



<b>To:</b>	Executive Te Huarahi	HI25/120 11 September 2025
<b>From:</b>	Kathleen Kaveney, Advisory Officer	



# PPTA submission on the proposal to replace NCEA

Attached is the PPTA submission to the consultation on the proposal to replace NCEA.



# Submission

To Ministry of Education on the  
Proposal to replace NCEA

## About PPTA Te Wehengarua

PPTA Te Wehengarua represents the majority of teachers engaged in secondary education in New Zealand, including secondary teachers, principals, and manual and technology teachers.

Under our constitution, all PPTA Te Wehengarua activity is guided by the following objectives:

- to advance the cause of education generally and of all phases of secondary and technical education in particular;
- to uphold and maintain the just claims of its members individually and collectively; and
- to affirm and advance Te Tiriti o Waitangi.

This submission is from the PPTA Te Wehengarua Executive and is on behalf of all of our members.

## Introduction

*“Our national qualification needs to recognise diverse pathways, from academic to vocational, and support holistic success.”* PPTA member, 2025

Qualifications are important to life outcomes. Leaving school with a qualification leads to better life outcomes, so ensuring Aotearoa New Zealand’s qualifications work well is essential for the success of our young people.<sup>1</sup> Papers on qualifications have been presented at PPTA conferences almost annually since 1991, demonstrating the significance of qualifications issues in teachers’ lives.

PPTA has a longstanding position of welcoming thoughtful and coherent change. Change becomes a problem for teachers only when it is not thoughtful and coherent. The two tests for change always need to be whether it is justified by the evidence and implemented properly. In many cases, these two tests are not met.

PPTA acknowledges the principles established by the PPTA-commissioned report, Te Tiro Hou, on the Qualifications Framework Inquiry<sup>2</sup>, asserting that an educationally valid qualifications system must be:

- Fair – ensuring equitable access and outcomes for all learners.
- Inclusive – responsive to diverse learning needs, backgrounds, and pathways, especially for Māori and Pasifika students.
- Cumulative – allowing students to build on prior learning in meaningful ways.
- Clear – with transparent standards, expectations, and assessment criteria.
- Motivating – encouraging engagement, aspiration, and achievement.
- Coherent – aligned across curriculum, pedagogy, and assessment.
- Constructive – supporting learning and development rather than punitive measures.
- Manageable – feasible for schools, teachers, and students to implement and sustain.

Furthermore, these criteria were reaffirmed and supplemented in 2020 by the Ministry of Education’s (MOE) Five Principles of the National Certificate of Achievement (NCEA) Review, an agreed-upon, multi-partisan agenda: Wellbeing, Inclusion and Equity, Coherence, Pathways, and Credibility.<sup>3</sup> These were the result of widespread consultation and were endorsed by the PPTA. The Inclusion and Equity principle is of particular importance to our members:

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<sup>1</sup> [Set up to succeed: How well is NCEA Level 1 working for our schools and students?](#)

<sup>2</sup> [Te Tiro Hou - report of the Qualifications Framework Inquiry](#)

<sup>3</sup> [What is the NCEA Change Programme | NCEA](#)

- Ensuring fair access and outcomes for all learners
- Recognising diverse identities, languages, and cultures

### The current system

*“Why are we talking about throwing out the baby with the bathwater?”* PPTA member, 2025

*“I am concerned with the negativity about NCEA - young people hear and react, lots of young people have done well with NCEA, lots of students have stayed at school longer as a result of its flexibility.”* Head of Pathways. 2025

NCEA is an indigenous qualification designed and relevant to all in Aotearoa New Zealand. It meets the diverse needs of students and focuses on the strengths of young people. NCEA celebrates what is unique about New Zealand, embracing Māori culture and its strengths.

For many teachers and parents, helping young people find and follow a purpose in life is what education is all about. NCEA is a qualification that enables more young people to discover and pursue a purpose that holds meaning for them.

Despite the recent rhetoric, NCEA is a high-quality qualification on par with other available qualifications, recognised and accepted here and internationally. It is an inclusive qualification — it allows young people to follow their areas of interest. It includes different types of assessments that work for more young people than simply exams.

There has been much commentary on the proposed change, and there is undoubtedly a variety of differing opinions within the PPTA membership. There is certainly a strong voice from those in favour of the proposal to move away from NCEA.<sup>4</sup> We have also heard the “call for an immediate stop to the proposal to replace NCEA” from a significant number of principals.<sup>5</sup> Deerness (2025) suggests influential NZ schools hastened the demise of NCEA and proposes that “it’s worth remembering the loudest voices calling for educational change don’t always represent what all students need.”<sup>6</sup>

PPTA considers that the real problem with our national qualification is the inconsistency of policies for children and young people’s education. The solution lies in increased collaboration and resources to ensure our strengths-based and flexible NCEA system continues to function effectively.

