



Report: Making system monitoring studies compulsory for schools

To:	Hon Erica Stanford, Minister of Education		
Date:	2/07/2025	Deadline:	7/07/2025
Security Level:	In-Confidence	Priority:	High
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Why are we sending this to you?

- You have requested advice about requiring schools to participate in system monitoring studies such as PISA, TIMSS and PIRLS, for inclusion in the Education and Training (System Reform 9(2)(f)(iv) Amendment Bill (ERE)).

What action do we need, by when?

- We are seeking your decision on whether to mandate school participation through ERE.
- To meet the timeframe for the Bill, decisions will be needed from Social Outcomes Committee by 13 August 2025. A timeline is set out in the Next Steps section.
- Please return the signed paper by Monday 7 July 2025.

Key facts, issues and questions

- New Zealand's participation in system monitoring studies is declining. Studies that target secondary aged students are at higher risk of low participation rates. This risks the potential loss of valuable system-performance data.
- Attempts to increase participation through non-legislative action like communication, incentives for teachers and students, and increased flexibility have not raised participation enough for New Zealand to meet technical standards. To improve participation rates, you could pursue mandating participation in the Education and Training Act 2020 (the Act).
- However, mandating comes with risks, particularly if you wish to use ERE as your legislative vehicle as we will not be able to mitigate these risks through consultation ahead of Cabinet policy decisions. We recommend excluding Kaupapa Māori education from the mandate in ERE with a view to include them via a future amendment bill, to enable genuine consultation and consideration of their likely concerns including data sovereignty issues.

Alignment with Government priorities

1. This report aligns with Government priorities to lift student achievement by providing advice on lifting participation in system monitoring studies. Higher rates of participation will align with your education priority for better use of data and evidence to inform decision making.

Background

2. New Zealand participates in four large scale sample-based studies that monitor the performance of our schooling system in delivering student outcomes (Annex 1):
 - 2.1. **Programme for International Student Assessment (PISA)** – occurs every 4 years
 - 2.2. **Trends in International Mathematics and Science Study (TIMSS)** – occurs every 4 years
 - 2.3. **Progress in International Reading Literacy Study (PIRLS)** – occurs every 5 years
 - 2.4. **Curriculum Insights and Progress Study**, formally known as NMSSA (Curriculum Insights) – occurs every year.
3. You have agreed to develop *Tirewa Mātai* as an equivalent of Curriculum Insights for Māori language settings [METIS 1327982 refers]. 9(2)(f)(iv)
4. Each study has strict technical standards that New Zealand must meet for the sampling of schools, students within the schools, and in some cases, classes within schools. All students within a targeted age group are sampled and every school type (state, state-integrated, charter, private) has a chance to be selected. The governing organisations of each study determine the sample.
5. When a country fails to meet the minimum sampling size, it may be excluded from the international reports produced from the results of each study, losing valuable system performance data. Low participation rates also reduce confidence that the results are truly representative of the targeted population.
6. New Zealand's participation rates are declining, with not enough schools participating to meet the strict technical standards for these studies. This is particularly true for the studies that target secondary aged students, although participation is also declining in the primary aged studies. The most recent cycles of PISA and TIMSS Year 9 fell short of minimum participation standards. PISA approved the inclusion of New Zealand and other countries because of the impact of the Covid-19 pandemic on schools, but New Zealand was left out of some TIMSS Year 9 reports.
7. We are concerned that we will not meet PIRLS 2025 or TIMSS 2027 participation requirements due to previous low participation and their inclusion of secondary-aged students. The invite for PISA 2025 has already been sent and positive response is at a record low (as of July 2025, only 51% of the sample have agreed to participate). The invite for TIMSS 2027 will be in quarter four of 2026.

