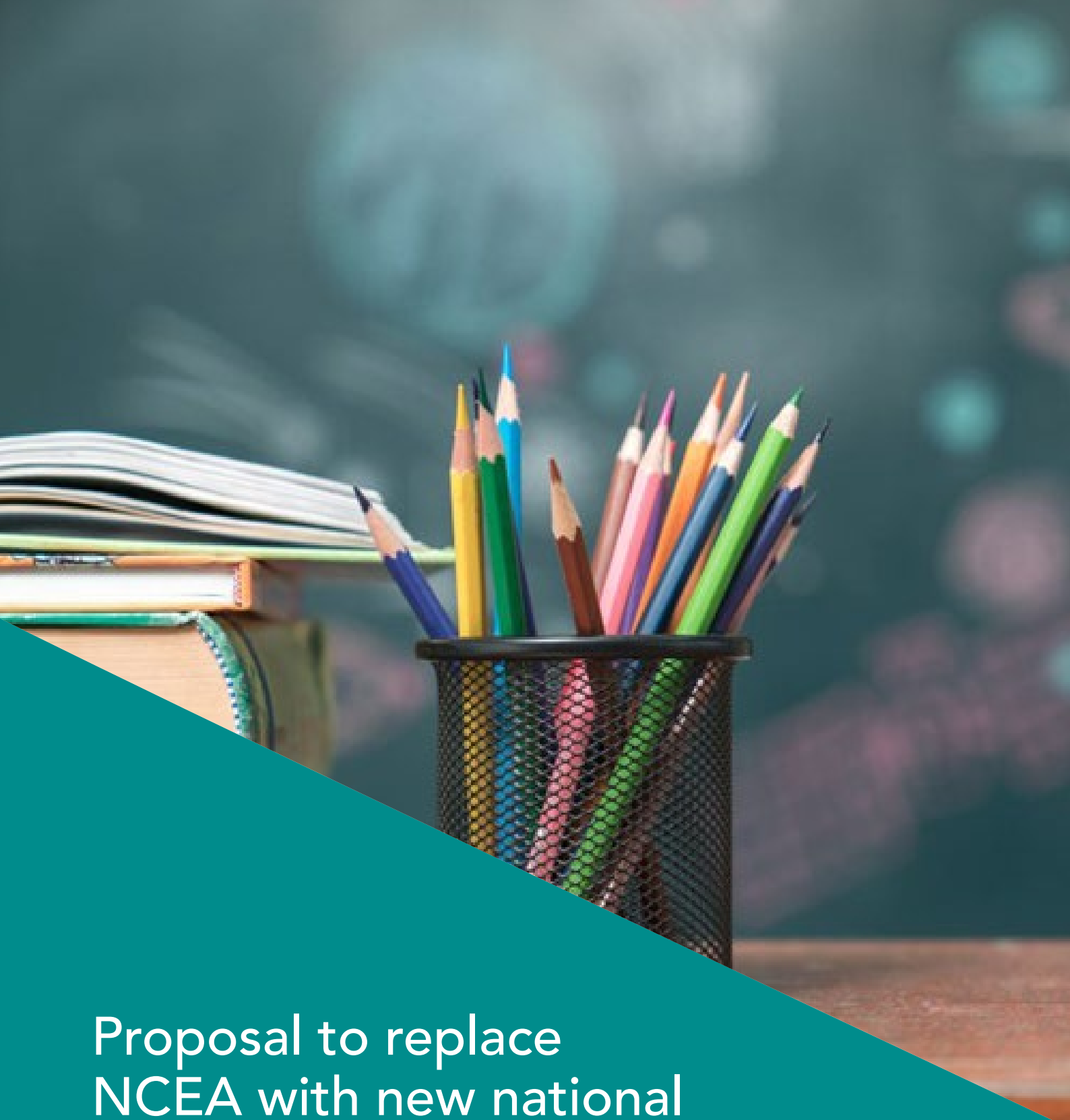




Proposal to replace NCEA with new national qualifications

Discussion document -
Summary of Submissions

05 November 2025



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Executive summary

This report summarises feedback on the Proposal to replace the National Certificates of Educational Achievement (NCEA) with new senior secondary qualifications.

Consultation focused on the Case for Change and four proposals: integrating vocational education and training (VET), introducing a Foundational Award, shifting to a structured and subject-based approach, and strengthening achievement requirements.

Methodology

Survey design

Three tailored online surveys were developed for educators, industry, and whānau and student submitters.

While Allen + Clarke supported the design, loading, testing, monitoring, and survey administration, the Ministry retained responsibility for content, and final decisions on questions for inclusion were at the discretion of the Minister.

Submissions received and in-scope

A total of 10,855 submissions were received. This included 8,729 survey submissions, 1,638 email submissions, and 488 responses from an independent Post Primary Teachers' Association (PPTA) survey.

Following comprehensive data cleaning to remove duplicate and invalid responses, a total of 7,541 survey submissions, 593 email submissions, and 158 PPTA survey responses were considered valid and in-scope for either quantitative or qualitative analysis.

Just over 1,000 additional emails commenting solely on the inclusion of Outdoor Education were analysed separately.

The strength of qualitative themes is expressed throughout this report using the following standard descriptors. These descriptors are based on the approximate volume of submissions that spoke of a particular topic, and not based on the total number of submissions.

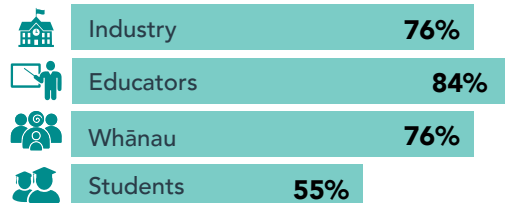
Few (<10 %)	Some (10–35 %)	Many (35–65 %)	Most (65–90 %)	Almost all (>90 %)
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Case for Change

Quantitative analysis

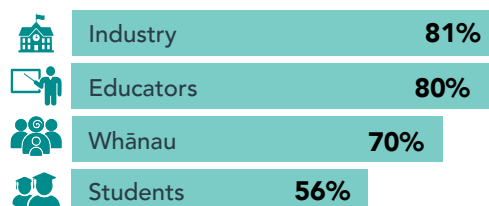
Agreement that national qualifications should align with the national curriculum

Educator (84%), industry (76%) and whānau (76%) submitters largely agreed that national qualifications should assess against national curriculum. Student submitters showed less overall agreement (55%).



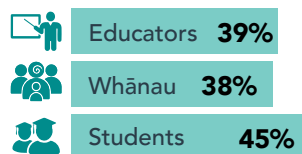
Agreement that the senior secondary qualifications system needs improvement

Educator (80%), industry (81%) and whānau (70%) submitters largely agreed that the senior secondary qualifications system needs improvement. Again, student submitters showed less overall agreement (56%).



Uncertainty about other opportunities for positive change

Many educator (39%), whānau (38%) and student (45%) submitters were either unsure or neutral to the suggestion of other opportunities for positive change.



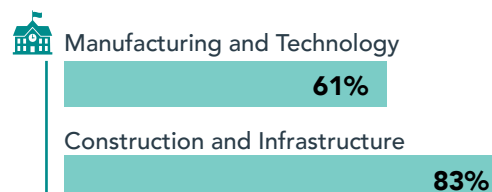
Division among educators on whether NCEA measures student readiness

Educators were divided on whether NCEA requirements do not consistently measure student knowledge, skills, and readiness, with just over half (54%) agreeing.



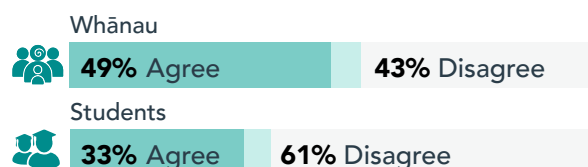
Industry agreement that NCEA is hard to understand

Of industry submitters, manufacturing / technology (61%) and construction / infrastructure (83%) industries expressed the strongest agreement that NCEA was hard to understand.



Different views on whether NCEA is hard to understand

Whānau submitters tended to agree that NCEA was hard to understand (49%), while student submitters tended to disagree that NCEA was hard to understand (61%).



✓ Support for change



Educators:

A few submitters expressed overall support for the case for change, welcoming the intent to create a credible, standardised, academically rigorous senior secondary qualification. Many submitters acknowledged the need for improvements to senior secondary qualifications, but cautioned against significant changes such as a complete overhaul of the system.



Industry:

A few industry submitters expressed support for changes. Most of these submitters supported changes based on their concerns with NCEA. Many of these submitters said there was too much inconsistency across students and schools. Some said that NCEA lacks credibility and clarity for employers. Some submitters considered that student tendency towards “credit counting” undermines the values of the qualification.



Whānau and students:

A few submitters expressed overall support for the case for change, welcoming a move away from NCEA, and considering that the significant changes to the senior secondary qualification system would better prepare students. Similar to educators, many whānau and student submitters also acknowledged the need for improvements to the secondary senior qualifications, however they also cautioned not to ‘throw the baby out with the bathwater’ by replacing the system entirely.

! Concerns about change



Educators:

Many educator submitters raised concern with the problems as identified in the discussion document. Some viewed the framing of NCEA as an inconsistent, complicated, and inadequate system to be overstated and inaccurate. Some were concerned that significant change to the senior secondary qualification system could disproportionately affect Māori, Pacific, and students with different learning needs who benefit from the flexibility that the current system enables. Some considered the case for change lacked consideration of Te Tiriti o Waitangi. Submitters called for improvements to be made to the current system instead of a complete overhaul.



Industry:

Some industry submitters raised concern with the framing of the identified need for change. They expressed concern that the significant changes to the senior secondary qualification system may result in a loss of the current system’s flexibility for students to focus learning on their strengths, needs, and career aspirations. Some also raised the potential for system changes to disadvantage Māori, Pacific, students with diverse learning needs, and small and rural schools.



Whānau and students:

Many whānau and student submitters raised concern with the problems as identified in the discussion document. Most contested the rationale for change and the assertion that NCEA is confusing, not internationally comparable, and that flexibility is a weakness. Some also expressed concern that significant changes would risk losing the flexibility of the existing system, which would negatively impact Māori, Pacific, and students with different learning needs who most benefit from flexibility to tailor learning to strengths, needs, and aspirations.

– Negative aspects of NCEA



Educators:

Many educator submitters highlighted negative aspects of NCEA. Many saw NCEA's flexibility enabled students to focus too heavily on credit counting, resulting in fragmented learning. Some raised concern with imbalanced credit value and allocation. Some said that a lack of standardised assessment can lead to incomparable achievement results. Some said that NCEA promotes memorisation rather than meaningful learning, and its grading criteria does not always reflect a student's ability. A few said the assessment workload of NCEA is burdensome for teachers. A few noted that NCEA was hard for whānau and employers to understand.



Whānau and students:

Some whānau and student submitters highlighted negative aspects of NCEA. Some of these submitters found aspects of NCEA vague and hard to understand, particularly the grading system and achievement requirements. Some noted concern with the trend towards credit counting and disengagement once enough credits have been accumulated. Some viewed the flexibility of NCEA as contributing to fragmented learning. A few expressed concern with assessment inconsistency and lack of standardisation. A few considered NCEA to be less rigorous than other internationally recognised qualifications, like Cambridge or International Baccalaureate.

+ Positive aspects of NCEA



Educators:

Many educator submitters described aspects of NCEA that they saw as positive or wanted retained in a new system. Many submitters viewed the flexibility of NCEA as a strength that was necessary to ensure learning is tailored to the strengths, needs, and aspirations of students. In particular, submitters valued the ability to create personalised learning and assessment and recognise a broad range of skills and pathways; and the balanced use of both internal and external assessment.



Whānau and students:

Many whānau and student submitters described aspects of NCEA that they saw as positive or wanted retained in a new system. Like educators, most submitters praised the flexibility of NCEA as a strength to tailor learning to the needs and aspirations of students. They valued flexibility of subjects, standards, and assessment types; a balance between internal and external assessment; a credit system that provides diverse opportunities for student achievement; and recognition of broad pathways. Many submitters, both whānau and students, also considered NCEA intuitive and easy to understand.

Assessment against national curriculum



Educators:

A few educator submitters qualified their support of assessment alignment to a new national curriculum to support coherence and credibility. Many educator submitters expressed concern about proceeding with consultation before the new national curriculum had been released. This limited submitters' ability to comment. Some submitters were concerned that rigid assessment against a national curriculum would limit teacher autonomy to tailor learning to the needs of students. A few considered the survey question to be "misleading" and disingenuous.



Whānau and students:

A few whānau and student submitters were supportive of a new national curriculum. Many submitters were concerned that rigid assessment against a standardised national curriculum would reduce flexibility to tailor learning to student needs, risking disengagement, particularly for Māori, students with different learning needs, and those who live rurally.



Priorities for improvement

Submitters most often prioritised:

- improved assessment consistency and moderation;
- clearer subject expectations;
- sustained flexibility to support diverse learners;
- stronger foundational literacy and numeracy;
- transparent records of achievement;
- adequate resourcing, guidance, and professional learning to support any change.

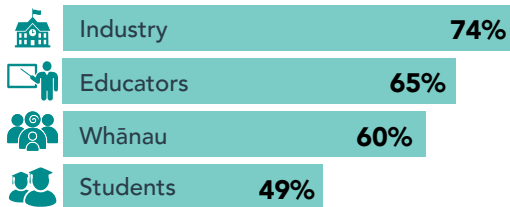


Proposal 1: VET integration

Quantitative analysis

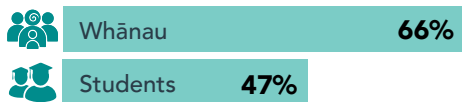
Support for Proposal 1

Overall, industry submitters were the biggest supporters of Proposal 1 (74%). Educators (65%) and whānau (60%) also expressed strong support. Student submitters tended to be more neutral or unsure (49% agree).



Support for Enhanced VET Access

Most whānau submitters were supportive of enhanced VET access (66%). Student submitters' agreement was low in comparison, instead tending to respond neutral or unsure (47% agree).



✓ Support for VET integration



Educators:

Most educator submitters supported the Proposal. They stated that VET subjects would strengthen engagement and achievement by linking learning to industry and recognised credentials. Many stated that partnerships would build applied skills and transferable capabilities. Some stated that parity between vocational and academic pathways was important, and that recognising VET as full subjects would support this.



Industry:

Some industry submitters supported clearer, earlier pathways from school to work and training. They considered that industry involvement would improve alignment and produce more work ready graduates. Some noted that relevant, hands on learning would help retain students who might otherwise disengage.



Whānau and students:

Many whānau and student submitters supported VET integration. They valued meaningful, career connected learning, and options for students who prefer practical learning. Some supported strong industry input to keep content current and relevant.

! Concerns about VET integration



Educators:

Many educator submitters raised risks of early streaming and a perceived hierarchy between academic and vocational pathways. Some were concerned about subjects being reclassified as “vocational” where they also have academic pathways (e.g., Outdoor Education, Tourism, and Performing Arts). Many noted capacity constraints: shortages of specialist teachers, lack of industry standard facilities, and costs for equipment and consumables. Some considered the current programmes (e.g., Trades Academies, Gateway, dual enrolment) effective and preferred strengthening these rather than creating new structures.



Industry:

Many industry submitters highlighted resourcing and timing risks. They noted that Industry Skills Boards (ISBs) are not yet fully established and may lack funding and capacity to design robust subjects at pace. Some questioned schools’ ability to deliver due to limited specialist staff and facilities. Equity concerns were common for rural and small schools with fewer local partners and placement options. Some cautioned against a two tier perception that devalues VET relative to academic subjects.



Whānau and students:

Many whānau and student submitters were cautious about premature streaming and losing flexibility to shift between pathways. Some questioned the need for change, noting that schools already use VET options. Equity of access for small, rural, or lower income communities was a recurring theme.



Implementation considerations and support needs

Submitters stated that successful implementation required a planned and well-resourced transition. Recruiting teachers with recent industry experience and creating pathways for tradespeople with pedagogical training was seen as critical by many industry submitters. Educator and industry submitters also identified the need for industry-standard facilities and equipment, capital and operational funding, and consistent access for small and rural schools.

Submitters suggested regional hubs, shared facilities, mobile workshops, coordinated transport, and dedicated partnership roles. They noted timetabling and logistics (block courses, off-site learning), and the need for national moderation and quality assurance. They sought comprehensive professional learning and development (PLD), clear guidance and exemplars, realistic timelines, phased roll-out with early adopters, involvement of subject associations and Māori partners, and support for ISBs to translate skill standards for secondary delivery.

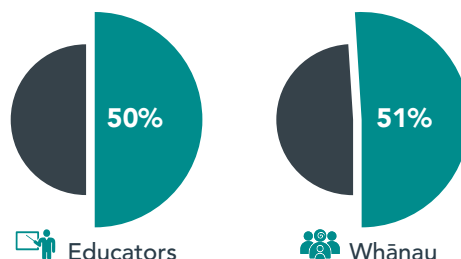
Proposal 2:

Foundational Award and Years 12-13 qualifications

Quantitative analysis

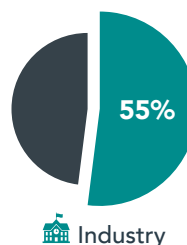
Support for a Foundational Award

Around half of educator (50%) and whānau (51%) submitters agreed that replacing NCEA Level 1 with a Foundational Award is a good way to prepare students with basic skills needed in Years 12 and 13.



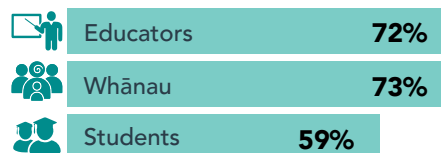
Support for removing NCEA Level 1

Around half of industry submitters (55%) agreed that it would be beneficial to remove NCEA Level 1 and focus assessment effort on Years 12 and 13.



Support for students staying to Year 12

Educators (72%), whānau (73%), and student (59%) submitters expressed agreement that it was important for the Government to consider ways to ensure more students stay in school until the end of Year 12.



✓ Benefits of Foundational Award



Educators:

Many educator submitters commented on potential benefits of a Foundational Award. Many of these submitters raised that a Foundational Award could enhance literacy and numeracy while reducing teacher workload from unnecessary high stakes assessment. A few submitters added that teachers having increased capacity could allow them to experiment and create a more innovative and engaging curriculum.



Industry:

Industry submitters supportive of a Foundational Award considered that a greater focus on foundational skills of literacy and numeracy would be beneficial.



Whānau and students:

Many whānau and student submitters commended the focus on numeracy and literacy as creating a strong foundation for students. They added that the Foundational Award could have positive impacts, such as improving student wellbeing, creating transparent achievement outcomes, and supporting equitable outcomes.

! Concern about Foundational Award



Educators:

Some educator submitters expressed concern about the introduction of a Foundational Award. Some of these submitters were concerned that the narrow scope of the Foundational Award would not be equitable or inclusive for all students, and would discourage students from further learning. A few submitters raised concern that a third “non-high-stakes assessment” year would be boring and demotivating for some students. A few submitters noted that Level 1 is optional for schools and that this flexibility should be maintained.



Industry:

A few industry submitters raised concerns about a Foundational Award. Namely, these submitters were concerned about the impact removing NCEA Level 1 may have on student readiness, the narrow focus of the Foundational Award on literacy and numeracy, and highlighted that some students will need wraparound support to achieve the proposed Foundational Award.



Whānau and students:

Some whānau and students submitters spoke of concerns with the introduction of a Foundational Award. Many of these submitters were concerned that the removal of Level 1 “high-stakes assessment” would inadequately prepare students for future learning. Many raised concern that a Foundational Award would reduce subject flexibility, and negatively impact students with diverse learning needs.

Alternatives to a Foundational Award



Educators:

A few educators suggested alternatives or adjustments to Proposal 2. Most of these submitters called for an earlier introduction of a Foundational Award, such as in Year 10 or earlier, to ensure foundational knowledge is solidified before Year 11. Some called for amendments to the current NCEA Level 1 instead of replacing it with a Foundational Award.



Whānau and students:

A few whānau and student submitters suggested alternatives or adjustments to Proposal 2. Many of these submitters suggested that the focus of literacy and numeracy improvement should be in primary school. Similar to educators, some whānau and student submitters called for amendments to the current NCEA Level 1 instead of replacing it with a Foundational Award.

Alternative qualification frameworks



Educators:

Some educator submitters discussed adopting an international qualification framework instead of introducing a Foundational Award in Year 11 and new certificates for Years 12-13. These submitters were divided. Those in favour of adopting an international qualification framework said that doing so would easily create a credible, coherent, and consistent framework compared to developing a new qualification. Conversely, those against adopting an international qualification framework considered the available options to be outdated and do not account for the New Zealand context.



Whānau and students:

A few whānau and student submitters suggested alternatively adopting an internationally recognised qualification, such as Cambridge or International Baccalaureate. They cited that doing so could increase the international comparability and compatibility of New Zealand's qualifications, and that adopting an established international qualification framework could improve academic rigour. A few other submitters opposed this approach, stating that international qualifications do not consider the important New Zealand context.

Other considerations of a Foundational Award



Educators:

Many educator submitters commented on other considerations for inclusion in a Foundational Award. Views were mixed around including an attendance requirement. Around half of educator submitters supported an attendance requirement to instil positive habits and increase participation in learning. The other half disagreed, considering that an attendance requirement would unfairly disadvantage those with disability and health challenges, and who face complex home lives. Some submitters considered that soft skills or extracurricular activities could be considered for inclusion.



Industry:

Many industry submitters commented on other considerations for inclusion in a Foundational Award. Views were mixed on attendance requirements, with slightly more industry submitters in favour of including attendance as a requirement of a Foundational Award. Others suggested soft skills could be a beneficial inclusion.



Whānau and students:

Many whānau and student submitters commented on other considerations for inclusion in a Foundational Award. Similar to educator and industry submitters, whānau and student submitters had mixed views on whether attendance should be required in a Foundational Award. Many whānau submitters expressed support for making attendance a requirement. Some considered that an attendance requirement would be more harmful than beneficial. Many tended to agree that the Foundational Award should include soft skills.

Students staying in school until the end of Year 12



Educators:

Many educator submitters provided comments on students staying in school until the end of Year 12. A few of these submitters agreed that students should be required to remain in school until the end of Year 12 through measures like raising the legal age to leave school. However, many educator submitters were concerned that forcing students to remain in school until the end of Year 12 would be counterproductive, leading to disruptive classroom behaviour and preventing students from pursuing other pathways like apprenticeships or employment. They suggested making school more attractive, supportive, and relevant to encourage students to have continued attendance.



Whānau and students:

Many whānau and student submitters commented on students staying in school until the end of Year 12. A few whānau submitters viewed 16 as too young to decide to leave school, and supported a requirement to remain until the end of Year 12. Similar to educators, many whānau and student submitters thought that forcing student to stay in school would be ineffective and disruptive to teachers and other students. They noted that students should be allowed to leave school to pursue employment or apprenticeships. Many submitters said that students are incentivised to remain in school when the learning is meaningful and flexible.

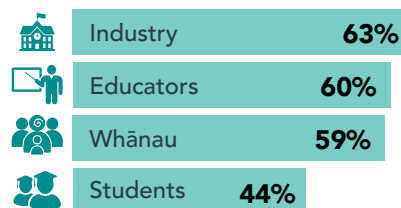
Proposal 3:

Subject-based approach

Quantitative analysis

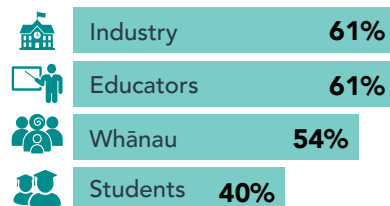
Support for a subject-based approach at Years 12–13

Overall, educator (60%), industry (63%), and whānau (59%) submitters supported the change to a subject-based approach to assessments at Years 12 and 13, though students showed lower agreement and higher uncertainty than other groups (44% agree).



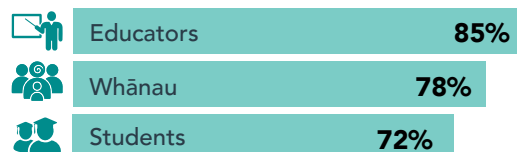
Support for engagement with the full curriculum

Educator (61%), industry (61%), and whānau (54%) submitters agreed that it is important for students to engage with the full curriculum for vocational and general subjects. Though students reported lower agreement and higher uncertainty (40% agree).



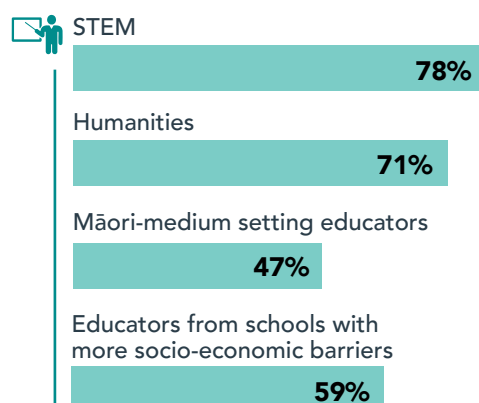
Support for requiring some subjects at Year 11

Most educator (85%), whānau (78%), and student (72%) submitters supported some subjects being required at Year 11.



Mixed views among educators on consistent assessment approaches

Educators reported varying levels of agreement regarding a need for more consistent approaches to assessment. STEM (78%) and Humanities (71%) indicated the most agreement, while Māori-medium setting educators (47%) and educators from schools with more socio-economic barriers (59%) reported relatively lower agreement.



✓ Benefits of a subject-based approach



Educators:

Some educator submitters spoke of benefits of a subject-based approach. Namely, many of these submitters said that a key benefit may include creating deeper, more coherent learning across the board. They added that a standardised subject-based approach could broaden student pathways, create equitable outcomes, and increase better assessment consistency across New Zealand. Some educators also considered that this approach would put an end to “credit counting” practices, increase engagement, and better prepare learners for tertiary study and employment.



Industry:

Some industry submitters commented on the benefits of a subject-based approach. Some of these submitters reported that benefits include the potential for clearer and more easily comparable qualification structure, deeper subject-based learning, and clearer signals to employers on student capability.



Whānau and students:

Many whānau and student submitters reported that a subject-based approach would beneficially provide the potential for more comprehensive learning, better reflect how life works, and support career planning. Submitters expected improved clarity and transparency around assessment outcomes, with whānau considering they will be better able to support their children. Other benefits reported by many submitters included increased consistency across schools and regions, better preparation for university, prevention of unintentional restriction of future pathways, discouragement of credit-chasing behaviours, and increased learner engagement.

