

A Review of the Draft Suite of National Occupational Standards for the Role of Yoga Teacher*

**occupational title to be confirmed*

health
yoga
education
standards

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Summary

The current system of 'Awarding Organisations' (AO's) for 'yoga teaching' has very serious drawbacks. The competition between awarding organisations is weak, so outcomes can sometimes be negative and have perverse effects.

Given two competing qualifications which are otherwise similar in scope and duration (for example, the ubiquitous, '200 hours'). If one is more demanding, employers will prefer the more demanding qualification, so students (and training providers) will resist the obvious incentive to prefer the 'easy' qualification.

But this does not happen in real life. Large employers, vastly outnumbered by micro-enterprises and the self-employed have little interest in keeping up-to-date on the precise value and assessment standards of every qualification that comes on to the market, so as provision increases AO's have extra incentives to produce more 'accessible' specifications to compete with the proposed NOS specification with content that is less intrinsically challenging to attract students, providers and maintain market share.

NOS anticipates a 'race to the bottom', with awarding organisations competing to offer less demanding qualifications that are as easy to teach and as easy to pass than has been the case without a NOS.

Providers will have every incentive to subvert assessment procedures and cut back on evaluation and monitoring, thus also subverting the aim of improving health and safety outcomes.¹

AO's are not in the best position to offer oversight of assessment procedures, or any expertise on the new demand for cultural competences.

SportEngland, SkillsActive and the sports coaching industry more generally do not understand 'the yoga industry' which straddles many sectors, including health and education.

There is an ongoing debate about the social inequality aspect to health, but *yoga* hasn't yet demonstrated any evidence of significant health benefits over the benefits of general exercise, so only general claims about relaxation and enhancing mood are accepted under current advertising standards in the UK.

Public Health England (PHE - an executive agency, sponsored by the Department of Health) takes 'an integrated approach to promoting health and

1 Simon Field and Pauline Musset, *A Skills beyond School Review of England*, OECD Reviews of Vocational Education and Training (OECD Publishing, 2013) <http://www.oecd-ilibrary.org/education/a-skills-beyond-school-review-of-england_9789264203594-en> [accessed 30 July 2017].

wellbeing' and 'work[s] with a range of partners to develop and implement robust, effective health programmes and to address the social factors that affect people's health'

Like the sports sector, PHE says the key elements of it's approach are 'skills development' as 'an important part of the modern economy'. The **National Workforce Development** and allied agenda's relating to protecting and improving the nation's health and wellbeing, and reducing health inequalities are seen as a legitimate government interest and the assumption is 'skills' provide confidence for people to get a job.

Progress on implementation within both health and education though has been slow despite decisions regarding the role of exercise and inactivity from PHE. Initiatives in healthcare fail to fully understand the *non-specific (or 'holistic')* nature of the practice, relying on self-reported scales of pain management which are too subjective to ascend the clinical evidence hierarchies used by the **National Institute for Health and Care Excellence (NICE)**, an *executive non-departmental public body* of the **Department of Health**

There is *much ado* about the prospect of doctors recommending yoga on a professional level, and although many might be happy to recommend a yoga teacher by word of mouth, in a personal capacity as part of their own social network, handing out a prescription for yoga seems a long way off because of the inherent difficulties in obtaining high quality clinical evidence.

When combined, the spectacular redundancy and parochial quality of this proposal suggests the main rationale might be to make good the problematic database entry for the role of 'yoga teacher' at the **Register of Exercise Professionals (REPs)**, which has never been based on NOS as promised and isn't well-known among most people interested in *yoga*.

Some organizations may develop products on this proposal, but it has lacked the calibre to attract widespread support. The requirement for *Standards Setting Organizations (SSO's)* is to develop standards that support skills and competences that will map on to *Vocational Education and Training (VET)* products. This work is based on the **United Nations** 'family of classifications' and mediated through the UK's own *Standard Industrial Classification (SIC)* and the *Standard Occupational Classification Standard (SOC)*.

Today, yoga still languishes in a class of sporting activities including **baseball**, **cheerleading** and **swimming**.

Under the UN system, nearly two hundred governments around the world, including many downstream non-executive agencies are classifying their data collection, statistical analysis, policy, standards and qualifications design work, and deforming peoples working lives assuming the resemblance between *yoga* and cricket is accurate.

The consultation has been largely ignored by almost everyone sharing an interest in *yoga* in the home nations, while at times attracting fierce criticism from thousands of sole-traders, freelancers and professionals working in partnership that wish to teach.

The NOS statement by *SkillsActive* ignores the *bureaucratic* bias towards form filling and box ticking, an activity which for most *yoga* teachers will feel out of place in the original context.

Therefore, the NOS proposal is widely regarded in the community as a particularly egregious kind of ***continuity error***.

In 2016 the ***United Nations*** own ***Educational, Scientific and Cultural Organization, (UNESCO)*** inscribed *yoga* on the ***Representative List of the Intangible Cultural Heritage of Humanity*** to better represent the many different traditions and paths *yoga* has taken over thousands of years.

