

# **DRAFT Education Policy Consultation: Round 2 Comments. 16/01/2014**

This document contains the second round of responses to the Permaculture Association's consultation on education policy. Many of the comments refer to responses that were received in the first round. Please see Round 1 comments document for these responses.

We have published comments in full, but they have been anonymised. If you wish make a counter comment in round 3, 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 5**

Reading the comments of respondents to the first round of consultation has helped me to understand some of the varying views held within the permaculture education community and to clarify my own feelings regarding the Association education policy. I have valued hearing 'dissenting' voices.

It seems that all of the following is true of all the respondents:

They have decided to be members of the Permaculture Association.

They believe that permaculture education is served by having taught courses some of which lead to certification.

That this certification is made valuable by Permaculture Association accreditation.

And that some of the following may be true of all the respondents:

They think that the Association should collate and distribute a Register of Teachers in the UK, which they recognise.

They think that some form of notice of teacher's qualifications to teach permaculture should be publicized, e.g. formal qualifications, designing/teaching experience, peer review, learners review etc.

Given this, it seems that there is already broad consensus around the value of defined groups, certification, accreditation and an interest in registration and the recognition of qualifications. Also it seems to be accepted that the Permaculture Association has the 'authority or mandate' to accredit (or not) permaculture courses.

What actually appears to be in dispute therefore is the exact nature and character of 'regulation', rather than a dispute with the concept of regulation per se. I thus consider this consultation to be a method of seeking clarity in an area that is currently murky and at risk of creating and maintaining hidden hierarchies.

## General Comments

I feel that the views expressed by all the respondents reveal the creative tension between the principles of **Integrate rather than segregate** and **Use and value diversity**. My personal response to this tension, in relation to an education policy, is to accept and appreciate that such a policy will never encompass all those diversely involved in permaculture education in the UK. What it could do is form an agreed understanding for those who have freely chosen to mutually associate under agreed terms.

As a result, where Respondent 1 sees educators deciding to operate outside an Association remit a source of 'strife and schism', I perceive this as a creative dissensus. I find the possibility that people might choose to set up their own organisations under different terms encouraging and potentially highly productive – dialogue between organisations and the individuals who might choose to be in one or more of these organisations could produce a diverse cross-pollinating polyculture. To an extent such a situation exists already, with the UK based Northern School of Permaculture, and transnational permaculture education offered through Gaia University, Geofflawton.com etc. and the itinerant teachers of the PRI and others. I thus find myself in agreement with Respondent 7 that an Association education policy should seek to define its own edges while respecting alternative approaches outside its remit, thus it might Use edges and value the marginal.

Respondent 8 notes that 'one is free to not be part of the PAB', and I think that it is in the context of this liberty that we might choose our own limits. I appear to have a different interpretation or understood application of the principle Apply self-regulation and accept feedback than Respondent 1 in regards to the policy. Respondent 1 appears to find a proposed policy to be agreed by engaged participants as hierarchically imposed regulation on individual selves. I instead understand the self, regulating itself here, as the collective self of the permaculture education community, an emergent property of individuals operating in mutuality rather than atomised individuals operating in isolation. The Association provides a forum in which the dialogue of regulation can take place between a mutually associating education community, and a management (rather than leadership) function for the regulation agreed by that community. Just as self-regulation of the press, reflects an order of regulation at organisational levels (that includes orders of regulation at individual levels) in the service of maintaining the freedom of the press and individuals acting within it I believe that we can create a system of service to our collective needs.

In several of the respondent's comments there is evidently fear about control from above, about a rule-setting authoritarian system, cabals of power brokers and more.

I share concerns about bureaucratic creep, increasing financial and regulatory hurdles and creating structures that tend towards exclusion, however I am also aware that this policy seeks to answer questions that I and others have had and continue to have. Respondent 1 asks 'where has the request to do this come from? (Vested interests?)'. I feel that it attempts to shape an agreed answer to the queries that others and I have posed formally and informally to the Association and its staff over a number of years and I appreciate the opportunity to discuss this provided by the consultation. There are undoubtedly some who may have a 'vested interest' in the status quo subject to no new analysis, just as there are those who may have a vested interest in the proposals as they stand in the original document. I think it would probably be impossible to have a decent dialogue on this subject if it didn't include participants who felt they had a strong personal interest in how they would be advantaged or disadvantaged by any decisions made.

