



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 Te Tiriti o Waitangi Komiti, a sub-committee of Te Huarahi Māori Motuhake - the national Māori governing body of PPTA Te Wehengarua. Te Tiriti o Waitangi Komiti is endorsed with shared decision-making on all matters relating to Te Tiriti o Waitangi (TTOWK). Te Tiriti o Waitangi Komiti was formed to lead decisions alongside Te Roopu Matua and the Executive in how the Association continued to develop in Te Tiriti spaces.

Te Tiriti o Waitangi Komiti is a voluntary group of six representatives from Te Huarahi Māori Motuhake (THMM) which is the national Māori governing body of the Post Primary Teachers' Association Te Wehengarua (PPTA). Te Tiriti o Waitangi Komiti has endorsed shared decision-making, and it provides guidance on all matters relating to Te Tiriti o Waitangi.

1. Introduction

This submission responds to the Ministry of Education's August 2025 Discussion Document proposing replacement of NCEA with two new national secondary certificates and a Foundational Award for Year 11 students. We approach this submission from a Tiriti-led and kaupapa Māori-informed perspective, honouring *tino rangatiratanga* and embedding *Te Tiriti o Waitangi* principles of protection, partnership, and participation throughout education reform.

2. Key Proposals

Abolish NCEA Level 1, replacing it with a Foundational Skills Award focused on literacy, numeracy, te reo matatini and pāngarau, with mandatory English/Mathematics or Te Reo rangatira/Pāngarau in Year 11;

Implement two new qualifications: the New Zealand Certificate of Education (Year 12) and the New Zealand Advanced Certificate of Education (Year 13);

Shift from standards-based flexibility to a structured subject approach, with mandatory subjects and some co-design with industry;

Adopt clearer grading: numeric marks out of 100 plus A–E letter grades; requiring at least four of five subjects to be passed to earn certification.- ²

This submission identifies several unresolved areas of concern regarding the governance and consultation framework underpinning the proposed changes to the NCEA system. Chief among these is

¹ Discussion Document: Proposal to replace NCEA with new national qualifications

² NCEARNZ+2Scribd+2Education.govt.nz+2

the lack of transparency and clarity in the proposal, which constrains meaningful engagement and limits informed decision-making.

Firstly, the formation and refresh of the Minister's NCEA Professional Advisory Group (PAG) do not appear to have involved adequate sector representation or independent oversight. There are no publicly available disclosure documents, nor is there evidence of broad consensus or formal endorsement from the profession regarding the process. This raises legitimate concerns about whether stakeholder voices, especially from Māori, were meaningfully heard, or omitted.

Secondly, the timing of the consultation process—limited to a six-week period—seems inadequate for the scale and complexity of the proposed changes. Such a compressed timeframe risks superficial input and marginalises in-depth reflection by educators, whānau, and communities.

Thirdly, there appears to have been selective use of data and framing within the proposal, including the use of 100-point scales and normative comparisons, which may obscure nuanced insight into student capability. This raises questions about the objectivity and integrity of the analytical foundation for reform.

From a kaupapa Māori perspective, these shortcomings are especially concerning. The proposed system is poised to reinforce entrenched inequities by sidelining localised, culturally responsive approaches—particularly those that served Māori learners effectively under the current flexible NCEA framework.

This submission is constructed to illuminate these structural deficiencies and advocate for a more inclusive, evidence-based, and Treaty-aligned consultation and design process going forward.

Cultural and Treaty-grounded Analysis

a) Protection of Māori Educational Aspirations

The shift to foundational awards and subject-based qualifications may offer potential to reduce inequities if implemented equitably. However, the risk is that the more structured system may inadvertently constrain culturally responsive pathways used in kura kaupapa Māori or Te Marautanga settings.

It is essential that mātauranga Māori and tikanga Māori maintain parity, not only as electives but as core learning areas. The Ministry's commitment to codesigning with kaupapa Māori settings is positive—but must include authentic participation, not token consultation and the detail is missing to ascertain whether and how this will occur.

b) Partnership and Participation

It is difficult to see how Māori will be better served through the proposal to replace NCEA. The document provides insufficient detail to allow for informed decision-making, particularly in relation to the place of te reo Māori and mātauranga Māori within the new framework. Critical questions remain unanswered: How will te reo Māori be valued as a language of learning? How will mātauranga Māori be recognised and upheld as a body of knowledge equal to Western paradigms? The Minister's previous decision to remove te reo Māori kupu from school texts—on the grounds that they interfered with English pronunciation—was unfounded and dismissive of research, and carries clear connotations of cultural bias. Such actions raise serious doubts about the level of commitment to mana ōrite mō te mātauranga Māori.

Unless Māori knowledge systems and language are embedded with integrity and equity, the proposal risks perpetuating assimilationist practices rather than advancing educational justice.