The UNESCO decision has come too late to have any effect on this proposal, and it may be many years before *yoga* is given a comfortable seat at the table of standards setting bodies. For the time being, in all the most powerful places around the world, *yoga* is recognized either as a type of sports coaching, or as a recreational pursuit involving physical activity.

The magnitude of the ***UNESCO*** decision has at least made visible a hitherto hidden fissure in the global and national systems of standards.

Introduction

This review is about the draft *suite of National Occupational Standards (NOS)* for the role of *Yoga Teacher* for consultation purposes.

National Occupational Standards are benchmarks of performance, not regulation.

We would like to emphasise that it is not the practice of yoga and its many approaches and philosophies that are being sought to be standardised.

The NOS review will only cover the teaching of yoga.

Likewise, it is appreciated that we are all individuals and this process should not be seen as trying to turn out teachers who are regimented in their teaching methods, delivery and approaches.

The process aims to be transparent and accessible, recognising and respecting the diversity of backgrounds, culture and traditions of practising yoga.

The NOS development process is to be focused on the teaching of yoga, which has no religious bias, goal or aim, thereby promoting yoga in an inclusive way that is open to all religions and not confined to one.

- SkillsActive, 2016/17

The difficulty is that many are unorganized and, unlike traditional professional groups, are more likely to depend on the state framing legislation [...] or on voluntary arrangements developed by employers.

In such a situation, it is likely that minimum standards of competency would form the basis for regulation, rather than high levels of skill and improving pay. In countries like the USA and UK, lack of institutional support for collective bargaining and the absence of workers' voice within the skills system make progress much harder.²

Vocational training in England started with the medieval system of guilds, which controlled apprentice training and regulated the entry to trades. This lasted from the twelfth century until the passing of the Statute of Artificers in 1563, during the reign of Elizabeth I;

2 Caroline Lloyd and Jonathan Payne, 'Licensed to Skill? The Impact of Occupational Regulation on Fitness Instructors', *European Journal of Industrial Relations*, 2017, 95968011770101 <<https://doi.org/10.1177/0959680117701016>>.

Traces still remain of the guild-dominated crafts; for example the main London guilds helped found the City and Guilds of London Institute in 1878, and the Worshipful Company of Goldsmiths is today assisting the British Jewellers Association in formulating vocational qualifications for the industry.

It is no longer possible to make clear distinctions about the differences between education and training, in the 1960s and 1970s there was greater clarity, because the industrial training system had no responsibilities for school education and virtually none in relation to university and polytechnic degree and post-graduate provision.

The only substantial overlap was with the further education sector, and even there the boundaries were reasonably clear.

During the 1980s there was a considerable blurring of these boundaries. While the Department of Education and Science in England (and its counterparts in the other areas of the UK) remained responsible in legislative terms for schools, colleges and institutions of higher education, Department of Employment programmes funded developments in all the educational sectors. The boundaries of these sectors is also changing, with redefinitions of Further Education and Higher Education.

Although vocational and 'academic' qualifications are being brought closer together, it is still possible to use the generic term 'vocational education and training' and to navigate through the system by defining responsibilities for policy, implementation and funding

Is there such a thing as a vocational training system?

Strictly speaking the answer is “no”, in that a system assumes a clear set of objectives and a logical and coherent framework for policy making and execution to achieve them. In reality, vocational training, sandwiched between the education system and the demands of the labour market, caught between the different and varying social, economic, and political priorities of political parties and the social partners, and in the conflicts between different ministries and public powers, at national regional, and local level, does not in any of the Community Member States demonstrate the characteristics of a system.

Twining, 'Vocational Education and Training in the United Kingdom. (European Centre for Development of Vocational Training)

I've often returned to the advice given to me by a former director, back when I was still relatively inexperienced in the vocational

qualifications world; she told me that if I stuck around in education long enough I'd see policy initiatives repeating themselves. And, a decade later, I can confirm she was right. This doesn't have to be the case: we have evidence and we can learn..³

In October 2004 *Paul Fox*, now Chair of the **British Wheel of Yoga (BWY)** wrote about the **Register of Exercise Professionals (REPs)** in an article in *Yoga Magazine*:

...some yoga teachers with the 'wrong' qualifications, [and] the developments that are already underway in the UK could lead to them being out of a job.

Since then, the online database built on *NOS*, the **Register of Exercise Professionals (REPs)** has been sold and is now itself under threat from an alternative in the form of a **Sport England** backed scheme from the **Chartered Institute for the Management of Sport and Physical Activity (CIMSPA)**

A CIMSPA spokesperson told *Sports Management* magazine that while the organisation "cannot state" that the registers will merge, it was not an option it would rule out.

They added that CIMSPA had entered into "early discussions" with Sports Coach UK (now UK Coaching) about "simplifying the landscape for the best needs of the sector".

Following [the] acquisition of REPs, the former chief executive Mark Gannon told *Sports Management* that the organisation was "working closely" with CIMSPA.

"I actually think there's an opportunity here," he said. "We're in dialogue with CIMSPA on a number of fronts, including trying to find some clarity in the system so that everybody knows where they fit in.

