



Submission

**On Education and Training (System
Reform) Amendment Bill 2025**

This submission is from the Secondary Principals' Council of Aotearoa (SPC). SPC represents secondary and area school principals who are members of PPTA Te Wehengarua. There are representatives for each region, as well as for Māori, women, and Area School principals. The Council 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 sought by educational bodies, policymakers, and the media. Public education is the foundation of a just and connected Aotearoa New Zealand. In an increasingly diverse society, our schools and classrooms are one of the few places where communities really do come together.

SPC supports public education that meets the needs of our rangatahi. There should be no barrier to quality public education, and we support a flexible, well-resourced, and innovative system. Secondary Principals' Council of Aotearoa (SPC) has expressed strong opposition to the Government's decision to remove the requirement for school boards to give effect to Te Tiriti o Waitangi within the Education and Training Act 2020.¹ SPC recommends that this decision be reversed.

For change to be successful in the education sector, it needs to be backed by strong research and developed and implemented in collaboration with teachers. The proposed Education and Training (System Reform) Amendment Bill has not been developed through consultation with the sector and its representatives.

Recommendations from Secondary Principals' Council Aotearoa

The Secondary Principals' Council (SPC) asks that the select committee consider our recommendations and the grounds for our opposition to the Education and Training (System Reform) Amendment Bill 2025

1. SPC recommends that the Minister halt this Bill and undertake genuine consultation with the education sector, with a more appropriate timeframe, to achieve feedback that will support high-quality system reform and clarity of roles and responsibilities.
2. SPC recommends that the proposed transfer of responsibilities for teacher professional standards to the Minister/ Ministry be halted, to maintain the professional independence of teachers.
3. SPC recommends that the government maintain sufficient flexibility in curriculum implementation to enable schools to adapt curriculum expectations within broad national guidelines and maintain local relevance.
4. SPC recommends the continuation of cultural responsiveness within the national curriculum that includes alignment with Te Tiriti, through inclusion of Māori perspectives, kaupapa and review processes.
5. SPC recommends that the decision to remove the requirement for school boards to give effect to Te Tiriti o Waitangi within the Education and Training Act 2020 be reversed.

¹ [Secondary principals urge Education Minister to reverse Te Tiriti decision](#) | PPTA

6. SPC respectfully suggests that the Minister work ‘with’ rather than doing ‘to’ the education sector as per widely recognised best practice in change management, particularly with regard to the proposed requirement for schools to participate in monitoring studies.
7. SPC recommends that the Government prioritise the resourcing of public schools, particularly with regard to staffing, curriculum support, professional development and the facilities where young people learn, to support positive system reform.

Submission comments

Purpose of the Bill

The stated aim of the Bill is to clarify roles and responsibilities across education agencies and functions, with new requirements for schools in relation to the curriculum, attendance exemptions, and system monitoring studies. SPC does not agree that the Bill helpfully clarifies roles and responsibilities, with the proposals in relation to the curriculum, attendance exemptions, and system monitoring.

Poor efforts for consultation

“There is a lack of quality consultation at the moment, and everyone feels they are just being forced into areas they are not comfortable with.” Principal 2025

Secondary Principals' Council of Aotearoa (SPC) is deeply disappointed at the lack of genuine consultation for the extent of the proposals, which appear to have been “slipped into the Education Training Amendment Bill at the last minute.”² SPC understands that this proposal goes against the advice given by officials and certainly does not reflect previous strong sector feedback.³

Any attempt to clarify roles and responsibilities must include genuine engagement with the sector representatives if meaningful change is to be effected.

The consultation timeframe is short and takes no account of teacher workload in setting the closing date, 14 January 2026. Whether intentional or not, it appears the Minister of Education is not really interested in the views of the wider education sector. We note that inadequate time for comprehensive consultation is stated in the Regulatory Impact Statement of previous consultations.⁴ This trend is of concern.

SPC recommends that the Minister halt this Bill and undertake genuine consultation with the education sector, with a more appropriate timeframe, to achieve feedback that will support high-quality system reform and clarity of roles and responsibilities.