### The issue of flexibility

*“Not everyone is the same, so why remove flexibility?”* PPTA member, 2025

PPTA accepts that teaching and assessment must be flexible to provide each young person with what they need. NCEA is a multi-field qualification; the content is not prescribed, only the level and the number of credits. It is a more inclusive qualification, providing multiple pathways for students with different learning preferences and abilities, rather than a one-size-fits-all approach.<sup>7</sup> PPTA members value its ability to cater to a more diverse population.

Schools have worked hard to devise course offerings that meet the needs of their communities, and a wide range of achievements have been recognised on learners’ Records of Achievement by the NCEA. PPTA is concerned that the government’s proposals represent an overcorrection from the flexibility of the current system, and that it would disadvantage students.

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<sup>4</sup> [Press Statement: Government’s NCEA reforms vindicate decade of education research | NZInitiative](#)

<sup>5</sup> [Principals urge halt to NCEA change plans | RNZ News](#)

<sup>6</sup> [The Cambridge factor: how influential NZ schools hastened the demise of NCEA](#)

<sup>7</sup> [https://en.wikipedia.org/wiki/GCE\\_Ordinary\\_Level\\_%28United\\_Kingdom%29](https://en.wikipedia.org/wiki/GCE_Ordinary_Level_%28United_Kingdom%29)

The proposal is a move to lockstep by year and level. This is a fundamental shift away from the current reality, yet this is not acknowledged in the discussion paper at all. For many, the proposed new qualification pathway has retrospective elements; the return of high-stakes assessment, a preference for external assessment, a return to grading by percentage, limited subject choice, and more ‘must-haves’ to attain the qualification.

PPTA considers that we need to be cautious to avoid moving backwards. School Certificate lacked flexibility in terms of subject choices and assessment methods, which did not cater to the diverse needs and interests of all students.<sup>8</sup> The new proposal appears to be advocating for methods and systems that we already know do not work for all.

The current system allows for creative development of courses to meet learner and community needs and interests. This flexibility for learners has been used to create a more engaging curriculum, which supports neurodivergent ākonga, who are *‘more likely to learn if information is presented to them in a range of ways that play to their strengths and interests.’*<sup>9</sup>

Designing courses based around themes or interests, including in a cross-curricular model (incorporating elements of several ‘subjects’ and assessment standards), can also support teachers who are neurodivergent themselves. These highly skilled teachers have been able to use their strengths of creativity<sup>10</sup>, and innovation<sup>11</sup> as well as specialist subject knowledge (including from special interests) and pattern recognition<sup>12</sup> to develop engaging courses for their students.

NCEA has provided opportunities for neurodivergent ākonga to *‘develop and exercise personal agency (choice and control)’*<sup>13</sup>. Developing agency is one of the five key themes for supporting neurodivergent students, as identified in the Mirfin-Veitch et al. literature review, undertaken in 2020 as part of the Learning Support Action Plan.<sup>14</sup>

For decades, teachers have had the flexibility to design meaningful programmes at the local level and have them recognised within the NCEA. Now, the Government wants to take over and decide what’s acceptable and ‘approved’. PPTA knows that teachers value their autonomy in planning the teaching and learning that is suitable for their young people. Reduced flexibility means reduced agency and authority for schools, and PPTA does not see this as constructive or motivating.

PPTA considers that there is a strong commitment within the sector to maintaining flexibility and ensuring equitable access in our national qualification for Māori, Pasifika, ELL, EAL, neurodiverse, and disadvantaged learners. PPTA members reject a ‘one-size-fits-all’ approach and do not agree with a more prescribed national qualification that reduces the ability of schools to meet the needs of their community.

## Consistency - more consistency in how we assess students

*“Consistency in internals/ will we lose task creation, which enables teachers to localise and personalise?”*

Senior Leader, 2025

<sup>8</sup> [Save-our-schools-solutions-for-new-zealands-education-crisis/](#)

<sup>9</sup> [FINAL-EDITED-VERSION-Donald-Beasley-Institute-Integrative-Literature-Review-Neurodiversity-020420](#)

<sup>10</sup> <https://doi.org/10.1177/1087054717727352> - Creativity in ADHD

<sup>11</sup> M. Majeed, Nadyanna & Hartanto, Andree & Tan, Jacinth. (2021). Developmental dyslexia and creativity: A meta-analysis. *Dyslexia*. 27. 10.1002/dys.1677.