Te Tiriti principles demand Māori participation in designing the new qualifications from the outset, not retrospectively as is the case. Ministry statements that "a subject approach will be carefully thought through for the kaupapa Māori context" are encouraging but miss the fact that a significant proportion of ākonga Māori (25% all school students in 2023)³ are taught in kura auraki and continue to have limited access to whakaako I te reo me ōna tikanga (learning te reo and tikanga) due to the shortage of teachers proficient in te reo Māori.

The statement, "We are aware that offering a wider range of high-quality, full subjects under the new system will present challenges for some schools due to teacher availability" acknowledges the teacher shortage problem with no clear solution to a barrier to implementation that risks equity and access to subject-specialist teachers.

c) Equity and Transparency

From a Māori perspective, the proposal to replace NCEA represents a regression to an inequitable and colonising model of assessment that undermines the intent of recognising ākonga potential and diverse ways of knowing. The claim that the new system would accredit students "based on capability" is misleading: the proposed subject-based structure, pass/fail scaling, and norm-referencing clearly compare learners against each other, rather than valuing their individual progress. Such an approach directly contradicts Māori aspirations for an education system that affirms mana motuhake, acknowledges multiple pathways to success, and fosters hauora.

By reintroducing rigid subject requirements and prioritising arbitrary thresholds for "success," the proposal ignores the lived realities of Māori and other historically underserved learners. The inevitable outcome will be the further marginalisation of Māori, Pasifika, neurodiverse and lower socio-economic ākonga, whose strengths and potential lie outside narrow, formalised testing frameworks. This shift is not only educationally unsound but also culturally unsafe, perpetuating systemic inequities rather than dismantling them.

d) Flexibility vs Structured Pathways

The Minister has claimed that the flexibility of NCEA has produced a poor achievement system. This assertion is inaccurate. Research has demonstrated that NCEA is internationally recognised as a credible qualification.⁴ The proposed return to whole-subject assessment, rather than a standards-based approach, risks further marginalising those already historically underserved by the education system. Subject-based assessments graded on a 0–100 scale or A–E framework are inherently norm-referenced, comparative, and grounded in deficit thinking, as they construct achievement in terms of passing or failing relative to other students rather than recognising capability. For Māori, this model is particularly detrimental, as it privileges a colonial knowledge base and assessment system that fails to meaningfully reflect or value Māori ways of knowing and learning.

Also, there is a significant risk that the imposition of compulsory external examinations and restrictive gatekeeping mechanisms based on Foundational Award achievement will have detrimental consequences for learners. For those who do not succeed under these conditions, the experience of

³ https://web-assets.education.govt.nz/s3fs-public/2024-05/BN-1321550-Maori-education-overview.pdf?VersionId=PbMot_Os63IQAlqs95.KGp_gqjqDVv2P

⁴ https://www.beehive.govt.nz/release/replacing-ncea-transform-secondary-education

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failure can severely undermine confidence, leading to disengagement from education and, ultimately, premature withdrawal from schooling without attaining formal qualifications.

Recent claims in the media that NCEA is "in crisis" are not only misleading but also politically motivated. Such narratives undermine the credibility of a qualification that has provided flexibility and opportunities for a diverse range of learners, including Māori. The alternative being proposed represents a return to an antiquated model of education—one that views learning as the filling of cups rather than the nurturing of potential. This rigid, subject-based approach assumes a mainstream-centric curriculum and caters to colonialist worldviews, reinforcing systems that have historically excluded Māori voices, knowledge, and ways of being.

The proposed mode for the updated English Curriculum, in prioritising Eurocentric texts while disregarding the validity of Māori and other Indigenous knowledge, reproduces a narrow, whitewashed curriculum that fails to reflect the realities or aspirations of our rangatahi. Such a curriculum not only denies Māori students the right to see themselves and their histories valued in their learning but also diminishes the richness of Aotearoa's shared educational landscape. It represents a narrowing of thought, driven less by educational evidence and more by political fear and control.

For Māori, education has always been about the flourishing of the whole person, grounded in whānau, iwi, and hapū, and connected to mātauranga Māori. A curriculum designed to recentralise control and impose rigid, Eurocentric standards undermines that vision and risks perpetuating the very inequities NCEA was designed to overcome. What is being proposed by the coalition government reflects a return to traditional conservatism rather than a commitment to equity, justice, or Te Tiriti o Waitangi. Ultimately, it is our students—especially Māori and those historically marginalised by the system—who will pay the price if these changes are pushed through.

(e) Vocational Education and Training

The proposed replacement of NCEA introduces considerable uncertainty into the education sector, particularly in relation to the development of vocational education and training pathways. While the intention to strengthen these pathways is welcomed, the absence of sufficient detail makes it difficult to evaluate the viability and effectiveness of the proposed changes. Central to the proposal is the creation of Industry Skills Boards (ISBs), which are expected to assume significant responsibilities. However, these bodies have yet to be established, and their ability to manage this workload remains highly speculative. The proposal suggests that ISBs will build on the work previously undertaken by the Workforce Development Councils (WDCs), but given the well-documented struggles of the WDCs, there is little evidence to support confidence in the capacity of ISBs to successfully implement such an ambitious agenda within the proposed timeframe.