! Concerns about a subject-based approach



Educators:

Many educators were concerned that a subject-based approach would restrict what students learn, how they learn, and their pathways after learning. Submitters noted that certain subjects such as Art and Social Sciences may be sidelined. They stressed that this approach would limit contextualised learning, which could marginalise certain vulnerable groups and teaching mediums such as Māori-medium setting approaches. A few educators expected that teacher autonomy and professionalism would be undermined.



Industry:

Some industry submitters raised concern about the shift to a subject-based approach. Submitter concerns focused on reduced flexibility, loss of subject “cross-pollination”, and over-reliance on examinations to the detriment of some student groups and creative and vocational subjects.



Whānau and students:

Many whānau and student submitters expressed concerns about the subject-based approach. Many of these submitters were concerned that a subject-based approach would reduce the ability for students to tailor learning to their strengths, needs, and aspirations, risking reduced engagement. They noted that not all pathways require subject mastery. Many whānau and some students were concerned about the impacts on the achievement rates of students with diverse learning needs and on Māori-medium students. Student stress and wellbeing were also raised as concerns.

Alternatives to a subject-based approach



Educators:

A few educator submitters offered alternative approaches to a subject-based assessment approach that could address the government's stated goals while retaining flexibility and equity. These approaches included refining the current system and maintaining a cross-curricular approach.

Engaging with whole vs segments of a subject



Educators:

Educator submitters were divided between those supporting a whole-subject approach and those preferring to engage students across multiple subject areas. Some submitters noted that there are benefits to both approaches. Supportive submitters said that a whole-subject approach would promote deeper understanding of the curriculum, be beneficial for STEM subjects, and provide clearer achievement signals. Submitters preferring flexibility to engage with segments of a subject stated that such flexibility supports building transferrable skills and more tailored and culturally responsive learning. Smaller blocks of learning were also expected to increase engagement and achievement.



Industry:

Industry submitter views were mixed on which approach was more beneficial, with more industry submitters generally supporting a whole-subject approach over engaging with segments. Benefits of a whole-subject approach included deeper more coherent learning and more accurate gauge of student knowledge. Benefits of flexibility to engage with segments included personalisation and specialisation of learning, improved student engagement, and cross-disciplinary learning.



Whānau and students:

Whānau and student submitter views were also mixed. Some submitters supported a whole-subject approach suggesting that this would deepen learning and increase employer understanding of student knowledge. A few noted that a whole-subject approach may help students identify clearer pathways, increase credibility of qualifications, and increase consistency across schools. Conversely, some submitters disagreed with the approach in favour of retaining flexibility to engage with parts of a subject and the ability to cater to individuals and their needs. These submitters reported that engaging with parts of subjects develops more diverse skills, better preparing students for the future.

Assessment consistency



Educators:

Educator submitters suggested that assessment consistency could be increased by the development of clear and consistent teaching materials, stronger moderation processes, and increased teacher professional learning and development. They also suggested increasing external assessments or standardising internal assessments. There were mixed views on the use of digital tools, such as artificial intelligence (AI), to create assessment consistency.

Subject requirements at Year 11



Educators:

While educators generally supported the required subjects, other suggestions included Science, Humanities and Social Sciences, Health and Physical Education, and/or combination of multiple subjects. On the other hand, many submitters were concerned with subject requirements at Year 11 as it could restrict student choice and potentially devalue other subjects that are less traditionally academic. Some submitters suggested core literacy and numeracy skills could alternatively be achieved through cross-curricular links.



Whānau and students:

Whānau and student submitters generally supported the subject requirements, with other subject suggestions including Science, Humanities and Social Sciences, Health and Physical Education, and/or combination of multiple subjects. Some submitters stated their support but noted that English and Mathematics are already required in many schools, and that students should have the flexibility to choose their remaining subjects. Conversely, some whānau and student submitters expressed concerns around reduced flexibility and forcing students to take subjects that do not align with their strengths or aspirations. A few also noted that literacy and numeracy skills can be developed across a range of subject areas, rather than strictly English and Mathematics.



Operational considerations of shifting to a subject-based approach



Educators:

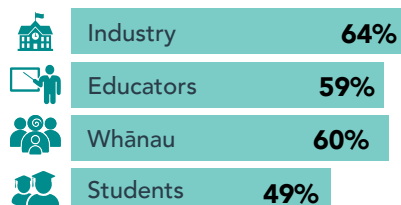
Educator submitters suggested a range of support that would be needed in shifting to a subject-based approach, including clear and consistent resources for teachers and students, professional learning and development, a clear curriculum, and additional supports (such as subject specialists / advisors, AI and digital tools, administrative flexibility). A need for external supports was also identified, including broader community involvement through stronger partnerships with industry, tertiary, and community groups, and whānau and wider student community integration. Educators highlighted that more time would be foundational to enable adoption of the listed operational considerations.

Proposal 4: Strengthening achievement requirement

Quantitative analysis

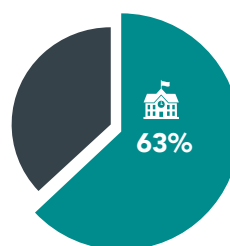
Agreement that achievement requirements are easy to understand

Well over half of industry (64%), whānau (60%), and educator (59%) submitters agreed that the achievement requirements are easy to understand. Students expressed the most uncertainty (49% agree)



Agreement that achievement requirements give employers clearer records

Slightly under two thirds of industry submitters (63%) agreed that the achievement requirements will provide employers with a clearer record of student knowledge, skills, and achievement.

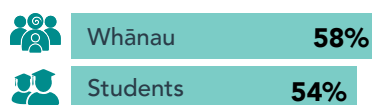


Agreement that four subject requirements are achievable

Most educator (60%) submitters agreed the four subject requirements should be achievable for most students.



Most whānau (58%) and student (54%) submitters agreed that four subjects would be a reasonable requirement to gain a secondary qualification.



✓ Support for proposed achievement requirements



Educators:

A few educator submitters supported the four subject requirement and the move to a subject grade out of 100. They considered that clearer grading and a compulsory external exam component would improve consistency and international comparability.



Industry:

A few industry submitters commented in support of the proposed achievement requirements. Some of these industry submitters considered that standardised subject requirements and aggregated grades would be easier to interpret across schools and would improve the credibility and comparability of qualifications. They also expected that requiring achievement across full subjects would ensure more comprehensive subject knowledge.



Whānau and students:

A few whānau submitters expressed support for the proposed achievement requirements. These submitters supported alignment with university style grading, a points-based approach, and clearer national expectations for achievement.



concern about strengthening achievement requirements



Educators:

Educators:

Many educator submitters stated that requiring passes in at least four subjects could recreate an 'all or nothing' system, increasing stress, disengagement, and withdrawals. Educators were also concerned about disadvantaging vulnerable and high needs students. They noted a risk that students could choose easier subjects or be disadvantaged where schools offer fewer options. Many educator submitters also considered that the A–E approach and percentage scoring would not capture learning equally across subjects, particularly in arts and practical disciplines. Some sought clarity on what constitutes a pass, how internal and external assessments would be weighted, and how the four subject requirement interacts with the Foundational Award. Educators emphasised the need for robust, transparent marking and moderation to ensure consistency.



Industry:

Some industry submitters questioned whether percentages and letter grades would improve clarity over current NCEA conventions. A few noted that generic percentages risk masking specific capabilities and do not always indicate workplace readiness. Some considered that a rigid four subject requirement could disadvantage learners with particular needs or those pursuing vocational pathways where depth may be more valuable than breadth. There was also some concern regarding over-reliance on external examinations as these may not accurately reflect knowledge or skills.



Whānau and students:

Many whānau and student submitters considered the proposed requirements too narrow and inflexible, with an increased focus on external examinations expected to raise stress and failure rates. They stated that a uniform approach would not recognise different learning needs or mixed academic–vocational pathways, and that a weak result in one subject could negate strong performance in others. Some submitters were also concerned that the proposed changes to the grading system have no clear benefit and will introduce confusion.

Other changes or supports needed to strengthen achievement requirements



Educators:

Many educators reported needing clear and robust curriculum and assessment frameworks, teaching collateral, and moderation systems. They also suggested enhancing the teaching experience through extensive learning and development, increasing the teaching workforce, reducing class sizes, increasing supports for students with additional learning needs, and addressing external factors that impact learning and engagement.



Whānau and students:

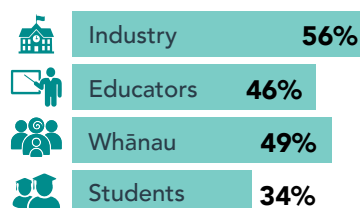
Some industry submitters called for a greater balance between flexibility and structure, consideration of subject choice and availability, and recognition of partial achievement.

Implications and next steps

Quantitative analysis

Agreement that proposed changes improve credibility and coherence

Whānau (49%), industry (56%), and educator (46%) submitters agreed to varying degrees that the proposed changes would improve the credibility and coherence of national senior secondary school qualifications. Students reported much lower agreement (34%).



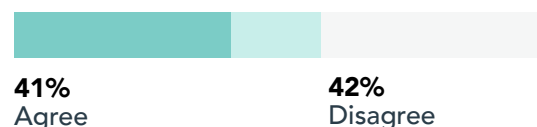
Agreement that proposals align curriculum and assessment

Educators were split on whether the Proposals would create better alignment between the curriculum and assessments (41% agree; 33% disagree).



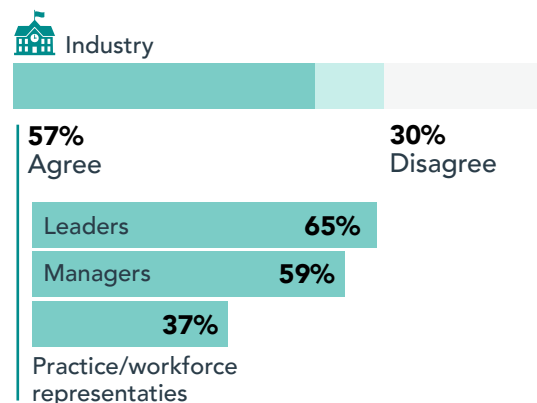
Agreement that proposed timeline is achievable

Educators were similarly split on whether the proposed timeline is achievable (41% agree; 42% disagree).



Agreement that proposed changes benefit industry

Over half of industry submitters (57%) agreed that the proposed changes would be beneficial for their business in future, with one third (30%) disagreeing. Leaders (65%) and managers (59%) were more likely to agree than practice/workforce representatives (37%).



✓ General support for the Proposals



Educators:

A few educator submitters commented general support in favour of the proposed changes. However, some of these educator submitters tempered their support with caveats that successful implementation will need to 'iron out the details'. Others commented that while they supported the change, the new system will need to be "flexible and equitable" and retain the good aspects of NCE.



Industry:

Some industry submitters supported the direction of the reforms, provided that implementation was well planned and adequately resourced. Submitters noted that successful delivery would depend on clear communication, strong support for teachers, and realistic timelines.



Whānau and students:

A few whānau submitters expressed general support for the proposed changes. These submitters reported that the proposed changes are positive and are welcome improvements to the current system. A few student submitters also reported general support for the proposed changes, noting that they expect that the changes would better align with international approaches.

! General concern for the Proposals



Educators:

Many educator submitters reported that there is also a lack of evidence that the proposed changes would achieve the expected improvements. Educator submitters expected that the rigid, 'one size fits all' approach proposed would result in increased inequity and failure rates (as well as increased dropout rates and decreased attendance). Educator submitters commented that the proposed model will not allow for localised, culturally responsive approaches, meaning that teachers will be unable to tailor learning for their students.



Industry:

A few industry submitters also noted uncertainty about what resources and support would be available. A few submitters emphasised that operational planning needed careful attention. They noted concerns about timetabling, staffing, subject availability, and coordination of industry partnerships.



Whānau and students:

Whānau and student submitters expressed concerns about regressing to an outdated system, the 'guinea pig' student cohort, having enough teachers to implement the changes, needing a phased implementation, recognition of NCEA qualifications, 'narrowness' of the system, and rising teacher workload. They said that resources (i.e. time and money) would be better used to tweak and strengthen the current system, which they said was good, rather than create immense disruption and burden for teachers and students.



Timeline considerations



Educators:

Most educator submitters considered that the proposed timelines for implementation are not long enough and are unachievable. Other submitters said that the timelines are rushed, unplanned, and do not consider the large change required. Submitters reported that they had very little confidence that they would receive the necessary resources and training in a timely manner to support a smooth and effective transition.



Industry:

Many industry submitters stated that the proposed timeline for implementation was too rushed. They noted that developing quality VET subjects, retraining teachers, and establishing robust assessment systems required more time than proposed.



Implementation considerations



Educators:

Many educator submitters reemphasised the need for sufficient PLD to support delivery of the change. Some educator submitters suggested that a thorough pilot of the curriculum, standards, assessments, moderation process, and resources is needed prior to nationwide implementation. Some educator submitters said that robust and nationwide access to digital tools are a key change needed to support implementation. Some submitters reemphasised the need to ensure that there are supports available for students with additional learning needs, to ensure all students have the ability to succeed in a less flexible system.



Industry:

Most emphasised that professional development for teachers would be essential. Many highlighted the need for ongoing partnership between schools, industry, and tertiary providers. Some industry submitters raised concerns about managing the transition period between systems and suggested a phased implementation with adequate transition support would reduce disruption.



Whānau and students:

Many whānau submitters called for increased support for teachers; a few said the Proposals would add to workload and risk burnout. Some students cautioned that limited support would compound confusion and stress for students and staff. Many whānau said learners with additional needs would require stronger supports to ensure equity and inclusion. Whānau and students sought clear, consistent, and transparent guidance on curriculum, assessment, and moderation. Some whānau also said any change must be backed by strong, regular engagement with students and whānau.

Other comments



Educators:

Many educator submitters emphasised that regardless of the approach taken, it must have bipartisan agreement from all political parties. Many educator submitters commented that the constant change creates much instability. They said that this instability damages the credibility of the education system and makes it very difficult for teachers to plan and students to succeed. Some educator submitters commented that these changes are likely to result in increased teacher resignation and early retirement, as well as lower attraction into the profession. A few submitters re-emphasised that the proposed changes are not in the best interests of students and will negatively impact on their achievement and wellbeing.



Whānau and students:

Student submitters said that the consultation needs to listen to student voices, and that any changes need to better consider and centre the needs and wellbeing of students and teachers. Student submitters advocated for change that is incremental and considers the individual. Like educators, some whānau submitters commented that changes to our education system, such as the proposed, need to have bipartisan support.



1 Introduction

The Ministry of Education (the Ministry) undertook consultation on the structure and features of the proposed new national senior secondary certifications to replace the current National Certificates of Educational Achievement (NCEA) as New Zealand's national qualification.

Between **4 August and 15 September 2025**, the Ministry called for written submissions on the proposed senior secondary qualification structure, including the Case for Change and feedback on four areas of changes:

working with industry to better integrate vocational education and training (VET) learning
introducing a new Foundational Award and two new national senior secondary qualifications for Years 12 and 13

using a structured and subject-based approach and introducing mandatory subjects

making grades easier to understand and changing how students get their qualifications.

The purpose of this report is to provide quantitative analysis of survey responses, and qualitative analysis of key themes on the Proposals from all written submissions.

1.1 Submissions received

A total of 10,855 submissions were received. This report is based on the quantitative analysis of 7,541 valid survey responses, and the qualitative analysis of 7,424 submissions that were in scope for analysis. **Table 1** and **Table 2** below outline the breakdown of submissions included in analysis.

Table 1: Submissions in scope of quantitative analysis

Ministry Survey	Educator	Industry	Whānau or student	Total
Rating scales (Likert) only	690	79	1,111	1,880
Rating scale (Likert) and/or written responses only	3,356	136	2,169	5,661
Total	4,046	215	3,280	7,541

Table 2: Submissions in scope of qualitative analysis

Submission format	Educator	Industry	Whānau or student	Other	Outdoor Education ¹	Total
Ministry Survey ²	3,356	136	2,169	-	-	5,661
Email	407	57	47	82	1,012	1,605

¹ Approximately 1,012 emails received were identified as solely expressing support for or comment on the inclusion of Outdoor Education in the qualification framework. These submissions were analysed separately with a summary of key themes raised in section **9 Outdoor**.

² All figures are post-data cleaning.

Submission format	Educator	Industry	Whānau or student	Other	Outdoor Education ¹	Total
PPTA Survey ³	158	-	-	-	-	158
Total	3,921	193	2,216	82	-	7,424

For further information on data exclusions, refer to the sections below.

1.2 Methodology

Submissions were received either via email to nceaconsultation@education.govt.nz, or via online survey hosted in Qualtrics.

Ministry survey submissions

Three separate online surveys were developed specifically to capture feedback from parents / caregivers / extended family (whānau) and students; teachers and principals (educators); and employers and industry submitters. All surveys were loaded and managed using Qualtrics, a professional online survey platform containing rich features for complicated surveys and strong data security measures. The survey was managed and monitored by *Allen + Clarke*.

Allen + Clarke worked closely with the Ministry in the design and establishment of each of the surveys, however final decisions on questions for inclusion, and specific wording of questions, were ultimately at the discretion of the Minister. Survey questions were amended based on the intended audience, and multiple language versions⁴ were available.

Email submissions

All email submissions received were uploaded by the Ministry to a secure ShareSpace. *Allen + Clarke* was provided access to this ShareSpace to process submissions for analysis. Email submissions were logged into a spreadsheet, allocated a unique identifier, and categorised into one of the submission types outlined in **Table 3** and coded alongside the surveys.

Table 3: Email submission categories

Submission type	Description
Educator	Submissions that self-identify as being from a teacher, principal or school
Industry	Submissions that self-identify as being from an employer or industry organisation
Whānau and student	Submissions that self-identify as being from a whānau / family member or student
Other	Submissions that either did not identify as one of the above groups, or did not provide enough information in their submission to confidently categorise the submitter as one of the above submitter types

³ Excluding blank responses.

⁴ 16 translation versions were available overall (Samoan, Tongan, Cook Island Māori and Te Reo Māori versions were available across all surveys, Niuean and Tokelauan versions were also available in both the whānau and students survey, and the educator survey).

Submission data management and cleaning

A consistent cleaning process was applied to ensure integrity and avoid double counting.

- **Quantitative survey data:** Incomplete responses (no valid answers to core questions) were removed. Duplicates were merged or removed (identified primarily via email address). Entries with obviously fake contact details or nonsense text were excluded. Where contact details were invalid, but core survey responses were present, the record was retained. In total, 1,188 survey submissions were removed from the quantitative dataset.
- **Qualitative (free text) survey responses:** The same validity checks listed above were applied to the qualitative responses. In total, 3,069 survey submissions were removed from the qualitative dataset during cleaning.
- **Email submissions:** Exact duplicates were excluded⁵ and, where the same content appeared across channels, the survey version was prioritised for inclusion (particularly within the smaller industry cohort⁶). Eight handwritten submissions were read and incorporated manually as they could not be loaded to the qualitative software.
- **PPTA survey:** The New Zealand Post Primary Teachers' Association (PPTA) developed a survey to run concurrently to the Ministry of Education survey. This PPTA survey broadly covered the same questions and content, however some questions were amended to streamline responses. We received the PPTA dataset separately. We removed 330 blank responses from qualitative counts and coded the remaining written responses in a distinct NVivo file to maintain data integrity. The PPTA survey is included in the educator counts.

Table 4 outlines the total number of submissions across submitter groups before and after data cleaning.

Table 4: Survey submissions before and after data cleaning

Survey submissions	Educator	Industry	Whānau or student	Total
Raw data received	4,565	411	3,753	8,729
Post-data cleaning – valid quantitative responses (total)	4,046	215	3,280	7,541
Post-data cleaning – valid qualitative responses (total)	3,356	136	2,168	5,660

Quantitative analysis

Demographic and Likert-scale⁷ survey responses were analysed using statistical software. Analysis began with descriptive statistics, followed by subgroup analysis and inferential

⁵ Duplicate submissions were defined as identical in content to a submission that we had already received by an individual or organisation of the same name.

⁶ Where industry organisations submitted through both the online survey and via email and the submission was obviously identified based on the organisation name.

⁷ Likert-scales are a type of rating scale used to measure submitters' level of agreement with certain questions or statements.

testing. Chi-square tests⁸ and p-values⁹ were used to identify statistically significant differences between groups. Subgroup results are reported in graphical form in the report only where differences were statistically significant.

To ensure adequate statistical power, demographic categories (for example, educator roles; industry types and sizes; student year levels and ethnicity) were regrouped with final groupings agreed with the Ministry before analysis.

In this report, percentages for demographic questions that allowed multiple responses may total more than 100 per cent.

For consistent term use of quantitative descriptors in reporting, we define the range adjectives below (as standard descriptors) based on the context and data of this submission analysis. *Please note that the definition of the descriptors is not static and may vary by context.*

The range adjectives in **Table 5** have been used for the quantitative analysis explanations.

Table 5: Quantitative analysis descriptors

Descriptor	Percentage Range
A few / Small	0% - 15%
Moderate / Some	15% - 35%
Substantial / Many	35% - 45%
Half / About half	45% - 55%
Strong / Most	55% - 75%
An overwhelming / A vast majority of	75%+

Qualitative analysis

A total of 7,424 in-scope survey and email submissions were coded¹⁰ and analysed using NVivo 15 qualitative analysis software. The coding framework combined the survey structure with an initial review of a sample of 100 submissions per submitter group. The framework was refined iteratively during coding of the first 1,000 submissions to support consistent application. For this report, the guide provided in **Table 6** was used to establish the strength of themes that came through from submitters.

Table 6: Qualitative analysis descriptors

Description	Approximate number of submitters
Few	Fewer than 10% of submitters on this topic

⁸ Chi-square tests are used to assess whether variations in responses between subgroups (e.g., the teacher group, the school management and the other group) represent genuine differences or merely reflect random fluctuation.

⁹ A low p-value, typically below 0.05, suggests that the differences between subgroups are genuine, and unlikely to be coincidental.

¹⁰ Coding in this context is a process of systematically categorising segments of data from a survey or email submission to identify themes.

Some	10 to 35% of submitters on this topic
Many	35 to 65% of submitters on this topic
Most	65% to 90% of submitters on this topic
Almost all	90% or more submitters on this topic
All	100% of submitters on this topic

Ethical considerations and privacy

The Ministry sought submissions through defined channels and noted that feedback would be managed in line with the Privacy Act 2020. Submissions may be subject to Official Information Act requests. Identification of individuals in reporting required express permission and necessity. Analysis and reporting followed these expectations.

Use of Artificial Intelligence

AI tools provided minor assistance with background tasks such as summarising, brainstorming, and preparation of this Report. All outputs were verified by *Allen + Clarke's* subject matter experts. At no stage were direct quotes, excerpts, or other content from individual submissions entered into an AI system.

Limitations

As email submissions did not reliably provide demographic data, quantitative analysis on email submissions was unable to be completed. This included where survey templates were filled out in a Microsoft Word document and submitted via email. In these instances, demographic information and Likert-scale questions could not be efficiently extracted in the required timeframes for inclusion in quantitative analysis.

Similarly, although the PPTA survey collected demographic information from respondents, as this survey data varied from the Ministry of Education survey data, a merge of datasets was unable to be performed in the required timeframes. Only written responses have been included as part of the qualitative analysis of educator responses.

When answering demographic questions as part of the whānau and students survey response, it was possible for respondents to select multiple categories to the question: *“Which of the following best describe(s) your interest in the NCEA changes?”*. Where submitters selected both a whānau-based category (parent or caregiver, or extended family member) and a student-based category (namely, former secondary school student), for the purposes of both quantitative and qualitative analysis, these submissions have been prioritised as whānau submissions and not captured as student submissions.

Given the large number of questions in the survey (up to 60), the volume of both survey and email submissions received, and the timeframes for completion of this report, quantification of qualitative themes could not be completed. Coding to the detail required to provide quantification of themes would require much longer to complete. To balance the need for timely analysis, this report instead relies on the terminology outlined in **Table 6** that is commonly used in qualitative analysis to gauge strength of views.

2 Overview of Submissions

A total of 5,819 survey submissions (see **Figure 1**) and 592 email submissions (see **Figure 2**) were received and in scope for analysis.

Figure 1: Survey submissions

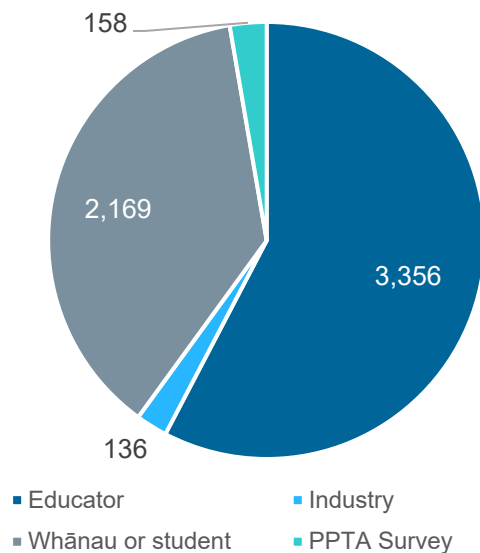
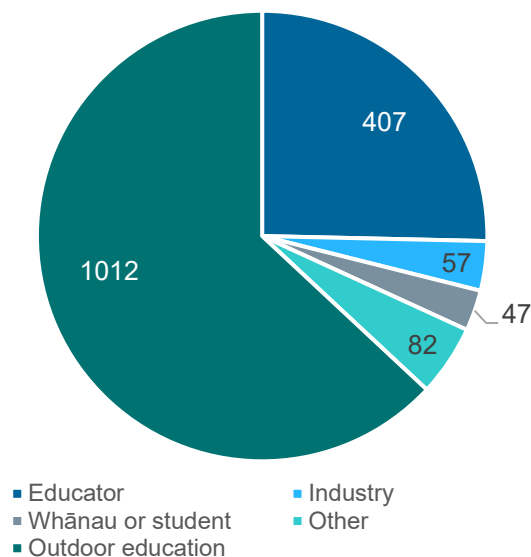


Figure 2: Email submissions



2.1 Educator submissions

Figure 3: Educator submissions by role (N=4,382¹¹)

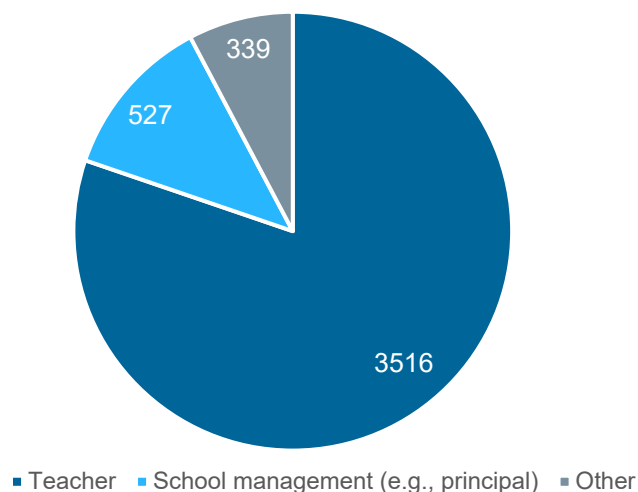
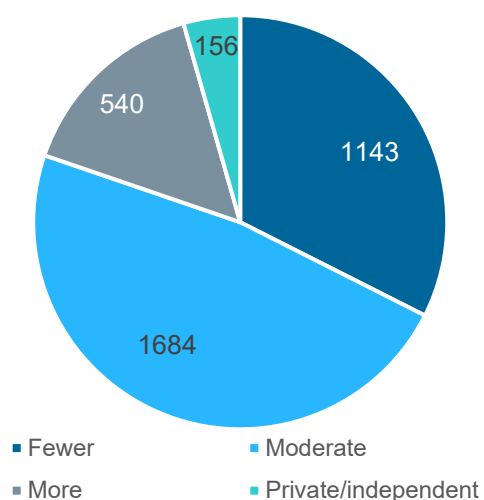


Figure 3 shows that overall, the large majority (87%) of submitters were teachers, while 13% were from school management, and 8% reported as “Other”.