Professional Independence of teachers is paramount

The Bill contains changes to several systems that affect principals and secondary teachers. Secondary Principals' Council of Aotearoa (SPC) is most concerned with the attempt to significantly increase the powers of the Minister of Education (Minister), to make changes to the curriculum

² [A crash course in the many changes shaking up education in Aotearoa | The Spinoff](#)

³ [Warnings of ‘political interference’ as Govt looks to move oversight of teacher training - Newsroom](#)

⁴ [Regulatory Impact Statement Template](#)

without consulting the sector and to move the professional standard-setting functions from the Teaching Council to the Ministry of Education (Ministry/MOE), which would facilitate undue political influence and interference in the teaching profession.

SPC agrees with many other commentators that “direct political control of professional programmes and standards by ministers through the ministry would be an overreach and is tantamount to political interference.”⁵ Principal members know that this level of ministerial direction is unwarranted. It does not occur in the training of lawyers, doctors, nurses or other professions and is inappropriate for the teaching profession. Teaching is a profession comparable to medicine and law, which requires independent regulation to maintain public trust.

“The biggest concern is the amount of change imposed by the government/MOE on teachers, school leaders, school boards, school communities, and New Zealand. This is a seismic shift in the fabric of education in New Zealand!” Principal feedback, 2025.

The recent announcements of changes to the structure and the role of the Ministry of Education have been seriously discussed amongst staff and principals across the country. SPC recognises that the proposal represents a profound shift in the regulation of the teaching profession. SPC opposes moving the powers of standard and criteria setting for qualifications, practice and certification from the Teaching Council, a democratically elected council of teaching professionals, to the Ministry of Education, which answers solely to a Minister.

SPC opposes the shift in the balance of power within the Teaching Council proposed by the reduction of the overall number of board members and the proportion of Ministerial appointments. SPC principals are concerned about the proposed increase in political control of teachers. SPC strongly opposes any shifting of responsibility and control away from the profession itself. Again, there has been no consultation on this proposal, as its development has been directed by the Minister.⁶ For system change to address standards in Initial Teacher Education, which is the purported purpose of this part of the bill, more meaningful engagement with the profession is recommended.

In line with other mature education systems that New Zealand compares itself with, principals value professional independence and do not support moves that reduce the profession’s ability to self-regulate and maintain independence from political influence. This proposal undermines the profession’s status. Maintaining the status of the profession is key to growing a skilled and capable teaching workforce. Independence ensures decisions are based on professional expertise, not short-term political policy agendas.

There is a serious concern that the bicultural principles and Treaty of Waitangi obligations in standards could be diluted under Ministry control and subject to political policy lurch.

Principals and teachers strongly value the independence of the Teaching Council. SPC agrees with the MOE’s Regulatory Impact Statement (RIS), which identifies risks related to government control of the teaching standards, such as frequent disruption and the potential for politicisation of the standard-setting process.⁷ Principals are concerned that standards and codes could change with government cycles, creating instability.

⁵ [Warnings of ‘political interference’ as Govt looks to move oversight of teacher training - Newsroom](#)

⁶ [RIS Changes to the teacher workforce regulation model.pdf](#)

⁷ [RIS Changes to the teacher workforce regulation model.pdf](#)

Shrinking the Teaching Council board reduces sector voice. The perspectives of principals and teachers will be diluted compared to appointed members. This opens the way for decisions being driven by political priorities rather than educational expertise. These changes may have an impact on teacher supply and quality. If registration criteria and qualification standards are set by the Ministry without strong profession-led input, lower standards could ensue in order to meet teacher shortages and/or inflexible professional criteria could result that do not reflect classroom realities.

We also note the RIS advises that previous decisions that placed workforce standard-setting functions with the Teaching Council as an Independent Statutory Entity were linked to reviews that advised that “teaching practice and status in New Zealand (NZ) would benefit from teachers’ participation in an organisation that is the voice and face of the profession, with independence from government.”⁸ SPC agrees with this advice and views the loss of professional autonomy and esteem from limiting professional-led regulation as a considerable risk. SPC believes it is necessary and desirable to maintain the independence of the teaching profession.

Many education systems around the world feature profession-led teaching standards, where the educator workforce itself plays the central role in developing, governing, and upholding professional expectations. In Canada, the Ontario College of Teachers, an elected professional body, defines the Standards of Practice and Ethical Standards that guide teaching in the province.⁹ In Australia, the Australian Professional Standards for Teachers, governed by AITSL, establish national benchmarks across career stages, designed and maintained through extensive consultation with teachers.¹⁰ The 2019 UNESCO/Education International Global Framework emphasises that professional teaching standards must be created and owned by teachers and their unions to ensure integrity, relevance, and autonomy in the profession.¹¹

The RIS states that “stakeholders such as the PPTA have long held the view that the Teaching Council should have a narrow set of functions focused on registering and de-registering teachers and investigating misconduct.” It suggests that the proposal aligns with previous feedback, noting, however, that these stakeholders have not been consulted on the proposal.¹² SPC PPTA members consider that the functions of the Teaching Council, including teacher registration, teaching standards, practising certificate criteria and the code of conduct, and teacher education qualification standards should remain with the Teaching Council as an independent professional body.