These uncertainties are especially concerning for Māori learners and communities, who have historically been underserved by mainstream education structures. Māori success in vocational and pathways education has often been grounded in strong, localised partnerships between kura, whānau, hapū, iwi, and tertiary providers. The proposal does not provide clarity on how these relationships—such as those with Service Academies, STAR, Gateway, and local providers—will be supported or protected under the new system. Disrupting or destabilising these arrangements risks further marginalising Māori learners who often rely on these culturally responsive pathways for equitable access to education and employment.

⁵ https://www.rnz.co.nz/news/national/560642/change-fatigue-hits-vocational-education

Furthermore, the lack of clarity surrounding Te Pūkenga raises questions about how Māori educational aspirations and commitments to mana ōrite mō te mātauranga Māori will be upheld.

Beyond this, teachers and kaiako Māori face the additional burden of implementing a curriculum and assessment system that lacks sufficient detail, direction, and resources. This compounds existing workload pressures and creates further barriers to realising Māori educational success as Māori. Without robust planning, genuine consultation with Māori, and a clear commitment to Te Tiriti o Waitangi obligations, the reforms risk replicating colonial patterns of decision-making in which Māori voices are sidelined.

The cumulative effect of these issues is a lack of confidence that the government's policies are well aligned with the needs of Māori learners and communities. Instead of advancing equity, the reforms risk widening existing disparities by introducing instability into an already fragile system. Ultimately, without detail, resourcing, and structural commitment to kaupapa Māori and Te Tiriti-based education, these reforms are unlikely to achieve their stated goals of improving student success and may in fact undermine the very learners they claim to serve.

(f) Impact on the Teaching Profession

Since the formation of this coalition government, the education sector has been under siege, with the voices of kaiako, whānau, hapū, iwi, and mana whenua excluded from meaningful participation in decision-making. Rather than honouring a Tiriti-based relationship, decision-making power has been concentrated within the Ministerial Advisory Group⁶ and Professional Advisory Group⁷ whose advice appears to outweigh the expertise and lived realities of those who actually stand at the forefront of teaching and learning. The profession itself—including subject advisors and Māori education leaders—has been ignored or called on only at the eleventh hour to patch together curriculum material, not to shape its vision. Such tokenistic engagement undermines both the profession and the mana of Māori educational aspirations.

Teachers and Māori leaders within education have endured a relentless cycle of hurried policy renewals, incomplete proposals, and under-resourced initiatives. Despite this, kaiako have defended the flexibility and innovation of NCEA—a qualification that not only fosters collaboration and professional growth among teachers but also created vital space for localised knowledge and mana whenua perspectives to shape curriculum design. This was a significant step toward embedding mātauranga Māori within mainstream education, affirming the identity, language, and culture of our tamariki and rangatahi.

By halting the inclusion of localised, mana whenua knowledge and replacing it with generic, externally imposed content, this government has cut off Māori learners from the relevance of their own realities. This represents a reassertion of colonial control over curriculum and assessment, narrowing the profession, and reducing opportunities for rangatahi Māori to see themselves and their knowledge systems valued in education. Such decisions are short-sighted and politically driven, and disregard both the profession's expertise and the Crown's obligations under Te Tiriti o Waitangi.

The persistent political interference, the silencing of expert voices, and the refusal to listen to the teaching profession reflect an arrogance that believes state-imposed authority is superior to the lived wisdom of kaiako and Māori communities. From a kaupapa Māori perspective, this approach undermines tino rangatiratanga in education and risks perpetuating inequities that NCEA had begun to

⁶ https://insidegovernment.co.nz/new-education-ministerial-advisory-group-named/

⁷ https://ncea.education.govt.nz/whats-new/updated-membership-ncea-professional-advisory-group

address.

Conclusion

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.

Teachers and Māori education leaders are tired of being silenced and sidelined while politicians, who lack the professional expertise and cultural grounding required, impose changes that do not serve our tamariki.

This proposal risks re-entrenching colonial models of teaching and assessment that have historically marginalised Māori learners, their knowledge, and their worldviews. For kaupapa Māori education, it signals a regression that strips away opportunities for rangatahi Māori to learn in ways that reflect and affirm who they are. Instead of progressing towards a system that upholds mana motuhake and mana ōrite mō te mātauranga Māori, the proposed changes pull us backwards into a narrow, monocultural framework.

If education is to serve all students, it must be shaped in partnership with the profession and Māori, grounded in Te Tiriti o Waitangi, and committed to equity and justice. Anything less is a betrayal of both our history and our future.

Recommendation.

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

Ngā mihi nui

Te Tiriti o Waitangi Komiti