¹¹ The number of responses would normally be higher than the total number of participants for multiple response questions. This applies to similar situations in this reporting.

Figure 4: Educator submissions by school EQI (N=3,523)

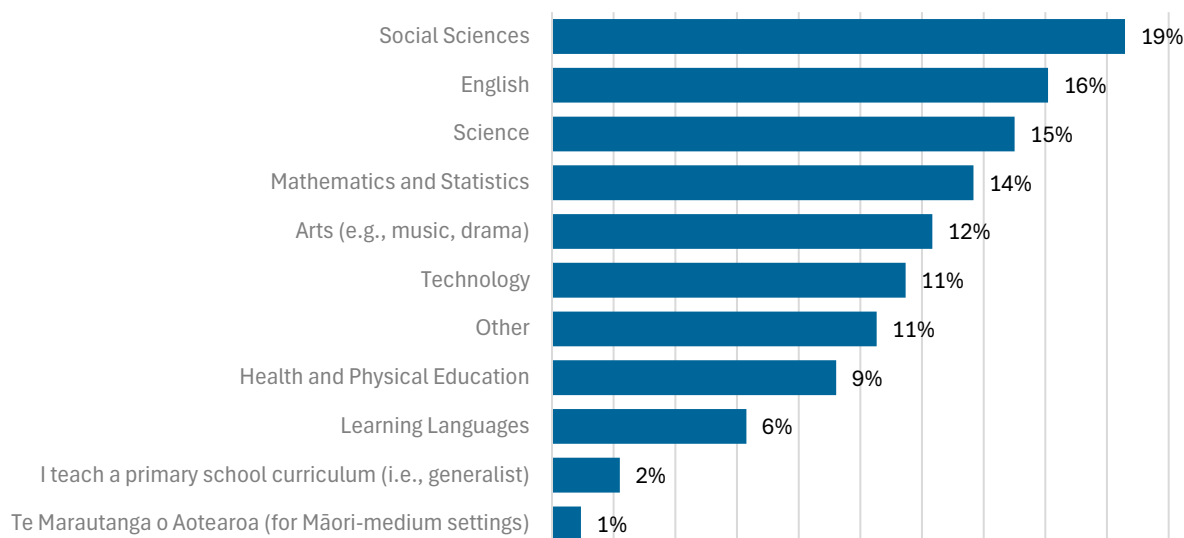


Educator submissions were from a wide variety of schools and locations (3,858 free text responses in school name and locations).

The Ministry of Education reviewed these free-text responses and provided Schooling Equity Index (EQI)¹² ratings for each school.

Figure 4 shows that there are 28% responses from schools with fewer students facing socio-economic barriers, 42% and 13% respectively from schools with moderate or more students facing socio-economic barriers. There is also 4% from private or independent schools.

Figure 5: Educator submissions by teaching areas (n= 4,707)



As shown in **Figure 5**, in terms of teaching subjects, the sample illustrates that the majority of submissions were received from educators in core subjects, followed by other subjects commonly taught in all secondary schools. Educators teaching the primary school curriculum and Te Marautanga o Aotearoa (for Māori-medium settings)¹³ were the smallest groups of submitters. The 11% of submitters that selected “Other” subjects covered very diverse areas.

For the sub-group analysis, Social Sciences, English, and Learning Languages educator responses were merged under ‘Humanities’; and Science, Mathematics and Statistics, and Technology educator responses were merged under STEM. All other teaching areas

¹² The Schooling Equity Index (EQI) is a statistical model that estimates the extent to which students face socio-economic barriers to achievement at school. More information on the EQI is available from the Ministry website. <https://www.education.govt.nz/our-work/changes-in-education/equity-index>

¹³ Results for Māori-medium setting educators should be interpreted with caution due to potential small sample size bias educators using Te Marautanga o Aotearoa (the national curriculum for Māori-medium settings) with a minimum of 24 and maximum 34 responses to individual questions in the online survey.

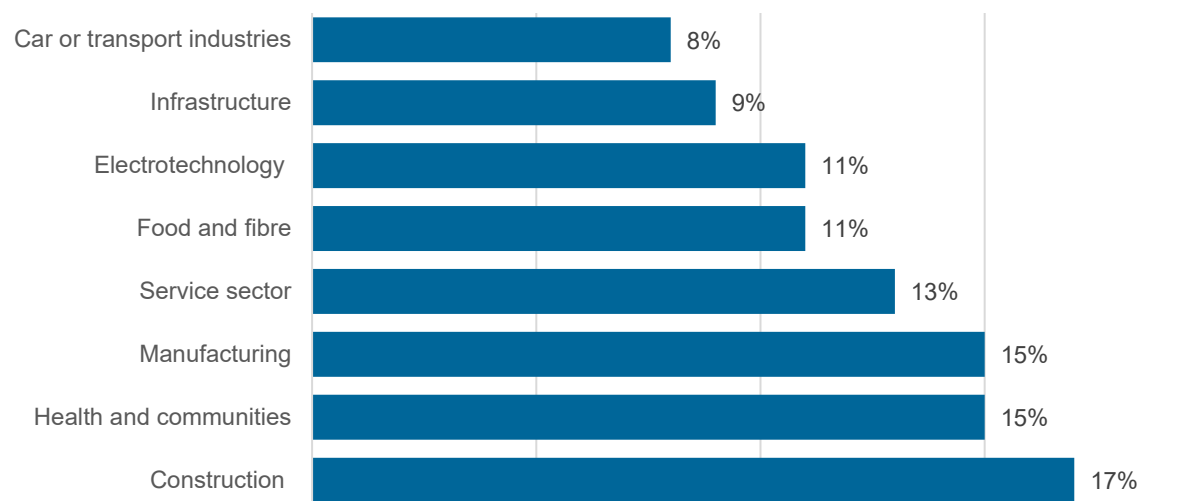
remained. Educators that indicated “Other” reported diverse areas of subjects that were not covered in the choices, such as Accounting, Horticulture, Careers and Gateway, Counselling, etc.

Overall, 70% of participants were educators with more than 10 years’ experience, followed by 6 to 10 years (15%) and less than 5 years (15%).

2.2 Industry submissions

Following the completion of data cleaning, there were 215 valid quantitative samples for the industry/employer survey.

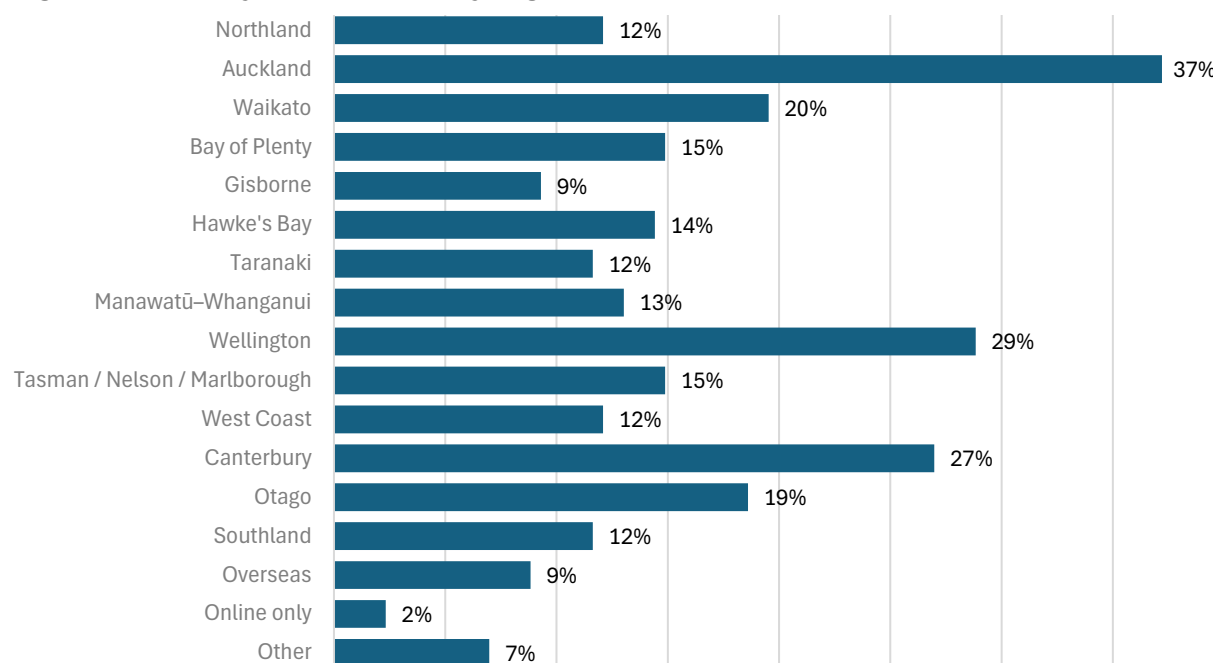
Figure 6: Industry submissions by industries (N=297)



As shown in **Figure 6**, the distribution was balanced across a range of industries. A further 39% selected “Other”, where the report includes analysis of industry submissions broken down by industry type, we categorised the “Other” submitters based on the industry area that most closely matched the free text.

Industry submitters were asked about their role, the largest group of submitters was leadership (39%), followed by management (30%), then employees and contractors (29%), with 3% stating they were unemployed and 9% being “Other”. Responses from small to medium firms (fewer than 100 employees) represented 78%, whereas large firms (more than 101 employees) represented 18%. The remaining 4% were “unsure”.

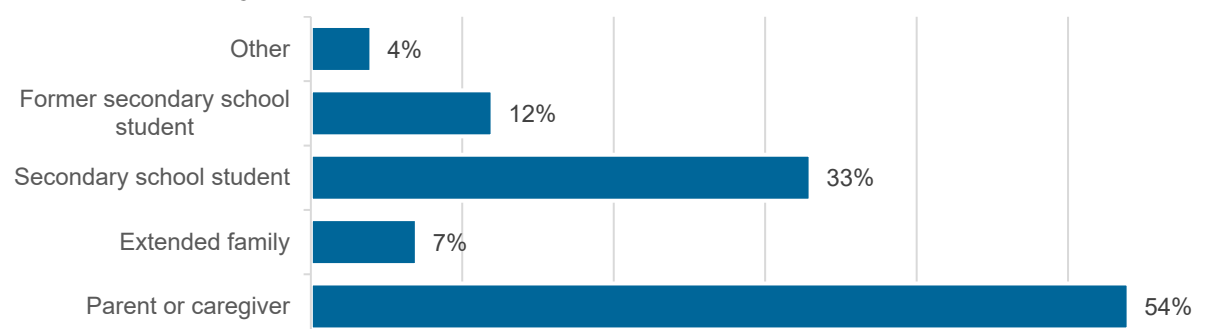
Figure 7: Industry submissions by region of operation (N=566)



Industry submitters were asked to provide their regions of operation and were given the choice to select all that apply. The spread across all regions is provided in **Figure 7**. For sub-group analysis the regional responses were grouped as Major Metropolitan areas (i.e., Auckland, Wellington, and Canterbury), North regional and South regional areas.

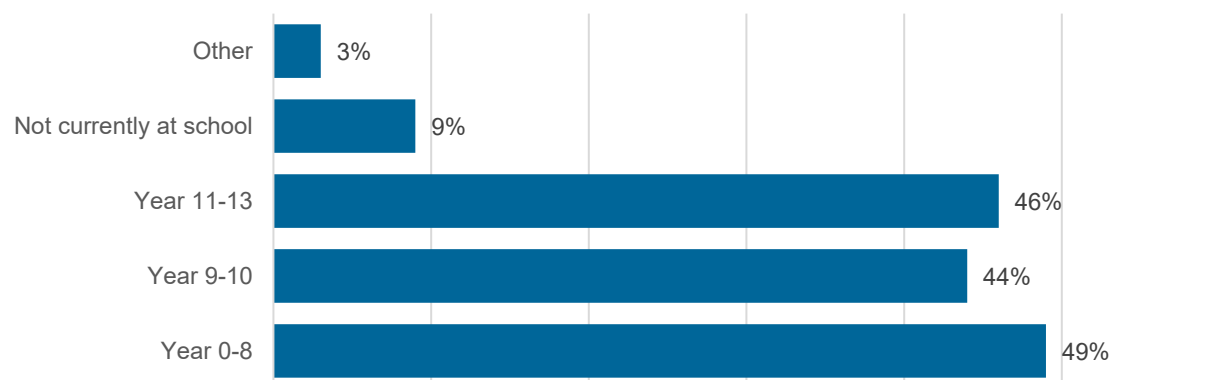
2.3 Whānau and student submissions

Figure 8: Which of the following best describe(s) your interest in the NCEA changes? Tick all that apply. (N=3611)



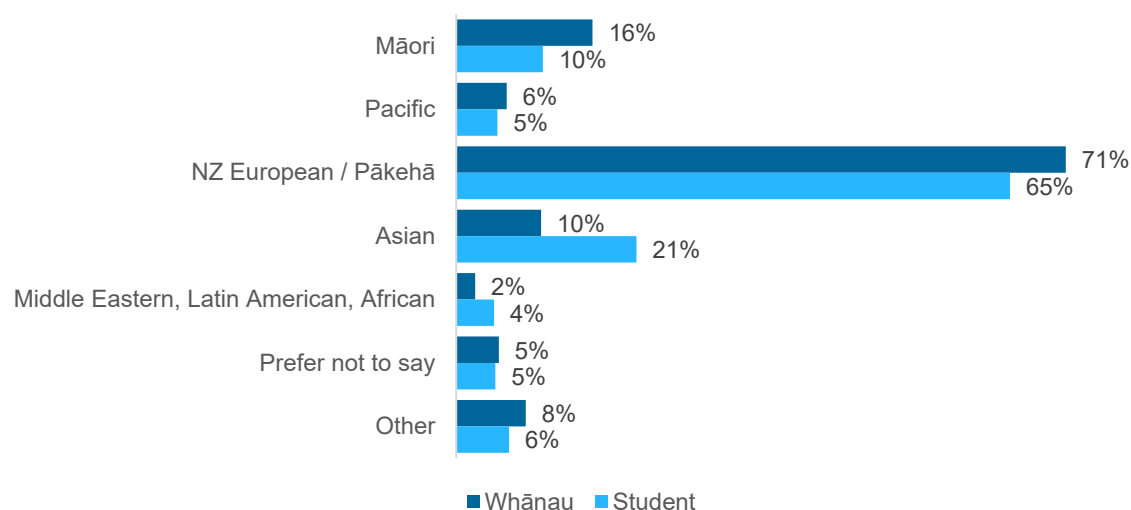
Respondents to the whānau and student survey were asked to indicate their interest in the NCEA changes (**Figure 8**), and approximately 10% of respondents selected more than one option. Throughout this report, subgroup analysis has been used to separate and compare responses from whānau and students/ex-students, as the responses from these two cohorts are from the same survey. Respondents that selected 'parent or caregiver' or 'extended family members' have been classified as 'whānau' and former secondary school students have been included in the analysis for students, unless they had also indicated they were responding as a whānau member.

Figure 9: What level does/do your child/children or family member(s) belong to? Tick all that apply. (Whānau responses N=2,940)



In order to understand the views of whānau in their responses, whānau were asked to indicate the schooling level of their children. Survey responses showed 677 whānau had children at different levels, and the spread of responses recognises that whānau may have some children that will be subject to the changes, and other children that have or will be subject to NCEA. **Figure 9** shows the range of responses received from all whānau submitters.

Figure 10: Which ethnic group(s) do you identify with? Tick all that apply. (Whānau responses N=2,302 and student responses N=1,442)



All whānau/student survey submitters were asked to indicate which ethnic groups they identify with. As shown in **Figure 10**, more than two thirds of submitters identify as NZ European/Pākehā, with Asian and then Māori as the next largest groups of submitters.¹⁴

¹⁴ Results for Pacific and Middle Eastern, Latin American, and African (MELAA) responses should be interpreted with caution due to potential small sample size bias, especially for the subgroup findings.

3 Case for Change

Discussion Document Overview

NCEA was introduced in 2002 as a flexible, inclusive, and standards-based senior secondary national qualification. NCEA has faced criticism that a lack of consistency and too much flexibility affects the credibility of NCEA and that it is confusing to understand. The consultation document outlined that changes are needed to improve the credibility and coherence of the senior secondary qualification. These changes would begin with a refreshed national curriculum.

Key questions posed to submitters included:

- *Do you agree that our national qualifications should assess against a national curriculum?*
- *Do you feel that you understand NCEA?*
- *Are there aspects of NCEA that you think support student learning and achievement? What are these aspects?*
- *Do you agree that the senior secondary qualifications system needs to improve?*
- *Do you think there are other opportunities for positive change with the new qualifications?*

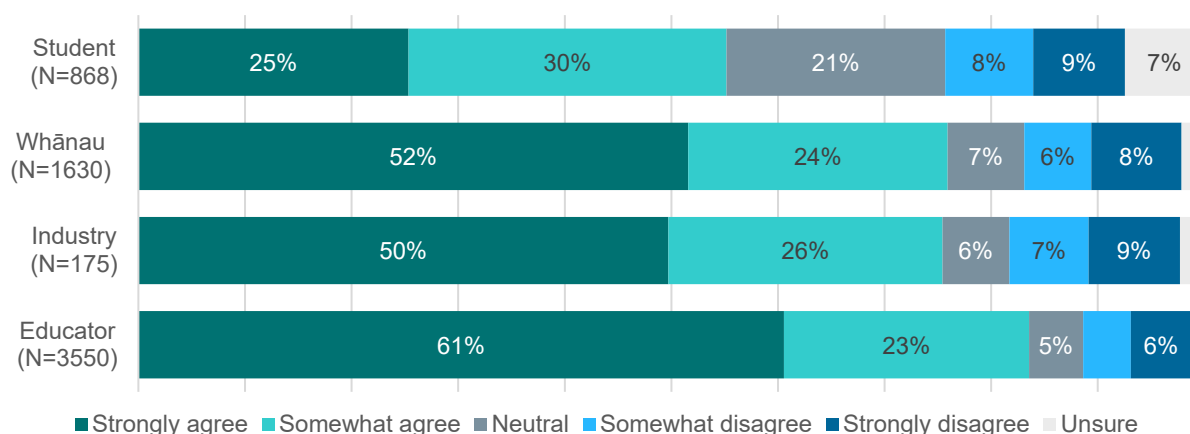
3.1 Quantitative survey analysis

The Case for Change section of the survey asked submitters a targeted question regarding the suitability of NCEA for supporting understanding for each audience. This section outlines the results of the three questions that were asked of all submitter types, and key subgroup analysis findings.

Note: In our visualisation of subgroup findings throughout the report, we have not included the percentages of a category of fewer than 5% for the sake of visual brevity.

3.1.1 Should the national qualifications assess against the national curriculum?

Figure 11: Do you agree that our national qualifications should assess against a national curriculum?



As shown in **Figure 11**, a vast majority of educators, industry and whānau respondents (76-84%) agreed to varying degrees that national qualifications should be assessed against a national curriculum. Student respondents were less confident, with just over half indicating agreement.

Figure 12: Do you agree that our national qualifications should assess against a national curriculum? (by teaching area)

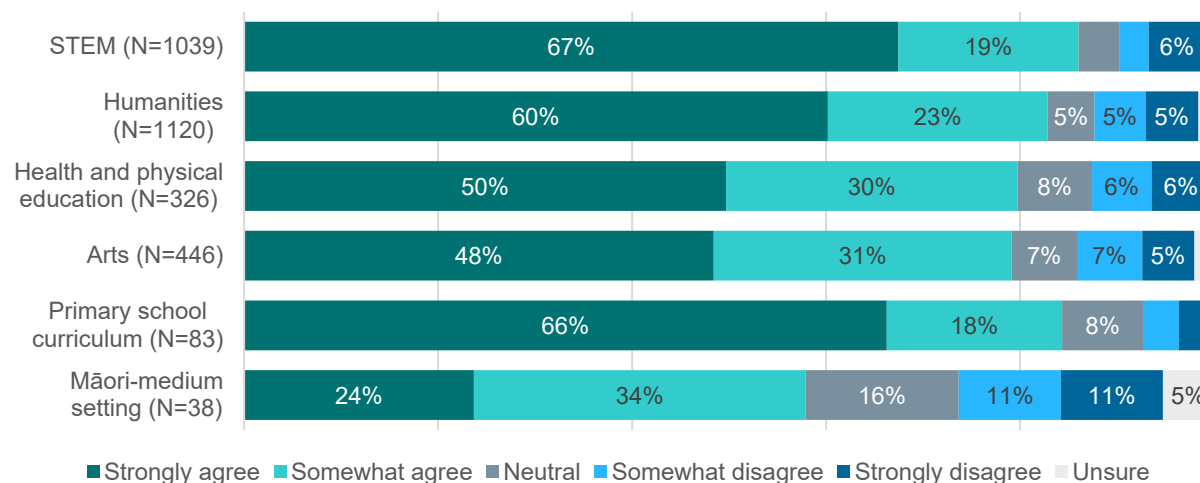


Figure 12 compares educators' responses on whether national qualifications should be assessed against a national curriculum, broken down by teaching area. Analysis confirms the differences across teaching subjects are statistically significant, indicating that while most subject areas show a vast majority of educators reported combined agreement (around 80%), Māori-medium setting educators expressed considerably less support for assessing against a national curriculum with only 58% combined, with a moderate proportion (22%) disagreeing and a further 21% neutral or unsure.

Figure 13: Do you agree that our national qualifications should assess against a national curriculum? (by school EQI)

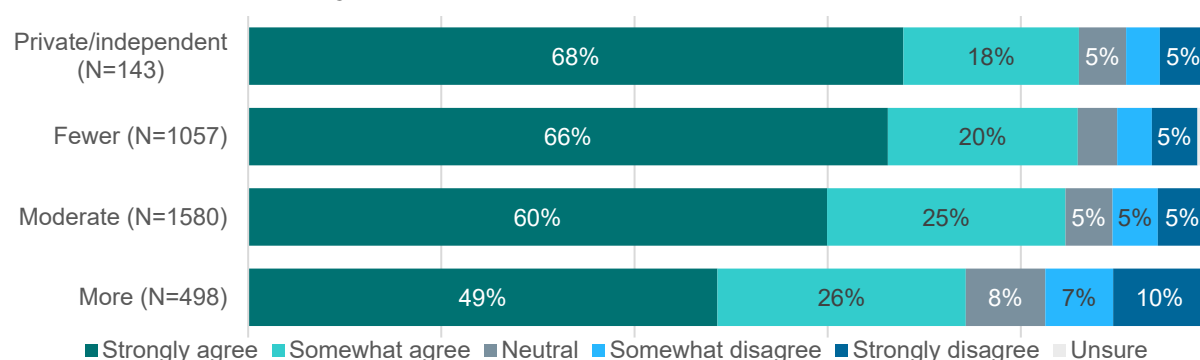


Figure 13 compares educators' responses on whether national qualifications should be assessed against a national curriculum analysed by school EQI. The vast majority of educators from private/independent schools, and from schools that have fewer students that face socio-economic barriers (86% for each) agreed that the national qualifications should assess against a national curriculum. Most educators from schools that the Ministry classified as having more students that face socio-economic barriers (74%) still supported assessment against a national curriculum, however they were more likely to disagree at 17% compared to

the other groups, suggesting that these educators in schools these schools may have more reservations about assessing against a national curriculum.