### **Particular Comments**

#### Feedback

Respondents 1 & 8 propose alternate quality-checking mechanisms through learner and/or peer review. I agree that this could provide useful data for monitoring/maintaining course quality at the Association level and on courses I have worked on it already provides useful information for evaluating and tweaking future teaching. I do not know how such a feedback system could be implemented and maintained in a cost/energy efficient way however, and I fear it could create a large bureaucratic burden. Respondent 1 usefully gives detail on how such a system might operate. I am not convinced by some of the details of this, specifically:

1. In my experience of using feedback forms, getting participants to fill them in on the last day of a course commonly leads to lightly filled in documents.
2. In my experience of using feedback forms, getting participants to fill them after a course has finished is nearly impossible.
3. Associating dispatch of a PDC certificate, with receipt of a feedback form might help to alleviate 2 but not 3.
4. The certificate giving 'ceremony' always forms an important part of course closure in my experience and would be lost in 3.
5. Non-certificated courses Intros etc. would not benefit from 3.
6. People who feel negatively about their experiences tend to write at greater length and in more detail than those who feel positively. This can provide useful data for an individual teacher, but could skew a teacher's profile.
7. The proposed £65 charge to teachers appears to be per certificate, i.e. £1300 to certify 20 students – which may reflect the work involved in processing the feedback

etc. but is so high, that in itself it would likely provoke widespread withdrawal from Association certification. £65 charge per course would be less than is currently charged simply for certificate provision on a PDC of more than 13 students, so would create costs for the Association.

8. As not all courses are certified, intros etc. there's little incentive for teachers to participate/pay Association.

I can't really think of a way to tweak this better. Any solution requiring more money going from teachers to the Association and courses costing learners more as a result (decreasing participation) is likely to be highly unpopular and form a more obvious 'additional obstacle and expense' than the proposed system. A teacher's Diploma fees and attendance on a PTLLS inclusive Permaculture Training of Teachers would cost little more in money than the £1300 to accredit 20 students on one PDC in this proposal. Rather than keeping the 'cost to prospective teachers down, and therefore less exclusive to people on low incomes' it seems likely to make courses more expensive to run and less accessible to people on low incomes, without providing prospective teachers with the benefits of investment in their own education offered by the proposed system.

#### Teaching/Design Experience

There are two competences at risk of being compounded or confused here – teaching competence and applied design competence. I think that we have a rich pedagogical ecosystem, in which there may be a handful of specialists reducible to the caricatures Respondent 1 calls 'academic teaching professionals' and 'those with practical experience' but within which most individuals have some ratio of both skillflexes. The Association is in a stronger position to assess design competence than it is to assess teaching competence, reflecting the investment in the Diploma. We should be wary of using one as evidence for the other, and aware of the opportunities/risks of using external qualifiers – PTLLS etc.

Respondent 8 usefully highlights where the requirements regarding teaching skills and experience appear to be higher for those following the 'exception route' rather navigating the mainstream. Completing the Diploma does not require criteria 2, 3 or 4 listed in the draft policy document, which is a curious anomaly. There should be equivalence of the teaching criteria required by diploma holders and "exceptioners". [A proposed "teaching pathway" as one route through the Diploma – might presumably address these criteria – leaving those with a Diploma not completed on a "teaching pathway" as exceptioners needing to meet criteria 2,3,4 separately. This would also beg questions about the qualities assumed of a raft of historic Diploma holders].

Completing the Diploma requires criteria 1 'significant design competence', and unlike Respondent 8 I feel that those on the exception route should also be able to demonstrate equivalence here. I believe that the ability to demonstrate design competence and the active engagement in exhibiting and disseminating one's competence through the publication of one's designs is absolutely key – with clear yields for permaculture outside the realm of education as well as within.

