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[nceaconsultation@education.govt.nz](mailto:nceaconsultation@education.govt.nz).

## **Teaching Council submission on the Ministry of Education's discussion document 'Proposal to replace NCEA'**

### **1. About Matatū Aotearoa | Teaching Council of New Zealand.**

Matatū Aotearoa | Teaching Council of New Zealand (the Council) is the independent professional body for teachers | kaiako working with and for around 150,000 registered and certified teachers in Aotearoa New Zealand. The statutory purpose of the Teaching Council is “to ensure safe and high-quality leadership, teaching and learning for children and young people in early childhood, primary, and secondary schooling in English-medium and Māori-medium setting, and setting of other languages, through raising the status of the profession.” (Education and Training Act 2020 s478)

The Teaching Council has statutory obligations to (among other things):

- carry out the functions relating to initial teacher education and teacher registration
- establish and maintain:
  - criteria for teacher registration
  - standards for ongoing practice
  - criteria for the issue of practising certificates
  - a code of conduct for teachers
- monitor and enforce the requirements related to mandatory reporting of conduct and competence matters.
- perform disciplinary functions related to teacher misconduct and convictions.
- perform the functions related to teacher competence.
- prosecute breaches of the requirements of the Education and Training Act 2020.

### **2. Responses to the Consultation Questions**

The table overleaf contextualises our submission in relation to the consultation questions that the Ministry of Education has presented.

As noted above, the Council's role and functions relate to teachers and teaching, and not directly to the system of assessment for the purposes of awarding formal credentials. We have therefore not taken a position on the four proposals put forward in the discussion document.

Rather, we have focussed on some thematic points that we have reiterated in response to a number of consultation questions. These themes are then elaborated further in Section 3, 'Discussion'.

## Part 1: Case for change

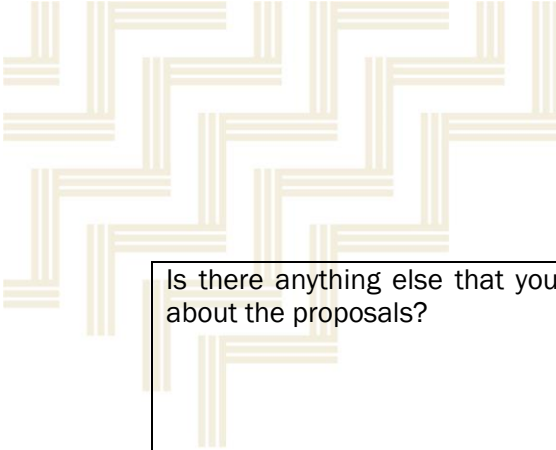
Do you agree that our national qualifications should assess against a national curriculum?	Strongly agree.
What elements, if any, of NCEA's flexibility do you think should be retained in a future design of the qualifications?	No view presented.
Do you agree that the current NCEA requirements do NOT consistently measure student knowledge, skills and readiness for future study, training or employment?	No view presented.
Do you agree that the senior secondary qualifications system needs to improve?	No view presented.
Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document?	<p>The Teaching Council wishes to highlight the importance of</p> <ul style="list-style-type: none"> <li>• Involving teacher expertise in the design of senior secondary assessment</li> <li>• Supporting the system to respond to change, and</li> <li>• Engaging with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori.</li> </ul> <p>See Section 3 for more on these points.</p>

## Part 2: Proposals

<i>Proposal 1: Working with industry to better integrate VET learning into the senior secondary qualification system</i>	
This proposal recommends that the government will work with industry to create Vocational Education and Training (VET) subjects. Overall, do you support proposal 1?	No view presented.
The government understands that investment is needed to make sure VET learning is a success. Aside from funding, are there practical or operational implications you think need to be considered for schools to successfully deliver VET subjects?	<p>Aside from funding, three of the key factors that need to be considered for schools to successfully deliver VET subjects are:</p> <ul style="list-style-type: none"> <li>• Involving teacher expertise in the design of senior secondary assessment</li> <li>• Supporting the system to respond to change, and</li> <li>• Engaging with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori.</li> </ul> <p>See Section 3 for general discussion of these points.</p>
<i>Proposal 2: Foundational Award and new senior secondary qualifications</i>	
Do you agree that replacing NCEA Level 1 with a Foundational Award in numeracy and literacy is a good way to prepare students with the basic skills needed to successfully engage with learning in Years 12 and 13?	No view presented.
Do you think other areas of learning or achievement should be considered as part of the Foundational Award?	The 2026 Standards for the Teaching Profession emphasise the need for teachers to work to 'Advance the progress and achievement of all