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8. The table below outlines our most recent participation rates for each study:

Study	Previous participation rate	Most recent participation rate
PISA	91% (2018)	74% ¹ (2022)
TIMSS Y9	87% (2019)	64% (2023)
TIMSS Y5	98% (2018)	87% (2023)
PIRLS	95% (2016)	90% (2021)
Curriculum Insights	86% (2023)	88% (2024)

Despite the challenges, increasing school participation remains essential

Schools choose not to participate for a range of reasons

9. In recent years, schools, principals, and peak bodies have indicated that system monitoring studies are not a priority and often decline invitations to participate. Their reasons generally fall into four categories:
- 9.1. logistical and workload challenges, including competing priorities and limited space in schools
 - 9.2. concern about the impact participating has on students, i.e., missing out on valued class time² *manuhaka*
 - 9.3. reputational harm for teachers and perceived misuse of the results by policy makers
 - 9.4. unexpected events such as traumatic incidents or severe weather.

There is a disproportionate impact on 'certainty' schools

10. All students have an equal chance of being selected for the sample. As a result, our largest secondary schools are 'certainty' schools that are guaranteed to end up selected in the sample of the study. For PISA, roughly 95 schools are certainty schools. For TIMSS Year 9, we have a large school cohort that has a 50% chance of being selected in each cycle's sample. When a large school in the cohort does not get selected, they are almost always allocated as replacement schools which means they will be called on if the originally selected school declines to participate.
11. These secondary schools will be asked to participate in a system monitoring study every cycle or every other cycle, resulting in a greater administrative burden. However, these schools may be better resourced and more capable of managing the demands.
12. Depending on how Tīrewa Mātai sampling is developed, many kura may also become 'certainty' schools for this study.

¹ This table is unweighted. All other information you will have received about PISA participation rates will have said 72% which is the weighted percentage (but would not match the rest of this table).

² Curriculum Insights, PIRLS and TIMSS Year 5 take approximately 2.5 hours out of a student's day. PISA takes 4 hours, and TIMSS Year 9 is somewhere in between. Depending on the starting time, sometimes schools decide for students to not attend any regular classes that day.

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Participation benefits New Zealand and could benefit schools and students

13. There are a range of benefits to participating in system monitoring studies at the system, school and student level.
14. System benefits include:
 - 14.1. benchmarks against global standards to compare across countries and over time^{3, 4}
 - 14.2. data that identifies strengths and areas for improvement
 - 14.3. commitment to transparency and continuous improvement
 - 14.4. prominence in the global education environment.
15. School benefits include:
 - 15.1. Better informed policies from Government
 - 15.2. School reports that highlight what students are achieving in and what they are not, which in turn can inform teaching and learning programmes within a school. Reports using PISA data also tell a school how students feel about the culture, including safety and belonging, which gives school boards data that helps them determine if they are meeting their s127 objectives or not.
16. Student benefits include:
 - 16.1. An opportunity to review their own progress and determine the areas they may want to improve on.

Current efforts to increase participation are not working

17. The Ministry encourages school participation by offering direct incentives, reducing logistical barriers, and increasing the value of involvement. Incentives include teacher release time payments (which has occurred since the beginning of the studies), food for students (a more recent incentive), and devices when needed. Current monetary compensation can be between \$350 - \$700 per participating school per sample. Sample sizes per cycle and per study vary. For PISA 2025, 260 schools have been selected which means a maximum compensation cost of \$182,000.
18. The Ministry offers flexible testing windows (e.g., a window of 8-10 weeks) and provides reports with information gleaned from the studies to help schools better understand their students.
19. However, these efforts have not produced the increased participation rates needed. You have now asked us for advice on making participation in system monitoring studies compulsory for schools.

Options for addressing participation problems

20. We have used an international comparison (Annex 2) to develop two options for addressing the participation problems we face:

³ In the case of PISA, TIMSS and PIRLS, the data spans 20-30 years which offers valuable insights for understanding shifts in student knowledge and competencies

⁴ Johansson, Stefan. *International large-scale assessments: what uses, what consequences?* April 2016.

