 6.

RESPONDENT 8

I understand the need for quality control for PDC's. But I believe that this is not the
correct way forward.

1: There is a risk to achieve the opposite effect as intended:
This teacher has a diploma, therefore the PDC has a stamp of approval from the PAB, therefore the course must be good.

A few similar examples of where similar attempts went wrong in my opinion.

- Police check:
The same is happening when people apply for a job working with vulnerable people. A police check gives organisations a false sense of security thinking that their new staff member is safe to employ. A police check is only partly effective. For it only tells you that the police has found no evidence yet of behaviour that potentially could be harmful. A result is that many organisations are more relaxed about things, as their back are covered anyway.

- Organic certification.
It is really expensive to be certified organic. Many small farms and producers are unable to label their stuff organic. And Organic doesn't mean it's harmful chemical free. Large organic farms still work with monocultures which attract diseases and pest. There for there is still a need for pesticides. Exceptions are asked for and granted. And it sometimes uses more Oil than chemical farming. Organic means: a serious effort is made to make it a chemically friendly as possible. But every time I explain that to my students many are very surprised. That is not what they thought it meant. An organic label is only partially a label of excellence and it makes life difficult for small producers (the ones that are most important in providing a future with food production)

- Forest schools.
Their certification is quickly becoming a standard. Without it it is difficult to teach forest skills. I have studied Pedagogy (science of teaching) for 5 years, worked in that field for 10, lived and survived (and practised the essence of permaculture) in the woods in a tent for four years. I have to go to a forest school and pay hundreds of pounds to get certified. (As if someone who has done 6 weekend courses is more qualified than someone who survived in a tent in the woods for 4 years. )

A side effect is that this 'new' proposal will put existing good teachers like me through time stress and financial difficulty. (financing a diploma is not affordable for everyone and making a presentation is time and energy consuming) In my personal case: I started a permaculture farm a year ago. I am working 12+ hours a day 7/7 to make it the success it is. I teach hands-on permaculture design to finance the project and get the help I need. Being able to write a certificate after a wonderful successful hands on PDC is a big plus. Joe states that the PAB has no intention to stop people from teaching, yet I hope we all agree that a PDC without the ability to write a PAB certificate is considered much less valuable than one with and makes it much more difficult to find good students.
My farm is all designed in permaculture ethics and principles. I have enrolled in the independent route of the diploma about two years ago and have plenty of designs implemented and not implemented, but they are not presentable yet. Some are under client confidentiality, the farm project is still young and others are just sketches. Putting a presentation together is not something I really have time for now. I feel I am being forced to take time out from doing permaculture to do something that I consider not really permaculture.

The diploma seems to have become a goal in itself with a magic attribution that it is somehow going to guarantee quality. That in the process it damages some permaculture people and projects seems to some with a diploma already a price worth paying.

It is making permaculture into a brand. This professionalisation of permaculture is hindering the spread, muffling some voices. Just at a time we need all hands on board. It is copying a system it is meant to improve. Someone from PAB is saying that they have no intention to become the Permaculture police. But the PAB is the only association in the UK, it is the only commonly recognised permaculture standard in the UK. Surely one is free to not be part of the PAB. Denying that this makes life difficult for the others is like denying the excellence of the PAB.

An example: I recently went to visit Norway. I introduced myself to someone who is starting an eco-project. His first question was: Do you have a diploma? As if having a diploma somehow guarantees a high standard. Maybe it does in the majority of diploma teachers, but an emphasis on it, damages other good permaculturists. Plenty of other people do excellent permaculture work and don't have a diploma. The work that Andy is doing as a CEO of PAB is priceless. He is doing it all without a diploma. The highly skilled woman who organised the English LAND project so wonderfully and successfully is in a same position. I'm sure there are many others in the same position. Is their expertise less valuable because they do not have a diploma? If it is, I argue that there is something seriously wrong with the diploma concept. It has become something that surpasses its intention. From a form of enticement and support way for people to learn about permaculture, it has become a medal of honour, a brand of expertise, a sign of elitism. I'm not so sure if that is positive. I'm sure it goes against permaculture ethics in many ways.

Like one permaculturist states regarding this discussion: "Hopefully we will push out the charlatans in permaculture and give full value in our course soon." As if the diploma would guarantee that. Is that an intention of this process? Who decides who is a charlatan instead of a dissenting voice (which in my opinion strengthens the diversity that gives resilience to permaculture)? Maybe it will push out charlatans, it surely will push out good teachers. Is that a price worth paying? Is it really inclusive, welcoming diverse educators?
I am concerned that this diploma label is allowing people with financial motives to exclude others. This was the case in a similar exercise in Scotland, where one diploma holder honestly declared to have financial motives in excluding non-diploma holders from becoming Land assessors.

It is also creating a fake boundary of 'expertise' used by diploma holders who are using the diploma label to exclude other permaculturists from taking part in important discussions, like a discussion on essential criteria for a PDC in Scotland.

I'm concerned that this decision is driven by what social psychologists call groupthink. [https://www.boundless.com/psychology/social-psychology/social-influences/groups-can-distort-decision-making/](https://www.boundless.com/psychology/social-psychology/social-influences/groups-can-distort-decision-making/)

All participants in this discussion are diploma holders themselves or might have similar opinions, with a lack of critical voices.

I'm sure there are better ways to guarantee quality in PDC's. Less dogmatic, I'm specifically thinking about peer review from students and colleagues.

**Comments on the requirements of exception:**

*Does the candidate demonstrate significant design competence? Provide > 5 fully costed & implemented permaculture designs.*

This is only one implemented design less than the diploma in the new system, it is pretty strange to have the number so high. It takes the need for the exception away.

These criteria are higher than for the diploma 5.0 that I enrolled in, where there is very little talk about nr's of designs that are needing to be implemented. And besides one decent design can show more competence than 100 smaller ones, proof of quality lies not in quantity.

*Has the candidate led at least 5 similar/longer/higher level courses? Provide scheme of work, session plans, handouts, student feedback.*

This seems higher than for a diploma teacher.

Is she/he required to show this too?

*Has the candidate taught as a support teacher/apprentice with a registered lead teacher? Provide referee contact details.*

This too seems higher than for a diploma teacher.

Is he/she required to show this too?

*Can the candidate provide other compelling evidence in support of their application to be a lead teacher?*
This too seems higher than for a diploma teacher. Is he/she required to show this too?

I understand the decision will be published 31 march 2014.

I and I assume others have courses planned and promoted for 2014. There is a need for a start time put onto this change. Maybe target date could be January 01 2015?

I have no illusions of the outcome, regardless of this 'consultation'. The need for a diploma to lead a PDC has been and is still published incorrectly in many documents and is quoted on the PAB website.

I have never felt the need to proof my expertise in the shape of a diploma. I have always felt that my skills and experience and testimonies spoke for themselves. I will now have to make time and space to make a presentation for my diploma. And I will. I still think it is important to air this dissenting voice, even though I'm sure it is not appreciated by everyone. I hope it will make you think twice and make it a bit easier to achieve this label of approval for people with lots of expertise already, for the benefit of permaculture as a whole and for the benefit of individuals involved.