<sup>12</sup> <http://doi.org/10.1098/rstb.2008.0337> - Talent in autism

<sup>13</sup> [FINAL-EDITED-VERSION-Donald-Beasley-Institute-Integrative-Literature-Review-Neurodiversity-020420](#)

<sup>14</sup> [FINAL-EDITED-VERSION-Donald-Beasley-Institute-Integrative-Literature-Review-Neurodiversity-020420](#)

For many people, we want education to spark young people’s curiosity and imagination. We want their educational experience to foster a sense of their worth as people in our communities. PPTA considers that the proposal to change our national qualification, with its emphasis on structure and prescription, puts this at risk.

Within the current system, some areas have caused teachers' frustration for many years, for example:

- Teachers have consistently raised concerns with over-assessment and the heavy demands of moderation.
- The failure to address the lack of credit parity has been an issue of frustration for teachers and students, and this is an area where consistency could be improved.
- The notional rule for the Framework, that one credit should represent ten hours of learning and assessment time, including independent learning by the student, has not consistently been applied. Teachers believe that the application of this rule in the development and approval of standards has been far from stringent and could be improved.

Consistency in assessing learners’ knowledge and skills could be improved by addressing the valid concerns of teachers. The proposal documentation admits that “It can be difficult to find balance between coherence, consistency, and flexibility when it comes to designing a qualification.”<sup>15</sup>

Future study, training, or employment are important educational outcomes for young people; however, education contributes to social cohesion, creativity, and wisdom in a society. There is a balance between consistency and prescription, and PPTA is not convinced that this proposal has the required balance.

### **Proposal: Working with industry to develop better vocational pathways so students are getting the skills relevant to certain career pathways.**

*“Who decides the vocational subjects?”* PPTA member, 2025

*“The VET has been announced as a new thing, but it is already happening”* – HOD Hospitality, 2025

A great education ensures that people have numerous options throughout life, and learning is integrated into the ways we work and connect. The purpose of education is to implant the ability to learn throughout life. Education is more than employment.

PPTA members, particularly those who are Careers and Transition educators, would agree with Johnson’s (2025) argument that there is a significant disparity of esteem between industry training and university education.<sup>16</sup> However, they have provided feedback indicating that they do not believe the proposal to integrate Vocational Education and Training (VET) subjects into the qualification system adequately addresses the disparity. There are too many unanswered questions.

Addressing the disparity in esteem between vocational and academic pathways was one of the original aims of NQF/NCEA. The fact that this has not been achieved more than 20 years later points to the complexity. This aspect of the proposal is lacking in detail, making it difficult to envision how well it could work. There are questions to be answered: What are the details? What is going to happen to the work that has already been done? Who decides on the subjects? When do we determine that a student’s future is fixed? Do we want to turn out electricians from school? What is the place of a broad and general education?

Our members are concerned about:

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<sup>15</sup> [Discussion Document: Proposal to replace NCEA with new national qualifications](#)

<sup>16</sup> [Trade Routes: Charting New Pathways from Secondary School to Industry Training | NZInitiative](#)

- The Industry Standards Boards (ISBs) – fewer resources, different roles, and more subjects to manage.
- The development process for VET subjects and how schools will be involved or consulted.
- Accessibility to meaningful workplace learning and experience - with equitable access a must.
- Transforming the competence-based skills standards, which require learners to be able to demonstrate competence more than once, into a 100-point/ letter grade.
- The appropriateness of a global percentage/grade.
- Costs for schools

A major concern for members is the lack of understanding by the MOE about how these subjects currently run and how they will 'fit' into the proposed certificate. Teachers struggle to see how the current industry standards they assess against can fit into a 100-point/ letter grade. This will mean developing a new set of assessments that fit this model for use in schools, which means they are no longer teaching an industry-aligned course. There are already 'school' courses with achievement standards that fill this need, such as Food Technology or Hard Materials Technology, so why would we make up a new version of Hospitality and Construction?

The change proposal states that “the first thing we want to do to improve qualifications is work with industries to bring VET subjects into the qualification system.”<sup>17</sup> This is confusing, as we know this is already happening. PPTA members want assurance that the quality work already underway will not be scrapped to undertake different or additional work in this area.

Principal members have questioned what UE will look like if students do a mix of VET and academic subjects. They also ask if qualifications are tied to industry needs, could they become irrelevant as technology and work shift, and whether the division between “academic” and “vocational” is valid, given that all pathways ultimately lead to employment.

The Government says it understands that funding investment is needed to ensure VET learning is a success; however, the proposed reduction in funding to the ISBs compared to that of the WDCs they’ll replace does not engender confidence in our members. PPTA believes that significant additional funding investment is required for VET to work as well as it should across the motu.

The change proposal emphasises that one's place of residence should not determine the quality of an education and qualification. Young people can therefore expect VET programmes to have the same accessibility, options, resources, and experience from wherever they reside in the country.