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- 20.1. **Option 1: Mandate participation for schools that are selected.** We could mandate the participation of all schools in relevant system monitoring studies when they are selected by the studies' governing bodies to participate. The specific studies would be notified via a Gazette notice to be issued by the Minister of Education (this means you do not need to decide on which studies will be mandatory until after ERE is enacted). This would be consistent with the approach taken in Australia, Norway, South Korea and Sweden.
- 20.2. **Option 2: Encourage participation via more incentives before and after participation.** We could explore improving our current incentives (or offering more) as follows:
 - 20.2.1. **before study participation:** direct incentives to school leaders, teachers and students; and/or
 - 20.2.2. **after study participation:** indirect incentives that use study insights as part of a continuous improvement process so that schools can improve teaching and learning, making benefits of participating more apparent. For example, Norway and France invite the principles of participating schools to conferences where findings are presented and discussed.
21. These options are not mutually exclusive. If you proceed with option 2 (either as a standalone action or combined with option 1) some of the funding currently applied to encourage participation could be repurposed. We would undertake an exercise to assess effectiveness of incentives used here and overseas. However, the trade-off of relying on option 2 alone is that it would take longer to achieve the benefits of increased participation.
22. We are beginning to assess these options for the purposes of a Cabinet paper and Regulatory Impact Analysis if you wish to proceed with option 1 (Annex 3). The criteria that we will assess these options against will be:
 - 22.1. Increases participation
 - 22.2. Minimises regulatory burden on schools
 - 22.3. Aligns with wider strategic goals
 - 22.4. Supports Te Tiriti o Waitangi
 - 22.5. Ease of implementation
 - 22.6. Cost (long term)
23. Our initial assessment is that option 1 would be more effective at raising participation rates, including having an impact sooner, and would not impose new costs on the Ministry. However, it would introduce new regulatory burden on schools, particularly 'certainty' schools. The impact on private schools, Kaupapa Māori education (KME) and Māori Medium education settings (MME) has not been tested (as discussed below). The scope (which schools the mandate should apply to) is considered further below. Option 2 may not be as effective and will take longer to achieve results. It will likely require some additional funding. However, it will not impose any new regulatory burden.

Detailed policy decisions will be needed for legislative design

24. If you choose to progress with mandating participation for schools, you will need to make further decisions about the legislative design.

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Exemptions

25. In some circumstances, reasons for non-participation are genuine and legitimate. We recommend that the legislation provide the Secretary for Education the power to exempt schools where:
 - 25.1. participation would cause undue hardship on the teachers or students (hardship includes significant logistical impracticalities or assessments not being in the language of instruction);
 - 25.2. an unforeseen event such as weather or a traumatic event has occurred; or
 - 25.3. any other reason the Secretary finds acceptable.

Scope

26. You have a choice over which type of schools to include in the mandate. All schools are eligible for selection through the sampling processes used by the studies' governing bodies. Mandating all school types will align with this current practice and achieve the most representative sample possible. Mandating all school types is also consistent with Australia's approach.

Private schools

27. However, including private schools would not be consistent with our usual 'light touch' approach which imposes minimal requirements on private schools. Proportionally, private schools accept or decline invitations to participate in system monitoring studies at the same rate as state schools. We have not engaged with peak bodies like Independent Schools of New Zealand (ISNZ) or Steiner Education Aotearoa New Zealand (SEANZ), so we are unsure of their stance on a mandate. You could choose not to include private schools in the mandate. However, this would mean state schools are overrepresented in our study results. If you wish to proceed with the mandate in ERB¹, we would seek to test private school concerns through the Select Committee consultation process.

