



Submission

To the 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 presented by members of Te Reo ā Rohe which is composed of 24 regional PPTA office holders elected to the role by members on the Māori electoral role of the Association. The role of Te Reo ā Rohe is to provide connections for kaiako Māori members from the regions to PPTA Te Wehengarua and Te Huarahi Māori Motuhake on important educational issues for Māori.

PPTA Te Wehengarua is committed to affirming and advancing Te Tiriti o Waitangi in all our actions. We are a union that takes pride in leading and demonstrating what it means to give practical effect to our constitutional commitment to affirm and advance Te Tiriti o Waitangi.

Te Reo ā Rohe members from the secondary school sector have called on their union to take decisive action and advocate in opposition to the sweeping changes to the structure and values underpinning our education system.

1. Introduction

This submission responds to the Ministry of Education's August 2025 discussion document¹ proposing the replacement of the National Certificate of Educational Achievement (NCEA) with a new national qualification structure. We submit this response with a commitment to equity, honouring *Te Tiriti o Waitangi*, and upholding the educational rights and aspirations of all ākonga, particularly Māori.

While the proposal aims to improve coherence and clarity in senior secondary qualifications, we raise significant concerns about the process, rationale, and implications of the proposed reforms. These include:

- The absence of any mention of Te Tiriti o Waitangi in the discussion document;
- A failure to uphold the Ministry's legal and moral obligation to give effect to Te Tiriti;
- The narrowing of curriculum offerings and resulting equity risks, particularly for Māori and students with learning support needs;
- The loss of student choice under a more rigid structure;
- The lack of consultation with Māori and the exclusion of kaupapa Māori perspectives from qualification design;
- Concerns regarding teacher supply, particularly for specialist and Māori-medium settings; and
- A general lack of clarity on implementation, leading to more questions than answers.

2. A Tiriti-Led System: Missing in Action

The most glaring omission in the discussion document is any reference to Te Tiriti o Waitangi. This is not only concerning—it is unacceptable.

¹ https://web-assets.education.govt.nz/s3fs-public/2025-08/NCEA%20Discussion%20Document%202025_web%206Aug.pdf?VersionId=s3FX.AjGhhVp5riTS4iUi_ZlvI_Ul7xP

The Ministry of Education is obligated under section 4(d) of the Education and Training Act 2020 to give effect to *Te Tiriti o Waitangi*. This includes consulting with Māori, ensuring equity of outcomes, and upholding tino rangatiratanga in decision-making. Nowhere in the document is this obligation acknowledged or acted upon.

We are concerned that the absence of reference to Te Tiriti o Waitangi in this proposal reflects a regression in education policy, excluding Māori voices, perspectives, and rights from decisions that profoundly impact Māori learners.

Without authentic Māori consultation and partnership, this proposed qualification framework cannot meet the needs of Māori or uphold Tiriti obligations.

3. Rationale for Change: Misrepresentation of NCEA Flexibility

The government's discussion document asserts that the flexibility of NCEA has resulted in qualifications that are "confusing, incoherent, and inconsistent,"² thereby damaging its reputation. It further claims that flexibility has been over-used, and that the qualification is "broken," and must be scrapped, suggesting that NCEA is neither recognised nor valued internationally.

Such assertions overlook the fact that NCEA has evolved over the past two decades into a qualification framework that is responsive to the diverse needs of New Zealand communities. NCEA has facilitated locally developed curricula that respect community identity, cultural knowledge and learner strengths—especially for Māori, neurodiverse, and culturally marginalised students. These curricula reflect and serve the unique cultural, social, and economic contexts of each region. This system has enabled mātauranga Māori to be integrated into kura and made accessible to ākonga through localised curriculum design and the work of Kāhui Ako. Adaptability is not a flaw, but a defining strength — one that many educationalists, both in Aotearoa and internationally, regard as a significant achievement.

Designing a system where achievement and success are recognised across all abilities requires considerable skill, innovation, and commitment. NCEA embodies the principle that every learner has the right to see themselves reflected in the curriculum and to have their pathways to success acknowledged. Far from diminishing standards, this inclusivity ensures that ākonga are guaranteed equitable opportunities to achieve, regardless of background or learning style.