"That's ongoing because we have a really positive relationship with CIMSPA."

Last April, Sport England revealed its intention to support CIMSPA – the Chartered Institute for the Management of Sport and Physical Activity – after the body was endorsed by the government's Sporting Future strategy.

3 Gemma Gathercole, 'Frontier Economics Is Right: The T-Level Tender Approach Is Not Viable', *FE Week*, 2017 <<http://feweek.co.uk/2017/07/20/frontier-economics-is-right-the-t-level-tender-approach-is-not-viable/>> [accessed 30 July 2017].

The possibility of the two organisations merging their registers of employers in the sport and fitness sector would be welcomed by many in the industry.⁴

Meanwhile...

Standards and quality assurance organisation PD Approval has been awarded a contract to provide endorsement services for the Register of Exercise Professionals (REPs), Sports Coach UK has announced.

Sports Coach UK acquired REPs in January and vowed to work with an independent endorsement provider to ensure services met high-quality standards. The deal with PD Approval means recognised courses run by REPs will be endorsed by an independent organisation with a thorough verification process.

As and when professional standards, recently developed by CIMSPA, become embedded REPs will align to these.

Sports Coach UK said: “With these developments just the beginning of the changes at REPs, it is clear the organisation is following up on its promise to return the register’s integrity and reputation as the leading independent public register of exercise professionals.”⁵

PD Approval are somewhat of an obscure enterprise with very little in the way of public disclosures available that provides details about it’s legal or trading status. A brief search of the domain name registry added to the mystery of the beneficial ownership of the outfit:

Registrant Contact
Name: Identity Protection Service
Organization: Identity Protect Limited
Mailing Address: PO Box 795, Godalming Surrey GU7 9GA GB

While rival certification providers like *Yoga Alliance* in the US claim registrations are increasing, according to Mr. Fox the BWY’s membership ‘peaked in 2008’. Since then the group has suffered a number of significant set backs in its efforts to deliver qualifications under the subsidiary, *British Wheel of Yoga Qualifications Ltd* not least because of serious internal management issues at the group, no doubt complicated further by the withdrawal of qualifications frameworks such as *QCF* by qualifications regulator, *OfQual*

4 ‘Update: “No Plans” to Merge REPs Register with CIMSPA Directory, Says Sports Coach UK | Sports Management’ <<http://www.sportsmanagement.co.uk/Sports-news/latest/CIMSPA-REPs-Sport-England-/329927>> [accessed 31 July 2017].

5 ‘Sport Coach UK Takes Steps to Raise Standards at REPs | Sports Management’ <<http://www.sportsmanagement.co.uk/Sports-news/latest/Courses-training/331001>> [accessed 31 July 2017].

REPs was once being touted as the most important form of regulation for yoga teachers, but this has since turned out to be wrong because NOS in most employment sectors has failed to live up to expectations and the situation could hardly be more different to what was predicted in 2004. The message from Mr. Fox to *non-BWY* affiliated teacher training providers remains as bellicose as ever:

*If Paul had the power to go into training institutions around the county he said he would likely close 75% of them down.*⁶

As more people enjoy the benefits of yoga as a hobby, the teacher-training arena as a result is growing and many course providers are jumping on this popularity offering a variety of training courses:

*The number of people applying to the BWY three-year course is flat lining though. According to Paul, it's the shorter, less-vigorous, cheaper courses, which are mopping up the increasing appetite for teacher training.*⁷

SkillsActive was commissioned by the **BWY** to develop this *NOS suite* for the role of *yoga teacher* with a small amount of initial funding of up to £20,000 in 2016. On a less optimistic note, former *SkillsActive* CEO *Ian Taylor* resigned about six months before the proposal was announced, already having informed a **Commons Select Committee on Education** in 2015 about fractures opening up in the governments skills and competency based agenda with *SkillsActive's* experiences with the *Trailblazer (Apprenticeship)* process:

"We are very employer-led and, through our Trailblazer, we engaged with 323 employers. Unfortunately, the process managed to disenfranchise and disenchant them [...] because there was a constant change of direction. The guidelines that were issued were then changed and they were told that funding was not part of the Trailblazer process, but then it was introduced halfway through. We had employers walking away and saying, "We won't be bothered with this."

SkillsActive is a group companies with three subsidiary companies including **HABIA** (hair and beauty) and the **National Skills Academy for Sports and Active Leisure**.

There is talk of establishing a new **Institute for Apprenticeships (IfA)** where NOS may be transferred to another public sector organisation.

6 Anna Lisinski, 'The Truth behind Becoming a Yoga Teacher', 22 June 2015, section Lifestyle <<http://www.telegraph.co.uk/lifestyle/wellbeing/11691964/The-truth-behind-becoming-a-yoga-teacher.html>> [accessed 30 July 2017].

7 Lisinski.

One commissioner from the **UK Commission for Employment and Skills, (UKCES)** suggested the government may be bypassing NOS in the development of "Trailblazer apprenticeship standards." and CIMSPA may use NOS for 'Trailblazer apprenticeships' or configure it's own 'to avoid being tarred with the same brush as SkillsActive'.