Kaupapa Māori education and Māori Medium education

28. Currently, KME and MME do not participate in PISA or TIMSS because the assessments are not available in te reo Māori. Students with less than two years of instruction in the assessment language are excluded from the sample. KME and MME do participate in PIRLS, but we do not have disaggregated data on their rates of accepting or declining participation.
29. Although a mandate for all state schools would include KME and MME, in practice, they would continue to be excluded from the sampling process of system monitoring studies that are not available in te reo Māori. KME and MME would be required to participate in studies that are delivered in te reo Māori such as PIRLS (and in the future Tīrewa Mātai).
30. We have not engaged with Te Rūnanga Nui o Ngā Kura Kaupapa Māori o Aotearoa (Te Rūnanga Nui) or Ngā Kura ā Iwi o Aotearoa (NKAI) or other peak bodies on the mandate. Some kura may consider that the studies do not comply with their philosophy, or have concerns about how their data is collected, stored or used. During our engagement with Te Rūnanga Nui on school planning and reporting changes, they stated that changes that create more prescription about the way kura are governed and managed does not support what they are trying to achieve.
31. We would recommend excluding KME from the scope of the mandate at this time. Excluding KME from the scope of the mandate would not prevent schools from being sampled for

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PIRLS. Instead, it would give them the continued right to decline. The decision to include kura kaupapa KME within the mandate could be reconsidered in the future, subject to engagement with Te Rūnanga Nui and NKAI.

32. If you agree to exclude KME from the mandate, you could instead focus on incentivising participation by these schools. This would align with Mana Motuhake | agency. However, if KME schools still decline to participate, other state schools may be overrepresented in our study results.
33. If you choose to include KME in the mandate, you could clarify in the Act that a school that does not provide instruction in the language of the study need not take part if selected. This would avoid confusion for PISA and TIMSS participation. However, the concern is likely to be about the mandate itself and data sovereignty issues rather than being compelled to complete the assessments in English.
34. The option of an exemption, as discussed above in paragraph 25 would not be appropriate because it would place a burden on kura to seek an exemption to be considered out of scope every time.

Requirements for teachers or students

35. We recommend that you do not mandate student participation. This aligns with research ethics that currently allow students to opt out of answering specific questions or the studies altogether.
36. However, we do recommend that you mandate teacher and principal participation for the questionnaires although still enable them to opt out of answering specific questions. This balances research ethics with the inability to replace surveyed school leaders and the potential loss of insights if they opt out.

Statutory intervention

37. No decisions on statutory interventions are required. If a school refuses to participate, the Ministry action that follows would be to consider whether a statutory intervention as outlined in s171 of the Act is warranted in the circumstances.

Risks

38. The tight ERE₁ timeframe has limited our ability to fully explore non-regulatory options and incentives. We have begun reviewing international approaches (see Annex 2), but more time would allow for a deeper analysis of their effectiveness here and abroad.
39. Meeting ERE₁ timeframes also limits our ability to consult the sector which appear divided on the issue. In late 2022, the Secondary Principals' Association of New Zealand (SPANZ) voiced concerns regarding the cultural relevance of the PISA assessment, questioning its alignment with New Zealand's educational context, particularly in relation to Māori worldviews and values. However, both the New Zealand School Boards Association (NZSBA) and the New Zealand Principals' Federation (NZPF) endorsed PISA in the same year.
40. Some schools may be more concerned than others. 'Certainty' (large) schools might react strongly due to being involved every cycle and facing extra administrative work. Private schools, KME and MME could raise concerns or refuse to take part. Enthusiasm for Tīrewa Mātai will depend on the extent to which kura are involved in its development.

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41. Ideally, we would have had an opportunity to discuss this proposal with ISNZ, SPANZ, Te Rūnanga Nui and NKAI, but the ERB timeframes do not allow for this. If you pursue a mandate, their first opportunity to provide feedback will be at Select Committee stage.
42. Risks associated with a lack of consultation now can be mitigated in part by holding consultation before any Gazette notice is issued. The Gazette notice will specify the precise studies which schools are required to participate in and their timing. A consultation prior to the Gazette notice being issued would inform decisions on which studies are to be mandated and detailed operational requirements.
43. Under data sovereignty principles, Māori have an interest in data about Māori. This includes the participation of ākonga Māori | Māori students in system monitoring studies. While we currently publish iwi-level data through Te Mataaho-ā-lwi, this does not currently include system monitoring studies. We may need to address this, and other Māori data sovereignty issues in the future.

