



Submission

Submission on the proposal to
replace NCEA with new national
qualifications

About the SPC

Following is the submission of the Secondary Principals' Council of Aotearoa (SPC). SPC represents secondary and area school principals who are members of PPTA Te Wehengarua. There are representatives of each region, plus one representing each of Māori, women and area school principals. The SPC chairperson is Kate Gainsford, Principal of Aotea College.

The independent voice of SPC reflects the leadership role principals play in the education system and provides a crucial perspective that is sought by educational bodies, policy makers and the media. SPC's focus is on what is educationally sound, good for students and their communities, practicable for schools and manageable for teachers. The recognition of learners' achievement and its formal record in the form of school qualifications is a central theme of that focus.

In this regard SPC acknowledges the principles established by *Te Tiro Hou*, the report of the Qualifications Framework Inquiry, commissioned by the PPTA. These principles are that an educationally valid qualification system is fair, inclusive, cumulative, clear, motivating, coherent, constructive and manageable. These concepts were affirmed and supplemented in 2020 by the Ministry of Education's *Five Principles of the NCEA Review*, an agreed, multi-partisan agenda. These five principles are wellbeing, inclusion and equity, coherence, pathways and credibility. Of particular significance are the descriptors for the inclusion and equity principle. These are:

- Ensuring fair access and outcomes for all learners, especially Māori and Pacific students.
- Recognising diverse identities, languages and cultures – particularly mātauranga Māori and te reo Māori.

Background

The proposal to replace NCEA with new national qualifications, and much of the rhetoric that surrounds it, starts from the point of view that the NCEA is deeply flawed and must be replaced from the ground up. In particular a political discourse has held – amongst other things – that:

- Employers, tertiary institutions and politicians find the NCEA “difficult to understand”
- The flexibility of the NCEA has been “over-used”
- Student achievement levels have reduced
- Students have “gamed the system” by “credit-farming”
- Choices have been made to take “easy options”
- Students have opted out of entering – and/or presenting for – examinations.

Particularly damaging is the claim that the NCEA lacks international credibility. This baseless allegation is accurately countered by NZQA's own tagline which states, “We make sure New Zealand qualifications are recognised and respected, here and overseas, and that qualifications and credentials meet the needs of learners in the changing world.”

SPC will take this opportunity to respond in some detail to the small part of the proposal's response survey that asks whether the NCEA could be improved. We think it could be, without the need for wholesale, dramatic reform.

Improving the NCEA

The flexibility of the NCEA certificates is one of their key strengths in terms of being fair, inclusive and motivating. The three NCEAs are multi-field qualifications (that is, having no specified content) *in order to* recognise and codify achievement of whatever nature. While it is true that end-users need to put some energy into understanding whether the individual is skilled at mathematics or forestry, there is no prospect of confusing the two; there are clearly stated outcomes listed on each learner's

Record of Achievement (RoA). Nevertheless there is no question that the RoA could be (and should be) made more accessible and user-friendly.

Principals seldom find people who struggle to understand the achieved/merit/excellence results of achievement standards. Indeed there are more than two decades' experience of seeing and interpreting these grades. Many current parents in fact went through the NCEA system. It's not only not difficult for them to understand, it's second nature. Equally, the more technical difference between unit standards with their single 'achieved' grade and achievement standards with a 'good/very good/excellent' approach seldom causes distress. Having said this, SPC would be interested in a debate about the terminology and whether it could be clarified.

SPC observes that the theory of credit-farming is a specific result of the annualised approach that the NCEA certificates adopted as a political compromise in 1997. If there were no credit threshold, there would be no motive to stop trying when the threshold was reached. SPC's view is that a single certificate, issued at the end of an individual's schooling and reporting on *all* of the standards (or components) assessed and achieved, would resolve the credit-farming perception entirely.

A school leaver qualification might be called the New Zealand Certificate of Education, for example. If there was an appetite for continuing with reward approaches such as endorsements, mechanisms could be established for higher recognition by a New Zealand Advanced Certificate of Education.

This would be an evolutionary development that would make perfect sense in the light of the attempt to make school qualifications accessible and motivating, but also credible and supportive of a range of pathways. This is exactly what *Te Tiro Hou* was referring to by its use of the word "cumulative".