Figure 14: Do you agree that our national qualifications should assess against a national curriculum? (whānau by ethnicity¹⁵)

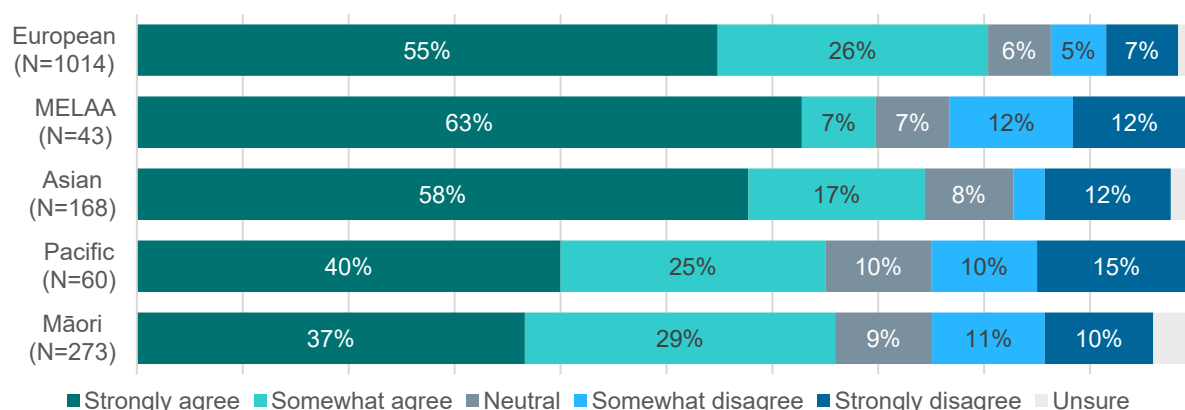
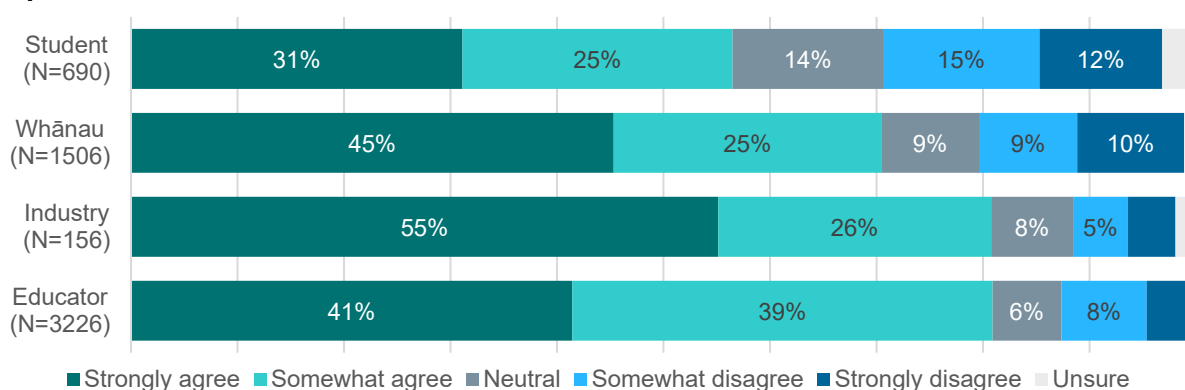


Figure 14 shows many whānau across all ethnic groups strongly agree with assessing against a national curriculum, however there is notable variation by ethnicity. A vast majority of European, and Asian whānau show support (75-81%), while most of Pacific, MELAA, and Māori whānau show support (65-70%). These differences across ethnic groups are statistically significant.

3.1.2 Does the senior secondary qualifications system need to improve?

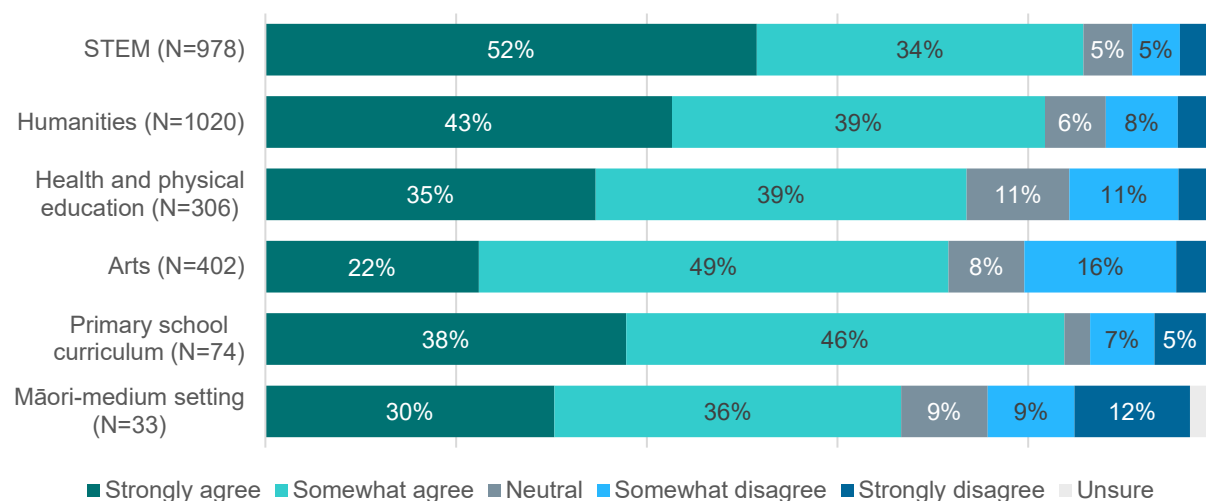
Figure 15: Do you agree that the senior secondary qualifications system needs to improve?



As shown in **Figure 15**, a vast majority of industry representatives and educators agreed that improvement is needed, followed by whānau (70%), while students are the most divided. Whānau are considerably more convinced that the system needs improvement compared to students/ex-students.

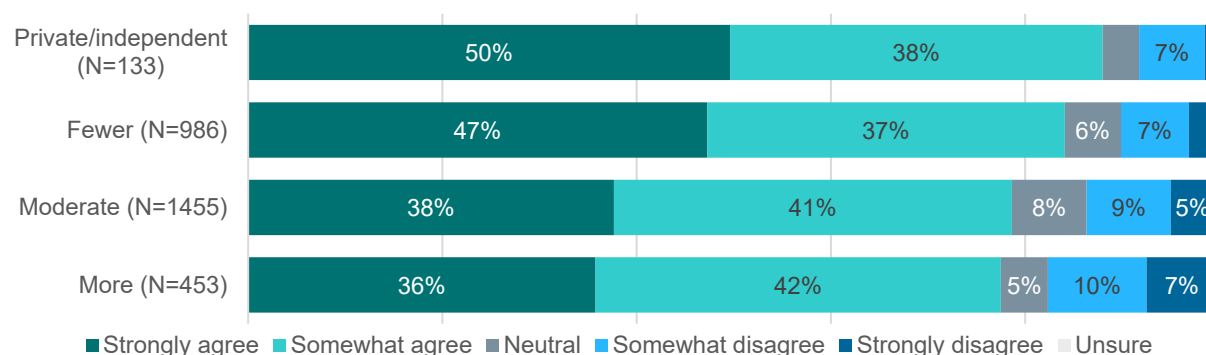
¹⁵ In subgroup analysis that involve ethnicity, European was coded as a broader category that consists of NZ Europeans and included submitters that chose 'Other' and then stated British, French, etc.

Figure 16: Do you agree that the senior secondary qualifications system needs to improve? (by teaching area)



On whether the senior secondary qualifications system needs to improve (**Figure 16**), the responses show across the board most educators shared varying levels of agreement across subjects. Māori-medium setting educators (66% combined support) and Arts educators (71% combined support) showing notably lower support and higher disagreement compared to educators from other subject areas.

Figure 17: Do you agree that the senior secondary qualifications system needs to improve? (by school EQI)



As shown in **Figure 17**, while all groups show strong support for improvement, private/independent school educators express the highest agreement at 88%, while educators from schools with more students facing socio-economic barriers show support at 78% with higher disagreement at 17%. This suggests that educators in schools with more students facing socio-economic barriers may perceive less need for system improvement.

Figure 18: Do you agree that the senior secondary qualifications system needs to improve? (whānau by ethnicity)

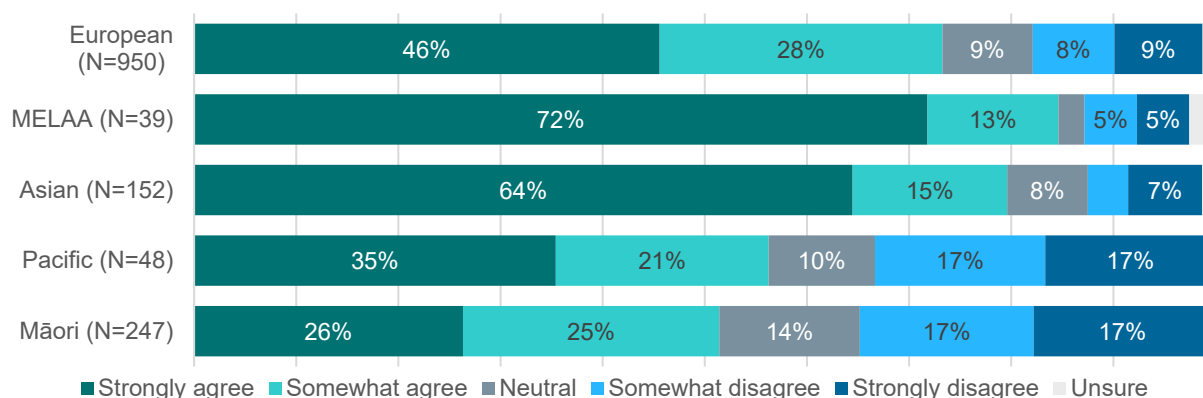
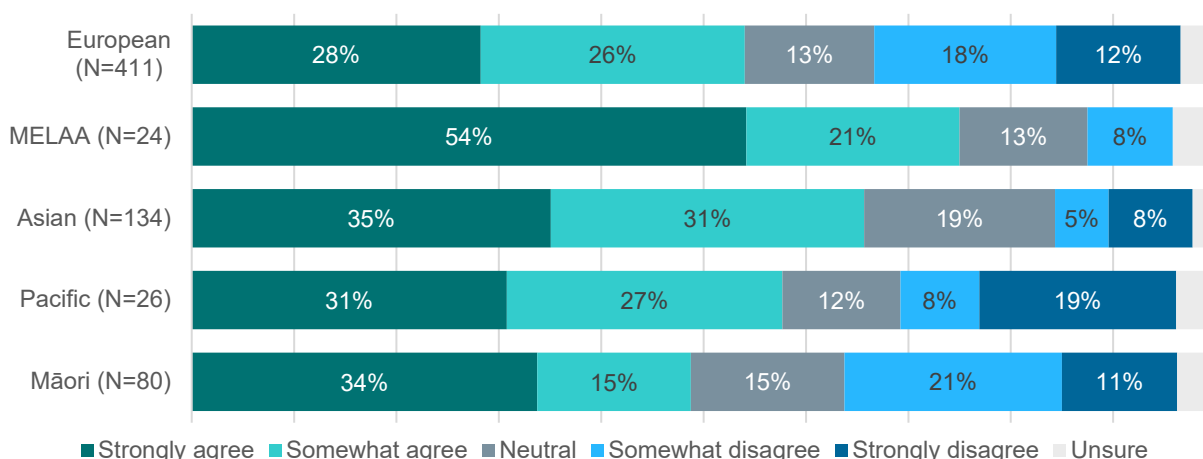


Figure 18 shows varying levels of support for change across ethnic groups with a vast majority of support coming from Asian and MELAA whānau (85% and 81% respectively). Most European whānau show 74% combined support with 17% opposing. Pacific and Māori whānau were more divided with both groups show roughly similar patterns with just over or about half in support (56% for Pacific and 51% for Māori) but about one-third in disagreement (34% for both groups). There is a clear pattern that MELAA, Asian, and European whānau strongly support system improvement (74-85%), while Pacific and Māori whānau are more divided on the issue (51-56% agreement).

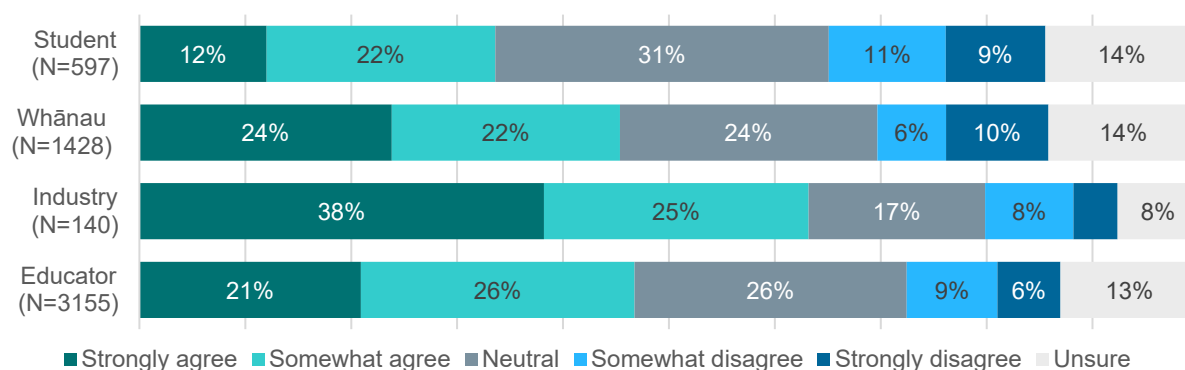
Figure 19: Do you agree that the senior secondary qualifications system needs to improve? (students by ethnicity)



Differences across students' responses of different ethnicity on the need to improvement are significant. As is shown in **Figure 19**, MELAA students express strong support for system improvement at 75%, followed by Asian students at 66%, while European, Pacific, and Māori students show lower support at 54%, 58%, and 49% respectively.

3.1.3 Are there other opportunities for positive change?

Figure 20: Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document?



As shown in **Figure 20**, some students show combined agreement (34%), however a further 20% disagreed, and many student submitters (45%) were either neutral or unsure. About half of whānau (46%) agreed there were other opportunities for positive change, however many were either neutral or unsure (38%). Industry representatives show the highest agreement at 63% and 12% disagreeing, however some (25%) were either neutral or unsure. Many educators show combined agreement (47%) with 15% disagreeing, again many (39%) were either neutral or unsure. Overall, many educator, whānau, student submitters, and some industry submitters, were either unsure or neutral to the suggestion of other opportunities of positive change.

Figure 21: Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document? (by teaching area)

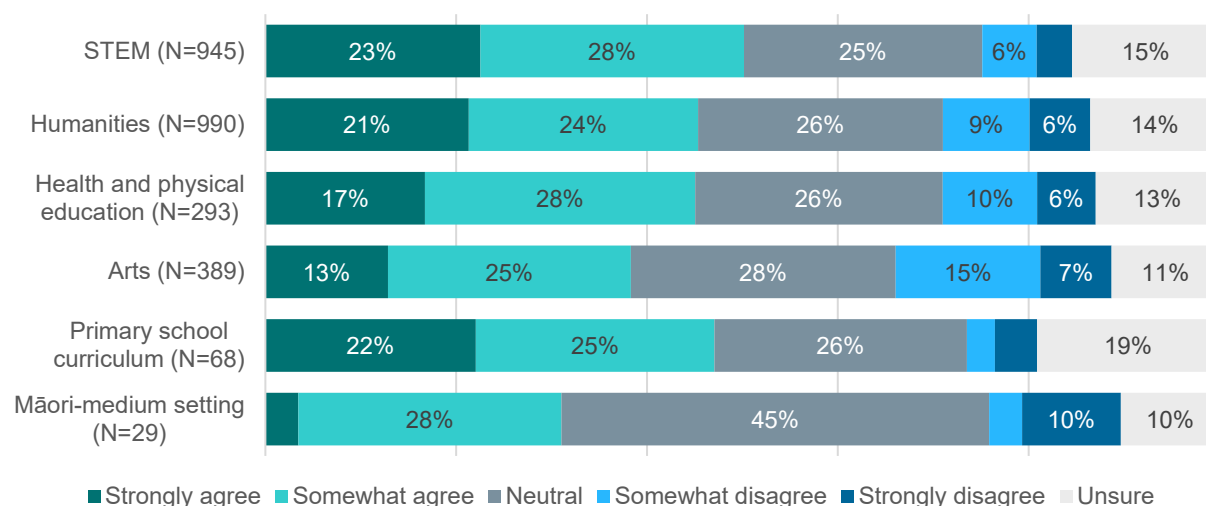


Figure 21 outlines educator responses to the question about additional opportunities for positive change with the new qualifications beyond what was raised in the discussion document. Submission responses show significant variation (31%-57%) in agreement levels across teaching areas. The differences illustrated are statistically significant, with Māori-medium setting educators and Arts educators showing the lowest agreement and highest

uncertainty. Notably, a substantial proportion of educators across all groups are either neutral or unsure (40%-55%).

Figure 22: Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document? (by school EQI)

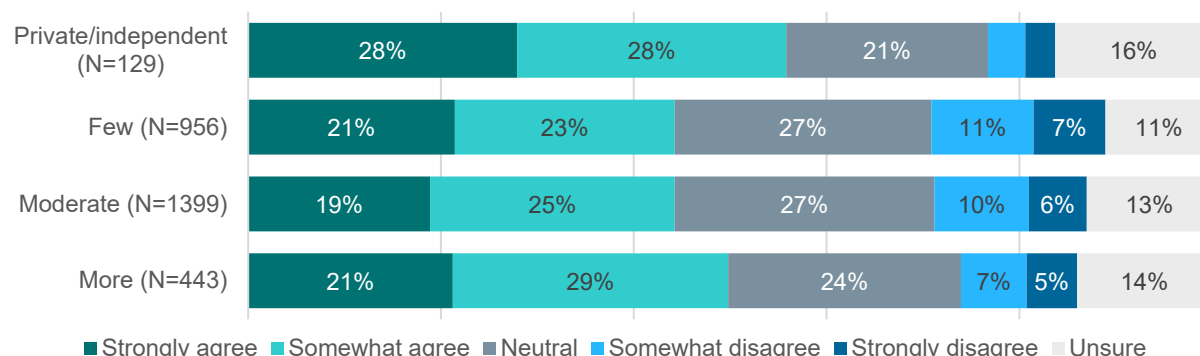
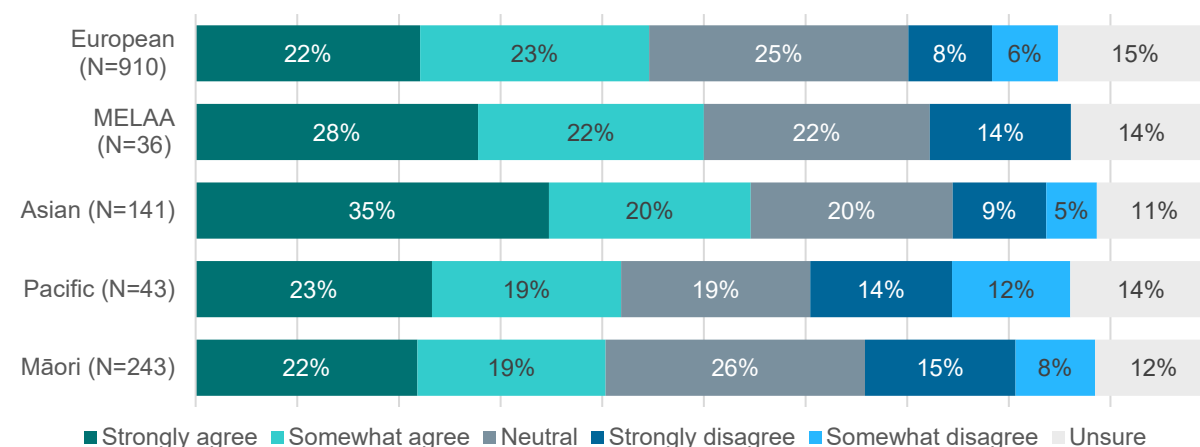


Figure 22 shows many educators across schools with the full range of students facing socio-economic barriers agree there are other opportunities for positive change with the new qualifications. However, the analysis also indicated many are neutral or unsure (37%-40%) across these sub-groups. Private/independent school educators showed the highest agreement at 56%, while educators from schools with more or moderate numbers of students facing socio-economic barriers had lower agreement at 44% with disagreement at 16-18%.

Figure 23: Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document? (whānau by ethnicity)



On whether there are additional opportunities for positive change, **Figure 23** shows varied agreement levels (41%-55%) with some uncertainty across all whānau groups. European whānau show 45% combined agreement with 40% neutral or unsure. MELAA whānau show 50% combined agreement with 36% neutral or unsure, Asian whānau show 55% combined agreement with 31% neutral or unsure, Pacific whānau show 42% combined agreement with 33% neutral or unsure, and Māori whānau show 41% combined agreement with 38% neutral or unsure. Combined disagreement across all groups was relatively low ranging from 14% - 26%.

A chi-square test reveals these differences border on statistical significance, indicating that unlike the previous questions, ethnic groups of whānau show relatively similar patterns of response on this issue.

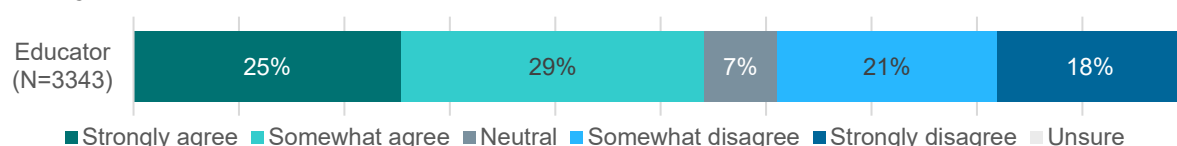
There is no significant difference between student respondents of European, MELAA, Asian, Pacific, or Māori backgrounds on this issue.

3.1.4 Questions related to understanding and value of NCEA

In addition to the three general questions outlined above, the survey included specific questions for each submitter type. These questions sought to identify the extent to which each submitter group agreed with concerns about NCEA that were specific to their submitter group.

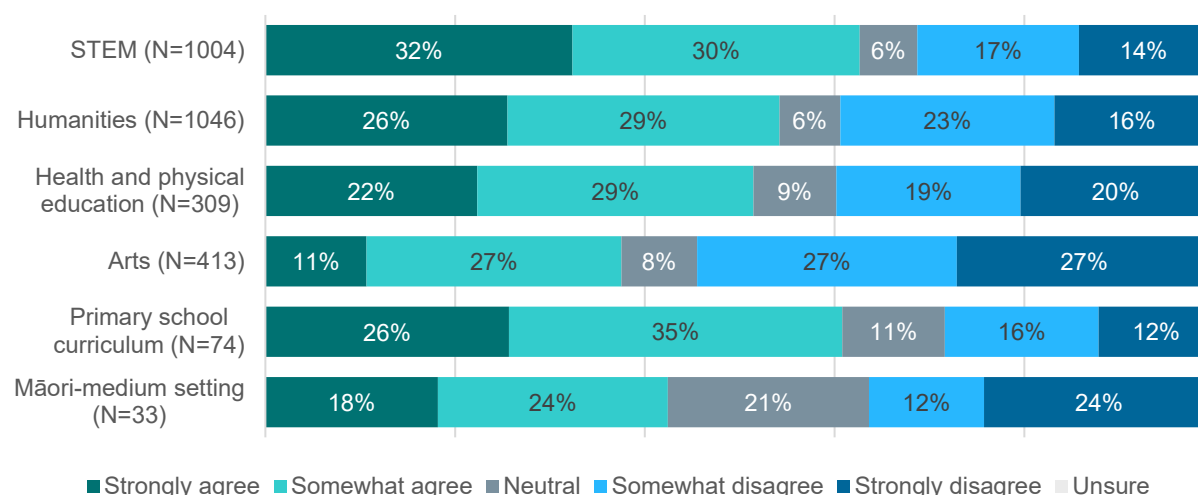
Educator only question

Figure 24: Do you agree that the current NCEA requirements do NOT consistently measure student knowledge, skills and readiness for future study, training or employment?



Educators were asked whether they agree that current NCEA requirements do NOT consistently measure student knowledge, skills and readiness for future study, training or employment. **Figure 24** shows that educators are divided on this issue, while just over half of educators expressed some level of agreement, however many (40%) disagreed to varying degrees, with only 7% being neutral.

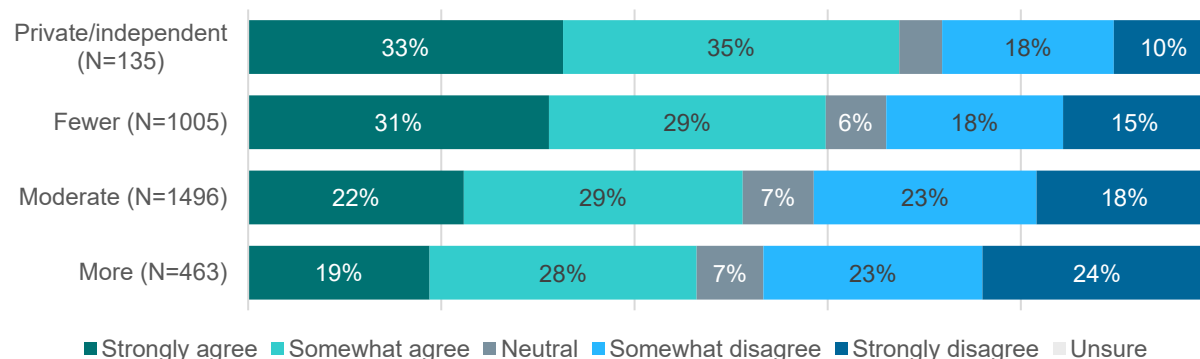
Figure 25: Do you agree that the current NCEA requirements do NOT consistently measure student knowledge, skills and readiness for future study, training or employment? (by teaching area)



As shown in **Figure 25**, the submission responses reveal substantial variation across subjects on the measurement issues of the current NCEA requirements. Māori-medium setting

educators are notably divided with 42% combined agreement, versus 36% combined disagreement and 30% being neutral/unsure. Arts educators were the most likely to disagree with only 38% agreeing versus 54% disagreeing. A chi-square test confirms these differences are statistically significant.

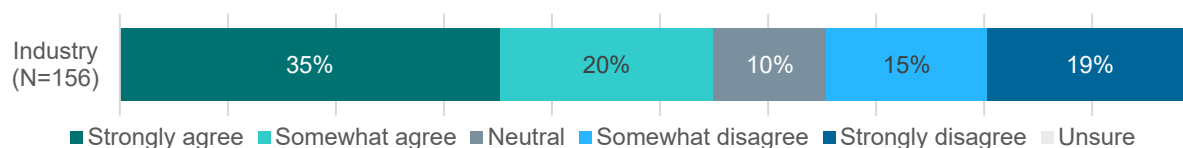
Figure 26: Do you agree that the current NCEA requirements do NOT consistently measure student knowledge, skills and readiness for future study, training or employment? (by school EQI)



The responses show divided opinions across schools with different EQI levels (**Figure 26**). Most educators from private/independent schools and schools with fewer students facing socio-economic barriers were most likely to express concerns about NCEA's adequacy in measuring student preparedness (68% and 60% agreement respectively), while educators from schools with more students facing socio-economic barriers are evenly divided (47% on each side). This suggests that educators in schools with more students facing socio-economic barriers may find NCEA more effective at measuring student knowledge, skills, and readiness.