The original idea of the skills agenda in Britain was a reasonably holistic idea of 'competence', but NOS in practice has been more restrictive, leading to criticisms of a 'lowest common denominator' standard inadequate for higher level roles.

NOS have evolved over time but have been widely criticised in the *Wolf Report, Department for Education and Department for Business, Innovation and Skills, (2011)*, the *Richard Review of Apprenticeships, School for Startups, (2012)* and more recently the *Independent Panel on Technical Education* chaired by Lord Sainsbury reported to government in the Summer of 2016 with findings that **there is little incentive for Awarding Organizations to [...] meet the requirements of industry because employers find it difficult to navigate the system and to remain up to date on the value of competing qualifications. This, coupled with the lack of accountability to ensure qualifications meet employers' needs can lead to competition enabling a race to the bottom rather than improving outcomes.**⁸

The very many changes in the rules for approving vocational qualifications have now broken the direct link between NOS and qualifications in England. A more direct, 'employer-led' approach was introduced in 2015 led by organizations like **The Chartered Institute for the Management of Sport and Physical Activity (CIMSPA)** who are planning to roll out their own professional development programmes for fitness professionals with £250M backing from **SportEngland**.

REPs uses the taxonomic label of 'yoga teacher' and has been claiming to offer, **'[...]a system of regulation for instructors and trainers to ensure that they meet the health and fitness industry's agreed National Occupational Standards.'** for many years, thus misleading everyone.

An effort to reform NOS was carried out by the body with overall responsibility for them, **UKCES** but this was overtaken by the removal of government support for NOS in England along with the Commission itself being wound up in 2016. The current outlook for NOS is that they will remain in use where there is support for

8 Frontier Economics, *Assessing the Vocational Qualifications Market in England* (Department for Education, July 2017).

them from the relevant industries, but in sectors where there is little employer interest they are likely to become largely redundant.⁹

Business in Brief

No review of vocational standards would be complete without visiting the economic context for them.

One item of bad news for the sports industry is that Chancellor Philip Hammond recently confirmed that sport and physical activity will be **omitted** from the 15 core employment pathways as part of the new *Post-16 Skills Plan* for vocational and technical education recommended by the *Sainsbury Review*.

According to SkillsActive, several ‘aspects’ drove the initial development of the suite for ‘yoga teacher’. One was ‘confusion of insurance providers regarding the standards for Yoga practice and what could be insured’. However, the following open letter from a member of the insurance industry suggests insurance provision is a straightforward matter:

I can confirm that there is no insurance issue with understanding the principles of Yoga or the qualification (by experience or certification) of those who teach it.

After an analysis of the ‘level of risk’ presented by yogis and yoginis to insurers there were just two areas that we looked at twice. One was hot yoga where there have been some incidents. The other was mindfulness which can produce very unpleasant reactions in some. After some considerable deliberation, we have elected to levy the same premium for those practices as we do for all others under the name “yoga”.

Generally speaking, we are now more interested in “who provides the teacher’s training”. For those who are approved by the IYN, for example, we will provide insurance without question whilst those who have BWY certification may be looked at more carefully. Perhaps more importantly, we will happily provide insurance to those with no certification but suitable evidence of experience.

It might also be worthwhile noting that the claims presented to us bear little correlation to certification or qualification.

1. One of our most experienced yogis was accused of misapplying pressure causing injury. This appears to be an ambulance chasing event.

⁹ Stan Lester and others, “‘Competence’ and Occupational Standards: Observations from Six European Countries”, *Education+ Training*, 59.2 (2017), 201–214.

2. The most common claim is caused by slips and trips.

It might also be worth pointing out that, very often, yoga is only one of the activities practised, enjoyed, performed and taught by yogis. When we provide insurance we include massage, reiki, herbalism, nutrition, personal training and anything else they tell us about. A [NOS] in yoga would offer no help to us in judging the capability of our client in any area. It would only tell us they have had to spend some money on getting that certificate.

In terms of insurance, it would be of no benefit to them or us.

Nick Elwell, BGi.uk, a trading style of H J Roelofs (UK) Ltd.

On the aspect of *'confusion from training providers regarding the correct qualification required by the sector'*, NOS is designed to have little effect on the number of rival teacher training products available. It is intended to have an opposite (positive) effect: increasing provision by improving competition, driving up quality and improving choice for learners.

On the *'need for standards that set a minimum level of experience/skills that ensure safe practice in teaching yoga, preventing the risk of injury to participants'* NOS is not a form of statutory or voluntary regulation in itself, so is not designed to ensure safe practice, or prevent the risk of injury to participants.

On the contrary, there is some evidence of a **positive** correlation between registrations based on credentialling and 'yoga-related injuries'¹⁰, casting doubt on the claim that even products based on NOS will have the desired outcome for a problem which, when compared to the volume and type of injuries found in mainstream sports, is both quantitatively and qualitatively trivial.