The subject of permaculture education at PDC level and above is permaculture design and teachers should be able to demonstrate their design experience. I also disagree with the implication if not the substance of the statement that 'one decent design can show more competence than 100 smaller ones', decent as that one design may be – if the designer has only applied their permaculture design skills once, in one area – then that decent design provides no real indication of broad design competence. [Perhaps that one design might be understood as a project containing several smaller designs reflecting multiple design cycles?]. Also, I believe in the value of mistakes in true learning and that being able to show one's progression from smaller less successful designs to more successful designs at a large or small scale may be a better indicator of design competence than one well-pressed design polished to perfection at the expense of ever designing anything else.

As a result of this I am against the idea of honorary diplomas as suggested by Respondent 2 as a way of 'getting round' criteria. I agree with Respondent 8 that many 'people do excellent work and don't have a diploma', but I believe that the exception route offers a pathway to "get through" the criteria if these people wish to teach courses that are Association accredited. Their expertise is not 'less valuable because they do not have a diploma' but it is likely to be less subject to comparative and independent assessment, especially if they cannot or will not publish costed and implemented permaculture designs. Doing so may be 'time and energy consuming' (design opportunity?) but provide multiple yields. Without some presentation and/or tutor/peer review of one's design work, it is essentially self-certified and unable to be critically reviewed – to the detriment, I believe, both of the designer's own learning and the wider dissemination of permaculture.

### Permaculture Training of Teachers

It is unclear from the consultation document whether the recommended qualification 'Permaculture Training of Teachers' refers to a generic concept or to the specific course run by Designed Visions. The second interpretation appears to be the cause

of Respondent 1's comment that 'you are specifying that all potential teachers attend a course only run by a single group of influential teachers'. As a recommended rather than essential qualification, I do not understand attendance to be specified; nevertheless mention at all does appear to provide Association endorsement for a course outside its certification remit, and feed concerns, wrongly or rightly, about particular individual's interests being served above others'.

If 'Permaculture Training of Teachers' referred to an Association certified course, with a freely available core curriculum as per the PDC its presence in the document would be appropriate. If it does indeed refer to a permaculture course delivered by specific providers who hold the intellectual property in that course and provide their own certification to those attending it, then its presence in the document would appear to be inappropriate. As Respondent 5 has noted regarding the 'internal verifier' role for Ofqual accredited courses, being the teacher of a 'Permaculture Training of Teachers' course appears to be another status/role not incorporated in this document and apparently on a 'separate pathway requiring other qualifications'.

While I do not believe that this policy can cover all present and future varieties of permaculture or related courses (as Respondent 3 appears to hope), it explicitly refers to four permaculture qualifications: intro, PDC, Diploma and Permaculture Training of Teachers, only two of which are currently certified by the Association (PDC and Diploma) – of the two which are not, policy scope appears to cover one (Intro) and not the other (Permaculture Training of Teachers). There may well be good reasons for this and they should be made explicit.

## **RESPONDENT 9**

This is the bad seed of protectionism and against Bill's expressed wishes.

I'll have no part of it!

Remember that the fish rots from the head.

No doubt, in time, you will reap what you sow.

## RESPONDENT 10

Draft policy looks appropriately scaled to me.

I have some comments regarding two of the first tranche respondents.

Respondent 1

- Apply self- regulation – I would like critical feedback at courses I teach on and would want students to be able to say exactly what they feel to an external (regulator?)
- This respondent appears to be against the PAB taking some form of responsibility for QA then come up with a whole set of criteria they would prefer to see
- I disagree that the PAB is protecting the interests of the few – I believe PAB is taking this approach to protect the interests of ensuring there is good quality teaching and practice of permaculture in the UK and have gone down a pttls etc route due to the fact that ‘public purse’ money is becoming a reality for many teachers – it also enables people to be supported to create a valid permaculture business pathway
- On ‘improvement’ I would disagree that ‘students that report most satisfaction’ is an indicator that the content has been appropriate – the counter to this is the ‘core curriculum’ and the lead tutor having a diploma (with it’s inherent ‘practical application and reflective learning)