The practical and/ or operational implications that need to be considered for schools to successfully deliver VET subjects are:

- Equitable access to trained specialist teachers of VET
- Equitable access to materials and plant to run VET programmes in schools
- Equitable access to partnership opportunities with tertiary providers
- Equitable access to workplace learning and experience across the country
- Equitable access to VET for students with diverse learning needs
- Appropriate pathways for all students.

PPTA considers that there needs to be a lot of thinking, work, and meaningful consultation before we can have confidence that the proposed changes will address the disparity of esteem and ensure that students have access to comprehensive, meaningful access to Vocational Education and Training (VET) subjects/ pathways.

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<sup>17</sup> [Consultation on proposal to replace NCEA - Ministry of Education](#)

## Proposal: Removing NCEA Level 1, requiring students to take English and Maths at Year 11, and sit a foundation award (test) in numeracy and literacy.

*“There is still a lot of confusion since the announcement of the proposed changes. Feelings are generally positive toward the change; however, the devil will be in the details. There is also some caution that the great parts of the NCEA assessment process should be retained, and there are hopes that this will be heard.”*

Principal member, 2025

*“The criticisms of the old NCEA level 1 were being addressed through the new NCEA level 1 – it hasn’t been allowed to embed.”* Senior leader, 2025

### Removing Level 1

PPTA has established, over the years, a considerable body of evolving policy about NCEA. In 2018, PPTA’s submission to the Ministry’s ‘NCEA review - Big Opportunities’ highlighted that it was essential to remember that no school was required to offer all levels of NCEA, and asked whether all three certificates were still necessary, given the emphasis being placed on achieving Level 2.

PPTA’s viewed the removal of the Level 1 qualification altogether as a positive option,<sup>18</sup> and considered that removing the Level 1 qualification would give teachers the space to develop more innovative Year 11 courses of the kind they are currently free to provide in Years 9 and 10.

### The foundation award (test) in numeracy and literacy

*“More focus on maths, CAAs – if level 1 goes, what is a foundational qualification?”* Senior leader, 2025

Ours is a unique place in the world. For many people, Māori culture and strengths are part of what makes our country distinctive. We need a national qualification that is educationally valid and reflects Aotearoa, New Zealand. It should ensure fair access and outcomes for all learners, and should recognise diverse identities, languages, and cultures—particularly mātauranga Māori and te reo Māori.

One of the implications of this proposal, identified in the government’s documentation, is the likely drop in results, “especially for students who are already disproportionately reflected in lower achievement results.”<sup>19</sup>

This means that our students with ‘less advantage’, predominantly Māori and Pasifika learners, and students with diverse learning needs, will struggle to achieve success with the proposed new qualification.

The Ministry claims that “the curriculum changes will go some way towards making sure there is a smooth transition between NCEA and the new qualifications, but it is unlikely that this will entirely prevent a drop in the achievement rate. Extra support will need to be provided for these groups to manage this risk.”<sup>20</sup> PPTA does not trust that the curriculum changes will meet the needs of these students and is certainly unconvinced that suitable resourcing and support will be available to meet student needs.

Wylie’s research on the Tomorrow’s School reform found that “schools in low socio-economic areas and with high Māori enrolment were likely to have gained least from the reforms and may even have gone backwards.”<sup>21</sup> PPTA has concerns that the current proposal will have the same outcome, and does not support educational reform that fails to meet the needs of all learners.

<sup>18</sup> <https://www.ppta.org.nz/publication-library/ppta-submissions/document/706>

<sup>19</sup> [Discussion Document: Proposal to replace NCEA with new national qualifications](#)

<sup>20</sup> [Discussion Document: Proposal to replace NCEA with new national qualifications](#)

<sup>21</sup> [Impact of education reforms | New Zealand Council for Educational Research](#)

PPTA's Te Huarahi Māori Motuhake is very clear on the importance of Te Tiriti o Waitangi and the need to protect and promote learning opportunities for Māori, Pasifika, and neurodiverse learners. This commitment is not reflected in the change proposal. Our members want a qualification that balances rigour with equity.

PPTA is not convinced that replacing the current co-requisite as a standalone award, with the literacy and numeracy test acting as a pre-requisite for higher qualifications, is fair or inclusive. We note the intention to increase the difficulty over time.

For many, the Common Assessment Activities (CAAs) are seen as inequitable, disproportionately affecting Māori, Pasifika, ELL, EAL, and neurodiverse learners. There are also concerns with its validity and societal relevance. The new proposal is very likely to exacerbate this inequity.

PPTA acknowledges strong calls for and against allowing students to pass NCEA Level 1 with or without the co-requisite (CAA) and believes that the same issue will arise with the proposed foundational award. There are concerns that the foundational award, inclusive of the literacy and numeracy test, will be an unachievable barrier for some students.