The *'request for consistency of standards for teaching yoga across the UK to provide a clear benchmark for entry on to REPs'* relates to the selling off of REPs by SkillsActive to a UK Charity called UK Coaching (formerly Sports Coach UK), a trading name of THE NATIONAL COACHING FOUNDATION as a result in changes to Sport England's funding strategy. This resulted in what industry insiders described as a 'bun fight' between SkillsActive and CIMSPA.

REPs has been using the taxonomic label of 'yoga teacher' while claiming to offer, ***'[...]a system of regulation for instructors and trainers to ensure that they meet the health and fitness industry's agreed National Occupational Standards.'*** thus misleading everyone over many years.

10 'Yoga-Related Injuries: The American Experience | BioCarta' <<https://docs.yuj.it/m8/yoga-injuries-american-experience>> [accessed 4 August 2017].

In the future, entry to REPs is likely to be managed by UK Coaching.

The ‘request from the sector to set a benchmark for the teaching of Yoga’ is related to the sixteen large leisure and fitness franchises which appear to have turned against *SkillsActive*. All are co-signatories to a letter sent to *SportEngland* urging the organization to support a new system run by *CIMSPA*. Identifying ‘the sector’ for this aspect would therefore seem to be the outgrowth of the recent funding reforms where employer-designed standards like the *Apprenticeship Standard for Personal Trainer (Level 3)* may replace frameworks like NOS.

The sixteen employers involved in creating the standard for *personal trainer* were:

<i>David Lloyd Leisure</i>	<i>ESPH</i>	<i>Everyone Active</i>	<i>Fitness First</i>
<i>Greenwich Leisure Ltd</i>	<i>Hilton</i>	<i>Jubilee Hall Trust</i>	<i>Nottingham City Council</i>
<i>Nuffield Health</i>	<i>Parkwood Leisure</i>	<i>Places for People Leisure</i>	<i>Virgin Active</i>
<i>LA Fitness</i>	<i>1610 Leisure Trust</i>	<i>1Life</i>	<i>Fitness Express</i>

The ‘Level 3’ credential for *yoga* is touted by some members of the *BWY* as a potential entry route into the *NHS* and G P’s surgeries based on unconfirmed claims that the *Department of Health* has gestured in some way that in order for GP referrals to go ahead, a level 3 qualifications would be required. Even if this claim can be verified, the reality is the *NHS* commissioning process and legislative context are complex, so a lot more work would need to be done to achieve that aim. A proposal from *SkillsActive* would, in any case be unlikely to match the NOS and related qualifications already developed by other *SSC*’s, such as *SkillsforHealth* and *Skills for Care*, who have wide-ranging diplomas ‘with built-in flexibility to suit all fields of health and social care’. These are the main qualifications required by the *Quality Care Commission in England* and the *Care Councils* in Wales and Northern Ireland.

The Consultation

The consultation process for this proposal has been dogged by historical rivalries between competing yoga teacher training interests and confusion about standards and yoga more widely, and NOS in particular.

One of the biggest problems has been inadequate engagement from the large commercial fitness chains and from the more informal, self-employed sole traders that make up the largest section of economically productive practitioners.

This weakness is evident at the top of the consultation, with the composition of the main ‘*Steering Group*’ as well as the ‘*Expert Working Group*’ (*EWG*) being

dominated by the BWY, and lower down in the regional '*Focus Groups*' where attendance has been close to zero.

This situation is particularly unhelpful since the kind of engagement needed in the construction of effective standards and qualifications is critical, and '*assistance from those out in the sector*' is needed by SkillsActive to: '*shape these NOS projects and ensure that they reflect best working practices*'. This hasn't happened.

From the wide variety of stakeholders available in the UK, almost everyone chose not to engage with the NOS development process, and it is only one awarding organisation and its affiliates, (the BWY) who are prepared to defend the proposal (and its initial investment) commissioning the initial proposal.

The BWY spends more time than any talking to, and attempting to satisfy the requirements of *Ofqual*, the *SSC's* like *SkillsActive* and others while few know the BWY has not met *SportEngland's recognition criteria for National Governing Body*, a term that has in the past always been mistaken as a prestigious measure of the quality of the NGB's training programs and an indicator of the pre-eminence of the organization. Only until very recently has the SportEngland logo been dropped from the BWY's online promotions.

Ofqual's interaction with the subsidiary '*British Wheel of Yoga Qualifications Ltd.*', a subsidiary set up in 2009 at a meeting dominated by '*BWY Diploma Course Teachers*' was not open to public inspection, but the result has been perennial commercial failure, for a few reasons.

Meanwhile large numbers of self-employed teachers and the various organisations they are affiliated with have to deal with the problems caused by decisions made in secretive meetings between the BWY and other organizations leading to persistent problems of low esteem and mistrust within a community of interest that lies outside the BWY's own control and influence.

In theory, there is competition with qualifications, but the market is not fully competitive, because of the critical importance of market reputation and the high upfront costs linked to the development of new qualifications.