Respondent 8

Similar to above, though I would comment that the PAB support for a PDC isn’t a sign that the course is good – it is a sign that,

- The tutor has experience (based on holding a diploma and some teaching qualification)
- It follows a core curriculum agreed by Bill Mollison and at the end of it students should be able to get engaged in ‘applied design process based on pc ethics and principles’

Otherwise I agree with the other 6 respondents

## RESPONDENT 11

I enjoyed reading about your Education policy consultation process. Please accept my contribution.

The IV process detailed in my contribution is not a complex process to administer. Quality improvement and transparency of decisions is the route of good practice and alternately brings about improvements generally!

Responding to previous contributions.

The eight responses (as detailed below) seem to be able to be abridged into a number of common concerns. Many of the more personal comments have been left out for the sake of brevity. This process could be repeated to ensure other issues have not been missed.

Respondent 1.

The governance of the delivery of PDC and other qualifications must be maintained within a quality environment. The quality environment must have an assessment for improvements for it to be a quality process. There must be an established quality check procedure which is both clearly defined by the constitution and within the transparency of policies.

Parametric Questionnaires can provide feedback.

An IV process is used to assess the quality of both standards by which student assessment and the awarding process is undertaken.

Quality improvement is made via feedback and the steps taken to make these improvements are accessible to all learners.

Respondent 2.

APL policy implemented to enable all Lead Teachers either hold the diploma or are awarded the diploma.

Respondent 4

Transparency of process: awarding the positions on the EWG.

Respondent 5

Holding a list of accredited providers and lead / experienced teachers.

An Internal Verifier panel will oversee the delivery of the qualification process

Respondent 7

APL policy implemented to enable all Lead Teachers either hold the diploma or are awarded the diploma.

Respondent 8

APL policy implemented to enable all Lead Teachers either hold the diploma or are awarded the diploma.

In response to the respondents concerns and an homogenisation of the conditions already in situ can produce a list of prerequisites to teaching.

### The Draft Education Policy

Constitution / Vision:

Underlying the framework is the principle that teachers should hold .....

“The PA is committed to providing a quality teaching resource; we are committed to working towards the delivery of high quality qualifications and educational services that promote environmental sustainability”.

### Who can teach?

Lead PDC teachers need to hold the diploma and have 2 years practical experience. The diploma may be achieved via graduating from the 72-hour PDC or have the diploma awarded via the APL pathway.

An activity / teaching portfolio / diary (for a period of two years) must be kept before taking on the role of lead teacher within a course (inclusive of time spent undertaking a PDC).

Lead teachers must hold the diploma to be able to award PDCs, they must be either listed on the accredited / experienced lead teachers or their course must be provided by an accredited course provider.

It's now mandatory to hold at least a PTLLS (Preparing to Teach in the Lifelong Learning Sector) qualification to teach a course that is funded in whole or in part from the public purse. Private paying attendees may be tutored by a lead teacher

A list of accredited / experienced lead teachers will be held by the PA.

A list of accredited course providers will be held by the PA

An Internal Verifier panel will oversee the delivery of the qualification process.

## **Exceptions or Accreditation of Prior Learning (APL):**

Teachers may apply to the assessment panel of the EWG for Lead Teacher status with evidence of their competence.

The candidates applying for APL criteria / exceptions should at least satisfy the criteria below:

1. Can the candidate demonstrate appropriate design competence? Provide E.g. 5 fully costed & implemented permaculture designs.
2. Does the candidate have experience of leading or supporting at least 5 similar/longer/higher level courses with a registered lead teacher?
3. Can the candidate provide evidence to support their APL application, E.G. schemes of work, lesson/session plans, handouts, student feedback/assessment.?
4. Can the candidate provide referee contacts?
5. Provide an extensive activity / teaching portfolio / diary (for a period of at least two years).

## **RESPONDENT 12**

There are some great responses in the 1st round of comments with some really well thought out solutions, eg the feedback forms etc.