Currently, failing the co-requisite (CAA) prevents students from achieving NCEA entirely, despite success in other standards. The change proposal continues this and will mean that students who do not achieve the foundational qualification will fail, even if they achieve Year 12 and Year 13 qualifications.

The enforcement of prerequisites will narrow student choice, and it is certainly not clear what happens to students who fail to meet the 'strengthened' requirements – do they end up repeating a year or leaving with nothing? Members are also concerned that making English and Mathematics compulsory at Year 11 effectively narrows the options for students, leaving limited choice for their other subjects.

### **Other possible barriers**

PPTA members value an education system that enables young people to flourish. and members do not want to see barriers to success.

### **Attendance**

The change proposal suggests that requiring a certain level of student attendance to attain a national qualification could be a requirement. PPTA considers this would be an unacceptable barrier and strongly rejects any notion of tying attendance to academic attainment.

Principal members point out that in many cases a student's lack of attendance is not the fault of the student themselves. Attendance levels are not a fair metric of future capacity; there are many cases of students with immense potential who nevertheless may not meet prescribed attendance requirements.

### **An overemphasis on external assessment.**

*"One of the ways that neurodivergent learners have been able to exercise their agency is by prioritising internal over external assessments."* Teacher, 2025

The government has indicated that externally assessed components will be compulsory in every subject. This position is based on the unfounded assumption that exams are more dependable than other forms of assessment. Exams are undoubtedly quite successful in evaluating how well learners cope with exams. In this way, they tend to favour learners from more advantaged backgrounds.

Neurodivergent learners will not be advantaged by an increase in external assessments. NCEA has supported neurodivergent students to choose assessment contexts that allow for increased accommodations and reduced stress. This is not a consideration in the change proposal.

The Minister’s Discussion Document suggests that a combined score across internal and external assessments would lead to a *‘fair assessment of a student’*<sup>22</sup>. Members have expressed concern that the shift back towards external assessments, especially those held in high-stakes exam settings, will negatively impact neurodivergent learners. Many neurodivergent learners have additional sensory needs and may struggle to demonstrate their learning under exam conditions, even for those who have access to Special Assessment Conditions (SACs).

The UDL framework includes providing multiple ways of expressing knowledge, offering supports and tools and emphasises the importance of formative feedback<sup>23</sup>. *‘When environments are intentionally designed to reduce barriers, every learner can engage in rigorous, meaningful learning.’*<sup>24</sup> External exams do not provide opportunities for timely and specific feedback for students, who are often left waiting months to know the outcome and without any real sense of how to improve.

Other groups of young people are likely to be disadvantaged by ‘strongly incentivising participation in external assessments where these are offered.’<sup>25</sup> PPTA has concerns about English language learners (ELLs) potentially being sidelined by this proposal. The change proposal will certainly be a success for some, but as Wenmouth (2025) points “the question is not only what works? but who does it work for, and who does it hurt?”<sup>26</sup> PPTA does not accept the need for winners and losers in this proposal.

PPTA does not want to see a return to all external assessment, or even a majority of external assessment for a subject. Principal members do not believe that making external assessment compulsory is in the best interests of those for whom the education system is already challenging. Members see a risk in the increased desire for externals, completed in a subject-based course, leading to scaling to manage results across schools. PPTA has no wish to see schools compared by their exam results.

### **Proposal: A subject-based approach - requiring students to take five subjects and pass at least four to attain each certificate.**

*“Is this a real consultation? What does the Minister mean by meaningful learning, courses, or subjects? Cross-curricula going out the window?” Senior leader, 2025*

NCEA is a responsive system designed to meet the diverse needs of young people. The proposal for change in our national qualification is a move back to a one-size-fits-all approach, which PPTA knows will not suit the needs of all students.

The proposal that learners have to “take five subjects and achieve at least four” to be granted the Level 2 and Level 3 certificates is a rationing of success. This is what abandoning School Certificate and the other ranking devices was intended to overcome.

This proposal is a significant change in philosophy from qualifications recording achievement to rewarding a much smaller, often more advantaged group. Every parent wants their children to succeed. This system will reduce achievement in our most disadvantaged communities, and this is not fair or inclusive.

Members are concerned that the Minister’s desire to return to a more rigid subject list, based around a focus on *‘whole subjects’* and *‘less flexibility in the design of individual learning programmes’*<sup>27</sup> will lead to reduced engagement and support for neurodivergent learners and teachers. They point out that a shift to ‘whole’

<sup>22</sup> [Discussion Document: Proposal to replace NCEA with new national qualifications](#)

<sup>23</sup> [Design options for expression and communication | Inclusive Education](#)

<sup>24</sup> [The Goal of UDL: Learner Agency | CAST UDL Guidelines](#)

<sup>25</sup> [Discussion Document: Proposal to replace NCEA with new national qualifications](#)

<sup>26</sup> [Success for Whom? And at What Cost? – FUTUREMAKERS](#)

<sup>27</sup> [Discussion Document: Proposal to replace NCEA with new national qualifications](#)

subject grading out of 100 will not highlight neurodivergent learners' individual areas of strength. It would not make it clear to a future employer or tertiary education provider whether a low grade was due to a lack of learning/understanding, or due to the barriers created by an increased emphasis on exam performance.