The awarding organisations operate as a mixture of *monopolists* (i.e. very similar products, potentially differentiated by non-price considerations) and *oligopolists* (few suppliers with high barriers to entry).¹¹

11 Field and Musset.

Developing a fit for purpose skills system carries the same assumptions as market-led policy-making more generally in that it depends on groups, not isolated individuals. Concerted, secret planning makes self-employed people feel unwelcome even though the ratio of self-employed to employed in *yoga* teaching is possibly as high as 9:1.

The general, negative perception of the proposal is among the self-employed who don't see NOS as an opportunity. They feel as if they are having something enforced upon them. The community doesn't feel the sports, recreation and active well-being sector has a sense of obligation to do anything to improve their occupational prospects and is doing nothing except threatening to put them out of work.

The Problems of Functional Analysis

The problems with adhering strictly to a functional analysis within an occupational domain are due to a process known as '*disaggregation*'. The literature identifies at least five major weaknesses of any functional analysis, but the most relevant one for this proposal is:

[...] weaknesses in its ability to represent occupations which are characterised by a high degree of uncertainty, unpredictability and discretion, and its arguable tendency – contrary to the aims of the model on which it is based to atomise work roles rather than represent them holistically

Lester, 'Management standards: a critical approach'

Thus, it is argued that standards tend to fragment[...] into constituent elements rather than representing it as an integrated whole. Whilst this simplification and objectification is one of the main attractions of the competency approach, what is represented is far removed from the actual reality

Grugulis, 'The Consequences of Competence: a critical assessment of the Management NVQ'

Dividing and **separating** functions is not recognized by many senior yoga teachers as being either necessary or desirable when evaluating yoga teaching practice, in fact the ultimate goal of *yoga* is most commonly understood not as 'splitting apart' but something more akin to 'union'.

Who is the ‘Yoga Teacher’?

The particular set of tasks or duties to be carried out varies widely depending on the terms of the relationship between the people involved. For example, if it is part of a subscription provided by a commercial leisure franchise, or as part of the activities of a religious community. Such work intersects so many occupational domains that defining an occupational title presents a challenge for development.

While many individuals offering a service to the public prefer to use the word ‘teacher’, other words used are ‘instructor’, ‘trainer’, ‘therapist’, ‘practitioner’, ‘educator’ and ‘professional’.

Within the structure of the classification¹² for the role of ‘yoga teacher’, knowledge provided via general education including basic literacy, numeracy and knowledge of appropriate health and safety regulations is usually expected, along with a body of knowledge associated with a period of post-compulsory education, but not necessarily to degree level.

The job of ‘Yoga Teacher’ is not directly referenced in *SOC2010*, but the word ‘yoga’ is listed in class 3443, FITNESS INSTRUCTORS:

Fitness instructors deliver training in a range of fitness activities, including weight training, yoga, pilates, personal training and other forms of exercise at private health and fitness centres, local authority run sports and leisure centres, other public and community establishments, and in private homes. There are no formal academic requirements. Entrants must, however, possess coaching qualifications recognised by the appropriate governing body. Applicants to coaching courses must normally be over 18 years old and hold a first-aid certificate. Background checks including a CRB check are required for those working with children.

The **Regulated Qualifications Framework (RQF)** system provides a single, simple system for cataloguing all qualifications and it replaced the **Qualifications and Credit Framework (QCF)**, and the **National Qualifications Framework (NQF)** in October 2015.

The RQF system is new and is expected to change over time making the information provided by *SOC2010* indicative only.

Jobs are recognised primarily by the associated job title and are classified into groups according to the concept of ‘**skill level**’ and ‘**skill specialisation**’. Within

12 Office for National Statistics (ONS) current standard occupational classification for the UK, (*SOC2010*)

the context of the classification, jobs are classified in terms of their **skill level** and **skill content**.

Trying to understand the *socio-economic class* for the provisionally title of 'yoga teacher', the most relevant question might be to ask:

'What do you mainly do in your job?'

Of the five major groups, most accurate description at the top-level, broad definition of occupation for the role is likely to be: *'Small employers and own account workers'*.

(A Lack) Of Knowledge and Understanding

SkillsActive like to say: "**we** don't write the standards, **you** write the standards".

This might be true, but people perceive both sides of that equation being the same entity, because it is based on contractual agreements between SkillsActive, the BWY and UK Coaching (formerly Sports Coach UK).

The proposal is founded on, and shaped by a knowledge requirement of a minimum of five out of eight areas that make up the 'core knowledge'.

There is a however a growing demand to acknowledge the vocabulary of cultural heritage to avoid the problems of the misrepresentation or non-representation of faith interests within the kind of functional competence model SkillsActive are committed to. This is evident from the public comments many teachers have made about the tendency to 'take' and not 'give anything back', which hardly touches on the long history of tokenistic gestures towards faith interests that the sports and recreational interest doesn't seem to 'get', and occasionally antagonizes.

The messaging in development meetings is 'yoga is not only religious', thereby allowing for a panoply of religious and irreligious worldviews, which is commendable.

However, just as one example - the references to what is being called the 'philosophy and fundamentals of yoga' do not use any of the diacritics found in *Sanskrit* or any translations either in *Hindi* or in *Devanagari* scripts for example, thus making the concepts vulnerable to being loaned indefinitely to the modern (English) lexicon.