Principals note teacher variability being blamed for the variance in student performance, and the changes proposed claim that the ‘problem’ is the high variability and unacceptable levels of achievement within and between schools in NZ. SPC supports evidence that shows addressing systemic barriers and ongoing equity issues within our education system is the best way to improve student performance.¹³ This work is complex and unlikely to be ‘fixed’ with the proposed changes.

⁸ [RIS Changes to the teacher workforce regulation model.pdf](#)

⁹ [Professional Standards | Ontario College of Teachers](#)

¹⁰ [Teacher Standards](#)

¹¹ [Adoption of the EI/UNESCO Global Framework of Professional Teaching Standards](#)

¹² [RIS Changes to the teacher workforce regulation model.pdf](#)

¹³ Ciuffetelli Parker, D., & Conversano, P. (2021). Narratives of Systemic Barriers and Accessibility: Poverty, Equity, Diversity, Inclusion, and the Call for a Post-Pandemic New Normal. *Frontiers in Education*, 6, 704663. <https://doi.org/10.3389/educ.2021.704663>

Principals can attest that trust within the sector has been eroded in the current political climate. There is certainly a lack of faith in the current capacity and capability of the Ministry of Education to carry out the functions that are proposed to be transferred to it.

There is no evidence to suggest that the Ministry has the workforce or resources to enable effective administration of these functions. The implementation of the curriculum has been poor with rushed timelines, constant revisions and changes to ‘finished’ documents, a lack of clear guidance on assessments, and an unacceptable level of under-resourcing; findings of both PPTA¹⁴ and ERO¹⁵. SPC rightly questions the Ministry of Education’s capacity for the proposed additional responsibilities.

Further, the Bill says that the Ministry is to play a role in providing direction and enhancing the status of teachers through its role in setting standards and supporting teachers to meet them.¹⁶ It is difficult to see how this will be achieved, given the disconnect between the sector and the Ministry and the low political priority of the profession, which is apparent to the sector.

The proposed transfer of responsibility for Initial Teacher Education (ITE) standards from the Teaching Council to the Ministry of Education represents a significant shift in governance. No clear evidence has been presented that centralising control under the Ministry will improve teacher preparedness or classroom outcomes. International best practice supports profession-led regulation, not government-led.¹⁷ SPC strongly opposes this proposal and calls for evidence-based, collaborative solutions to improve teacher education quality.

There appears to have been selective use of evidence from the recent TALIS results (2024)¹⁸ to justify aspects of the proposed Bill. OECD’s Teaching and Learning International Survey (TALIS) 2024 shows that initial teacher training (ITE) isn’t sufficiently supporting new teachers to be confident in the classroom; however, OECD TALIS and ERO reports highlight challenges in teacher workload and induction support, not governance structure.¹⁹

The Teaching Council has deep knowledge of teacher practice and ethics, including cultural expectations and obligations. There would be a loss of specialist expertise were this proposal to be enacted, and Treaty and cultural commitments are threatened. SPC believes the Minister should strengthen partnerships between the Teaching Council, universities, and schools and commit to evidence-based reforms that enhance teacher education without compromising independence.

SPC recommends that the proposed transfer of responsibilities for teacher professional standards to the Minister/ Ministry be halted, to maintain the professional independence of teachers.

Strengthening school curriculum settings

The Bill proposes to give the Minister of Education the power to directly set curriculum statements without a curriculum review or advice from the Ministry of Education. These curriculum statements will replace the current democratically and professionally shaped national curriculum statements.