Industry only question

Figure 27: Do you agree that it is difficult to understand the value of NCEA?



Industry representatives show divided opinions on understanding NCEA's value, with over half (55%) agreeing it is difficult to understand, some (34%) disagreeing and a few (10%) remaining neutral (**Figure 27**).

Figure 28: Do you agree that it is difficult to understand the value of NCEA? (by industry)

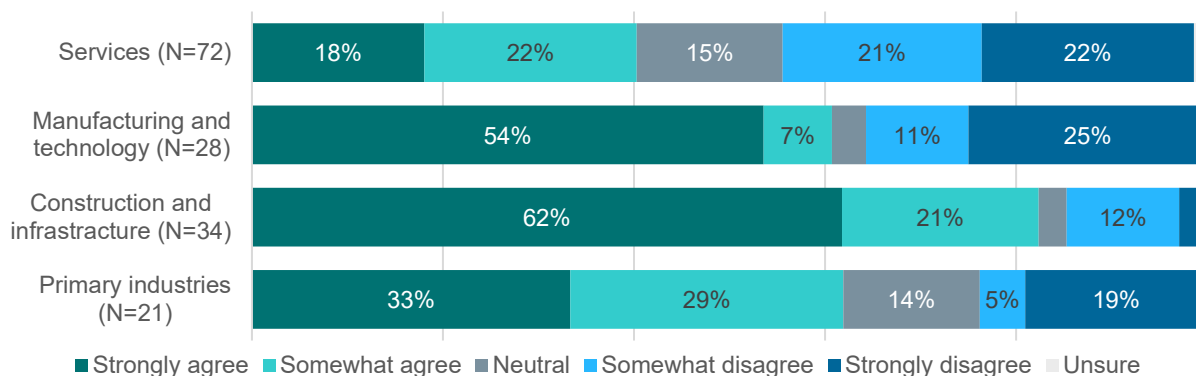
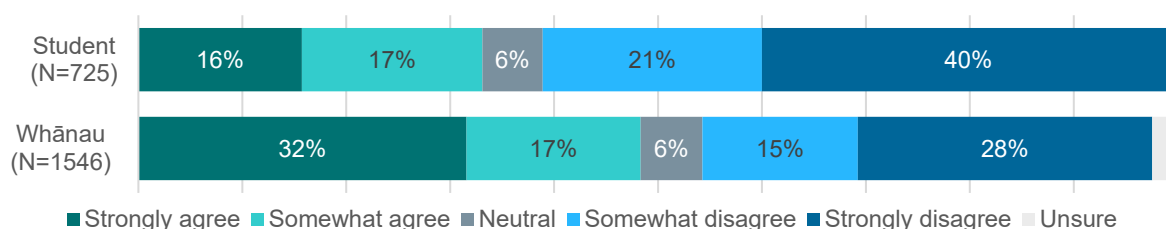


Figure 28 compares industry representatives' responses on whether it is difficult to understand the value of NCEA, broken down by four broader industry categories. Services industry representatives show a relatively even split across agree (40%) and disagree (43%) and a further 15% were neutral. By contrast, a vast majority of construction and infrastructure industry representatives agreed (83% combined agreement). Primary industry representatives show 62% agreement versus 24% disagreement. Manufacturing and technology representatives show 61% agreement versus 36% disagreement. It indicates that construction and infrastructure representatives find NCEA's value most difficult to understand, while service industry participants are more divided.

There is no significant difference between industry groups on all other questions in this section.

Whānau/student question

Figure 29: Do you agree that NCEA is difficult for whānau and students to understand?



The two groups show markedly different perspectives on whether NCEA is difficult for whānau and students to understand (see **Figure 29**). Most students (61%) disagreed that NCEA was difficult to understand, while 33% agreed. Whānau respondents were more evenly split with 49% agreeing compared to 43% disagreeing. A chi-square test confirms these differences between the groups are statistically significant, indicating that whānau find NCEA considerably more difficult to understand than students do.

Figure 30: Do you agree that NCEA is difficult for whānau to understand? (whānau by ethnicity)

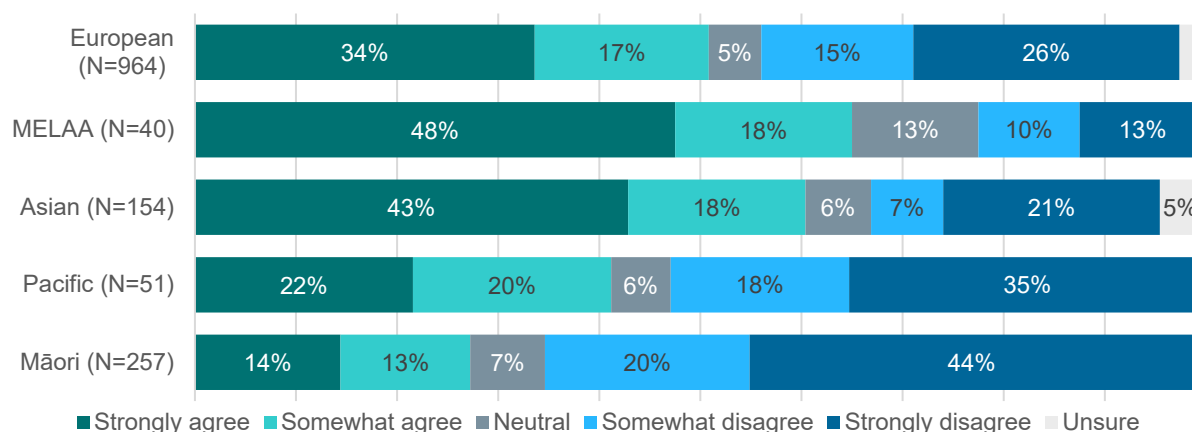
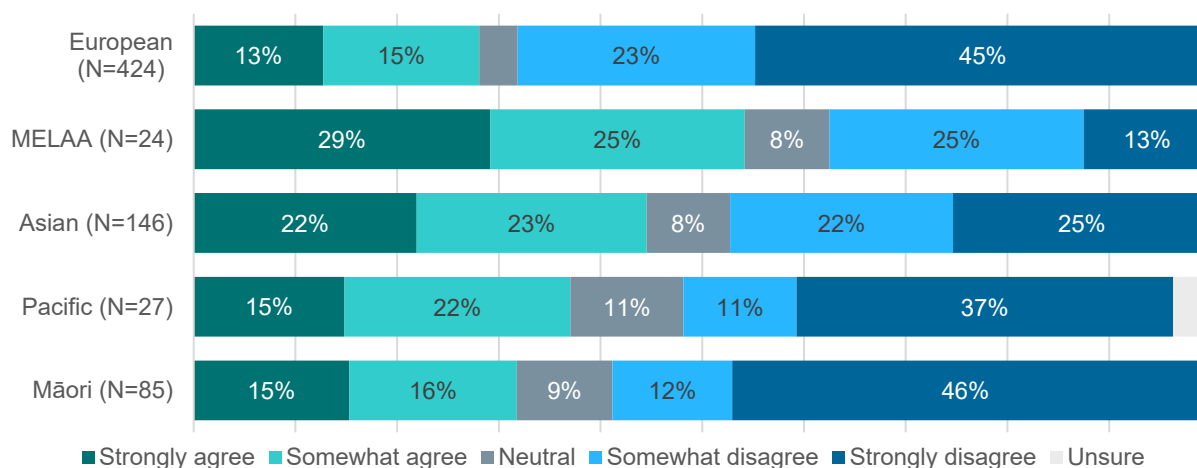


Figure 30 shows there is significant variation across ethnic groups with regards whether NCEA is difficult for whānau to understand. European whānau are divided with half (51%) indicating combined agreement and 41% disagreeing. High agreement was received from MELAA (66%) and Asian (61%) whānau. By contrast Pacific whānau (44% agreeing versus 53% disagreeing) and Māori whānau (27% agreeing versus 64% disagreeing) reported overall lower agreement and higher disagreement.

There are obvious differences where MELAA and Asian whānau find NCEA most difficult to understand, European whānau are divided, while Pacific and especially Māori whānau largely disagree that NCEA is difficult to understand, suggesting greater familiarity or comfort with the qualification system of these two whānau subgroups. The significantly different perspectives across ethnic groups likely reflect cultural and contextual differences of whānau.

Figure 31: Do you agree that NCEA is difficult for students to understand? (students by ethnicity)



There is a clear pattern that students of different ethnicities have varied opinions (**Figure 31**). There are significant differences where half MELAA students find NCEA most difficult to understand (54% agreement), Asian and Pacific students are divided (45% and 37% agreement, 47% and 48% disagreement respectively), while most European and Māori students disagree that NCEA is difficult to understand (68% and 58% respectively).

3.2 Educators



While the quantitative analysis indicates that there may have been strong support among submitters for the case for change, the qualitative analysis reads less positively. This is because submitters were more often asked to provide additional comments based on their concerns with specific proposals or aspects of the case for change.



Submitter summary

Most educator submitters were concerned about the case for change, with few supporting the change overall. Submitters' perception of NCEA's flexibility was mixed; some reported that it makes learning adaptable and relevant to students, while others argued that it leads to inconsistent learning and inequitable outcomes. While these submitters acknowledged the positives and negatives of NCEA, they preferred an approach to improving the current system rather than introducing a new system. They identified opportunities to improve assessment consistency and clarity between schools and provide schools and Realm Nations with adequate resourcing and support.

Educator submitters were also apprehensive about the proposed new national curriculum, noting it was not publicly available at the time of consultation on the Proposals which limited the ability to comment on concerns they have regarding whether the qualifications should assess against the national curriculum.

3.2.1 Support for the case for change



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on why they support the changes, approximate numbers of submissions that commented in support are unable to be provided, however it was relatively low.¹⁶

General support for change

Very few submitters provided additional comments in general support of the need for change as outlined in the consultation document. However, some of these comments simply indicated support without providing further explanation of their support.

This is a great step forward. (Educator, Email, EME-2097)

¹⁶ Comments relating to negative aspects of NCEA have been separated from exclusive indications of support for the changes as all respondents were asked to provide comment on negative aspects of NCEA, not only those that supported the proposed changes.

The changes will improve coherence and credibility

A few of these submitters commended the intent of the proposed changes to create a credible, standardised, and academically rigorous senior secondary qualification system. These submitters explained that the proposed changes will simplify and improve consistency as well as domestic and international comparability of the senior secondary qualification system. Other submitters expressed support for assessment to be more closely aligned to a new national curriculum.

We acknowledge the strengths of NCEA but agree that reform is needed to improve clarity, coherence, and credibility. We strongly support the move to align assessment more closely with the curriculum. This will better ensure that learning, not credit accumulation, drives classroom practice. (Educator, Email, EME-2404)

Any change must lead to improved outcomes

While these submitters were supportive of the alignment to a new national curriculum, a few caveated their support. They stated that they supported the case for change so long as it progresses equity, inclusivity and improves student outcomes overall. A few others who were supportive about alignment to a new national curriculum were apprehensive as the curriculum has not yet been made available.

We strongly support curriculum-led assessment design as a fundamental principle of sound educational practice. However, we are concerned that the current proposal reverses proper sequencing by advancing assessment changes before the curriculum development is complete. Assessment should follow and support curriculum, not drive it. The Refreshed New Zealand Curriculum must be completed and thoroughly embedded before designing assessment systems that accurately and authentically measure curriculum achievement. This “cart before the horse” approach risks creating misalignment and compromising both curriculum and assessment effectiveness. (Educator, Survey, EME-2856)

A few submitters also commented on the specifics of the changes that they agreed with. These elements included fewer assessment years and exams contributing to the overall grade.

3.2.2 Concerns about the case for change



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on why they support the changes, approximate numbers of submissions that commented in support are unable to be provided, however it was relatively low.¹⁷

¹⁷ Comments relating to negative aspects of NCEA have been separated from exclusive indications of support for the changes as all respondents were asked to provide comment on negative aspects of NCEA, not only those that supported the proposed changes.

The framing of NCEA as an inconsistent, complicated, and inadequate system is overstated

Some of these submitters disagreed with the problem definition outlined in the consultation document, particularly the claims that NCEA is confusing and unreliable, too flexible, not rigorous enough, and not working as well as it should. These submitters considered such problems to be overstated and lacking sufficient evidence. Others noted that the rationale for change was based on a flawed understanding of NCEA's strengths and weaknesses and does not take into account the impact of social determinants of learning.

I disagree with the framing that NCEA's flexibility is a weakness. Flexibility is actually one of its greatest strengths, allowing students to succeed across a wide range of pathways, from academic to vocational. (Educator, Survey, R_4i60QIgEU51rlu5)

Parents not knowing the technical details does not mean NCEA lacks clarity or value, nor that employers and tertiary providers fail to recognise its worth. Schools already run NCEA information evenings, but low attendance points to engagement rather than system failure. (Educator, Survey, R_4i60QIgEU51rlu5)

In addition, some of these submitters noted that ongoing comments about NCEA being an inadequate system is unfair to current students or recent school-leavers.

The representation of NCEA as a failed assessment system has been widespread and we have significant concerns about the impact this has had and will continue to have, on our current students. Those students will carry an NCEA qualification with them into the future so it is disappointing that their efforts have been marred by the rhetoric. The presentation of NCEA as a system that fails to assess a student's understanding of the New Zealand curriculum is irresponsible, damaging and inaccurate in our opinion. (Educator, Email, EME-2464)

A few submitters questioned the rationale behind the change, stating that it lacked evidence and was politically driven. While some noted that NCEA is not a perfect system and there is room for improvement, they could not understand where the basis for the Proposal came from. These themes are also discussed and elaborated on by more submitters in section 8.2.2.

The "problems" are a construct of an elitist ideology and is designed to enable this at the expense of the students of New Zealand. There is a lot of supposition and little evidence. (Educator, Survey, R_4rY6sfKRhMEz03Z)

In particular, some submitters disputed the claim that NCEA is not internationally credible.

Particularly damaging is the claim that the NCEA lacks international credibility. This baseless allegation is accurately countered by NZQA's own tagline which states, "We make sure New Zealand qualifications are recognised and respected, here and overseas, and that qualifications and credentials meet the needs of learners in the changing world. (Educator, Email, EMI-1001, Secondary Principals' Council of Aotearoa (SPC))

Other submitters highlighted that the case for change lack the mandate and buy-in from large portions of the sector.

[We note] that the Secondary Principals Association of New Zealand's (SPANZ) member survey on this proposal shows there is insufficient mandate from secondary

principals to implement and embed such significant reform. Little over 50% support the changes overall. There is a huge risk to the education sector, to the Ministry of Education and of course to ākonga, that these sweeping and swift changes won't stick well with low sector buy in. (Educator, Email, EMI-1021 NZEI)

Changes to the senior secondary qualification system could disproportionately impact certain groups, such as Māori, Pacific, and those with different learning needs

Note that equity concerns were raised throughout the feedback received. A summary of the broader equity concerns of educators is provided below, with commentary specific to individual proposals included in the relevant sections below.

Some submitters, including the Open Letter from Principals, expressed concern that potential changes to the senior secondary qualification system would be regressive and cautioned that the rigidi approach from a loss of flexibility may be harmful to students.

Some of these submitters pointed to the anticipation that changes to the system will result in a temporary decline in achievement for some students particularly those from vulnerable groups, such as those with different learning needs, migrants, second-language learners, neuro-diverse, and Māori and Pacific students. These submitters considered it inappropriate for changes to knowingly allow achievement to decline for such students. Submitters expressed concern for a lack of focus on equity for all learners, noting that the changes appeared targeted at those already bound for university.

We are deeply concerned that the Cabinet paper openly anticipates an initial decline in achievement rates for our most vulnerable ākonga. Any reform that knowingly entrenches disadvantage cannot be considered equitable. (Educator, Email, EME-2825)

The proposal risks reversing significant advances made towards equity for Māori, Pasifika, neurodivergent, disabled, second language and migrant ākonga as well as transient learners and ākonga from lower socio-economic backgrounds. (Educator, Email, EMI-1021 NZEI)

Educator submitters also considered that a loss of flexibility from the adoption of a different system would limit students' ability to explore and be recognised in a range of other educational areas. They warned that this could risk pigeonholing students into narrow educational pathways too early. A few submitters were particularly concerned about the cost of excluding art-based subjects.

It appears that we are returning to the separation of academic and vocational pathways like when my parents were at high school and had to choose to go to Academic College or Technology College. (Educator, Email, EME-2840)

Lack of consideration of Te Tiriti o Waitangi

In addition to the risk submitters raised with disadvantaging certain groups, some educator submitters also considered that the case for change did not adequately consider Te Tiriti o Waitangi (Te Tiriti) obligations. Submitters stressed that Te Tiriti must be valued, upheld, and reflected throughout any potential changes to the senior secondary qualification system and the consultation process. Submitters reiterated the importance of upholding Te Tiriti given that

that changes to the system are expected to have particularly adverse implications for Māori students. Others commented that much greater consideration needs to be given to equity, cultural safety, and obligations under Te Tiriti.

We stress the importance of Te Tiriti o Waitangi guiding principles, and in particular working in partnership with Māori, to promote equity and protect Māori knowledge appropriately within the education system. (Educator, Email, EMI-1046, Māori Education Advisory Group)

The lack of specific consultation with iwi Māori presents a risk to this NCEA change proposal. Leaving iwi and hapū out from the development process of this proposal does not align with the principles of Te Tiriti o Waitangi. Te Tiriti o Waitangi is not clearly present throughout the change proposal as it should be. (Educator, Email, EMI-1021, NZEI)

A significant concern is the visible absence of Mātauranga Māori and Te Tiriti o Waitangi in the proposed changes. Any reform of national qualifications must be grounded in Te Tiriti obligations and genuinely reflect Aotearoa New Zealand's bicultural foundations. (Educator, Email, EME-2438)

Strengthen the current system instead of an expensive complete overhaul

Many educator submitters reiterated that tweaks should be made to strengthen NCEA rather than a costly and resource-intensive overhaul of the whole senior secondary qualification education system. These submitters cautioned not to 'throw the baby out with the bathwater'. Submitters called for incremental changes and refinement of NCEA instead of a large-scale overhaul that replaces NCEA with a new qualification system.

I strongly disagree with the proposal to replace NCEA. We need to refine and improve our current system, not make sweeping, oppositional changes that will tax teachers, confuse students, waste 20 years of innovation, and add little benefit. (Educator, Email, EME-2859)

Submitters suggested that resources would be better spent on refinements and ensuring schools and teachers have adequate funding.

Instead, the focus should be on refining and improving the existing system clarifying standards, providing stronger exemplars, and ensuring consistency rather than replacing it. Maintaining the structure we already have, while making targeted improvements, would strengthen alignment without losing the benefits that are already in place. (Educator, Survey, R_9QlvTdoPXJGw1WS)

A few other educator submitters noted that progress made by wharekura and kura kaupapa Māori to understand and adapt to NCEA for kura risk being lost in a new system.

Wharekura feel that any weaknesses in the current NCEA system could have been addressed without resorting to a wholesale change that risks undermining twenty years of accumulated knowledge and experience. (Educator, Email, EMO-5226)

3.2.3 Negative aspects of NCEA



Comments on this topic

There were approximately 1711 comments from educator survey submitters related to the negatives of NCEA. Submitters described aspects of NCEA that they saw as negative or that led to an inconsistent measure of student knowledge, skills, and readiness.

While more submitters reported on the positives of NCEA than the negative, some provided insight into both positive and negative aspects.

NCEA's flexibility and autonomy enables credit counting, which detracts from disciplined learning

Many educator submitters raised concern that NCEA can lead to inconsistent assessment and learning. These submitters, including Services Academies NZ, commented that the current system can enable students to focus too heavily on credit counting and accumulation over genuine learning. Some of these submitters described this as “credit farming”, “credit harvesting”, or “credit counting”. Submitters argued that this practice drives assessment-based curriculum, which jeopardises comprehensively learning a subject.

“Credit Farming” and over-assessment - where students can pick and choose where to take their credits and not have to sit any externals for example. The focus now is on how many credits to get across the line, rather than actual teaching. We are teaching assessment, rather than content. It should be the other way around. (Educator, Survey, R_4mz2Bh0Jm68EufS)

Many of these submitters stressed that credit accumulation across high quantity of assessments can incentivise students to select courses based on internal assessment and opt-out of external assessments (exams). They warned that this risks students reducing their learning down to task-based outcomes and disengaging from meaningful learning once they have enough credits to pass. These submitters warned that this piecemeal approach creates fragmented learning and enables students to gain a broad qualification that is difficult for universities and employers to compare.

There is a big difference between a student who has gained L3 with Achieved and taken academically rigorous subjects, compared to a student who has the same qualification but has taken much less academic subjects. (Educator, Survey, R_4QVEzMhEMGWK7Et)

A few educator submitters identified that schools can also use the system to their advantage. They outlined that currently; internal assessments are selected by the schools and are not centrally set. They suggested that schools can select easier internals, which helps them have better achievement data.

NCEA has allowed both students, teachers and schools to game the system. Education has become about number crunching rather than a driver for the betterment of the students. (Educator, Survey, R_92mZuO4c2XfbQe1)

Insufficient credit parity attracts students to easier subjects

Some educator submitters, including the PPTA Executive, expressed frustration with inconsistencies and imbalances in credit value and allocation. They explained that the standard of difficulty, workload, and quantity of credits available can vary between schools and subjects, resulting in challenges around credit parity.

I think the main issue I have with current NCEA is that some courses offer far more credits for less work when compared with others. (Educator, Survey, R_9KpB34SMDZiJlnh)

These submitters explained that this lack of credit parity risks artificially drawing students towards easier subjects, and deterring them from traditionally more difficult subjects. They added that this inconsistent approach means that students may not challenge themselves academically and unintentionally exclude themselves from potential career pathways.

Lack of standardised assessment and grading processes lead to incomparable results

Some educator submitters noted that available standards, expectations of what is needed to achieve, and moderation of internal assessments can vary both within and across schools, making it challenging to gauge a consistent measure of post-school readiness.

Schools have flexibility in choosing which standards to offer, meaning two students at different schools could earn the same qualification with vastly different learning experiences. This affects consistency in preparedness for tertiary study or employment. (Educator, Survey, R_4rBLLpvNG4YH0vA)

Some submitters labelled the grading criteria as vague and ambiguous. They said that this leads to subjective interpretations and inconsistencies between schools despite moderation processes. A few of these submitters explained that there is a lack of national guidelines and clear expectations for marking.

The poor way in which the achievement standards have been set up leads to a very vague and inconsistent interpretation of what is required to meet the standard. (Educator, Survey, R_4aEr1vlhh7dU4eJ)

Other submitters highlighted the discrepancy between internal and external grading. They considered internals less academically rigorous as they often have unclear guidelines and grading may be influenced from teacher bias. They added that schools may offer different conditions for internal assessment, including varying input from teacher guidance, and multiple opportunities for resubmission. A few added that the use of digital tools, such as AI, compounded with the ability for take-home assignments makes it harder to verify the authenticity of students' internals.

Internal assessments heavily scaffolded and allowance for resubmission, vast differences in the conditions used for these assessments between schools - evidence by discrepancies in pass rates between internal and external assessments. (Educator, Survey, R_9p4Nw907b0ATkbP)

Some educator submitters categorised NCEA's moderation process as a negative of NCEA due to poor design, under resourcing, and assessment variation between schools. A few of these submitters also added that moderation's abilities are limited and cannot account for assessment conditions, which may vary between schools.

Post hoc moderation of standards, with a primary focus on consistency of assessor judgements, with very limited opportunities (let alone a mandatory system) for pre-assessment moderation of assessment tasks has created uncertainty and lack of trust in a standardised approach between schools. (Educator, Survey, R_4BnSTtyDyXvIRVp)

NCEA's content and assessment do not sufficiently prepare students with 'real world' skills or accurately reflect their skillset

Some educator submitters raised that NCEA is not conducive to disciplined learning as it promotes memorisation, wrote-learnt responses, and has assessment-led learning rather than curriculum-led. They explained that the criteria favours learnt responses, rather than application of knowledge in an unfamiliar context.

The structure of some tests means that students end up rote-learning "how to do a test", which is counter-productive to nurturing students' understanding of the topic. They should be learning content, not how to sit a test. (Educator, Survey, R_9gqlh15Fn1NhJwQ)

A few submitters also discussed that marking criteria may not accurately represent students' abilities. They considered that this can inflate or deflate a student's results, depending on the assessment layout. For example, they explained that students can learn Excellence-type answers and disengage from Achieved or Merit questions and knowledge, meaning they pass with Excellence despite not having a coherent grasp on the subject. In other cases, submitters noted that the omission of minor detail can take a Merit or an Excellence worthy response down to an Achieved.

The hierarchical [sic] nature of the achieved, merit and excellence assessment criteria means that many very able students get results that do not reflect their ability. Making one small omission or error can drop a grade to achieved, even if the rest of the response is of a very high standard. (Educator, Survey, R_933DuwRMWh8pvnT)

NCEA is burdensome for teachers, creating high pressure and workload stressors

A few educator submitters critiqued the heavy administrative and assessment workload required to deliver NCEA. They explained that excessive assessment can create bottle necks in teacher workload so they default to assessment informing teaching, rather than the full subject. They stated that these assessment requirements reduce the time teachers can dedicate to high-quality teaching and learning, which indirectly impacts the consistency and quality of education students receive.

The heavy administrative and assessment workload required to deliver NCEA reduces the time teachers can dedicate to high-quality teaching and learning. This indirectly impacts the consistency and quality of education students receive. (Educator, Survey, R_9SqxiaTDbimEalw)

NCEA is confusing and is not internationally comparable

A few educator submitters stated that NCEA was hard for whānau and employers to understand, citing grading, achievement standard requirements, and inconsistencies across subjects.

The grading system (NAME) does not compare well to other systems around the world. Two 'A' students could know or demonstrate very different content knowledge. Internals are not fit for purpose and vary widely in grading and moderation and bias towards higher grades compared to externals. Also not all credits are "created equal" some assessments have larger number of credits but don't take as long or are not as rigorous as other smaller credit assessments. (Educator, Survey, R_9VNecqXyj9OtOgh)

3.2.4 Positive aspects of NCEA



Comments on this topic

There were approximately 4432 comments¹⁸ from educator survey submitters related to the positive aspects of NCEA. Many submitters described aspects of NCEA that they saw as positive or valuable, and wanted to see retained in a new system.