Secondly, the list of eight concepts used does not map on to any enumerative definitions found in any Indic literature, potentially diluting the cultural heritage of

India as was recently inscribed on the *Intangible Cultural Heritage of Humanity* by India at UNESCO.

In particular, while the concepts of 'relaxation' and 'bandhas' do exist for many people, neither one seems to relate very closely to the broader Indian traditions while the specification for the role of yoga teacher only dictates a requirement to know a 'minimum of 5', thus disrupting the holistic assumptions underpinning such procedural knowledge.

When taken in the round, the subject knowledge requirements seem to suggest that Indian cultural heritage is to be seen as something as an optional gimmick in the role of the yoga teacher and not the central importance it has historically always had.

In sum, it seems as though as it stands there is some degree of complicity in the *Steering Group* and *Expert Working Group* in the way the religious/non-religious implications have been either misinterpreted or reinterpreted as 'yoga is not religious', which is hardly in the spirit of fully acknowledging cultural heritage in standard setting for *yoga* in Britain.

The proposal under review denies *yoga* (proper) an accurate public image and instead presents an image of vocational sports and recreational training.

For industries and its partners, stakeholders to come together to provide support in developing solutions to the challenges would require a culture change in standards setting that admits the mistakes of the past and is committed to change by obtaining accurate data through the *Standard Industrial Classification (SIC)* system that is meant to help *Standards Setting organizations (SSO's)* properly classify the provision of activities.

While *yoga* has featured in the *United National Industrial Standards of International Classifications (ISIC)* since around 1980's, collecting reliable statistical data, designing standards and drawing inferences from those systems, or systems based on those systems has been based on:

[...]sports instruction (baseball, basketball, cricket, football, etc.); cheerleading instruction; gymnastics instruction; riding instruction; swimming instruction; professional sports instructors, teachers, coaches; martial arts instruction and card game instruction (such as bridge).

The *United Nations Statistics Division* states it's current position as follows:

In general ISIC follows a narrow definition of sport and the Expert Group on International Statistical Classifications has earlier ruled to classify yoga as a recreational activity. Yoga is classified in ISIC in two different places depending on whether the activity consists mainly of teaching or practising yoga: Units that organise yoga as a recreational activity are classified in 9329 (Other amusement and recreation activities n.e.c.) ; Units whose principal activity is yoga education are classified within Education in 8541 (Sports and recreation education). Please note that this has to be specialised, structured education. Simply acquiring yoga skills while doing it would not meet these criteria.

Studying the profile of occupations within the *Office for National Statistics for Great Britain (ONS)* also presents a similar picture since yoga is listed in **Class 3443 FITNESS INSTRUCTORS:**

Fitness instructors deliver training in a range of fitness activities, including weight training, yoga, pilates, personal training and other forms of exercise at private health and fitness centres, local authority run sports and leisure centres, other public and community establishments, and in private homes.

Great Britain, Office for National Statistics, Great Britain, and Government Statistical Service, Standard Occupational Classification 2010

The promise of delivering economic advantages in classifying and standardizing yoga under the self-styled UN classification systems has brought with it problems for many practitioners who do not want their practices accredited, standardized or regulated in the same way sports coaches or fitness, gym or aerobics instructors are, and even less do they welcome pressure to submit to the auspices of a *Standard Setting Organisation* for the *active leisure and learning sector* in partnership with a *sport governing body*.

The critical category errors in the classification of the activities means reliable data is not available, so all policy work, standards setting and qualifications design and provision for yoga is also unreliable, and therefore not influential.

The problem with defining competences within a particular occupational domain is that many practices may well look the same to an untrained eye but may not be comparable in terms of goals or aims. For example, the purposes and outcomes valuable to large employers such as increased productivity and reduced absence are not always the same as the purposes and outcomes many people practising yoga are interested in delivering through teaching.

The functions a person may be expected to perform working in a large fitness franchise hardly resemble the functions a person may be expected to perform in a Hindu temple or Buddhist monastery for example and so it is very hard to identify the standards that need to be met and the knowledge required.

To get a sense of the functional perspective for *yoga* the *2016 Yoga in America Study (Yoga Journal and Yoga Alliance)* stated: '*the top five reasons for starting [yoga] are: flexibility (61 percent); stress relief (56 percent); general fitness (49 percent); improve overall health (49 percent) and physical fitness (44 percent)*'

Under this proposal, a high price has already been paid in terms of the many other legitimate goals and aims, and judging by the astonishing lack of support and animated criticisms, the price looks as though it is too high for most people.

The only other related standards setting organisations are *SkillsforHealth* who have developed a NOS for *Delivering Yoga Therapy to Clients*. A number of autonomous education and training providers exist but they do not carry the status of *recognised professional bodies*.

Meanwhile, there is no prospect of any statutory professional regulation for teaching *yoga*.

Good *yoga* teachers, (or more accurately perhaps, 'good *yoga* teaching') is, for the most part selected by word of mouth recommendation, trial and error, intuition and very rarely (if at all) by qualifications.