For example, should a certain level of student attendance be required? Describe these areas of learning or achievement.	<p>learners' by 'Teach[ing] in ways that ensure sufficient progress for the diverse range of learners, providing additional support or extension when needed' (focus area 4.3).</p> <p>The design of the assessment system should similarly seek to recognise the capabilities of the diverse range of learners.</p> <p>Involving teacher expertise in the design of senior secondary assessment will be crucial to achieving this goal.</p>
<p>Most students will complete the New Zealand Certificate of Education in Year 12. Do you agree that it is important for the Government to consider ways to ensure more students stay at school until the end of Year 12?</p> <p>How can we make sure students stay in school until the end of Year 12 and have a better chance of achieving a meaningful qualification?</p>	<p>Strongly agree.</p> <p>In considering how to make sure students stay in school until the end of Year 12 and have a better chance of achieving a meaningful qualification, the Teaching Council wishes to highlight the importance of</p> <ul style="list-style-type: none"> <li>• Involving teacher expertise in the design of senior secondary assessment</li> <li>• Supporting the system to respond to change, and</li> <li>• Engaging with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori.</li> </ul> <p>See Section 3 for more on these points.</p>
<i>Proposal 3: Shifting focus to a structured and subject approach</i>	
Overall, do you support a subject approach to assessments at Years 12 and 13?	No view presented.
Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects?	No view presented.
Do you agree that we need more consistent approaches to assessment? For example, between internal and external assessments.	<p>No view presented.</p> <p>However, the Teaching Council does wish to highlight as a design consideration that it is important that 'summative' assessment (for credentialling purposes) does not 'crowd out' the opportunity for secondary teachers to undertake and make effective use of formative assessment to guide teaching and learning. See 'The role of assessment in secondary school education' in Section 3.</p>
Do you support some subjects being required as part of the Year 11 curriculum? For example, English and Mathematics or, in Māori-medium settings, Te Reo Rangatira and Pāngarau.	No view presented.
Aside from additional funding, what practical resources and supports do you think will be important for learners and schools when shifting to a subject approach?	<p>The Teaching Council wishes to highlight the importance of</p> <ul style="list-style-type: none"> <li>• Involving teacher expertise in the design of senior secondary assessment</li> </ul>

	<ul style="list-style-type: none"> <li>Supporting the system to respond to change, and</li> <li>Engaging with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori.</li> </ul> <p>See Section 3 for more on these points.</p>
<b>Proposal 4: Strengthening achievement requirements</b>	
Do you agree that the proposed achievement requirements for the new qualifications are easy to understand? For students this means they must achieve a passing grade in at least 4 subjects and the Foundational Award.	No view presented.
Do you agree the four subject requirements should be achievable for most students?	No view presented.
Aside from additional funding, what other changes, supports, or mitigations do you think are needed to support strengthened achievement requirements?	<p>The Teaching Council wishes to highlight the importance of</p> <ul style="list-style-type: none"> <li>Involving teacher expertise in the design of senior secondary assessment</li> <li>Supporting the system to respond to change, and</li> <li>Engaging with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori.</li> </ul> <p>See Section 3 for more on these points.</p>
<b>Part 3: Implications and next steps</b>	
Do you agree that the proposals will create better alignment between the curriculum and assessments when compared to NCEA?	No view presented.
Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications?	No view presented.
Aside from additional funding, what further changes or resources would you (or your school) need for you to deliver the new qualifications?	<p>The Teaching Council wishes to highlight the importance of</p> <ul style="list-style-type: none"> <li>Involving teacher expertise in the design of senior secondary assessment</li> <li>Supporting the system to respond to change, and</li> <li>Engaging with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori.</li> </ul> <p>See Section 3 for more on these points.</p>
With appropriate resources, do you agree that the proposed timeline is achievable? The proposed timeline includes introducing the Foundational Award in 2028 and the two new senior secondary qualifications in 2029 and 2030 for Years 12 and 13 respectively.	The Teaching Council wishes to highlight the importance of involving and taking account of teacher expertise in relation to the timeline for any changes to senior secondary assessment.



Is there anything else that you would like to say about the proposals?	<p>In summary, it will be important to:</p> <ul style="list-style-type: none"> <li>• Ensure teacher expertise is included in the design of senior secondary assessment</li> <li>• Support the system to respond to change, and</li> <li>• Engage with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori.</li> </ul> <p>See Section 3 for more on these points.</p>
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### 3. Discussion

#### Importance of teacher expertise in the design of senior secondary assessment

Our most important message in this submission is: listen to the profession.