Our members have many questions - can multi-level study still happen with the proposed subject approach, especially in the 'lockstep' environment mentioned earlier? What happens to those students who do not achieve Level 2 or Level 3 but do get parts of the subject? What will the impact be on wharekura and kura a iwi where flexibility in learning programmes are an important part of the approach of the school?

There are many innovative schools with cross-curricular programmes, and a subject-based approach appears to put these in jeopardy. No evidence is presented to explain why the proposed approach is preferable to a cross-curricular one.

PPTA members point out that the shift toward a "knowledge-rich" curriculum is at odds with research showing skills (e.g., adaptability, digital capability) are becoming more valuable in the age of AI. It is unclear how 'future-proof' this proposal will be.

### Proposal: A grading change - Marking out of 100 with grades A, B, C, D, E.

*"NCEA needed changes, and we would agree to assist this. Losing Level 1 is OK, but the big surprise is Level 2 and 3. The grandstanding in the announcements - a new qualification, 100 points, A-E grades, what hogwash."* Principal, 2025

PPTA rejects the premise that marking out of 100 with grades A, B, C, D, E is 'easier to understand.' Most teachers, young people, and their parents have no trouble understanding the current levels of achievement in NCEA. The suggested grading is certainly regressive, taking us back to the School Certificate days of our grandparents. This is neither necessary nor desirable.

The grading system is a return to the clunky past – for example, the proposal documentation gives us the example of Sam, who passes History with 50% (C) and fails Geography with 46% (D). Many would argue that both results are the same if we account for the margin of error; however, one is a pass and one is a fail. This is not fair.

PPTA is concerned that this is a reversion to a way of thinking that meant if individuals were second-language learners, less comfortable in a school environment, disabled, or neurodivergent, as examples, they were set up for failure. This is not inclusive.

There are questions of coherence with the proposal to change the approach to common standards. A standard, however, clearly expresses what an individual must know or be able to do. Assessment against the standard identifies whether the individual knows it or can do it. By contrast, the proposal to report learner outcomes by a 100-point scale leaves it to the general public to interpret what (say) 72 marks means. This is not very clear.

Regardless of the government's stated intention not to change the approach, the use of a 100-point scale is a concern. This is a fundamental part of the proposal that there is not enough information on, so we cannot say that the proposed change is clear, or how constructive the feedback to learners of this system will be.

An underlying philosophy of a standards-based qualification regime is that achievement is recognised, and every student is provided the opportunity to succeed. A strength of the NCEA is that it can encourage creativity and individual expression and formally recognise diverse experiences. The proposed change does not appear to value this.

## Proposal – Two new qualifications - Replacing NCEA Levels 2 and 3 with two new qualifications (The NZ Certificate of Education at Year 12 and the NZ Advanced Certificate of Education at Year 13).

*“Allow young minds to accelerate. Don't hold them back. Year 11s could do level 2 and 3 work.”* PPTA member, 2025

*“Too much of a jump from one level to the next, we need better flow from 1-2-3.”* PPTA member, 2025

NCEA needs adjustments and changes to keep it relevant — the seven key changes to NCEA are still appropriate and should be adopted.<sup>28</sup> Thousands of people across the country took part in the 2018 Review, providing feedback, with an overwhelming majority favouring changes to strengthen NCEA.

Young people do better when our education system focuses on their strengths. In 2025, however, the focus has shifted to strengthening the curriculum. The curriculum is being rewritten into subjects, but this work has not been completed or embedded, and so it is concerning that such a big jump is being announced for assessment. PPTA members are concerned to ensure that learning across the levels remains connected and that there is alignment between the levels.

PPTA notes the proposed name change for the national qualification and is unconvinced that this is necessary. The proposal is for a list of required subjects to contribute to the NZCE/ NZACE and for a number of vocational 'subjects' to be included on the approved subjects list. There are concerns here of fairness (who decides what makes the list) and coherence in the alignment of vocational and academic pathways.

The disappearance of subjects has caused alarm - subjects that keep young people engaged, for example, outdoor education or pest control. Members rightfully ask - who decides the subject list and what are the criteria? What is the review process?