Participants in the consultation might be made up of a disproportionate number of people who work on an employed, fixed salary basis who might be expected to struggle in understanding the unique concerns of *yoga* teachers whose self-employed work or unpaid volunteering is far more informal and precarious.

Teaching *yoga* in the lexicon of this proposal means '*sports coaching*'. The sports hall, fitness studio or gymnasium is the primary location for a Sports Coach, and yet most *yoga* teachers work in a variety of diverse locations including temples, monasteries, retreat centres, health spas, community centres or at their own, or in their clients homes or place of work.

Yoga teachers can't get promoted and their achievements aren't easily measured, least of all by the judgement of an upline manager relying on an externally designed benchmarking system rather than her own experience.

Yoga teachers are intrinsically and totally connected to their own practice and there is no book of sporting rules or officials in yoga, so subjecting a yoga teacher to the same standards as a Sports Coach misses the real occupational demand.

If NOS is only going to be relevant to a narrow range of people engaged in providing a highly reduced set of sports coaching functions, and the scope of functional analysis reflects that and covers only that much narrower area of work, this also suggests limiting the name of the role to a narrow occupation title too, for example, '*British Wheel of Yoga Teacher*' since '*yoga teacher*' implies a much closer connection to the culture of Asia.

The mental model of 'sport' introduces the prospect of yoga becoming an Olympic sport. The Olympics entails ideas of physical elitism, public spectacle, national politics and "winning" in competitions. Sports competition and training may be harmful structurally and biologically to the human body in many cases.

Whereas yoga has no rule book, no referees, and no umpires, sports competitors may consider the risks and rewards of pushing the human body to its absolute limit acceptable, but for yoga teachers, their livelihood, their students well-being and the reputation of yoga as a relatively safe and healthy practice it all makes the association with sport a very worrying concern for them.

Due to both the (actual) category errors and the (perceived) continuity errors contained in this proposal, the types of occupations yoga teaching is compared with hardly resemble the work many yoga teachers are doing today.

The unsolved problem of industrial classification means it's exceptionally difficult to identify any links between the occupation and the sector or between sectors or the occupation with other occupations.

Yoga has been dropped into the same basket of activities as Baseball and Cheerleading, infuriating anyone that either identifies with the broad, established Indic cultural backdrop, or wishes for proper attribution based on philosophical and cultural development.

The proposal has had far more success in comparing *yoga* to activities like synchronized swimming than it has to *sāṃkhya*¹³ based on a haphazard construction of an extremely narrow range of competences borrowed from physical fitness training.

The scope of the NOS cannot be stabilized sufficiently to allow the key purpose of the NOS to be accurately described and sufficiently described.

13 *Sāṃkhya* and *Yoga* are traditionally regarded as major schools of Indian philosophy.

This means any qualifications and job descriptions will not be free from practical bias and unfair discrimination against individuals that identify with particular cultural goods both in the shape and content of the model and in the proposed consultation.

In the narrow, sports coaching case, the full potential to drive enterprise, create jobs and lead to sustainable economic growth is critically compromised by the need to drastically reduce the set of functions and benefits covered.

The fullest range of functions and purposes can only be admitted properly by incorporating, and fully acknowledging (with attribution) Indic literature.

The problems about observing the characteristics and extent of participation in *yoga* are broad and complex. The tension binding *yoga* to specific functional perspectives isn't helped by 'reverse engineering' the practice within VET, and even less the sports coaching and active recreation industry.

Large numbers of people are being encouraged to 'teach' very soon after having first gained an interest in yoga, and legitimacy to "teach" since the mid-nineteen-eighties has been officially bound to political and social recognition within the global, sports and recreation education industry rather than anything else.

Under *UK SIC*, VET explicitly **excludes** the main facet with the best chance of rehabilitating '*yoga teaching*' towards a more unified, culturally aware, sensitive and competent practice: ***Class 85.52 cultural education.***

If instruction is to be classed under the broad, top-level classification of 'education' at all, the design, development and distribution of standards based on a ready-made alternate to *sport* could represent yoga more accurately:

...formally organized instruction, mainly for hobby, recreational or self-development purposes... This class includes: music instruction, art instruction, dance instruction and dance studios, drama schools, fine arts schools, performing arts schools...

Class 85.52: Cultural education includes ***instruction in "schools", "studios", "classes" etc.*** and recognizes yoga is a **non-competitive activity which lacks both rules and officials.**

The result would be a remarkable uplift concerning the perennial 'problem' of reconciling culture and traditions; pedagogy and modernizing.

The politics of sport would have little influence on future development as it does today and an awareness of the inter-cultural dimensions of human wisdom would triumph not only in Britain, but around the world.

Information science critically impacts the ways in which people practice, develop and disseminate ideas about yoga, and so we need to get the information science right.

If the cultural heritage of India ought not to be brought into service to promote industrial notions of "keep fit" in the way most contemporary yoga teacher training organizations are currently configured to operate; standards are proposed; and policy work is developed then modifying the dual classification of sports/recreation in the *UN family of classifications* is the first step to take because **no economically active practitioner is able to refuse the UN system.**