I have a real concern over the view that there may be a small few benefiting from this system. As one who may be considered as one of these, it is hard not to take it personally after gifting years of dedication and hard work. The benefits I have gained are huge - a strong, communicative, co-operative, resilient, diverse celebratory network (finances have never been the motivation).

I am sure that these comments were not meant personally however and I would welcome any suggestions to strengthen the system so it is not that a small few could benefit. Others can put on teacher training courses, there must be other creative ways that individuals and groups can design greater diversity within the system.

As anything within permaculture it just comes down to designers coming up with creative solutions rather than simply identifying the problems. I would be happy to explore the options of democratising (is that the right word?) who teaches the teachers and who trains the tutors. Selection? Elections? Feedback from the wider

pc community? Please do come up with suggestions / designs / comments for this if you feel motivated to do so.

## **RESPONDENT 13**

I'm not persuaded that the teachers' register and the process for joining and 'gaining promotion' will meet the aim "to ensure... [the] levels and types of competence [that] are required". Most educational institutions would not appoint someone to teach accredited courses purely on the basis of qualifications, which the process would seem to allow.

A teachers' register could be open to anyone with a PDC and either experience or a qualification in teaching. That might create "... a network... open to anyone with an interest and passion in educating people about permaculture" (in any context, not just accredited courses). It's a personal and subjective response, but the use of 'rank' and 'promotion' doesn't feel very inclusive and welcoming to me.

Ensuring that accredited courses are delivered by people with appropriate subject knowledge and teaching skills feels like a separate design. Qualifications might be a start point, but my experience as a student is that the best qualified on paper don't necessarily make the best teachers in practice. My experience as a tutor in FE & HE is that qualifications would only be a pre-condition to getting a rigorous interview. There might be good reasons why the PAB doesn't want to go down that route, but there has to be something more than paper qualifications.

## **RESPONDENT 14**

Just had a chance to look through the draft policy doc and comments from the first batch of respondents.

Firstly thanks and well done for all the work you're putting in to this, I'm sure sure it will help develop the pc education system (well, it already has)

Good to have dissention - hope they're all listened too, though don't agree with some there are some gems there too. Except the Designed Visions-bashing....

The last respondent particularly had a lot of good points to make, though ultimately fails to address the issue of how to maintain quality assurance in an expanding, demand-driven movement.

Lead PDC teacher yes to diploma and having been through support/shadow/apprentice roles but I wouldn't make PTTLs obligatory - because if they want to teach supported courses they will need it anyway and won't be allowed to without. (I also know that PTTLs isn't essential to be able to teach a good PDC)

Would like to see something on having follow-up systems after a course - the Handbook missed it completely, let's not miss the chance again. If you need some suggestions let me know.

So I started this response a few days ago (Christmas distractions) and have since read [Respondent 12]'s email and agree (see above) that the points made are mainly valid and even cause for concern, though would not see the DV bashing as a reason to stand down as I think it's a very minority point of view compared with the hundreds of folk that have been through our courses, many of whom - in the case of ToTs - have gone on to teach cumulatively hundreds more. Is Darren D. "elitist" because he's lead RegenAg/Keyline to it's current status and has international credibility? Likewise DV - with a huge amount of often free/voluntary/low-paid devoted time - has inclusively lead ToT development and been a leader in PDC delivery and diploma/education development standing alongside PAB, EWG, etc., and if some (a real minority) people see that as elitist, should it change how we work and who we work with? So IMO I accept that the "elitist" viewpoint is there, and suggest that we endeavour a) to understand why it's there and b) to find a way of transparently and inclusively dealing with it, as unfortunately it probably won't go away by itself.

## **RESPONDENT 15**

Yes, there's a good point made about the idea of a more self-regulating system by respondent 1, but not sure some of the 'steps' suggested make total sense - especially when we already have an anonymous feedback loop post-pdc. That could work better though if the Association initiated the invitation to PDC graduates - one of the provisions of providing certs could be that the teacher always returns a list of graduates post-course that the PA could follow up with.