The proposal document advises that “54% of Year 12 students who achieved NCEA Level 2 did so with three or more full subjects (defined as 14+ credits per subject). For Year 13 students at Level 3, this was 65%.”<sup>29</sup> PPTA questions why the proposal would require 4/5 to achieve the qualification, why not three? Do we even need an overall number of subjects to be passed?

### The timeline

*“NCEA - ‘devil in the detail’, pace is concerning”* Principal, 2025

*“Teachers are straining under change fatigue as well as uncertainty moving forward with curriculum refresh continuing, and the schools are continuing with NCEA Level 1.”* Principal, 2025

PPTA knows that the sector is overwhelmed with change and that reform fatigue is real. PPTA is concerned to ensure that any further changes to our national qualification are delivered as the Minister has stated, *“The key for us is to make sure that we're giving schools lots of advance warning, lots of time, lots of information so that they know that they can plan, and they know what's coming.”*<sup>30</sup>

PPTA members, including principals, consistently ask for time. Time isn't just a resource - it's a prerequisite for trust, stability, and success. There needs to be time given to planning course design, understanding curriculum changes, and unpacking new standards. Teachers need space to learn, adapt, and collaborate. Time is necessary for clear, consistent, and early communication from NZQA and MoE with the sector. There

<sup>28</sup> [What is the NCEA Change Programme | NCEA](#)

<sup>29</sup> [Consultation on proposal to replace NCEA - Ministry of Education](#)

<sup>30</sup> [2025 shaping up as a big year in education](#)

certainly needs to be time to ensure communication with learners, whānau, employers, and tertiary providers is sound.

The lack of detail makes the timeline problematic, as the sector needs answers before it can give authentic and appropriate feedback. The current timeline, for example, is 2028 for the Foundational Award. There is no detail on the preparation of materials over the next two years. There appears to be no time for co-creation, capacity building, and piloting, all of which take significant time.

The public has been told that “the new qualification will be underpinned by a new national curriculum for Years 9-13 that will clearly outline what students need to learn in each subject and when, providing more consistency.”<sup>31</sup> It is advisable to ensure the curriculum is completed before contemplating changes to the national qualifications.

### Funding the system - Aside from additional funding, what further changes or resources would you or your school need for you to deliver the new qualifications?

**“Whatever we end up doing, [it needs to be] very well communicated, very well staged and very well resourced.”** Minister for Education, 2025

**“Where is the acknowledgement that the rollout of 2024’s new NCEA Level 1 was appalling?”** Head of Department, 2025

Teachers enjoy supporting young people, modelling thinking and curiosity, and drawing out their strengths. They do this best when they have time and the right resources to support them. Young people and teachers have experienced significant and continued change, and ERO’s recent report confirmed that the implementation of changes has been poor.<sup>32</sup>

PPTA knows that our national qualification, NCEA, needs stability and proper resourcing so young people can get the best from their teachers. The system needs well-thought-out adaptations and changes to keep it stable so that our students don’t suffer, and teachers don’t burn out. PPTA agrees with Minister Stanford that any proposal to make changes to the education system needs to be **“very well-resourced”**.

PPTA notes that the proposal feedback consistently repeats the statement *‘aside from additional funding.’* This is confusing as it implies additional funding will be needed/ available; however, this is not stated in the documentation. PPTA unequivocally states that additional funding will be needed for any changes to be successful.

Teachers persistently provide feedback that they need:

- More time before implementation.
- Clarification before the rollout of any changes.
- Timely, targeted resources that are aligned to changes.
- Complete curriculum documents aligned with assessment before implementation.
- Exemplars - assessment exemplars, task templates, and model student work.
- Resources for managing assessment requirements, especially for the Principal’s Nominee (PN).
- Centralised assessments (particularly for externals or high-stakes internals).
- Resources that reflect diverse pathways and cultural perspectives, including mātauranga Māori and vocational contexts.

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<sup>31</sup> [Replacing NCEA to transform secondary education | Beehive.govt.nz](#)

<sup>32</sup> [Set up to succeed: How well is NCEA Level 1 working for our schools and students?](#)

- Better PLD, which covers the realignment of the standards, is timely and comes before teaching the standard.
- PLD around moderation, available across a year and face-to-face.
- Online platforms for secure, accessible assessment and moderation.
- Clear frameworks for integrating AI equitably.
- Pathways for students with lower levels of literacy, ELL, EAL, and neurodivergent students.

Principals want and need:

- Centralised, digital tools (e.g., moderation platforms, assessment platforms)
- Funding for school-chosen resources
- Funded, in-depth PLD for all staff (especially middle leaders and those without subject associations)
  - Ongoing, regional and online support hubs or hui
  - PLD on student pathways, culturally responsive practice, and AI
  - Adequate staffing to backfill during PLD time.

