

EWG consultation

Note from Ute: I thought it might be helpful to organise responses by 'categories'. There are, of course, many overlaps, but I hope this is helpful. Different points are not, as a result, in their context, but hopefully they still make sense. I have not, for the most part, indicated the frequency of different points, but many of the concerns were expressed by more than one respondent. Overall, similar points were expressed in all three rounds, and most respondents only seem to have participated once. Many participants must have taken quite a bit of time and care to formulate their thoughts, and I feel it is important that we take them seriously. I hope I have captured most of the points, but there is of course a lot more detail (and strength of feeling/personal involvement) in the responses themselves - I think it would be good if we all had another look at those in addition to this attempt at a summary.

The main tension seems to be one between valuing diversity, inclusion, openness and flexibility on the one hand, and clarity and transparency on procedures, qualifications and standards on the other hand. The key question, perhaps, is how we achieve both. In the process, it is important not to lose sight of permaculture ethics and principles (even though there seem to be some different interpretations of what these mean in relation to this policy)...

Concerns

a) Expressions of disagreement with the suggested policy

1. There is a sense that the intention and rationale for a change in policy has not been made explicit, and that this might, or could be perceived as being, driven by vested interests. As a result, questions are being raised about whether there is in fact a problem, and if so, what exactly this is. This also involves questions about existing monitoring systems and what, if any, problems these have picked up.
2. There is a concern over whether the new policy goes against (or could be seen to go against) permaculture principles (e.g. self-regulation, using and valuing diversity) rather than demonstrating that the Association is committed to putting them into practice in its own work.
3. There is a worry that the new policy might lead to division among UK permaculture teachers and practitioners, with potentially negative effects for the Association (people teaching outside its

framework, or even a potential split/new rival institution). This could also weaken the reputation of permaculture in the UK.

4. Another concern is that additional requirements for teachers to fulfil will make it harder/more expensive for people to start teaching, and be felt to be frustrating for people who have accepted one hurdle (diploma) and are now facing additional ones/changing goalposts (teaching qualification).
5. There's a worry that the new system will privilege 'academic'/professional teachers rather than active practitioners.
6. Putting a great emphasis on the diploma as a qualification that will enable people to teach could have problematic effects, particularly with regards to differentiating between different permaculture practitioners and introducing a 'hierarchy' that may not be warranted - e.g. people without the diploma but with significant experience might end up being seen as less 'qualified' than diploma-holders with relatively little experience (both in relation to teaching and permaculture practice).
7. Making it harder for people to become teachers (and the process of formalisation/professionalization more generally) undermines, rather than strengthens, the spread of permaculture - not least by increasing costs for potential teachers that are then likely to be passed on to students.
8. Paper qualifications are not a reliable indicator of someone's actual teaching competence or of good practice. The policy thus is unlikely to achieve the objective of quality assurance while at the same time creating unnecessary hurdles and/or divisions, and potentially decreasing diversity.
9. A number of respondents express worries about reducing diversity and thus undermining some of the strengths and resilience of the current range of PDCs on offer in the UK.
10. There are concerns that this is part of a process of normalisation/formalisation that mimics a problematic mainstream approach to education rather than encouraging creative alternatives to the mainstream.

b) **Concerns about the details of the new policy**

1. How would qualifications be monitored/checked, and what are the time/cost implications of this?
2. Need to allow enough lead-in time/notice period, to avoid difficulties with planning courses, esp. for people whose status may change.

Suggestions

a) **Alternatives to the suggested policy**

1. A transparent system of giving and receiving feedback on courses, teachers' qualifications and course content, in the spirit of 'using self-regulation and accepting feedback' and allowing flexible responses to problems that are identified through the system (as an alternative to centralised regulation).
2. Give greater emphasis to a peer review system.
3. If the issue is the requirements of government-supported courses, an alternative could be to create another course that meets those requirements rather than conflating it with PDCs.

b) **Suggested amendments to the policy**

1. There should be no exceptions to the requirement for PDC lead teachers to be diploma holders.
2. Lead teachers should be able to decide who else would contribute usefully to their PDCs (i.e. not requiring them to be enrolled for the Diploma).
3. Greater clarity on what is meant by 'accreditation' – there is potential for confusion between 'accredited by the Association' and OCN accreditation.
4. Consider 'honorary' diplomas to get around the problems of experienced teachers who don't hold a diploma.
5. Include some guidance about teaching specific skills that are relevant to permaculture (e.g. beekeeping, hedge-laying etc.).
6. Need for greater clarity about the status of qualifications awarded by other bodies/outside the UK, and the procedures for deciding this.
7. The Association's documentation in relation to OCN has a role of 'internal verifier' – this should be included in this policy, along with details about how to qualify for this role.
8. The Association might want to think about how to support independent teachers (i.e. those not in other educational institutions) in gaining government-approved teaching qualifications).
9. Make legislative requirements more explicit in the document.

10. The criteria to be met by 'exceptions'/APL should be equivalent to – and not lower or higher than – those required for PTLLS/diplomas.
11. Avoid over-complication/proliferation of forms/pathways.
12. There needs to be a clear and robust approach to accreditation of prior learning – at the moment, much valuable experience/expertise is not being used effectively.
13. Avoid being overly strict and excluding people with a range of different strengths/approaches – need for exceptions and flexibility.

Expressions of agreement with the suggested policy

1. Agreement with levels of qualification suggested in the policy.
2. Looks sensible overall. (x2)
3. Difficult to think of viable alternatives.
4. Clarity is helpful, and it is good that there is provision for exceptions.

Other questions/concerns/comments

1. How is the EWG constituted/appointed, who is it accountable to, and what are its members' qualifications?
2. In one respondent's view, it is not a problem if the Permaculture Association's criteria for teaching PDCs are different to those of other permaculture bodies, as long as the differences are made clear and transparent. This would also mean that including everyone teaching permaculture in the UK in the new proposed system is not necessarily a priority. Another respondent expressed the strong view that from the perspective of those who might end up being excluded/marginalised by the new policy, this stance makes life much more difficult and goes against an inclusive ethos.
3. PTLLS should be recommended to all potential teachers (possibly more so than ToT).
4. Tutor training is currently difficult to access, and this can be frustrating for people interested (not sure whether this refers to ToT or diploma tutor training). Several people express frustrations with the tutor training system, and there are some suggestions of making this easier by using more self-directed/distance learning/e-communication.

5. Should ToT be specifically mentioned/recommended in the policy? As one respondent points out, this is not itself regulated by the Association or another body, so might be an anomaly.
6. Student feedback is not necessarily a reliable indicator of course quality – need to be cautious about using this as an alternative to core curriculum and/or qualifications framework.
7. Alternative systems might be more costly than the current proposal.
8. The proposed core curriculum (version 1.6) does not look rigorous enough.
9. Consider E-learning/training opportunities for potential teachers/tutors, to enable people unable to pay for/attend face-to-face training.
10. It is important that the consultation isn't tokenistic but is taken seriously and able to make a difference.
11. There seems to be an assumption that those involved in formulating the policy are all diploma holders; this is something we as the EWG need to clarify...
12. The system as a whole needs to remain flexible and not become set in stone.
13. There is a need for humility and openness in working towards higher standards of permaculture education and practice.
14. It may not be necessary for each member of a teaching team to have all of the needed qualities/qualifications – combining different strengths is a valuable alternative approach (and an illustration of permaculture in action).