From an international standpoint, inclusive and adaptable assessment systems are recognized as essential to equitable education. The UNESCO Global Education Monitoring Report affirms that curricula and assessments must be *relevant, flexible, and responsive* to diverse learners, warning against rigid systems that create barriers to inclusion.³

Similarly, the OECD's curriculum innovation framework emphasises the importance of Universal Design for Learning, holistic development and avoidance of stigmatising personalised or competency-based content.⁴

These are foundational principles that the proposed NCEA overhaul overlooks.

² <https://ncea.education.govt.nz/whats-new/consultation-proposal-replace-ncea>

³ <https://www.unesco.org/en/inclusion-education>

⁴ [OECD](#).

Well-designed flexibility is a strength, not a flaw. The solution is not to remove choice, but to ensure schools are supported to offer rich, coherent, and high-quality learning pathways.

4. Curriculum Narrowing and Equity Risks

Under the proposed system, students will take five full-year subjects. This raises immediate equity concerns.

From a kaiako Māori perspective, these proposed reforms risk repeating the mistakes of the past. By prioritising a narrow, standardised model of achievement—“take five subjects and achieve in at least four”⁵—the system strips away the flexibility needed to reflect the realities, aspirations, and cultural contexts of our ākonga Māori. The lack of detail also raises questions around achievement – pass and fail and what this looks like. Such a model has privileged subjects grounded in dominant cultural norms and undervalued mātauranga Māori, te reo Māori, and kaupapa Māori approaches to learning. This is disturbingly reminiscent of the inequities entrenched under the old School Certificate system, which systematically disadvantaged Māori learners and constrained Māori educators. Without deliberate structures to recognise a fuller spectrum of achievement—grounded in tikanga, whanaungatanga, and holistic measures of success—the new framework will again underserve those who most need education to work for them.

5. Internal vs External Assessment and Student Wellbeing

The Government’s proposal to make externally assessed components compulsory in every subject rests on an unfounded assumption that examinations are a more reliable measure of achievement than other assessment methods. While exams may measure performance under time-limited, high-pressure conditions, they fail to capture the diverse ways in which learners acquire, apply, and express knowledge. For ākonga Māori, neurodiverse learners, and those from non-dominant cultural backgrounds, this approach reinforces a one-size-fits-all model that ignores cultural ways of knowing, learning strengths, and the realities of their lives. By embedding compulsory external exams into every subject, the proposed system risks narrowing the range of subjects ākonga feel able to take—and particularly those already alienated by assessment practices that do not reflect their identities or capabilities. This reduction in choice will inevitably lower the likelihood of achievement for learners who are already marginalised and, in this proposal, rendered invisible. Far from promoting fairness or raising standards, such a model threatens to entrench inequities and undermine the recognition of achievement for those who most need an inclusive and responsive system.

6. The Dismissal of NCEA Level 1

The claim that “many high-achieving schools no longer offer Level 1, so we should remove it” is not valid grounds for system-wide change. Removing NCEA Level 1 would disproportionately affect:

- Māori and Pacific students;
- Learners in low-decile schools;
- Students who benefit from early goal-setting and incremental achievement.

⁵ [Discussion document NCEA change](#)

The range of standards at Level 1 currently allows for diverse success and identity-building in ākonga. Removing this layer without clear alternative scaffolding is risky and inequitable. PPTA policy has evolved over many years and PPTA conference 2024 supported NCEA Level one remaining optional.

7. The Impact of the Foundational Award for Māori

The introduction of the new Foundational Award, framed around documenting achievement in literacy and numeracy or te reo matatini and pāngarau, poses significant risks for Māori learners. While promoted as a structured and subject-based approach, in practice it establishes a rigid pass/fail system that has historically worked against Māori success. A “do not pass, do not progress” model is a return to deficit thinking—where learners are defined by what they cannot do, rather than being supported to flourish in their strengths.