Any further changes to the national qualification should not be left to principals and teachers to front. There is a need for strategies to rebuild public trust and protect the qualification’s reputation.

### Other - Is there anything else you wish to add about these proposals?

#### Review process

*“We cannot rely on hope or assumptions. Te Tiriti principles must be clearly visible and applied every day.”* PPTA Māori vice-president

*“Who is representing the high equity index voice?”* PPTA member, 2025.

PPTA urges the government to engage in policies and practices with regard to modifications and changes to NCEA that are evidence-informed, collaborative, and appropriately resourced and beneficial for all students.

All qualifications need to be regularly reviewed and adjusted to make sure they include a wide range of knowledge and work for young people, the people teaching them, and broader society. PPTA wants to see a robust, collaborative, and transparent process of developing the resulting review programme, as well as true collaboration around what the changes should be.

In 2025, we need to ensure there is rigorous research to guarantee that the proposed changes lead to improvements in student learning. We need to clearly understand:

- What are the aims of the proposed educational reform? How does the proposal align with Te Tiriti o Waitangi principles?
- What evidence and research are used to justify this proposal?
- What evidence is there that this proposed change will be an improvement on the current NCEA system, and in what ways?
- What are the clear measures of success for this proposal? What is the inquiry cycle in place to monitor that the objectives of the change are being achieved?
- What evidence is there that the long tail of our achievement statistics and inequity can be attributed to NCEA rather than other societal factors?

PPTA remains unconvinced that this proposal to change the national qualification is justified by the evidence, nor is it thoughtful and coherent change. There is strong support within the sector for a culturally inclusive qualification that reflects Aotearoa's unique identity and serves all ākongā equitably.

### **Authentic consultation**

*"The NCEA 'proposal' is more of an announcement, due to the limited period of consultation."* SPC member, 2025

*"My concern is the well-being of the education sector with all this change and little consultation."* Principal, 2025

Every young person in Aotearoa New Zealand deserves the chance to succeed in a qualifications and assessment system that meets their needs and keeps them at the centre. NCEA is not perfect, but evolution would produce the most settled environment and best outcomes for our learners.

Member feedback is that the consultation process has been non-existent, with principals on the PAG bound by restrictive non-disclosure agreements, while students and whānau have had no opportunity to contribute in the development stage. Our members are concerned about the limited consultation period as well as the lack of a curriculum to consult on.

It is difficult to find Māori representation and voice in this change proposal. Te Tiro Hou reminds us that Māori participation in developing and managing Māori qualifications is a clear example of the partnership promised by Te Tiriti.<sup>33</sup> This partnership means fairness, respect, and Māori having authority over their own taonga.

Consultation on these proposals must be a genuine opportunity for the Government to hear and respond appropriately to address valid concerns. A mere box-ticking exercise risks serious disadvantages and harm to future generations. The proposed changes will reshape how we teach, assess, and support our students. Teachers and other education professionals must be heard in this process.

The government's comments on AI marking are an example of poor consultation with the sector. The comments are premature and misaligned with the current state of AI capability. There has been no meaningful engagement with the profession, no consideration of the role of teacher professional judgment, or the importance of learner engagement. The position appears entirely speculative and disconnected from the realities of classroom practice.

### **Multi-partisan education policy**

Education is about more than individual success; it is a public good. Communities in general see the education of young people as an important function of our society and a way to build cohesive, wise societies. Parents and teachers want the young people in our education system to do well and not just in terms of their educational assessments.

NCEA is and has been caught in a political tug-of-war, further undermining its status and the profession's trust in reform processes. Young people need stability and certainty to thrive. No matter who is in government, it is critical that they take a collaborative approach to improving what is a good qualification that focuses on young people's strengths. The education profession wants and needs long-term, stable reform that outlasts political cycles, avoids frequent shifts, and is grounded in sector consultation.

There have been calls for a radical overhaul of the school system, expressed by a variety of interest groups, over a number of years. Brown (2021) warned that "You can't separate educational practice and policy from social welfare policy, from health policy, you can't even separate it from employment policy, so you can't

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<sup>33</sup> [Te Tiro Hou - report of the Qualifications Framework Inquiry](#)

solve educational achievement problems by just looking at schools and teachers and saying all we need is better teachers working in a better way."<sup>34</sup> Instead of knee-jerk responses about detail in the school system, the government should be addressing the underlying causes of disparity.

It is a serious concern to PPTA members that the NCEA has become a football to be kicked around. Students' and parents' confidence in the qualifications system has been undermined. There should be a broad consensus among politicians that our standards-based qualifications system is what New Zealand is committed to having, and that the task of government is to ensure that ours is the very best system that can be developed.

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<sup>34</sup> [Experts urge overhaul of school system following falling student achievement | RNZ News](#)