Next Steps

44. Once you have indicated a preference, we will develop a Cabinet paper to obtain necessary decisions so that a proposal can be included in ERB with the following timeline:

Milestone	Dates
Draft Cabinet paper and Regulatory Impact Statement (unless exemption obtained) to Minister for approval to begin Agency and Ministerial consultation	15 July 2025
Concurrent Ministerial and Departmental consultation	22 July – 1 August 2025
Lodge Cabinet paper	7 August 2025
SOU	13 August 2025
Cabinet	18 August 2025

45. If you indicate a preference to pursue a proposal in ERB, you can expect the draft Cabinet paper and a Regulatory Impact Statement (unless an exemption can be obtained) on 15 July 2025.
46. Following the enactment of ERB, we will provide you with advice on which studies could be mandated and a proposal for consultation.

Annexes

The following are annexed to this paper:

- Annex 1: Information about each study monitoring the performance of the NZ education system
- Annex 2: Comparison of different jurisdictions
- Annex 3: Options to increase participation in system monitoring studies

Recommended Actions

The Ministry of Education recommends you:

- a. **note** that school participation in international and domestic system monitoring studies is declining, putting New Zealand's participation at risk.
Noted
- b. **agree** to:
 - i. option 1: seek a new requirement in the Education and Training Act 2020, through ERE [redacted], that mandates school participation in studies named in a Gazette notice.
Agree / Disagree
 - ii. option 2: **direct** the Ministry to explore additional/improved incentives for schools, including an assessment of the effectiveness of incentives, and report back to you on our findings.
Agree / Disagree
- c. **note** that while our initial analysis indicates option 1 will be more effective, it also comes with risks that may make it less desirable to progress at this time (and we will complete this analysis to inform Cabinet policy decisions, subject to your decision to proceed).
Noted
- d. subject to your agreement to option 1:
 - i. **agree** to include private schools in the scope of the mandate.
Agree / Disagree
 - ii. **agree** to exclude kaupapa Māori education from the scope of the mandate (recommended)
Agree / Disagree
 - iii. **agree** to clarify in the Act that a school that does not provide instruction in the language of the study need not take part if selected.
Agree / Disagree
 - iv. **agree** to seek that the legislation provides the Secretary for Education the power to exempt schools in circumstances of undue hardship, unforeseen events or any other reason the Secretary finds acceptable.
Agree / Disagree
 - v. **agree** to mandate teacher and principal participation for questionnaires, but continue to allow opting out of specific questions.
Agree / Disagree
- e. **note** that excluding kaupapa Māori education from the mandate would not prevent them from being sampled in the future; they would simply maintain a right to decline.
Noted
- f. **note** that legislation could be amended in the future to include kura kaupapa Māori and ngā kura-ā-iwi within the scope of a mandate, following appropriate engagement.
Noted

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- g. note that pursuing a new requirement through ERE means a very compressed timeframe and no opportunity to consult prior to Cabinet policy decisions (although there will be consultation at Select Committee).

- only come up lately because of poor uptake of PISA - now PIRLS & TIMSS are at risk.
- h. agree to consult with the sector prior to issuing a Gazette notice specifying the required system monitoring studies.

Agree / Disagree

- i. note that mandating participation in these studies is likely to receive pushback from schools. from some. But please investigate further incentives

Noted

Proactive Release:

- j. agree that the Ministry of Education release this paper once final Cabinet has taken decisions on your preferred approach with any information needing to be withheld done so in line with the provisions of the Official Information Act 1982.

Agree / Disagree

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02/07/2025

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S/07/2025

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