¹⁴ [NCEA survey shows serious concerns about rollout of Level 1 changes | PPTA](#)

¹⁵ [Report reflects teachers’ concerns about shambolic implementation of NCEA L1 | PPTA](#)

¹⁶ [Education and Training Amendment Bill \(No 2\) 140-3 \(2025\), Government Bill – New Zealand Legislation](#)

¹⁷ [2021-OECD-International_Regulatory_Cooperation-Best_Practice_Principles.pdf](#)

¹⁸ [Full Report: Results from TALIS Starting Strong 2024 | OECD](#)

¹⁹ [The demands of teaching: Results from TALIS 2024 | OECD](#)

The amendment introduces a regular review process for curriculum statements, but it also grants the Minister the power to modify curriculum statements without review or consultation. These changes constitute a pointed increase in political influence in curriculum settings and give unprecedented power to the Minister of Education to dictate curriculum.²⁰

“Pace of change is still a huge concern - keeping up-to-date with updates (He Pitopito Kōrero, MOE emails) and managing school operations simultaneously.” Principal feedback, 2025

School leadership opportunities and responsibilities are wide-ranging and complex, and New Zealand’s system of self-management allows principals to respond in ways that are appropriate to the needs and circumstances of their own schools. A school principal/tumuaki is the kaitiaki (guardian) of those things the school community believes are important.

Secondary Principals’ Council of Aotearoa (SPC) has critical concerns with the proposal to ‘strengthen school curriculum settings.’ This proposal centralises control, reducing schools’ ability to adapt curriculum to local needs and community priorities. As current principals, we can attest to the importance of working with the School Board, parents, students and staff members of our school community. Our principals value local autonomy and the flexibility to reflect their school’s unique context, including cultural and community expectations.

Tātai Aho Rau Core Education states that “At the heart of a local curriculum is the focus on what improves learning for the ākonga in your context.”²¹ Localised curriculum is often developed in partnership with parents, caregivers, whānau, local iwi, hapū and other organisations. SPC agrees that a localised curriculum reflects community values, culture and identity, and creates rich learning opportunities. The Bill’s proposal pushes a one-size-fits-all curriculum and is at odds with this. A one-type curriculum statement and setting expectations for different groups of schools will limit innovation and responsiveness, undermining the diversity of teaching approaches and local curriculum design.

SPC supports the growth of a culturally responsive secondary education system that promotes and enhances Māori success as Māori. Schools should be places where ākonga Māori and their whānau feel a sense of belonging and connection. SPC believes that there needs to be alignment with Te Tiriti through the embedding of Māori perspectives and kaupapa Māori principles in curriculum expectations and review processes.

SPC believes that principals and sector representatives need to be involved in shaping the review process, so it is collaborative, rather than imposed. SPC supports the requirement for regular review so that the curriculum does not become outdated and then needs a significant overhaul. SPC is, however, concerned about the proposed increase in Ministerial power, including the ability to make changes without sector involvement.

This proposal will increase the compliance burden, which is already significant. Change fatigue is real and a major concern for principals, as they try to “*keep up with everything and ensure nothing is missed.*” Principals know that adding rolling reviews could exacerbate reform fatigue.²² It is certainly unclear how rolling reviews will improve curriculum quality and student outcomes.

²⁰ [Education and Training \(System Reform\) Amendment Bill - Ministry of Education](#)

²¹ [Tātai Aho Rau Core Education | Local curriculum design \(core-ed.org\)](#)

²² [How do primary principals in Aotearoa feel about recent curriculum changes?](#)

SPC recommends that the government maintain sufficient flexibility in curriculum implementation to enable schools to adapt curriculum expectations within broad national guidelines and maintain local relevance.

SPC recommends the continuation of cultural responsiveness within the national curriculum that includes alignment with Te Tiriti, through inclusion of Māori perspectives, kaupapa and review processes.

SPC recommends that the decision to remove the requirement for school boards to give effect to Te Tiriti o Waitangi within the Education and Training Act 2020 be reversed.

Strengthening the system's response when the Education Review Office (ERO) identifies a school of 'serious concern'

"I am concerned about the tone of the Minister that schools are not doing a good job, and the system is broken. This is without facts (or cherry-picked facts) and is harming the sector and the process of attracting good candidates into the profession." Principal, 2025

Secondary Principals' Council of Aotearoa (SPC) has valid concerns with the proposed amendment to the Education and Training (System Reform) Amendment Bill, to create a specific response when the Education Review Office (ERO) identifies a school of 'serious concern'.

The Bill requires the Chief Review Officer (CRO) of ERO to notify both the Secretary and Minister "within 2 working days of forming a view that a school may be of serious concern." Following this, a written report with recommendations must be provided.²³ This requirement could create political interference because it directly embeds the Minister into the early stages of school performance oversight, which traditionally should be handled by independent agencies. This is not something SPC wishes to see happen.