SPC believes that progress made in the review of Level 1 was valuable and ought to continue. The consultation exercise was difficult but the outcome was to produce clear bodies of knowledge and improved standards that both teachers and learners have benefited from.

The Proposal

Consensus

SPC believes that reform and improvement are essential elements in any robust curriculum and qualifications system. These should be motivated by sound educational reasoning and be based on the types of principles that we have already outlined. Underlying this should be a sense that broad consensus has been reached through informed debate and the unhurried and dispassionate consideration of alternative points of view.

SPC members are very concerned that the present reform proposal appears to be a hurried effort to effect significant change by decree. This has been the feedback from a large number of SPC's constituents. An unusually compressed timeline for consultation unfortunately supports this interpretation.

Detail

It is a symptom of the consensus shortfall that the Ministry of Education's (MOE) proposal document is light on detail. SPC's constituents have consistently observed that they feel constrained in responding to the MOE's proposal because (amongst other things) they don't know:

- What will constitute 'subjects'
- Whether some subjects may be identified as compulsory and if so, which ones
- To what extent mātauranga Māori and te reo Māori will be incorporated and valued
- What status Mana ōrite mō te mātauranga Māori has, now and in the future
- Which VET areas may be approved and which not

- What a future RoA will look like, and in particular how (or if) partial or piecemeal completion will be reported
- How additional factors such as attendance data and the school leaving age might affect the regime, and what else may be under active but unspoken consideration
- The degree to which significant change would be supported by significant resourcing
- The costs associated with rebranding and where these would be borne
- The degree to which schools and teachers would be expected to educate their communities about the changes
- When these decisions will be made and by whom.

For many observers, this shortfall in information unfortunately presents the impression of secrecy and *fait accompli*.

Removal of Level 1

SPC believes that three year-levels of certification in secondary schools is unnecessary. In general terms the removal of a Level 1 qualification is therefore worthy of debate. SPC is concerned though about the function of the proposed Foundational Award as a gatekeeper to the further qualifications. The stated intention to increase the difficulty of the Foundational Award's criteria "over time and gradually" underlines the gatekeeping intent of the proposal.

The proposal document also acknowledges the risk that some learners will leave without a Foundational Award. SPC is particularly concerned about those who will leave with nothing at all. At present, students can accumulate credits on the New Zealand Qualifications and Credentials Framework, whether or not they eventually receive an NCEA certificate. In the context of the structures envisaged by the proposal, schools will have little flexibility to continue to offer learners alternative programmes outside the new regime and to award Framework credits. It's possible to envisage these learners having no formal record at all of their achievements.

At present Alternative Education and Activity Centre providers play an important role in keeping vulnerable students in education, with personalised learning programmes that build on success over time. Accumulating standards over more than one year and across a range of learning areas supports these students into meaningful pathways to employment and further learning. Principals are concerned for the future of these learners and their programmes.

Raising the school leaving age isn't likely to help: the gatekeeper function of the Foundational Award ensures that some learners could make no progress, regardless of the time served element. Experience tells us that some schools would resort to streaming in the face of these challenges. SPC says that would be the most backward step of all educationally.

Subjects to the fore

It is a central assumption of the proposal that moving back towards a reliance on the concept of nationally prescribed 'subjects' is a means of reducing the "over-use" of flexibility referred to earlier. SPC's initial response is that it is an unwelcome return to the previous, pre-2002, era. It will at best suppress innovative, cross-curricular flexibility. At worst it risks re-inventing past hierarchies of subject 'importance' with the associated thought silos, and is completely at odds with knowledge development and application in modern economies.

If this proposal proceeds, SPC urges the Government to engage in a thoughtful, iterative process to determine what the canon of approved subjects will be. Collaboration in making these decisions will help secure the buy-in of the professionals who will be responsible for implementing any changes.

The central assumption of prescribed subjects also enables the proposal for scores expressed out of 100. These scores are inherently antagonistic to the principles of standards-based assessment that New Zealand intentionally adopted in 1990 and which drives much of the NCEA policy. Specifically,

the education community rejected norm-referencing as relating to an era that had already disappeared in which drafting people out of the system early for unskilled work had previously made some sense.

A standards-based system takes pains to identify, assess and report on *components* of the curriculum. Knowing that an individual performed well in geometry but less so in algebra was generally agreed to be more valuable than being presented with a score of 52% in mathematics.