The history of failed implementation of policies in education is a long and fraught one. The common thread running through that history is not taking the time and energy to genuinely engage with teachers | Kaiako, principals | tumuaki and other professional leaders and then take proper account of their feedback (A second thread is not providing the profession with adequate support to successfully enact the change – as discussed in the following section).

That is why, whatever broad decisions the Government makes about the future of senior secondary assessment following the current round of consultation, the detailed development of those changes will need substantive involvement from secondary school teachers | kaiako and principals | tumuaki.


There are a myriad of pedagogical, administrative and workload considerations in the design, content and roll-out of senior secondary assessment. Unless the time and effort are taken to genuinely involve the profession in this development process, then sub-optimal decisions will be made.

We want to stress this as a point of good policy design and to help ensure there are no unintended consequences. It is also a matter of fairness, given the significant impact that the design of senior secondary assessment can have on the workload and job satisfaction of teachers | kaiako, and on the way that schools | kura are run.

Finally, substantive involvement of a broad range of teachers | kaiako and principals | tumuaki in the design of senior secondary assessment is an important investment in the sustainability of the system. If the profession feels a sense of ownership of the assessment system, because their advice was sought and listened to, then this will be reflected in greater commitment to its successful implementation and will help to develop a ‘positive feedback loop’ where real ‘chalkface’ experience continues to inform system improvements and evolution to meet emerging needs and challenges.

#### Supporting the system to respond to change

Teachers | Kaiako are overwhelmed with the number of changes currently or planned to be implemented into the Sector. Introducing a new assessment system, or making significant changes to the current one, would create further pressure and stress for teachers who are already strained.



The proposals in the consultation document would have a significant impact for all, especially within Secondary Schools, Kura Kaupapa and Wharekura. Support would be essential to enable principals | tumuaki and teachers | kaiako to adapt and upskill to ongoing change.

To implement effective change will require dedicated additional Professional Learning Development (PLD). The design of senior secondary assessment should include opportunities for the profession to have significant input into the amount and nature of this type of support.

Specific consideration should also be given to ensuring that other groups within the profession who need to understand the emerging system, and those working in Initial Teaching Education (ITE), also receive the support they need.

## **Engagement with Māori to ensure the senior secondary assessment system supports Māori to achieve educational success as Māori**

Under the 2026 Standards for the Teaching Profession, all teachers | kaiako and principals | tumuaki are required to:

- Demonstrate commitment to tangata whenuatanga and Te Tiriti o Waitangi partnership in Aotearoa New Zealand” (Standard 1)
- Design teaching and learning experiences that reflect Te Tiriti o Waitangi partnership in New Zealand including affirming for all learners the knowledge, identity, language and culture of te ao Māori and tangata whenuatanga (focus area 1.3), and
- Specifically support the educational aspirations for Māori learners, taking shared responsibility for these learners to achieve educational success as Māori (focus area 4.6).

We believe that the secondary assessment system should also reflect these commitments under Te Tiriti, and to do so its design will need to be genuinely informed by authentic engagement with iwi, hapū, whānau and Māori.

This should aim to ensure that the senior secondary assessment system is effective in Māori medium settings and works seamlessly with the refreshed Te Marautanga o Aotearoa curriculum.

Just as importantly, however, the senior secondary assessment system must also be designed to support the educational aspirations for the majority of Māori students who are enrolled in English medium settings, so that they too can achieve educational success as Māori.

## **The role of assessment in secondary school education**

While the Teaching Council has not taken a position on the proposals in the discussion document, we do have a significant interest in supporting and encouraging assessment for learning. In this context, we want to highlight as a design consideration that it is important that external assessment (for credentialling purposes) does not ‘crowd out’ the opportunity for secondary teachers to undertake and make effective use of formative assessment to guide teaching and learning. There are likely to be both risks and opportunities in this regard with any significant change to the senior secondary assessment system (for instance, the move from three years of assessment for awarding qualifications to two years has the potential to create more space for effective use of formative assessment).

While it is not referenced in the discussion document, there has been some indication that the proposed changes to senior secondary assessment could provide greater opportunities for the use of artificial intelligence to mark students’ work, in external assessment but also to some extent in internal assessment. We consider that, while this might have the benefit of reducing teacher workloads, there is a risk, particularly in relation to internal assessment, that it could also reduce the effectiveness of assessment *for learning* by lessening teachers’ direct involvement in assessing what students have learnt.