NCEA's flexibility to tailor learning to the interests and abilities of students and recognise a broad range of skills is a strength

Many educator submitters praised NCEA's flexibility as a strength of the system. Specifically, submitters supported personalised learning and assessment tailored to students' needs, and the ability to create a localised curriculum that reflects students' local communities. These submitters noted that such flexibility supports inclusive student engagement and achievement, particularly for Māori, neurodiverse students, or students with other learning needs.

Despite the recent rhetoric, NCEA is a high-quality qualification on par with other available qualifications, recognised and accepted here and internationally. It is an inclusive qualification — it allows young people to follow their areas of interest. (Educator, Email, EME-2340 PPTA Executive)

Many submitters added that flexibility helps develop students beyond school as it enables them to exercise autonomy and judgement. Submitters emphasised wanting to retain such flexibility in the new system.

I am particularly concerned that if this flexibility is reduced, students with special educational needs will be disadvantaged, as they often rely on adapted pathways to experience success. Maintaining this adaptability is vital to ensure NCEA continues to be inclusive, equitable, and relevant for all learners. (Educator, Survey, R_9QSTn8htl9dEahN)

In addition, many educator submitters viewed NCEA's flexibility to recognise a diverse range of skills, support broad pathways, and enable students to have exposure to a wide variety of subjects as positive. A few of these submitters reinforced that this variety and flexibility is

¹⁸ Overall number of comments relating to positive aspects of NCEA were high as comments were gathered from two key questions: "What elements, if any, of NCEA's flexibility do you think should be retained in a future design of the qualifications?" and "Which aspects of the current NCEA requirements do you think provide for a consistent measure of student knowledge, skills, and readiness?"

critical as it accurately reflects the realities of the sector, and it accommodates the specialised teachers who come from the industry.

Educator submitters also said NCEA enables students to gain credits towards vocational skills alongside academic knowledge and enables students to flexibly move between pathways. Submitters saw this as a feature they wanted to retain in a new system.

Schools also need the flexibility to move students between pathways. Students might go for a vocational pathway and then realise and mature and need to go into an academic pathway. Keeping doors open to both pathways for as long as possible is required and is a feature of NCEA. (Educator, Survey, R_9poj4XplyHcYyYf)

Retaining a balance of internal and external assessment opportunities is important

Many educator submitters also highlighted the ability for students to demonstrate their knowledge and skills in a range of ways through both internal assessment and external exams as a positive aspect of NCEA. These submitters, including the Mātauranga Iwi Leaders Group, Disability Voices Group, and Ngā Kura Kaupapa Māori o Aotearoa, commented that a balance of internal and external assessment would be necessary in the new system, especially to ensure equity for Māori, neurodiverse students, non-academic students, and those with other learning needs who benefit from internal assessment options.

NCEA currently allows students to: Earn credits through internal assessments, not just exams; Use portfolios, performances, or practical tasks to show learning; Mix and match subjects across academic and vocational areas. This flexibility supports diverse strengths and learning styles, which is especially important for neurodivergent and disabled learners. (Educator, Email, EME-2724 Disability Voices Group)

Most of these submitters praised the inclusion of internal assessments as they complement externals and provide an effective, continuous, and well-rounded assessment.

We think the new system should continue to use a combination of internal and external assessments. This mixed approach is essential because it allows for a balanced evaluation of a student's knowledge and skills. (Educator, Email, EME-2400 Services Academies)

Further, some educator submitters commented that NCEA's moderation process and standards-based assessment as beneficial. A few of these submitters explained that it creates fairness, consistency, and clarity. Assessment consistency is discussed in more detail in section 6.2.5.

One of the strengths of NCEA is that achievement standards are nationally moderated, which provides consistency in how student knowledge and skills are measured. (Educator, Survey, R_9QSTn8htl9dEahN)

3.2.5 Concerns about assessing against a new national curriculum



While the quantitative analysis indicates that there may have been strong support among submitters to align assessment to a national curriculum, the qualitative analysis reads less positively. This is because submitters were only asked to provide additional comment if they disagreed that national qualifications should assess against a national curriculum.



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Concern over release of the discussion document prior to the proposed new national curriculum

Many educator submitters criticised that the discussion document was released prior to the new national curriculum. Some of these submitters explained that this meant they could not provide comment. Others considered it inappropriate for a new qualification system to be proposed and consulted on without first finalising a new curriculum.

A qualification system should not be built on a curriculum that has not yet been finalised, embedded, or resourced. (Educator, Email, EME-2849)

Concern that curriculum would create rigidity and not account for diverse student context

Some educator submitters were opposed to the proposed alignment with a new curriculum. They expressed concern that a strong national curriculum would be too rigid, would create an inability to account for regional, cultural, or individual learning needs, and would remove teacher autonomy to creatively adapt learning to be relevant for their students. Submitters added that it also risks jeopardising the development of wide-ranging soft skills, such as critical thinking and creativity. Overall, these submitters considered that assessments fixed against a national curriculum could result in classroom learning that is less responsive to student needs.

I have concerns that the proposed new qualifications assessing against a national curriculum will not support all learners to achieve. At present, NCEA allows flexibility for teachers to design learning and assessment that is relevant and meaningful to the students in front of us. My concern is that moving to a set national model will remove this flexibility and result in teaching content that may not feel relevant or equitable for all learners. (Educator, Survey, R_9kCVWEWsDjjKscp)

There is preference to strengthen and work on curriculum already under development



Note that the discussion of whether a new national curriculum should be introduced was outside the scope of this consultation. However, submitters continued to express their views about the introduction of a new national curriculum. These views have been included and captured below to support understanding of the wider feedback.

Some educator submitters spoke specifically about the introduction of a new national curriculum. Of these submitters, some commented that a new, overhauled national curriculum was not necessary and that the current curriculum should be strengthened instead. They also noted that the curriculum was under development from the previous government, recommending that it should continue.

The proposal to replace NCEA is premature as the senior curriculum to be assessed by NCEA is still in development and its implementation is delayed. Replacing NCEA ahead of or during curriculum change poses huge risks of misalignment or creating a system geared towards teaching to the test, rather than robust assessment of learning. (Educator, Email, EMI-1021 NZEI Te Rui Roa)

The consultation question relating to the national curriculum was confusing

A few educator submitters were concerned with the phrasing of the first question.¹⁹ They considered this question to be disingenuous, leading, and that responses would not accurately capture real sentiment. There was also some confusion among a few submitters as they reported that NCEA is currently assessment against a curriculum.

The first question is terrible. Being forced to answer a question which nobody would disagree with (we should assess against the curriculum) and using that as a justification to change the whole system of NCEA is manipulative. In my experience NCEA does assess against a national curriculum. [...] My level of agreement with the statement is not support for change. (Educator, Survey, R_91ioUbNKTdXHUzn)

3.2.6 Priorities for improvement



Comments on this topic

There were approximately 2862 comments from educator survey submitters related to priorities for improvement.

Many educator submitters provided suggestions for priorities for improvement. They identified consistency, clarity, and additional resources as priorities for improvement. Some submitters,

¹⁹ The question was “Do you agree that our national qualifications should assess against a national curriculum?”

including an Open Letter from Principals and Te Kura, preferred that the current system should be improved rather than introducing a new system.

Improve assessment consistency and clarity between schools

Many educator submitters stated that assessment consistency should be improved. They explained that improvements should be focused on a better balance of compulsory external assessment with externally marked internals, and that credit weighting should be reviewed. Submitters also suggested altering the grading scheme, and proposed narrowing and clarifying the grading rubric, implementing a more rigorous moderation process, and introducing additional NZQA review as well as clearer timely communications from NZQA.

More needs to be externally assessed with stronger input from [NZQA] on the remaining internals. Schools are drowning in AI plagiarism without the tools to accurately track and counter it. More external moderation is the only way that is going to change. It also removes bias from the process. (Educator, Survey, R_9fMJQrtCtpHki0p)

Despite the strong need for consistency, some submitters also argued that flexibility should be maintained and improved.

We need a balanced approach that combines structure with flexibility and also avoids a one-size-fits-all model that could stifle innovation and equity. A diverse range of standards, closely linked to the curriculum, is essential to meet the needs of all learners. Aotearoa has changed, and our education system (curricula AND assessment) must reflect that by promoting equity and ensuring we do not exclude our most vulnerable students. (Educator, Survey, R_9FwUI1PJVGJcDbz)

Further discussion around submitters' views on assessment consistency can be found in section 6.2.5.

Provide teachers and schools with adequate and equitable resources and supports

Some submitters, including SIEBA and Ngā Kura a Iwi o Aotearoa, stressed the need for improved resources and support in general. The supports referenced included clearer well-constructed exemplars and increased in-classroom support. They also suggested that there needs to be investment in the sector to make the teaching profession attractive and improve equity of access to resources across schools.

There are clear disparities between schools in terms of access to resources, specialist teachers, and support for diverse learners. Prioritising investment in equity measures will help ensure that all students, regardless of their background or school, have fair opportunities to succeed in NCEA. (Educator, Survey, R_4YM5EQ8Bn1sljx4)

Some submitters, including Services Academies and Te Kura, commented that any changes should be underpinned by core principles, such as fairness and equity. A few submitters, including Disability Voices Group and the Teaching Council of Aotearoa New Zealand, raised that there is opportunity to improve assessments through inclusive design and partnership with different communities. They suggested that this will help to ensure they have a role in what educational success looks like for their group.

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. (Educator, Email, EME-2722 - Teaching Council of Aotearoa New Zealand)

Improvements need to be made between Achievement Standards and Unit Standards to prevent gaming the system

Some educator submitters raised the need to amend the disparity between Achievement Standards and Unit Standards. These submitters tended to provide different views on what this might look like. A few raised that change needs to be made to amend the perception that Unit Standards are 'inferior' and 'easier' than Achievement Standards. A few also suggested preventing students from stacking credits from Unit Standards. One submitter recommended altering the system so that Unit Standards cannot contribute to University Entrance.

Unit Standards were designed to be used at tertiary technical level and Achievement Standards at secondary school level. But soon Tertiary started offering Achievement Standards and schools started offering Unit Standards. This compromised comparability of levels of achievement. (Educator, Survey, R_92GUsrLKxoKWqMV)

Furthermore, submitters noted grade inconsistencies between Unit Standard courses available, where some courses only offer Achieved and Not Achieved, while others provide Achieved, Merit and Excellence.

Any changes need to acknowledge the impact on Realm Nations

A few submitters, including the Cook Islands Ministry of Education and Government of Niue, also stated that the curriculum needs to be flexible and inclusive to consider Island Nations that also use our curriculum and qualification framework. They added that adequate training and resources also need to be provided to Realm Nations with the same quality and at the same time as New Zealand schools.

Cook Islands students must graduate with the same qualifications as New Zealand students, with no separate arrangements or delays...Realm Nations must receive curriculum, resources, and training simultaneously with NZ schools (from 2026) [...] Our national language must be a recognised subject with its own curriculum and assessment design. (Educator, EME-2723, Cook Islands Ministry of Education)

3.3 Industry



While the quantitative analysis indicates that there may have been strong support among submitters for the case for change, the qualitative analysis reads less positively. This is because submitters were more often asked to provide additional comments based on their concerns with specific proposals or aspects of the case for change.



Submitter summary

Industry submitters often expressed conditional support for reform of the NCEA system. These submitters noted credibility concerns, issues with “credit counting”, and a desire for greater consistency across students and schools. However, some raised significant concerns about the case for change, particularly regarding a loss of flexibility and impact on equitable outcomes. Many submitters expressed both support for change and concern about implementation, indicating support was often conditional rather than unconditional.

3.3.1 Support for the case for change



Comments on this topic

There were 73 industry survey submitter responses received related to support for the proposed changes.

Industry submitters who supported reform identified three main areas of concern with the current system.

There is too much inconsistency in the current system

Many industry submitters expressed a desire for standardised, consistent, and comparable outcomes across students and schools. These submitters noted that the current system allows too much variance in how standards are delivered and assessed.

Standards are interpreted and awarded inconsistently by teachers. Resulting in what appears to be a diluted qualification. (Industry, Survey, R_4AwlknnDOYQuYQV)

Some industry responses emphasised the need for clearer benchmarks that they considered recognise effort and ensure a higher standard of education.

Consistency of qualification content, delivery and assessment is important to ensure a high level of secondary education. (Industry, Email, EMI-1030)

NCEA lacks credibility and clarity for employers

Some industry submitters stated that the current NCEA system lacks clarity for employers. Submitters noted difficulties in understanding both the record of achievement and what specific knowledge or skills a student possessed.

NCEA is impossible to interpret as to what skills a student actually has. (Industry, Survey, R_4h0XgiZEXzjrX3)

Some submitters emphasised that current NCEA records do not clearly demonstrate whether students are ready for work. Submitters from construction and trades sectors particularly emphasised this concern, noting that they need clear indicators of student capability in core areas such as literacy, numeracy, and practical problem-solving.

Students are arriving into the workforce with poor basic skills/knowledge. (Industry, Survey, R_4AwlknnDOYQuYQV)

Credit counting undermines the value of the qualification

Some industry submitters raised concerns about students gaming the system through credit harvesting. Submitters noted that this practice undermines the value and meaning of the qualification.

The ability to opt in and out of core subjects creates a real risk that school leavers do not have the basics required that any employer will expect of a new employee. (Industry, Survey R_91ZB32IXk8y5BoK)

Submitters highlighted concern that students can achieve NCEA by accumulating credits from unrelated or easy standards without demonstrating comprehensive subject knowledge.

Standards picking = [sic] breeding laziness and leading teenagers into a devotion to the path of least resistance = [sic] worst thing we can be teaching them. (Industry, Survey, R_9zOzU17auOKOU6m)

Some submitters noted specific examples of students achieving qualifications through a patchwork of unrelated standards, including non-academic activities such as Outdoor Education or Sports, without building foundational knowledge in core subjects.

3.3.2 Concerns about the case for change



Comments on this topic

There were approximately 73 comments from industry submitters related to concerns with the case for change.

Changes to the qualification system may mean losing the flexibility of the current system

Some industry submitters expressed concern with the proposed changes to the senior secondary qualification system due to a risk of losing the current system's flexibility. They noted that certain aspects of the current system support diverse learners, particularly the ability to focus on areas of interest and to suit varied learning approaches.

Flexibility allows students to engage with their interests, and to find assessment types that suit their learning style, ie, many students perform much better on internals than they do in an exam. (Industry, Survey, R_4TYS82qZoq6kMY4)

Some submitters emphasised that the current system allows students to demonstrate achievement in ways that suit their strengths and considered this to be beneficial.

NCEA's flexibility supports the use of formative assessment evidence and ongoing feedback cycles. (Industry, Email, EMI-1073)

Submitters viewed flexibility as particularly important for students who excel in practical or applied learning but struggle with traditional exam-based assessments. Some submitters emphasised that internal assessments better reflect workplace competencies such as project management, collaboration, and problem solving.

Changes to the qualification system may result in less equitable outcomes

Note that equity concerns were raised throughout the feedback received. A summary of the broader equity concerns of industry is provided below, with commentary specific to individual proposals included in the relevant sections below.

Some industry submitters raised equity concerns with the case for change, often alongside issues of flexibility. These submitters noted the potential disadvantage to Māori, Pacific peoples, and neurodiverse learners under a more rigid senior secondary qualification system. Some submitters expressed concern that removing flexibility would increase barriers for students who are already underserved.

The system's flexibility is not the problem; it's a feature that must be protected. (Industry, Email, EMI-1019)

Submitters from rural areas and smaller centres particularly emphasised concerns about equitable access to VET subjects and specialist teaching, noting that urban schools would likely have greater capacity to deliver the proposed changes than rural schools, smaller schools, or schools facing greater socio-economic barriers. Submitters noted concerns with the expected drop in initial achievement for some students, and submitters questioned why the government would proceed without a clear mitigation plan.

The consultation document acknowledges the risk of an initial drop in achievement rates, particularly for students who are already disadvantaged. (Industry, Email, EMI-1019)

3.3.3 Priorities for improvement



Comments on this topic

There were approximately 169 comments from industry submitters related to priorities for improvement.

Appropriate resourcing and funding for schools to integrate VET subjects

Some industry submitters emphasised that adequate resourcing would be critical to successful implementation. Submitters noted concerns about funding for schools, teachers, and specialist facilities. Some submitters noted that Industry Skills Boards (ISB) are still being established and questioned their capacity to develop robust VET subjects within the proposed timeframe.

The proposed resourcing of the ISBs is insufficient to support even the current fragmented and woefully under-resourced vocational education pathways offered in schools. (Industry, Email, EMI-1050)

Some submitters noted that rural schools and schools facing greater socio-economic barriers would require targeted support to ensure equitable access to VET subjects and specialist teaching. Submitters also emphasised the need for funding to support industry partnerships, work placements, and transport for students accessing offsite learning.

Rural schools and smaller schools may struggle to resource new VET subjects, limiting student access. To avoid this, reforms must include equity safeguards such as targeted MOE funding, regional partnerships, and flexible delivery models. Ensuring equitable access is not only a matter of fairness, it is also critical for building a diverse and inclusive future workforce. (Industry, Email, EMI-1037)

Changes require evidence and evaluation

Some industry submitters also called for stronger evidence to support the proposed changes and for ongoing evaluation of impacts. Submitters noted that the discussion document did not provide sufficient evidence that the new system would deliver better outcomes than improving the existing NCEA system.

It is our strong view that government must invest in consistent research and evaluation activities that sit alongside any change programme around the curriculum and assessment and qualifications regime. (Industry, Email, EMI-1066)

3.4 Whānau and students



While the quantitative analysis indicates that there may have been strong support among submitters for the case for change, the qualitative analysis reads less positively. This is because submitters were more often asked to provide additional comments based on their concerns.



Submitter summary

Most whānau and students expressed concerns about the case for change, with few supporting the need for change as outlined. Concerns about the case for change were largely related to disagreement with the rationale for change and problems identified in the discussion document. Submitters were concerned that changes to the senior secondary qualification system may result in a loss of the current system's flexibility, and would have an impact on vulnerable groups and to students' future pathways. Whānau and student submitters classified NCEA's flexibility and diversity as strengths. However, other submitters raised concern with NCEA, namely a vague grading system, credit counting practice, difficulty understanding NCEA, and limited international comparability. Priorities for improvement included the need for improved assessments and grading, as well as increasing literacy and numeracy levels.

3.4.1 Support for the case for change



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on why they support the case for change, approximate numbers of submissions that commented in support are unable to be provided, however it was relatively low.²⁰

General support for the case for change

A few whānau and student submitters agreed with the case for change away from NCEA to a new secondary school qualification. Of those who agreed, most were enthusiastic for the changes, expressing that they were well overdue. Some commended the inclusion of VET, amendments to grading, and minimising credit counting.

I am very relieved that the country's education system is finally moving towards the right direction. Our children will not be placed at the bottom compared to other countries. I am looking forward to this new change with welcoming hands. (Whānau, Survey, R_9WNEmy5bhXrMBfY)

NCEA is confusing

Very few student submitters agreed that NCEA is confusing. They explained that NCEA was time consuming to understand due to vague documentation. These students added that the changes to Level 1 have made NCEA more burdensome.

I have spent countless hours trying to wrap my head around the confusing requirements, forms, and systems, that all too often, logically, don't turn out the way that you would expect. [...] I have too often been told to simply "look at the achievement standard document" which is a confusing and nondescript mess because it is so generic. So to answer the question, the NCEA system, in its entirety, needs to be scrapped in favour of the new proposed system. (Student, Survey, R_9LTLoAvGQmpWP8R)

Proposals bring clarity and will better prepare students for the future

A few other whānau submitters praised that the Proposal would benefit students by better preparing them for the future and improve New Zealand's international recognition.

I appreciate the simplicity and clarity of the proposed system, which would also enhance its global compatibility. By adopting this new framework, New Zealand's education system would be better equipped to prepare students for an increasingly complex and interconnected world. (Other, Email, EMO-5139)

²⁰ Comments relating to negatives aspects of NCEA have been separated from exclusive indications of support for the changes as all respondents were asked to provide comment on negative aspects of NCEA, not only those that supported the proposed changes.

3.4.2 Concerns about the case for change



Comments on this topic

There were approximately 657 comments from whānau and student survey submitters related to concerns with the case for change.

The problem definition and logic underpinning the case for change is misleading

Most whānau and student submitters who disagreed with the case for change, contested the framing of NCEA, the rationale for change, and the evidence behind the case for change. Some whānau and student submitters labelled the proposed changes as “restrictive”, “backwards”, and risked disenfranchising more students than the current system.

It's going backwards to the 90's system which was harder to achieve, and many failed, everyone has a different way of learning, some are visual, hands on, one on one, people are getting left behind if they don't fit into a teachers way of learning, learning needs to be centred for the client, which are students and all their learning needs should be taken in to account. (Whānau, Survey, R_98FYMOGscgguaeI)

Many whānau and student submitters questioned the logic that underpinned the discussion document. They disagreed with the assertion that NCEA is confusing, is not internationally comparable or credible, and that flexibility is framed as a problem rather than a benefit. A few submitters suggested that NCEA was unfairly scapegoated as the issue and the real issue is a lack of funding and support for staff and students. A few student submitters addressed that there is a gap in the discussion documents about the benefits of NCEA.

I disagree with the suggestion that the current system is overly confusing for parents and students. From my experience, once the NCEA structure—credit requirements, grading, and internal/external assessments—is clearly explained, it is straightforward to follow. (Whānau, Survey, R_40xkWud91FqYvXT)

NCEA in it's[sic] current state is NOT confusing, and it is NOT unclear as to how we are supposed to [achieve] it. (Student, Survey, R_4ztSKy6QeNDVnK9)

Like educators, whānau and student submitters also questioned the rationale behind the proposed changes and what value changes would bring. Some commented that NCEA does not need to be changed. Other whānau and student submitters, and submitters supporting the student perspective such as Mana Mokopuna – Children's Commissioner, considered that while NCEA has its flaws, the current system should be strengthened to become more equitable, instead of undertaking the costly exercise of creating a new system.

Rather than scrapping NCEA, the focus should be on improving it—making the system more streamlined, addressing areas of concern, and ensuring that it continues to evolve to meet the needs of future students. The current system's ability to adapt to various learning styles and career paths is invaluable and should be preserved, not discarded. (Student, Survey, R_4f1UvNVukChvH4D)

Persistent gaps in achievement for mokopuna Māori, Pacific, whaikaha (disabled), neurodiverse, care-experienced mokopuna and those from low socio-economic

backgrounds show that our education system is not yet delivering equitable outcomes. Any reforms must therefore be designed to dismantle systemic barriers, rather than risk reinforcing existing inequities. (Student Representative, Email, EMO-5225 Mana Mokopuna Children's Commissioner)

A few whānau and student submitters questioned the claim that student credit accumulation, avoiding exams, and autonomy to choose standards was negative. They explained that the current system allows students to focus on the standards that will best set them up for their chosen career path and exercises 'real life' decision making. A few student submitters added that exams are not always an adequate test of knowledge and that students may opt out of exams to get work experience or partake in extra-curricular activities to progress their personal goals.

The representation that students are using NCEA to 'cheat the system' is inaccurate of what students are actually doing and lacks an understanding of their situation. Some students may have other post-school or career aspirations that aren't necessarily rooted in outstanding academic achievement, so it is understandable that they have less motivation to stay in school or work towards credits that will not benefit them. (Student, Email, EMW-4286)

Potential changes to the senior secondary qualification system could reduce flexibility and have disproportionate impacts on some students



Note that equity concerns were raised throughout the feedback received. A summary of the broader equity concerns of whānau and students is provided below, with commentary specific to individual Proposals included in the relevant sections of the report.

Similar to educators, many whānau and student submitters were concerned with risk that potential changes to the senior secondary qualification system would remove the flexibility of the current system. They considered that any changes to the system that take a "one size fits all" approach, would not adequately cater for neurodiverse students, those with learning disabilities, Māori and Pacific students, or those who struggle academically.

Having a high degree of choice around what subjects and standards to take has been helpful for me and my sister, both of us being neurodiverse. (Student, Survey, R_9H6tZZCFAdXALR0)

Not all children are capable of studying and sitting formal exams for one. There are more and more diverse learners in schools for which standardised tests and exams will simply not work. (Whānau, Survey, R_90wsT88JEwHc3pw)

A few whānau and student submitters raised that the proposed structure would limit students' options and funnel them into certain pathways. There was particular concern for students who tend to be non-academic.

The new qualifications risk narrowing pathways for students whose aspirations don't align with traditional academic or vocational tracks, limiting flexibility for diverse futures. (Whānau, Survey, R_42QA8nFZhEsTJIV)

Further, some students and a few whānau submitters warned that changes to the system would create confusion. They explained that they are concerned for the transition period and the perception of how robust the new qualifications will be.

NCEA is familiar to most students, and changing it while they are still in school could become confusing, even if they finish school before the changes are put in place, as having two different standards could make applying for jobs hard, so keeping NCEA makes it easier for students to understand their learning. (Student, Survey, R_9Do2EixmHfJxHCQ)

3.4.3 Negative aspects of NCEA



Comments on this topic

There were approximately 847 comments from whānau and student survey submitters related to the negative aspects of NCEA.

Concerns that whānau submitters had for NCEA often centred around their lack of understanding for the system and the effect this had on their involvement with their child's education. Concerns from student submitters were more likely to focus on navigating the system and its requirements.

Some submitters find NCEA hard to understand

Some whānau and student submitters found all aspects of NCEA difficult to understand. A few of these submitters explained that the system became clearer to them as time went on, but many retained their confusion throughout their entire experience with NCEA.

Everything, no matter how many times it is explained, it makes absolutely no sense. (Whānau, Survey, R_4UFfS6pqUyP0Gkx)

Some student and whānau submitters explained that the help and communication provided to them by schools and NZQA was insufficient for a well-rounded understanding of NCEA. A few submitters commented that information they did receive was either of poor quality or not written in plain language for students and whānau to understand.

There is an urgent need for clearer guidance, plain-language materials, and inclusive planning tools that help families make confident, well-supported choices through the NCEA journey. For families with autistic or PDA students, complexity becomes a form of exclusion. (Whānau, Survey, R_9rlkyh79EWsX5Ny)

Many whānau submitters completed high school before NCEA was implemented, for these submitters, a lack of familiarity with NCEA made the system difficult for them understand. This combined with poor communication from schools and NZQA left many whānau submitters incapable of having in-depth involvement with their child's education.