Ironically, in light of current claims that employers don't understand the NCEA's grades, one of the prompts for the introduction of a standard-based system was a strong employer voice demanding achievement information that was more fine-grained and informative than mere percentages.

VET as subjects

SPC sees value in the proposal to develop more formalised, and recognised, vocational pathways than currently. As a nation we have long struggled to grant parity of esteem between the academic disciplines and 'the trades'. Placing VET 'subjects' on an equal footing amongst the other offerings is one way of improving the profile of those courses of study and recognition. For some learners there may also be improved opportunities to identify and pursue pathways into future careers.

This proposal is not without its significant shortcomings. First, there is too little detail about precisely which VET areas may, in time, be considered and approved. Amongst other challenges this factor causes respondents to take a conservative approach rather than seriously considering the opportunities.

Secondly, it is proposed that the work of developing the VET 'subjects' would be undertaken by the Industry Skills Boards (ISBs) which are not yet established. They in their turn will inherit the work programmes of the Workforce Development Councils (WDCs) which have struggled to maintain their own qualification review schedules since they were established four years ago. SPC understands that the MOE is planning to contract ISBs to do this work. Nevertheless, we doubt that they will have the capacity to take it on and successfully create what are effectively brand-new qualification pathways (or at the least significantly adapted versions of existing provisions) in the time signalled. This is complex work which can only be achieved with the full collaboration of key industry representatives. It must not be rushed.

Thirdly the proposal highlights other uncertainties for many respondents. Much of the learning, assessment and credentialling in the VET area is already handled in partnership between schools and their local tertiary providers, ITPs and others, including Services Academies. More VET recognition is likely to need more such collaboration to be successful. In places where the future of the local ITP is currently caught up in the uncertainty of Te Pūkenga's demise, there's a strong view that Government policies are not well aligned. In other, isolated, communities (Lumsden, Kaitaia or Piopio as examples) the wider recognition of VET areas is likely to exacerbate the inequities that such communities already face in setting up meaningful partnerships.

Proposed grading system

SPC is open to discussion about how the grading system could be improved. However, what's proposed, both 0-100 and A-E scales, embed failure into the reporting regime. The proposal uses the word 'pass' regularly though it is silent on what constitutes 'passing'. Fortunately the mock-up of a proposed record of achievement (p29) illustrates the intent well enough: 46/100 is a D and a fail, this despite the fact that Sam knew or could do nearly half of what was required by the subject Geography.

SPC's view is that reporting against whole subjects compares unfavourably with the current situation which is that if a component of a learning area (that is, a standard) has been achieved, it is reported on the RoA. In Sam's case, two components may have been achieved in the 46/100 scenario but they are obscured by the 'fail' outcome. Sam is unlikely to find this motivating.

SPC rejects the assertion in the proposal document (p14) that the changes would retain the NCEA's "accrediting students based on capability, rather than by comparing students against each other." This is wrong and misleading. The combination of reporting whole subjects rather than components of them, and of establishing scales that include failure at one end is norm-referencing. The norm in this case is the arbitrary 'pass' mark and the scale overtly and specifically compares each student's achievement with others'.

The retrograde step of returning to a subject-driven model is exacerbated by a requirement that learners achieve a minimum number of subjects. Returning to Sam's record of achievement mock-up, five subjects out of six have been 'passed' (though 50/100 in History is well within the margin of error). Nevertheless, Sam doesn't need to drop very many points (9/600 to be exact) before 'failing' the proposed New Zealand Certificate of Education entirely. This well illustrates the arbitrary and capricious nature of the proposal.

Effects on learners

Those learners who are worst affected by a regime that rejects flexible approaches and then routinely records failure and reports it to the world are those who are already at a disadvantage:

- Māori and Pacific students
- those from predominantly lower socio-economic backgrounds
- Those with English as a second language
- Transient people
- Neuro-diverse learners
- Those for whom school is not a positive experience
- Those who struggle in a formal assessment environment.

SPC has been troubled by the political rhetoric that identifies the NCEA as in crisis. This does nothing for the confidence of the large cohort of learners who have received NCEA qualifications over more than two decades.