Principals have already noted a change in how ERO conducts its school review. The reviews have moved from a partnership model to one with a focus on compliance and data monitoring. Although Māori achievement, attendance, and the CAA results are scrutinised, research and practice-based responses appear to be taking a secondary position behind a government 'watchdog' role.

The use of language such as "of serious concern" is itself of serious concern in that it does not define how this "view" may be formed. Principals rightly question what the 'serious concern' definition will be – is it the result of attendance issues? Are NCEA or other assessment outcomes going to be the trigger for 'serious concern'? Will a school's inability to comply with PISA testing directives be a cause for 'serious concern'? Will the challenges schools face, driven by unmet needs in the student population and wider community, be acknowledged as a 'serious concern'?

Principal feedback on ERO's current response to school interventions identifies issues that this proposal does not address:

- There is no clear evidence that traditional or punitive interventions make a positive difference.

²³ [Education and Training \(System Reform\) Amendment Bill - Ministry of Education](#)

- Interventions are misaligned. In many cases, the signs that a school may need support are evident well before such interventions as the Limited Statutory Managers and Commissioners are triggered.
- There is no transparency. Data thresholds are supposedly used to guide decisions about schools currently facing interventions on attendance issues, but these have not been publicly released.
- The national approaches to low-level statutory interventions, starting with attendance, are described as support for school boards, but offer oversight without meaningful assistance (support).

A significant concern for SPC is the risk of stigma and reputational harm for schools labelled as a ‘serious concern’. The tight timelines (2 days for notification, 28 days for CRO report, 30 days for Secretary response) may prioritise speed and completion of paperwork over thorough investigation. There is a risk that early judgments could be made before the full context is understood, and the school’s reputation could be damaged. This affects students, teachers, their families and communities.

There appear to be limited opportunities for school input. The proposed process emphasises the CRO and Secretary reports but does not clearly state how principals or boards can provide valuable contextual evidence before decisions are made; this is an important element of national justice. Knowing that concerns will be escalated quickly to the Minister could impact negatively on the constructive relationships required across school leadership in schools and the Ministry of Education, and inadvertently create greater challenges, especially in schools already facing challenges beyond their control (e.g., socio-economic factors).

Current ERO communication to schools is that “the role of ERO has not changed.”²⁴ However, the requirement for rapid notification and formal reporting to the Minister does not demonstrate confidence in school leadership as a starting point, and an escalation of surveillance brings with it greater responsibilities for care, which are not evident in the proposed changes.

SPC believes that collective decisions and responses about how best to support any schools of concern provide the best way to address those concerns. Proposed changes are not seen as effective ways to positively impact schools of ‘serious concern’.

SPC also notes the expanded regulatory role for ERO (private schools and hostels) and is concerned that this expansion may blur the line between support and compliance. ERO traditionally focuses on review and improvement; adding more enforcement powers is likely to reduce trust and openness during evaluations. SPC questions how the proposed changes will affect ERO’s approach to state school reviews and whether similar powers could apply in future.

Mandating schools to participate in education system monitoring studies

The Bill enables the Minister to require participation of state schools, charter schools and private schools to participate in large-scale studies that monitor the performance of our schooling system, such as the Programme for International Student Assessment (PISA) and Trends in International Mathematics and Science Study (TIMSS).²⁵

²⁴ Email, 5 December 2025, Keeping you updated with the latest news from ERO

²⁵ [Education and Training \(System Reform\) Amendment Bill - Ministry of Education](#)

“We used to (conduct PISA) when the workload was manageable - it's a 'no' because the benefit to our students is minimal - not a priority when they are being tested left, right and centre.”

Principal feedback, 2025

Principals have valid reasons for not participating in large-scale studies that monitor the performance of our schooling system. There are logistical and workload challenges for schools, with already significant workloads, managing the curriculum and NCEA changes that continue unabated, and disruption to programmes to undertake such assessments. These assessments are unnecessary, high-stakes assessments, with low return for NZ schools.

The increasing unwillingness among students to do these assessments is very apparent to principals. Many students do not care about this assessment and are voting with their feet. This is evident in other countries, with several failing to meet the required number of student participants in PISA 2022²⁶. There are competing priorities for students and schools. Principals question whether PISA and TIMSS provide meaningful value to improving the educational outcomes of our rangatahi.