Some submitters were confused by the ratio of credits earned for an assignment to the amount of time and effort put in, highlighting a lack of consistency across the curriculum. A few student submitters explained that some courses have assignments where most course credits can be achieved in a single day, whereas other courses have assignments that require longer

stretches of effort with fewer credits achieved. These student submitters found this confusing and unmotivating.

It is also unclear whether the number of credits it's worth is related to the quantity of content needed studied for that specific standard, whether it's relative to how long the paper/assignment is, or if it's how difficult the assessment will be. (Student, Survey, R_49ht8NoNFJVxnh9)

NCEA's grading system is too broad and vague

Some whānau and student submitters were confused by NCEA's Not Achieved, Achieved, Merit, and Excellence (NAME) grading system, finding it too broad and vague to accurately reflect a student's level of achievement. Some whānau and student submitters were confused by the terminology NCEA uses; this commonly included the grades, credit requirements, subject endorsements, and university entrance. Whānau submitters often mentioned they struggled to apply these concepts to their child's education. Other whānau submitters wanted to understand the equivalent of NCEA's terminology in the context of the school curriculum they experienced. For example, it was common for whānau submitters to want to know the equivalent of their child's NAME grade as a letter or a percentage.

One of the most challenging aspects of NCEA is the grading system involving credits, merit, and excellence. While these distinctions are meant to reflect varying levels of proficiency and achievement, they are not well understood by all students and families. (Whānau, Survey, R_4HZjyL0sQxSmRtD)

A few student submitters highlighted that they did not understand what was needed to pass a course, a level of NCEA, or gain university entrance.

The Idea of "passing". I even had teachers who didn't know you would a [sic] fail a class if you didn't get 14 credits and sit an external. I think its [sic] confusing as for example you have to get 14 credits in each five classes to pass but then you have to get 60 credits for a general certificate and then there is still U.E to consider and that's just one level. (Student, Survey, R_4usxjv9Ln2l9hh)

Credit counting is a concerning outcome of NCEA

Some whānau submitters were concerned about a growing trend of credit counting observed in students where students disengage from their learning entirely once they have accumulated enough credits to pass, behaviour that the NCEA system enables. A few submitters also pointed out that some students actively seek out academically easier subjects to finish school with the lowest possible effort.

My son is credit counting and is not extending himself beyond that (Whānau, Survey, R_4eqIMx6leyY8Xaj)

Some submitters were concerned that students can pass all levels of NCEA after gaining enough credits from internal assessments only. Submitters observed students opting out of exams at the end of the year because their qualification would not benefit from the further effort. There was concern from a few submitters that this practise leaves students unprepared for exams during tertiary education. Additionally, some submitters were concerned that

allowing students to opt out of exams is a significant motivating factor in the previously described credit counting culture.

Students achieving “Excellence” and those achieving “Achieved” receive the same credit value, while many can pass entire year levels through internal assessments alone, effectively bypassing external examinations [...] The result is that students enter universities and workplaces with vastly different knowledge bases despite holding equivalent qualifications, creating an unequal foundation that disadvantages both employers seeking reliable indicators of competency and tertiary institutions struggling to assess genuine academic preparedness. (Whānau, Survey, R_4P1FhHMrZHigCq1)

NCEA does not sufficiently prepare students with relevant, coherent learning

Some whānau and student submitters stated that NCEA does not sufficiently prepare learners for adulthood. They considered that students lacked the skills to pursue further education, enter the workforce, or manage everyday responsibilities. These submitters wanted stronger emphasis placed on knowledge and experiences directly relevant to life after school. A few submitters also took issue with credits awarded for non-academic activities (e.g., driver licensing or part-time work), saying these did not add educational value and that NCEA should prioritise academic learning.

I don't really understand about the criteria NCEA uses to assess student achievement, and also I am a bit confused about how activities such as obtaining a driver's license or engaging in part-time employment can be counted as academic credits. (Whānau, Survey, R_98U3Za09RvFeAq5)

Some submitters were concerned that offering a wide mix of subjects came at the expense of in-depth learning. They viewed programmes as fragmented, with minimal meaningful overlap between subjects and limited opportunities to build cumulative knowledge. According to these submitters, breadth without clear connections reduced the coherence of learning and weakened progression across levels.

NCEA also fails to prepare many students for life beyond school. International studies suggest that qualifications should embed “transferable skills” - problem-solving, adaptability, and selfdirected [sic] learning to equip young people for quickly changing workplaces (OECD, 2019). Under NCEA, too many students complete school with credits but without the confidence or skills to continue learning independently. This is worrying, since learning does not stop after school and is important for the rest of your life. (Whānau, Email, EMO-5105)

NCEA is inconsistent in assessment and availability

A few whānau and student submitters questioned NCEA's rigour and consistency. Some stated that it was too easy to pass, including where achievement could be awarded for less than half the assessed material, while others said it was needlessly difficult to excel, noting that the difference between Achieved and Excellence could hinge on minor details. A few submitters also raised concerns about assessment load across the year, linking frequent assessments to learner exhaustion. In addition, a few submitters said support for neurodiverse learners was insufficient, and that limited support undermined equitable access to quality learning.

A student can produce high quality work, yet miss ticking a single box when it comes to assessment criteria. What's difficult to understand is exactly what is required by the student until after the teacher has marked the work and tells them then. (Whānau, Survey, R_9ou3vZTMUcYdDGw)

Other submitters were confused by the lack of a standardised curriculum across the country and were uncomfortable that students would receive different education depending on their school and location.

For instance, some schools may emphasise certain criteria over others, leading to discrepancies in how students perceive their achievements. This variability creates confusion, as families may struggle to grasp the true value of these grades without a standardised understanding. (Whānau, Survey, R_4HZjyL0sQxSmRtD)

NCEA has limited international comparability

A few submitters were concerned that NCEA does not compare to other internationally known curriculums. These submitters frequently commented that NCEA does not challenge its students enough, often comparing the level of difficulty in NCEA to internationally recognised curriculums like Cambridge or IGCSE.

Our family used IGCSE and then switched to NCEA levels 2 and 3 for one child's qualification pathway - NCEA was substandard in every possible way, including the content, the marking parameters, and it's [sic] usefulness for tertiary studies. (Whānau, Survey, R_9ou3vZTMUcYdDGw)

Some of these submitters were concerned that international universities do not understand NCEA terminology enough to judge how well a student performed under the system. There was concern that this would put students applying to study overseas at a disadvantage.

3.4.4 Positive aspects of NCEA



Comments on this topic

There were 2873 comments from whānau and student survey submitters related to the positives of NCEA.

NCEA's broad flexibility to tailor learning and assessment to the needs and aspirations of students is a strength

Most whānau and student submitters highlighted the general flexibility of NCEA as a major positive trait and supported retaining this in the new system. Submitters cited multiple examples of positive flexibility within NCEA, ranging from accommodation for diverse learning needs, to the balance between internal and external examination. The following positive traits were identified consistently by submitters:

- Flexibility of subjects, standards, and assessment types
- Balance between internal and external assessment
- Flexibility and support for diverse learners and students with specific learning needs

- Credit system provides consistent and diverse opportunities for student achievement throughout the year
- Strong support for vocational and non-academic pathways.

Many whānau and student submitters emphasised the balance between internal and external examinations in NCEA, highlighting it as a major positive for students. Submitters made the point that utilising a balanced mix of assessment options gives students who possess different learning styles the opportunity to succeed academically, including those who struggle in the high-pressure environment of an exam room, as well as those with specific learning needs such as neurodiverse students. Submitters noted that the balanced mix of assessment options reduces stress for students, who can be assured that their workload is distributed throughout the year, and that they will have multiple attempts to achieve to a satisfactory standard.

Some submitters also made the point that internal assessments allow for a wider demonstration of student skills, which can be constrained by external-heavy courses.

NCEA currently offers a good balance of internal and external based assessments. The range of internal assessments offers a range of skills that help students prepare for tertiary education. These include writing reports, essays, researching, designing and carrying out investigations. These options are inclusive of neurodiverse learners which both my children are. Exams are a snapshot of what students know on the day. This also depends on the way they are feeling. (Survey, Whānau, R_4YxPnSAbHymY3pC)

While highlighted by whānau, many student submitters particularly valued the flexibility allowed by NCEA in terms of subject and achievement standard selection, stating this enables students to tailor their learning towards their strengths and passions, increasing motivation and engagement. Alongside this, student submitters appreciated the credit-based system of NCEA. Student submitters stated that as currently structured, this system enables students to more easily pass NCEA levels, as regardless of academic ability, students can earn credits from multiple sources throughout the year, ensuring that overall student achievement is not derailed by weak subject areas.

NCEA ensures that even though some students aren't the brightest academically, depending on their intended career path, they can still achieve credits in subjects that are more practical or suited to their strengths. For example, students who are good with hands-on work can succeed in trades-based subjects or vocational pathways. This flexibility helps more students stay motivated, finish school with qualifications, and move towards jobs or training that suit them. (Survey, Student, R_95QM1MtZi3gWqG1)

Many whānau and student submitters considered NCEA easy to understand

Many whānau and student submitters stated that the core structure of NCEA is relatively simple.²¹ Most of these submitters pointed to the grading system and the credit system when

²¹ In relation to how easy or confusing NCEA is to understand, qualitative data from all email and survey submissions and quantitative data from survey submissions only are not completely aligned. The qualitative data revealed that whānau reported NCEA as being easy to understand to the same extent as students. The quantitative data revealed that whānau perceived NCEA as more difficult to understand than students (**Figure 30** and **Figure 31**).

discussing the simplicity and intuitiveness of NCEA, describing these systems as straightforward and easy to understand.

Many whānau and student submitters did not consider the NCEA grading system to be difficult to understand. These submitters considered the Not Achieved, Achieved, Merit, and Excellence grading standards to be intuitive, providing a clear picture of the level a student has performed at, without the vagueness of a percentage grade. Some submitters further made the point that the marking criteria clearly states the difference in student performance between grades, giving a clear outline of what is required to achieve a high grade.

My understanding is that there is a criteria that you are assessed against to achieve either excellence, merit, achieved and non achieved which for me is easy to follow and understand. It actually informs you of what they did and didn't meet to get their grade. It is useful to sit down with my child and identify any gaps in their learning. (Survey, Whānau, R_9KdVPXrq6fkRJ0)

Many submitters were also clear on how the NCEA credit system operates and how credits contribute towards subject achievement, endorsements, and University Entrance. These submitters considered the core structure of NCEA to provide a clear outline of what is required of a student to gain senior qualifications. Some whānau submitters demonstrated their understanding of the credit system by providing a written outline of how it operates. Student submitters themselves were very clear on what is required of them under NCEA.

One of the simplest and most straightforward aspects of NCEA is the credit system. Each subject and assessment has a set number of credits, which makes it easy for us to track our progress and see how much work we need to put in to achieve our goals. [...] Overall, the structure of NCEA is transparent and provides clear milestones, which makes it easier for us to understand where we stand and what we need to do next. (Survey, Student, R_4f1UvNVukChvH4D)

3.4.5 Concerns about assessing against a new national curriculum



While the quantitative analysis indicates that there may have been strong support among submitters to align assessment to a national curriculum, the qualitative analysis reads less positively. This is because submitters were only asked to provide additional comment if they disagreed that national qualifications should assess against a national curriculum.

Introduction of a new national curriculum would limit students and teachers

Many whānau and student submitters were concerned that the introduction of a new, standardised national curriculum would have adverse impacts on students. Some student submitters explained that assessing against a national curriculum would remove flexibility, consequently reducing learning pathways and possibilities for students. They warned that this would not provide an accurate reflection of their skillset or allow them to experiment with new interests. A few whānau and student submitters added that it could result in higher disengagement from students, academic and non-academic alike.

The new curriculum you are proposing won't show the different parts of the subject that someone is excelling or failing in. The current one shows the different parts and shows what people excel in. (Student, Survey, R_9S2pAWoBYFDKcFj)

Some student submitters also added that it would restrict teacher's ability to formulate a lesson plan reflective of their skillset, or what would best suit and engage their students.

Assessing based on one national curriculum is detrimental for multiple reasons. First, it limits a teacher's freedom on what topics they teach, what specific history, environmental issue or cultural priority which could be important to them or the students. Additionally, it will limit their creativity in lesson plans, they will be forced to teach to the test, rather than to the students interests or needs. (Student, Survey, R_90kkCgAHtz36Nj2)

A few whānau and student submitters warned that a strict curriculum would inadequately prepare them for life outside of school. They explained that standardised content and measuring risks not creating a well-rounded cohort that is reflective of society or society's needs.

We need a balance of real world learning and education that prepares our students for the world. Having a curriculum is too narrow of a focus- numeracy and literacy are important and can to be integrated into other types of subjects. (Whānau, Survey, R_4smnRnhlQHOGT62)

Further, distinct from whānau submitters, a few student submitters warned that a rigid curriculum could create unnecessary mental health issues, such as increased stress, depression, and anxiety.

If it becomes more strict, it could make school really stressful for students, especially those struggling with mental health. (Student, Survey, R_48Ulf16TdJzbjGx)

Rigid assessment against a new national curriculum does not account for learner diversity, which could exacerbate inequities



Note that the content of a new national curriculum was outside the scope of this consultation. However, submitters continued to raise their views on the content of the new national curriculum. These views have been included below to support understanding of submitter feedback on the proposed changes.

Some whānau and student submitters raised concern that rigid assessment against a new national curriculum would not account for individualised learning contexts, including student interest, learning ability, or cultural background.

I believe schools and regions should set their own qualifications so they can adapt learning to local needs, cultures, and priorities. A single national curriculum risks ignoring regional diversity, limiting innovation, and making education less relevant to students' real lives. (Student, Survey, R_9aqk2XSO1NJn69j)

Some whānau and a few student submitters stressed that assessing against a rigid new national curriculum may create inequities and disadvantage vulnerable groups, such as those who live in rural areas or Māori. They explained that their needs may not align with the standards or methods for judging those standards, which may hinder their learning and development and further entrench inequities.

Assessing one curriculum will limit those whose learning styles or capabilities do not fit those standards as everyone has their strengths in either essay writing, test taking, the arts or the academics. This would also affect those with fewer resources, who would be limited in their education compared to those with wider resources leading to inequities and larger achievement gaps, especially for those rural or in low socioeconomic areas. (Student, Survey, R_90kkCgAHtz36Nj2)

A new national curriculum is positive provided it reflects the needs of New Zealand students

On the other hand, a few whānau submitters conditionally supported the inclusion of a new national curriculum. They stressed that it needs to be crafted with a student-centred approach. They explained that it should reflect New Zealand students' needs, particularly those who may be disproportionately impacted by the proposed change.

I recognise the value of having a strong and coherent national curriculum that sets clear learning expectations for all students. However, my concerns lie in how the proposed qualifications system will assess against that curriculum — and whether the assessment model will truly reflect the diversity of learners in Aotearoa. (Whānau, Survey, R_4g2l6kfbmv8Bbot)

Adopt the curriculum already progressed by previous government

Similar to some educator submitters, a few whānau submitters preferred the progress made on the curriculum by the previous government. They explained that it was more inclusive and a future curriculum should build from this work.

Te Mataiaho draft was excellent curriculum for Maori and PI [Pacific Island] learners. Data seems skewed to them in the low literacy rates - why not go back to the mahi done by the previous government to include their world view? (Whānau, Survey, R_4E4ai1NHDF9Uy89)

3.4.6 Priorities for improvement



Comments on this topic

There were approximately 1869 comments from whānau and student survey submitters related to priorities for improvement.

Most whānau and student submitters provided priorities for improvement that overlap with other sections of the proposed changes. These include the need for a curriculum, improving assessments and grading as well as increasing literacy and numeracy levels.

Make assessments more fit-for-purpose and reflective of student learning

More student submitters than whānau raised that there is room for improvement among assessment standards. A few suggested that there should be more variety and flexibility for assessments, enabling students to complete standards that align with their interests and at their own pace.

A few whānau and student submitters also suggested that there should be improvements to assessment structure. They explained that deep learning and content retention should be prioritised for assessment preparation. They also recommended that the assessments produced should be a higher quality with more coherent questioning that appropriately and accurately tests knowledge.

A few whānau and student submitters raised that assessment should be more culturally responsive, especially for Māori. They explained that weaving Te Tiriti o Waitangi principles, and kaupapa Māori ways of learning throughout the curriculum would strengthen engagement, achievement, learning, and equity.

An important opportunity for positive change is to strengthen pathways that reflect kaupapa Māori ways of learning, assessment, and achievement. NCEA should recognise mātauranga Māori, tikanga, and iwi-specific knowledge alongside mainstream academic standards, so that tamariki and rangatahi can succeed as Māori. (Whānau, Survey, R_4K2plThfaNp2s2W)

NCEA grading needs to provide a holistic view of student skillset and knowledge while being culturally inclusive

Some whānau and student submitters commented that grading should be improved to create consistency, clarity, and comparability. Of the whānau submitters that provided this answer, some stated they preferred percentage or alphabet assigned grading to better understand student performance. This is discussed more in Proposal 4.

Student submitters tended to provide more detailed responses than whānau submitters, pinpointing the specific problem with the current grading system. Some of these student submitters explained that current grading was not an accurate reflection of their knowledge or skill level. They elaborated that it is easy to pass, but attaining higher levels may not be achieved due to the omission of minor points rather than demonstrating sufficient mastery of the subject. A few emphasised, that this unfairly impacts neurodiverse learners. They recommended improving the grading system so it provides a more holistic view of their skillset, rather than the current rigid system.

The quality at which a test / exam assesses a student's knowledge should improve. On many assessments it is possible to lose a large portion of your grade over a single mistake, even if that mistake is inconsequential and does not detract from the overall level of understanding shown throughout the rest of paper. This leads to a lot of exam preparation revolving around knowing the exact language [NCEA] expects, rather than actually learning relevant knowledge that will be used in the future. (Student, Survey, R_4EgCCRN6DzTyJ4B)

A few whānau submitters raised that grading could be improved to be more culturally inclusive. They explained that the definition of success could be broadened to include contribution to hapū, iwi, and community to make it more meaningful and relevant to kura and whānau.

Improve numeracy and literacy, as well as other skillsets for life beyond school

Whānau and student submitters sometime raised points about particular skillsets that should be prioritised for improvement. Namely:

Some whānau and a few student submitters suggested that the pathway between in class learning and future potential employment should be strengthened to increase relevance for students and employers. Additionally, some student and whānau submitters also noted the need to develop students through soft skills, that support their understanding of financial and digital literacy, AI, critical thinking, ethics, philosophy, life skills, sustainability, social responsibility, and cultural awareness. This theme is discussed further in section **5.4.4**.

Subjects could have more relevance to applied situations - for example, mathematics focussing on [quality] surveying for future tradespeople, health subjects for future healthcare professionals or carers. More applicable to careers. (Whānau, Survey, R_4c1WDofZCAOYISd)

An additional opportunity for positive change would be to strengthen the focus on global citizenship and values-based learning across the qualification system. While academic and vocational outcomes are important, young people also need the skills, empathy, and awareness to navigate a rapidly changing, interconnected world. (Whānau, Survey, R_4VrtNLIFJhfQlgM)

A few whānau and student submitters raised that numeracy and literacy levels of students are inadequate and should be prioritised for improvement. This is discussed further in **5.4.1**.

A few whānau and student submitters raised that other subjects should be strengthened alongside literacy and numeracy, including core subjects such as Science and History. This is discussed further in section **6.4.4**.

Resourcing and support for teachers, whānau, and students to create greater consistency and equity

Some students and whānau submitters raised that additional support needs to be provided for vulnerable cohorts. While NCEA's flexibility is useful, submitters reported that neurodiverse students are at higher risk of burnout, stress, and pressure. Examples of additional support needed for students included more reader/writers in exams; assistive technologies; flexible timing; alternative assessment options to fairly demonstrate their learning; and accessibility of teaching spaces and improved alternative methods that are catered to their needs.

Providing an inclusive learning and assessment pathway for autistic and neurodivergent students, who often drop out of school entirely because the classroom environment is too distracting or overwhelming for them. (Whānau, Survey, R_4hBgjCeNMIAQmbB)

A few student submitters also provided examples of supports for students more generally including an emphasis on wellbeing and learner centred support; modules on how to study,

how to learn, how to navigate the standards; better quality and more accessible exemplars; and more access to teacher aides.

Improved resources for teachers included teacher training, professional development, and clear guides for teachers to create consistency across New Zealand.

Teacher training is another priority — educators require ongoing professional development focused on inclusive assessment practices and effectively supporting diverse learners within the qualification framework. (Whānau, Survey, R_4g2l6kfbmv8Bbot)

Some whānau and student submitters raised the need for more transparent communication about NCEA and student performance. They suggested that this should be accessible, use plain language, easy to follow and catered for busy whānau who may not understand NCEA or are not academically inclined. This resource should be designed to support whānau understanding of how their child is performing and how they can best support them.

Clear structure and pathways so that students and family - not just teachers - know how they're tracking and where they need to focus more or get help. (Whānau, Survey, R_9M4lkuaSXGZjbtw)

Further, a few whānau submitters highlighted that this communication should also be culturally inclusive to remove barriers for Māori whānau. These submitters provided the examples of bilingual guides, hui, resources in Te Reo, and examples that reflect kaupapa Māori contexts. They suggested that these resources should be shaped in partnership with iwi and kura.

4 Proposal 1: Working with industry to integrate VET subjects



Discussion Document Overview

Proposal 1 includes the creation of new valuable and credible Vocational Education and Training (VET) subjects for use in schools. This will include using Industry Skills Boards (ISBs) and other industry organisations to shape the new VET subjects so that they are connected to real post-school opportunities.

Key questions posed to all submitters included:

- *Do you support government working with industry to create Vocational Education and Training (VET) subjects?*

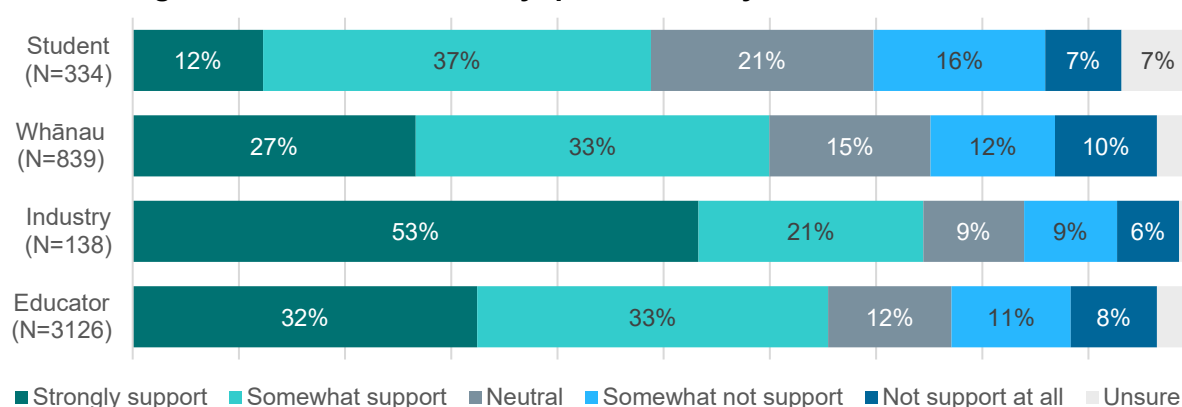
Whānau and students were also asked:

- *Do you agree that access to enhanced VET subjects would be a positive change in the design of the new qualifications?*

4.1 Quantitative survey analysis

4.1.1 Overall level of support for Proposal 1

Figure 32: Overall, do you support Proposal 1: Working with industry to better integrate VET learning into the senior secondary qualification system?



As shown in **Figure 32** most industry (74%) submitters supported working with industry to better integrate VET learning into the secondary qualification system. This integration was also supported by most educator (65%) and whānau (60%) submitters. About half of students supported (49% agreement) and 23% disagreed. However, a further 28% were neutral or unsure, suggesting students may have less clarity about how VET integration would benefit their learning experience. A chi-square test further confirmed that the opinions from whānau and students on Proposal 1 are significantly different.

Figure 33: Overall, do you support Proposal 1 that the government will work with industry to create VET subjects? (by teaching areas)

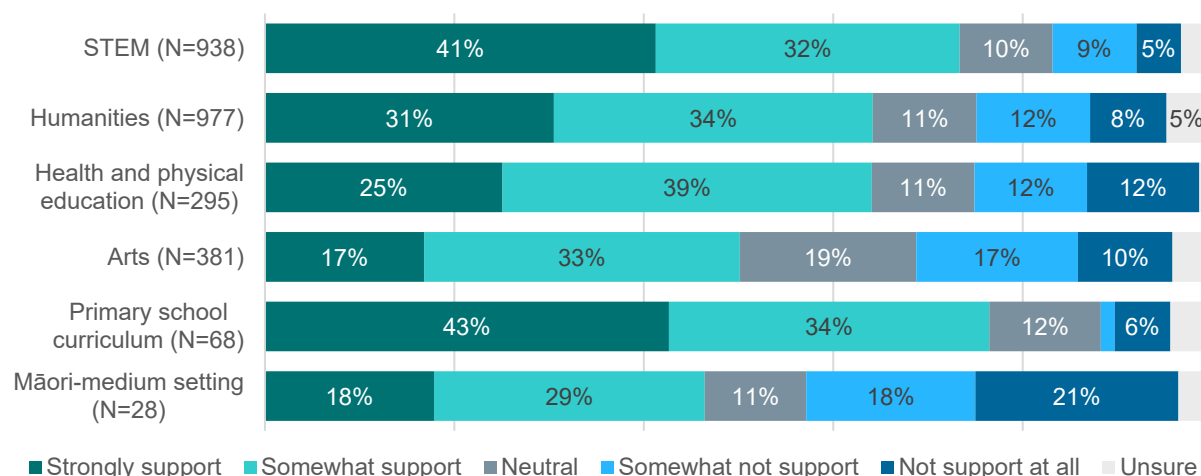
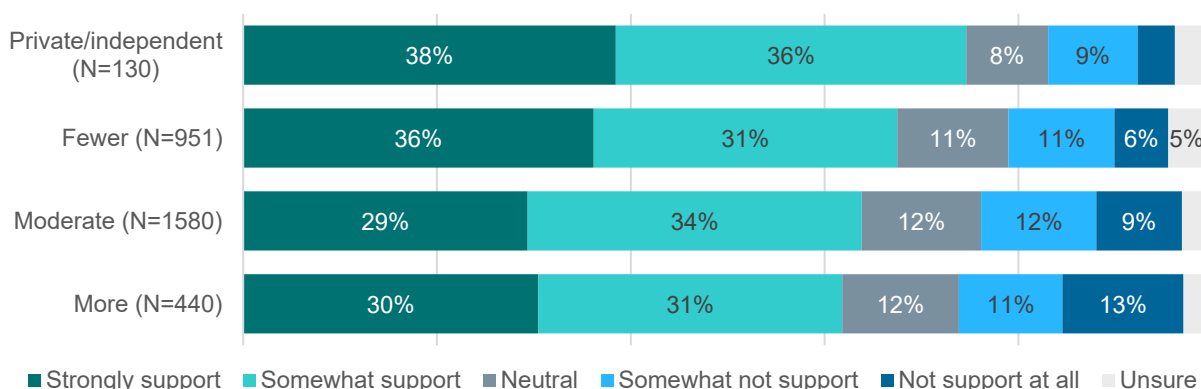


Figure 33 shows most STEM (73%) and a vast majority of primary school curriculum (77%) educators supported government working with industry to create VET subjects, while Māori-medium setting educators are notably divided with nearly equal proportions supporting and not supporting the Proposal (47% versus 39%). Other educators (47%-65%) also indicated support, although Arts educators show reserved opinions with 50% supporting and 23% neutral or unsure. A chi-square test confirms these differences are statistically significant.