Another group in a similar position is the current Year 8 cohort. The MOE is in the process of refreshing the curriculum, the draft of which will be available early in 2026, the very time when this year's Year 8s will be needing to be taught under that curriculum. The same cohort will be the first group through the proposed qualifications changes. There is understandable alarm amongst parents of that cohort about the potential consequences of this apparent lapse in planning.

One outcome of the move to a subject-based approach is that external assessment effectively becomes compulsory. The proposal document touches on this issue a number of times asserting, for example, that "some students aren't turning up for exams" (p9) and that this is "largely because students already had sufficient credits" (p16). Beyond these presumptions, the proposal offers no rationale for making exams compulsory or any insight into the underlying thinking. SPC repeats the *Te Tiro Hou* principles that a valid qualification system is fair, inclusive and motivating. Assessment that is removed from the learning environment is generally artificial. For many learners, including those increasing numbers with Special Assessment Conditions (SACs), the dislocation is deeply stressful. They find themselves tested on how well they manage the examination context as much as on their knowledge of the discipline involved. Exams tend to be favoured only by those who have themselves performed well in exams.

SPC members do not believe that making external assessment compulsory is in the best interests of those for whom the education system is already challenging.

Effects on the teaching profession

SPC members and our principal colleagues worry about the health of the profession. Our staff daily exhibit the signs of change fatigue and resource anxiety. They have experienced one wave of policy renewal after another, often hurried, sometimes not completed, always under-resourced. They find themselves defending the system – and especially at present the NCEA – to the community which is responding to the latest series of attacks through the media.

The proposal document acknowledges (p31) that the proposed changes may have implications for the supply of specialist teachers. This is likely to be true though the lack of detail in the proposals makes this difficult to forecast with accuracy. This point does illustrate one of the key concerns principals and others have for the future of the profession: the era of the NCEA encouraged innovation, flexibility and collaboration. These factors enhanced professional growth and broke down barriers. Being in a position to improve the educational offering to the benefit of communities has been rewarding and gratifying.

If the proposals before us are put in place, we see a narrowing of the professional options for teachers, a lessening of the intrinsic rewards of the job and potential for a new generation of teachers with a narrow focus on their discipline to the detriment of collaboration and flexibility.

Principals identify implications for international recruitment of secondary teachers, many of whom have identified the flexibility of the current system as a drawback. Other potential recruits are dissatisfied with the uncertainty of the proposals' effects on their subject areas and have no sense that their view will be included in a professional and collaborative process.

Principals steered their communities through COVID, working well beyond their brief to ensure courses were still delivered, qualifications still achieved and attendance figures improving. Many principals are angered by the lack of consultation to date and their lack of inclusion in the development of proposals that they will have to front with their teachers, students and wider communities. They are left being unable to answer valid questions being raised in their communities.

Resourcing

SPC does appreciate that the words, "Aside from additional funding..." which appear in a number of the MOE's survey questions are intended to convey the message that the government knows that additional funding is required and that survey respondents will be saying so. The message is intended to be that it's taken for granted. Sadly, the words convey the exact opposite to many readers. To them these words say, "Anything you want except anything that costs money". The phraseology is unfortunate.

Principals, teachers and their school communities are accustomed to being under-resourced. The fact that neither the proposal document nor Budget '25 contains any reference to resourcing these major changes gives us no confidence that these expected changes will be any different from previous experience.

A case in point is last year's implementation of revised Level 1 achievement standards. The exact experience differed subject by subject but in many cases teachers were in the position of assessing against the new standards *before* receiving the support materials such as exemplars, conditions of assessment and sample assessment tasks, all of which had been promised but were late.

SPC members are keen to engage with senior officials to discuss the resourcing needs imposed on schools by changes in curriculum or assessment regimes. Such discussions inevitably touch upon the impact of late, inadequate or inequitable resources on the learner experience as well as on teacher morale, and the consequent effects on ongoing teacher supply. These may not be comfortable conversations, but they need to occur and SPC members wish to be a part of the process.

To conclude

The Secondary Principals' Council of Aotearoa appreciates the efforts of senior staff of the Ministry of Education to make themselves available for discussion with us kanohi ki te kanohi. Our comments in this submission about the nature of this particular consultation exercise illustrate the value of such interactions compared with the relative impersonality of a written submission.

As noted, SPC is available for further discussion on this proposal.