International testing data is often used selectively; results are amplified through the media. A ‘crisis’ story can be built to justify policies not necessarily supported by the data. This is and has been an issue in NZ. Data is made to fit with government reform agendas.²⁷ Principals certainly have concerns about reputational harm and misuse of data.

There is potential for the data to be misused to ‘label’ groups of students who have not done well.²⁸ We question the relevance of international benchmarks to local curriculum and values and know that there may be concerns about alignment with cultural principles and data sovereignty, particularly for Māori. It is also reasonable to ask, in an age of rising concern about big data and privacy, how data on students and teachers collected globally may be used and to what end.²⁹

Teachers value their autonomy and professional judgment. Many teachers already face high workloads, so any additional mandated tasks increase this. Completing questionnaires and supporting the logistics of international studies adds to existing administrative burdens, and the effort doesn’t translate into immediate improvements for classroom practice.

Principals question the validity of the assessment. Australian researchers found that “nearly three-quarters of Australian students didn’t fully try on the PISA 2018 tests.”³⁰ Principals certainly wish to focus on relevant teaching and learning.

Many factors influence student achievement, and researchers consider that PISA is not the fully reliable assessment it is assumed to be. The limitations of PISA are known, including cultural and linguistic differences. PISA focuses on a limited set of quantitative indicators (reading, math, science), which critics argue cannot capture the complexity of education quality. PISA results for OECD countries have fallen since 2000, while the proportion of students who feel they don’t belong at school has increased threefold from 7% to 22%.³¹

²⁶ [Student-hunger-bad-teachers-revealed-in-latest-pisa-tests-showing-dip-in-nz-teens-scores](#)

²⁷ [When Do Numbers Count?](#)

²⁸ <https://www.nzcer.org.nz/nzcerpress/set/articles/thinking-critically-about-pisa?language=en>

²⁹ <https://theconversation.com/problems-with-pisa-why-canadians-should-be-skeptical-of-the-global-test-118096>

³⁰ [Nearly 4 in 5 Australian Students Didn't Fully Try in PISA 2022.pdf](#)

³¹ [Nearly 4 in 5 Australian Students Didn't Fully Try in PISA 2022.pdf](#)

Schleicher (2011, p.57) asserts that education reform requires teachers to contribute as the architects of change, not just its implementers. He notes that “some of the most powerful reforms are those supported by strong unions rather than those that keep the unions’ role weak”³². If the NZ government is sincere in its wish to deliver a ‘world-leading’ education system,³³ it is advisable to ensure that the voice of teachers is heard.

SPC respectfully suggests that the Minister work ‘with’ rather than doing ‘to’ the education sector as per widely recognised best practice in change management, particularly with regard to the proposed requirement for schools to participate in monitoring studies.

Strengthening Attendance Regulations

*“Attendance – the expectation is to do more and more, but no new ideas after all the school can do”
Principal, 2025*

The Bill tightens provisions for attendance exemptions, allowing the Secretary to set rules that must be met for a principal to exempt a student from attending school.³⁴ Secondary Principals' Council of Aotearoa (SPC) is again disappointed at the lack of consultation and limited engagement with the education sector during the development of the proposed changes.

Schools and school boards take school attendance very seriously; they know their communities and what works and what doesn't. Boards having policies that describe/define justified and unjustified absences. Principals can currently approve short-term justified absences based on their knowledge of the student and family context. Removing this discretion means principals must include more ‘red tape’ around the prescribed grounds, reducing their ability to respond to individual circumstances quickly.

Presently, principals can consider the unique and contextual circumstances of each student and family when deciding whether an absence is justified. The new rules would limit their flexibility and require them to adhere strictly to prescribed grounds and evidence, which may account for all nuanced situations. Principals will lose the flexibility to approve of what were previously considered acceptable reasons. SPC does not believe this discretion is misused and questions the need for this prescription.

The proposed intervention, with more steps in the process of recording absences, is unnecessary. No one needs more red tape. The latest ‘revisions’ of attendance codes, for example, were meant to make them easier to use but have caused complications with previous categories being lumped together. The need to verify evidence for absences and ensure compliance with rigid rules adds to an already substantial principal workload.

SPC considers that this proposed change could strain relationships with families, possibly leading to conflicts between schools and families, especially if absences that were previously exempted are no longer considered reasonable under the new rules. The tightening of exemption rules may disproportionately affect students from marginalised communities, already overrepresented in non-attendance statistics.