For Māori, the delivery and content of this award are deeply problematic. Kura auraki have long struggled to serve Māori equitably, often failing to reflect or affirm te ao Māori in teaching and assessment practices. NCEA, despite its imperfections, provided avenues for innovation and the inclusion of mātauranga Māori, enabling Māori students to see their culture, reo, and identity valued in their education. The Foundational Award strips this away, narrowing learning to a colonial framework of literacy and numeracy, rather than recognising the multiple literacies, knowledges, and capabilities Māori bring with them.

This is particularly troubling given the proven success of Te Rūnanganui o ngā Kura Kaupapa Māori, whose results under NCEA lead those of kura auraki. Māori-medium education has demonstrated that when te reo Māori, mātauranga Māori, and kaupapa Māori principles are central, learners excel. The question remains: why dismantle a system in which Māori have built pathways of success, only to replace it with an outdated model that risks reproducing failure?

The Foundational Award, far from uplifting Māori learners, threatens to undo the progress achieved under NCEA. It risks re-imposing barriers that our whānau, hapū, and iwi have worked tirelessly to remove, undermining mana motuhake and the right of Māori to an education system that reflects and values who we are.

8. Vocational Education: Industry Input but No Māori Representation

The proposal highlights collaboration with Industry Skills Boards to develop new vocational qualifications. However, the disestablishment of Te Pūkenga and Workforce Development Councils has erased much of the Māori-led progress in this space.

Without Māori voices at the table, vocational reforms risk replicating colonial, Pākehā-centric frameworks that have long underserved Māori learners.

The Government’s proposal reflects a troubling lack of preparedness, strategic foresight, and respect for the teaching profession. By selecting Industry Skills Boards that have not yet begun to be operational, it assumes these entities that are still to be formed will have the capacity and institutional knowledge to develop effective, sustainable partnerships with schools. This assumption is both unrealistic and dismissive of the complex work required to align secondary education with vocational training needs — particularly for rangatahi Māori, whose success relies on culturally grounded, well-resourced, and whānau-informed approaches.

The decision to abolish the Workforce Development Councils,⁶ which were arguably beginning to function, have an effect and build strong vocational pathways, undermines their work and dismantles the networks established between educators, industry, and communities. Such changes are symptomatic of a wider pattern: government Ministers — often without educational backgrounds — asserting authority over schooling, making sweeping changes without consultation, failing to engage with Māori, and neglecting to provide the necessary resourcing and support.

For kaiako, this is yet another example of being expected to carry an ever-heavier load caused by political decisions made far from the realities of the classroom. The NCEA overhaul document lacks detail on implementation, staffing, and resourcing — making genuine public engagement impossible. In kaupapa Māori terms, this fails the principles of whakawhanaungatanga (building relationships) and mana ōrite (equal partnership). It positions the public, and Māori communities, as passive recipients rather than active partners in shaping the future of education.

If implemented, these changes risk accelerating burnout among kaiako, driving experienced educators from the profession, and narrowing opportunities for Māori learners. Without culturally sustaining approaches and equitable resourcing, the proposed system will deepen existing inequities and make achievement less attainable for those already marginalised. The price will be paid by the very ākonga the system claims to serve — leaving them with fewer pathways, diminished support and a future shaped by political expedience rather than educational integrity.

9. Conclusion

This proposal presents as a rigid, underdeveloped framework that ignores the realities of the current education system and the aspirations of diverse learners, particularly Māori.

The absence of Te Tiriti o Waitangi, lack of Māori consultation, and disregard for student wellbeing and choice make this discussion document deeply flawed.

From a kaupapa Māori perspective, this proposal represents a serious backward step for education in Aotearoa. The lack of detail provided prevents whānau, hapū, iwi, kaiako, and communities from making informed decisions, and undermines the very partnership obligations guaranteed under Te Tiriti o Waitangi. The deliberate dismantling and misrepresentation of NCEA ignores the evidence of its flexibility, international credibility, and its proven ability to create space for mana whenua knowledge and localised curriculum design.

Recommendation

That the profession is given the authority to improve NCEA and that this proposal to replace NCEA is stopped.

Ngā manaakitanga,

Te Reo ā Rohe Taskforce

⁶ <https://mukatangata.nz/future/>