I agree that perhaps more emphasis could be put on the apprenticeship route to being a lead teacher. I certainly gained more I feel from going through this than the C&G7307, though the latter also added value. There's so much more to leading a PDC than just knowing the topics - a teacher has to be able to juggle many different roles & these are best learned I feel from apprenticing with more experienced teachers.

And on the subject of 'gaining' from the system, this has always in my experience been offered without payment to the lead teacher (though food & accommodation costs are usually involved).

## **RESPONDENT 16**

Having looked at the proposed policy and the comments from the first round I share concerns that the policy is too rigid and may be counter-productive. Whilst having a qualification at a higher level than that being taught can be considered a useful guiding principal I would make or re-iterate the following observations:

The ability to inspire and stimulate learning is arguably the most important quality of an educator (I know one very proficient ICT trainer who is very open about learning together with his students, of course he has background understanding and a lot of experience, but is not always familiar with the particular packages being used). Qualifications and teacher training are no guarantee of quality - the policy seems 'teacher' rather than 'learner' focussed

The insistence on qualifications includes those recently qualified with little experience but excludes those active in the field with many years experience

Sessional tutors with specific expertise (eg renewable energy, plant propagation) can make very valuable contributions to courses but may have little interest and/or experience of permaculture themselves, the

tutor integrating their expertise into the permaculture framework

There is only one route to many of the required qualifications restricting diversity (and enforcing conformity)

Overall the attempt to ensure quality is desirable, but perhaps greater discretion needs to be given to lead tutors about who supports their delivery and more emphasis on prior experience as alternatives to qualifications. The process needs to enable those able to create good learning environments to lead courses rather than create hurdles to jump through.

I have had very good experiences of peer observation and review with mainstream FE; would it be possible to devise a system where accreditation to teach was in part determined by a peer review, although there may be issues in maintaining objectivity and fairness in a peer process given the 'market' benefit of maintaining a scarce supply of teachers.

Hope you find this helpful.

## **RESPONDENT 17**

I love the Permaculture world because it is not structured as the traditional education system and it is open to all kinds of people.

I feel we are moving towards too much normalisation.

I think we need clarity, not regulation.

## RESPONDENT 18

Hope this is still useful and fits within your timeline for feedback.

The proposal of such strong formalisation and desire for accreditation of Permaculture as set out in this document concerns me and I fear may undermine the basis and strengths of Permaculture as a discipline.

I would be wary of becoming too formalised or tied into a system of accreditation. Unless everything that is taught from a one day course to a Diploma is standardised I think it is very difficult to achieve anyway, and will not necessarily bring any higher levels of consistency and quality assurance. Unless you go for a specific curriculum which I would hope you are trying to avoid. Accreditation will not necessarily bring the credibility we are striving for - the best way to do this is around advocacy and research, not over formalisation of Permaculture Learning in general.

I see Permaculture as a practice not an academic pursuit. More like yoga for example - a moral and ethical system that has a consistent basis but that is taught in different ways and appropriated differently by different practitioners, whilst maintaining a standard foundation. On this basis PTTTS would be similar to the training that yoga teachers do but training beyond that would not be compulsory - so long as the teacher remains an active practitioner in the field. I am concerned that over formalisation will kill the very essence that makes Permaculture exciting - its accessibility and fluidity.

Over formalisation of teachers is also tricky too - a teaching qualification does not make a good teacher! And should not be necessary to contribute to most Permaculture teaching. For examples of shared professional practice look to the cultural sector where practitioners frequently teach music, drama, art,,, etc... at degree level without teaching qualifications. It is about sharing exemplary practice and not learning by rote so within an agreed structure this feels entirely appropriate.

I think the key is a clear system by which teachers are all active permaculture practitioners, and that they clearly record and share the content of their courses. Maybe through peer-assessment and through PAB. A formal means of feedback for students would also add more clarity and consistency. In my view if you are working to a set foundation and recording what you are doing AND are an active Permaculture practitioner a PTLLS qualification is a nonsense.