³² [Building-a-high-quality-teaching-profession.pdf](#)

³³ <https://www.1news.co.nz/2024/04/29/govt-plans-fundamental-changes-with-education-goals/>

³⁴ [Education and Training \(System Reform\) Amendment Bill - Ministry of Education](#)

“Coming from a school with high non-attendance and high needs, we don't have the capacity to do it all, and we are understaffed to do all that is required. Increased funding needs to be looked at.”

MOE attendance webinar participant, 2025

SPC encourages the Government to continue its interest in school attendance and foster society's understanding of its importance to young people's learning and futures. The Ministry could explore ways to reduce attendance anomalies and work with schools rather than focus on ‘rules that specify the requirements that must be met for a principal to exempt a student from attendance.’³⁵

SPC considers that the appropriate provision of resources to help schools manage their school attendance issues is the best place to focus on improving school attendance.

Establishing the New Zealand School Property Agency (NZSPA)

A new Crown agency responsible for planning, building, maintaining, and administering the school property portfolio. The Ministry will continue to lead education policy and network decisions, including where growth is needed.³⁶

Secondary Principals' Council of Aotearoa (SPC) acknowledges the complexity involved in the national prioritisation of property investment. Property does take considerable time for many principals, and the reality for many schools across the country has been a slow response to building concerns. Principals are concerned that devolving property decisions from MOE to a crown agency could further slow down maintenance and upgrades, especially if NZSPA processes are complex or under-resourced.

SPC believes the sector needs clear and timely communication about property priorities. Schools are increasingly under pressure, with growing rolls, curriculum demands, and they need certainty about property solutions. The application of resources needs to respond to variations in student population data and contextual needs, and the prioritisation process for property projects should be transparent. Principals also need to be clear about the pathways for escalation when facing urgent property issues.

SPC has a concern that moving property management to a Crown agent may reduce principals' ability to influence decisions about their own school's facilities. SPC sees a risk that property decisions managed by a separate agency might not fully align with the teaching and learning needs of the school. It is important to retain the principal's ability to manage local issues and ensure the school's property is aligned with the teaching and learning needs of the community. Classroom design, specialist spaces, and cultural considerations require close collaboration with educators.

SPC accepts the MOE premise that ‘standardisation will help reduce time and costs to deliver safe, warm and dry teaching spaces.’³⁷ There is certainly variation in occurrences, with some schools pleased with modular builds; others have experienced modular ‘Tui’ classrooms being trucked onto sites without reference to previously signed-off agreements between the school and MOE. Questions remain about the long-term strategy for specialist spaces which cannot be met through modular builds and ensuring that classrooms meet basic needs—warm in winter, cool in summer, and dry year-round.

³⁵ [Education and Training \(System Reform\) Amendment Bill - Ministry of Education](#)

³⁶ [Education and Training \(System Reform\) Amendment Bill - Ministry of Education](#)

³⁷ [Standardising school property - Ministry of Education](#)

SPC values equitable outcomes, including property decisions. SPC understands that data-driven models can unintentionally disadvantage smaller or rural schools if algorithms prioritise high-utilisation urban sites, and SPC does not wish to see this happen. SPC considers that Te Tiriti obligations and the needs of Māori and Pasifika communities should be fully embedded in property data frameworks.

Schools want functional learning environments, and the need for well-designed spaces remains. Ensuring data consistency is critical for making informed decisions about school property investments. Principals want assurance that data will inform decisions without replacing professional judgment, and that local context remains a key factor.

SPC supports greater alignment between government policy, student data, and school property planning.

Pathway for charter schools to revert back to the State sector

Secondary Principals' Council of Aotearoa (SPC) is an unwavering champion of public education in Aotearoa New Zealand and has been unequivocal in its opposition to the reintroduction of charter schools.

SPC supports a flexible, well-resourced, and innovative system and has firsthand experience of the underfunding of our education system. Our state schools are financially strained, and the removal of resources from state schools to publicly funded charter schools contributes to further widening funding disparities.

SPC considers that the reintroduction of charter schools has been undesirable and unnecessary. It has further fragmented the public education system and will not deliver quality education for all. SPC does support the provision of a pathway for State schools that have converted to Charter status to revert back to the State sector. We do not believe that our public schools wish to be privatised.

SPC recommends that the Government prioritise the resourcing of public schools, particularly with regard to staffing, curriculum support, professional development and the facilities where young people learn, to support positive system reform.