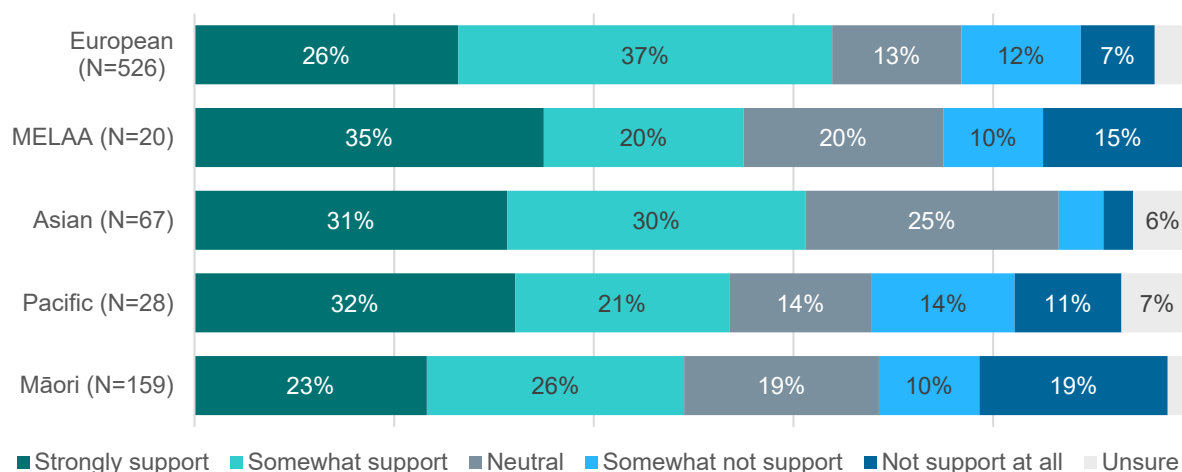
Figure 34: Overall, do you support Proposal 1 that the government will work with industry to create VET subjects? (by school EQI)



As shown in **Figure 34**, most educators from private/independent school (74%) and schools with fewer students facing socio-economic barriers (67%) support Proposal 1. Educators from schools with more students facing socio-economic barriers show somewhat lower support at 61%, with notably higher opposition at 24% and 15% are neutral or unsure. A chi-square test confirms these differences are statistically significant.

The subgroup analysis of industry participants revealed no statistically significant findings regarding Proposal 1.

Figure 35: Overall, do you support Proposal 1: Working with industry to better integrate VET learning? (whānau by ethnicity)

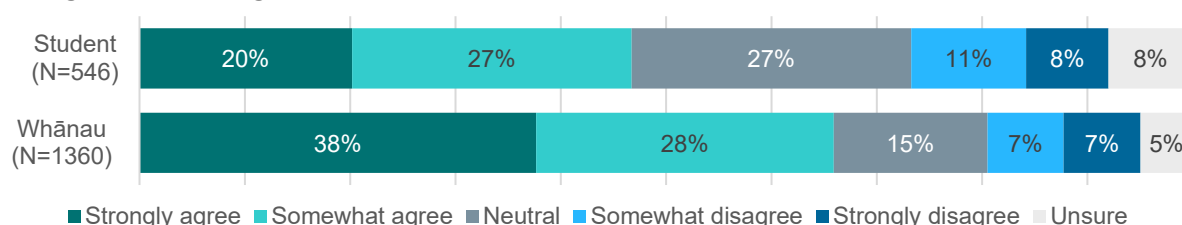


As shown in **Figure 35**, while whānau support for Proposal 1 is substantial or strong for working with industry to integrate VET across all ethnicities (ranging from 49%-63%), European and Asian whānau show higher support (63% and 61% respectively), though Asian whānau show notably high neutrality at 25%. Māori whānau are the most divided with nearly equal proportions supporting and not supporting the Proposal (49% versus 29%), and about half of Pacific and MELAA whānau show support (53% and 55% respectively). A chi-square test confirms these differences are statistically significant.

Student support for Proposal 1 did not differ significantly by ethnicity.

4.1.2 Is access to enhanced VET subjects a positive change?

Figure 36: Do you agree that access to enhanced VET subjects would be a positive change in the design of the new qualifications?



Most whānau were supportive of enhanced VET access showing 66% agreement compared to 47% of students (**Figure 36**). While student disagreement was relatively low (19%), a third of students (35%) were neutral or unsure whether this would be a positive change. The differences are statistically significant.

Figure 37: Do you agree that access to enhanced VET subjects would be a positive change in the design of the new qualifications? (whānau by ethnicity)

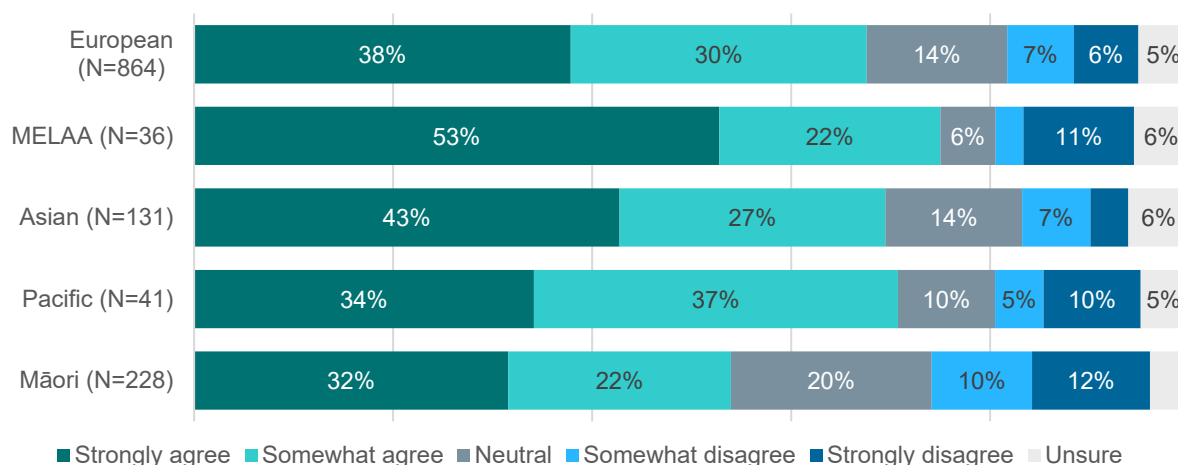


Figure 37 shows most MELAA, Pacific, and Asian whānau support enhanced VET access (70-75%), while Māori whānau show notably lower support at 54% with the highest disagreement at 22% and highest neutrality at 20%. A chi-square test confirms these differences on this issue are statistically significant.

Student support for enhanced VET access did not differ significantly by ethnicity.

4.2 Educators



Submitter summary

Overall, more educators provided comments about benefits of Vocational Education and Training (VET) integration than concerns. Those who were supportive argued that it provides students from all backgrounds with greater hands-on exposure to the trades, which could spark new career pathways.

On the other hand, submitters who were concerned were worried that it would pigeonhole students into 'trades' or 'academic' pathways as well as equity and resourcing concerns between different schools. Some were unsure as to how this differentiated from the current involvement of VET in schools. Educator submitters stressed that in depth implementation considerations would be critical for the success of the Proposal. They identified partnerships, staff recruitment and development, adequate systems and logistics, and equitable resourcing as some of the core foundations needed in the Proposal.

4.2.1 Benefits of VET integration



Comments on this topic

There were approximately 1848 comments from educator survey submitters related to benefits of Vocational Education and Training (VET) integration.

VET integration would support development of practical skills in a meaningful context

Most educator submitters supported the Proposal to include VET subjects in NCEA, saying that it would offer strong benefits for student learning and achievement. Many of these submitters said integration would help students acquire skills and knowledge directly linked to 'real world' industry needs, making their education feel more meaningful and relevant. They considered that this would prepare students for future careers or further study, increase their motivation and engagement in learning, and improve their opportunities to secure better jobs.

Students [will] see a direct link between what they learn and real-world careers. Learning is contextualised in authentic industry problems and practices, making it more relevant and engaging. (Educator, Survey, R_4QVEzMhEMGWK7Et)

Many educator submitters noted that VET subjects provide an engaging alternative that could reduce dropout rates and improve achievement among diverse learners. They said that students would graduate with practical experience and recognised certifications, giving them a head start in the workforce. Submitters also highlighted that being able to start working toward tertiary qualifications while still in high school would reduce duplication of effort and make it easier for students to move into further study.

Students will be completing standards that are linked to what the industry wants and will have the skills to make them employable. Real world skills will hopefully lead to better motivation for learners who find some of the subjects that are less relevant not engaging - which can lead to attendance issues. (Educator, Survey, R_4qfKpCtz59qNAfg)

VET subjects are beneficial for students with non-academic skills and aspirations

Some submitters supported this Proposal as VET subjects work well for students who prefer hands-on, practical learning as an alternative to traditional classroom-based study. These submitters also noted that VET pathways are particularly beneficial for students who are less academically driven, or who do not aspire to follow an academic tertiary pathway. They said that giving VET subjects the same status as academic ones would recognise vocational learning as a valuable and respected pathway.

Not all students are focused on University entrance and training. These new proposals will suit those students who potentially struggle in a school setting, but will encourage them to obtain a secondary education, minimising the drop-out rate. (Educator, Survey, R_44gcAiXdvgEggfy)

Working with ISBs would ensure VET subject content is aligned

Many educator submitters considered that working directly with industry would ensure students learn what is currently required in industry rather than outdated content. Submitters said that ISBs would ensure VET content keeps pace with new and growing industries such as technology, renewable energy, and healthcare. They highlighted that industry involvement would mean assessments reflect current and future skill needs and would support students being industry- or apprentice-ready upon leaving school. It would also create closer ties between industries and education.

By involving Industry Skills Boards (ISBs), the new VET subjects will be directly shaped by industry needs. This ensures that what students learn is current and relevant to real post-school opportunities. (Educator, Survey, R_9TMpU8G0kc9L8vT)

A few submitters also noted that VET learning would help students build important transferable skills like teamwork, communication, and problem-solving through 'real world' experiences and partnerships with employers.

VET integration could support equitable outcomes through meaningful career options

Some educator submitters said VET subjects could help create more equitable outcomes by giving students from diverse backgrounds, including those in rural or lower-income areas, access to meaningful education and employment pathways.

Having clear, nationally consistent skill standards will reduce variability between schools, ensure students across the country receive equally rigorous training, and make it easier for employers to recognise and trust qualifications. This consistency supports equity of opportunity, regardless of a student's location or school. (Educator, Survey, R_4v0uCjcHZ5zPC4t)

A few of these submitters saw particular value in providing students with 'real world' learning experiences through internships, apprenticeships, or workplace placements, saying these opportunities would help build confidence, develop useful connections, and give students a clearer sense of future career options.

Preparation for the future – students leave school with a genuine foundation of competency and confidence, rather than just accumulated credits. (Educator, Survey, R_4mJG3hC7NfayQhP)

A few educator submitters highlighted the cultural significance of VET pathways, particularly for Māori and Pacific students. They explained how such programmes connect with cultural values like whanaungatanga (building relationships through teamwork), kaitiakitanga (stewardship), and manaakitanga (care and hospitality), providing a sense of belonging and purpose that is important to these students' engagement and success.

This holistic approach ensures that qualifications are not just about academic credits, but about building well-rounded, resilient, and culturally grounded individuals ready to contribute meaningfully to society. (Educator, Survey, R-9vk7ZG3vhDGgX1P)

4.2.2 Concerns about VET integration



Comments on this topic

There were approximately 580 comments from educator survey submitters related to concerns with VET integration. While most educator submitters supported VET integration in principle, many also raised concerns about implementation, equity, and the potential for unintended consequences.

The Proposal may stream students into narrow pathways too early

Many of these submitters expressed concern about students being channelled into vocational or academic pathways too early, warning this could replicate historical streaming systems that disadvantaged particular groups. Submitters noted that as students frequently change their minds about career directions, the education system needs sufficient flexibility to enable students to explore different options. They emphasised the need to avoid pigeonholing students.

Our education system is not there to produce robotic individuals only capable of specific industry defined jobs. The education system is there to produce individuals with developed talents and skills that they can apply to a range of occupations. (Educator, Survey, R_92GUsrLKxoKWqMV)

In addition, many educator submitters considered the Proposal would create a perceived hierarchy between academic and vocational pathways, with vocational subjects viewed as second-tier or less valuable than academic subjects. Submitters expressed concern that certain student groups – particularly Māori and Pacific learners, as well as those who are neurodiverse – would be disproportionately directed toward vocational pathways, reinforcing existing inequalities.

Historically, vocational pathways have often been overrepresented by Māori, Pasifika, and students from lower socio-economic backgrounds. Without careful design and safeguards, VET could reinforce existing structural inequalities, where some groups are subtly pushed toward trades and others toward university. This is not a pathway—it's a track—and it contradicts the principle of equitable opportunity. (Educator, Survey, R_4Blxs1UXlqzg5Cp)

A few submitters also raised concern about subjects being moved from academic to vocational categories, particularly Outdoor Education, Tourism, and Performing Arts. Submitters said these subjects have both academic and vocational value and categorising them solely as vocational would undermine academic pathways in these areas and undermine workforce development goals.

I do not think that subjects should be divided into what the Ministry assesses as academic or vocational. This is a narrow way of looking at education and privileges some subjects above others. (Educator, Survey, R_4cOeyLngBQH4Dul)

Many schools may be unable to deliver on the proposed VET subject integration

Many submitters commented on schools' capacity to deliver VET subjects. They noted critical shortages of qualified teachers in vocational areas and questioned where specialist staff would come from. Submitters asked how schools would fund and provide the necessary facilities, equipment, and specialist spaces. They considered that without significant additional investment; the Proposal would be impossible to implement effectively.

Schools generally don't have resources to allow students to learn practical vocational skills on site. (Educator, Survey, R_4BQR2ET8fHux49F)

The Proposal lacks differentiation from current VET integration

Many educator submitters questioned the rationale behind the Proposal as they noted that schools already offer successful vocational pathways, such as through trade academies and partnerships with polytechnics and industry. These submitters suggested that the existing programmes should be strengthened instead of being replaced with a new system or programmes.

The proposal implies that aligning VET with industry is something new. In fact, standards in fields such as Hospitality and Construction have long been co-designed with industry bodies like ServiceIQ and BCITO. This existing strength should be acknowledged and built upon, not overlooked. (Educator, Survey, R_4lxWjXQmjwlqfQQ)

In addition, some submitters expressed concern that the proposed subject-based structure would be more rigid than current vocational pathway arrangements, limiting schools' ability to tailor VET-based programmes to local contexts.

Small and rural schools may face additional access barriers to VET opportunities

Some educator submitters raised concern about equitable access to VET opportunities. These submitters noted that rural and small schools face significant disadvantages such as limited access to tertiary facilities and limited local industries, meaning students would have less access to high-quality VET programmes. Submitters emphasised the risk that the education system would become a 'postcode lottery' where opportunities depend on location and school resources.

The entire proposal relies on industry to be ready and willing to work alongside schools which could create huge inequities [sic] to access across the country depending on the industry, the amount of available connections and the ability to the industry to connect. More rural contexts could be hugely disadvantaged with access to outside providers in their area of interest. (Educator, Survey, R_41N2zfYvQADDT09)

A strong focus on workforce preparation and industry involvement in education may result in students with less well-rounded or future-oriented skills

Many submitters expressed concern that the Proposal focuses too heavily on workforce preparation and employment outcomes. These submitters considered that education should be about preparing well-rounded students for life. Some submitters said that focusing too heavily on current industry needs could result in students being trained for jobs that may not exist in the future.

Education is preparation for life, not just a specific job. There is a danger of students being pushed into a narrow career-based programme, to the detriment of a broader education. With a rapidly changing world, who can tell which skills a student may need 5-10 years after leaving school. A more generalist education may be better for them in the long run and provide awareness of important life aspects beyond the workplace. (Educator, Survey, R_9cqMcQFu413lwT2)

A few educator submitters raised concern about the proposed increased involvement of industry in developing the VET subjects. These submitters questioned whether industry partners would have the knowledge needed to design effective educational programmes. They

considered that industry does not understand the school system, noting that industry experts are highly skilled practitioners, but they are not expert educators. Some submitters expressed concern that industry involvement could narrow education too much toward immediate workforce needs rather than developing well-rounded learners, or that business interests could override educational priorities. A few also noted concerns about lack of Māori representation in ISBs and the potential for culturally responsive pathways to be undermined.

Industry lead design would, in theory, align student learning with the skills required for vocational pathways. The industry lead panel, however, should be carefully picked. Previous curriculum reforms have had some poorly qualified members with minimal practical experience in subjects that have caused significant issues in curriculum content and coherency. (Educator, Survey, R_9EpeRic1TXBoMyB)

4.2.3 Considerations for implementation



Comments on this topic

There were approximately 2678 comments from educator survey submitters related to considerations for implementation, with most identifying staffing as the most critical implementation challenge.

Attracting, retaining, and developing qualified staff will be critical to the success of the Proposal

Many submitters emphasised that attracting and retaining appropriate staff will be critical to the success of this Proposal. Submitters highlighted that schools, particularly small and rural schools, face a severe shortage of qualified teachers with current industry experience, particularly in technology, trades, and hospitality. Teacher salaries were repeatedly discussed with some submitters noting industry professionals can earn significantly more in their fields than in teaching, which would make recruitment difficult.

The entire education system is underfunded, from teacher's pay (especially if hoping to recruit technology specialists to fill these jobs), to time allowances for specialists and for PLD or administration of subject areas, to support staff and facilities. If the government will not invest in the creation of and support of these expected programmes, then they are unlikely to succeed. (Educator, Survey, R_4rH4qgOBejPBn6p)

Submitters highlighted the need for clear pathways to bring tradespeople into teaching without requiring lengthy retraining and noted that industry experts require pedagogical training to work effectively with teenagers in educational settings.

Additionally, some submitters identified professional development and implementation timelines as critical success factors. They said teachers require extensive, ongoing training to maintain current industry standards and develop effective vocational pedagogy. These submitters commented that subject-specific professional development must be delivered through multiple channels and suggested phasing implementation to allow learning from early adopters. They considered that adequate time must be built in for resource development, teacher training, and system testing before full rollout of new VET subjects.

Schools cannot successfully deliver VET subjects without teachers who are well-supported, properly resourced, and given the time and professional learning needed to adapt programmes for diverse learners. [...] If the government is serious about strengthening VET, the focus should be on retaining skilled teachers, reducing workload pressures, and ensuring ongoing professional development. (Educator, Survey, R_4i60QIgEU51rlu5)

Ensuring students have equitable access to VET subjects will require intentionality

Many submitters considered that equitable access to VET subjects would require deliberate design. They specifically highlighted that rural and small schools need support to offer VET subjects given limited local industry, fewer placement opportunities, transport difficulties for students, and difficulty attracting specialist teachers. Some submitters suggested solutions including regional hubs, shared facilities, mobile workshops, or coordinated transport.

Not all students live near industries or providers that can support placements (e.g., rural areas). Schools may need to provide transport solutions, digital access for remote learning, or partnerships with regional hubs. (Educator, Survey, R_9l481IT0LmOTQOG)

Submitters also noted that single-sex schools need strategies for offering full ranges of trades, while students with disabilities, neurodivergent learners, and English language learners require specific accommodations and support structures built into programme design.

Successful implementation will require investment into school facilities and resources

Many educator submitters raised that substantial planning will be required around facilities and resources to support implementation of this Proposal. They commented that successful delivery will require schools with industry-standard equipment including commercial kitchens, fully equipped workshops, automotive facilities, and specialised machinery. This delivery will also need to consider capital investment for ongoing maintenance, regular upgrades to keep pace with industry standards, safety equipment, and consumables. Submitters noted that many schools lack these specialist spaces and face property constraints, particularly in rural areas.

Many schools, particularly in rural or lower socio-economic areas, lack the infrastructure to deliver high-quality, hands-on vocational training. Without significant investment in tools, machinery, and safe learning environments, VET subjects risk becoming theoretical rather than practical. (Educator, Survey, 9DNv6gPBVgNA5IX)

Partnering with industry requires significant input, planning, and systems in place to be successful

Many submitters noted that partnership development requires dedicated staffing and systems. They explained that building sustainable relationships with employers and industry training organisations is time-intensive work requiring specialised skills. Therefore, schools need dedicated positions to manage partnerships, coordinate placements, monitor student progress, and ensure compliance with health and safety requirements, police vetting, and legal responsibilities. A few submitters suggested that partnerships with Māori employers and wānanga would be critical.

Further, submitters considered that clear protocols are needed for managing industry relationships and expectations, and that regional variation in industry capacity must be addressed through coordinated planning.

Delivering quality VET programmes requires strong coordination between schools, students, and external providers or businesses. This creates a substantial administrative and relational workload that cannot fall solely on teachers or school leadership. Schools need dedicated support staff to manage placements, liaise with employers, monitor student progress, and ensure health and safety requirements are met. (Educator, Survey, R_9hDRyC89dlwa6HZ)

Many educator submitters also reported that timetabling and logistics will need careful consideration. They noted that VET learning requires flexible structures including block courses and extended periods that do not fit traditional school schedules; schools to plan for transport costs and supervision requirements for off-site learning; and work placement coordination, particularly in rural areas. Some submitters explained that the administrative burden of Education Outside of the Classroom (EOTC) paperwork for students attending external programmes must be streamlined to be manageable at scale.

VET courses might require extended blocks of time (rather than short periods) to allow for project work or travel to offsite training/work placement. This is particularly challenging for those schools outside the main urban centres where students may lose 1-2 hours learning time from their day in the commute. Schools may need to adjust timetabling so students can participate without losing access to other essential learning areas. (Educator, Survey, R_9ktp0mbd2GatXxL)

Implementation will require quality assurance to maintain consistent assessment and robust moderation

A few submitters stated that quality assurance systems must be established from the outset. They explained that schools need robust national moderation systems to maintain VET qualification credibility, and that assessment must be competency-based yet nationally consistent. Submitters said clear standards are needed for how VET subjects contribute to overall qualifications, and that the relationship with existing programmes must be clarified.

VET subjects may require workplace-based assessment, industry mentor involvement in evaluation, and coordination between school and external assessment. Schools need systems to manage this complexity while ensuring consistency and meeting NZQA requirements. Training multiple stakeholders in assessment standards adds another layer of complexity. (Educator, Survey, R_905VN3mGcoleuyi)

Some submitters also noted that ISBs require support and clear frameworks for developing educationally sound standards suitable for school contexts. Submitters suggested that subject associations should be involved in curriculum development to ensure pedagogical appropriateness.

I have concerns about the ability of industry boards to write curriculum or standards, as they do not have the appropriate pedagogical curriculum knowledge base and lack experience working with rangatahi. NZQA and the MoE should be partnering in this space. (Educator, Survey, R_4uKb12tVLgLvVhi)

4.3 Industry



Submitter summary

This Proposal was widely supported in principle by industry submitters, who were particularly supportive of the potential for clearer pathways, greater industry alignment and relevance, and improved student engagement and retention.

However, submitters also often raised implementation concerns, most notably around resourcing and capacity, implementation timeline and ISB readiness, impacts on equity and access for some schools, and parity of esteem across vocational and academic pathways. Industry submitters wanted to see a retention of existing programmes that work well, greater partnerships, and pathway flexibility.

4.3.1 Benefits of VET integration



Comments on this topic

There were approximately 104 comments from industry survey submitters related to benefits of VET integration.

Integrating VET would make pathways clearer

Some industry submitters stated that VET integration would create clearer pathways between school, further training, and employment. Submitters noted that aligning compulsory education with industry qualifications would help students understand potential career options and make more informed decisions about their futures. Some considered that students would benefit from earlier exposure to vocational options, enabling them to build relevant skills while still at school and transition more smoothly into apprenticeship or employment.

This year should prepare students to be out on apprenticeships, work-based training, employment, or intensive VET for Y12 and Y13. (Industry, Email, EMI-1014)

Some industry submitters expressed support for the equal recognition of vocational and academic pathways. They stated that elevating the status of vocational education would help address workforce shortages.

Vocational pathways must be viewed as equally valid and valued options as academic pathways. (Industry, Email, EMI-1023)

Ensuring industry input into subjects would improve alignment and relevance

Some industry submitters considered including industry input during the development of VET subjects would support these subjects to better reflect current workforce needs. They noted that closer alignment between what students learn and what employers require would produce more work-ready graduates.

Students will learn stuff that is relevant and useful and lays [sic] the base for future training. (Industry, Survey, R_4D6r2y77E8CTFuY)

VET subjects support improved engagement and retention for some students

Some industry submitters stated that relevant, hands-on learning would increase student engagement and help retain learners who might otherwise disengage from education. They supported integration as they considered that vocational pathways could provide purpose and motivation for students whose interests and strengths lay outside traditional academic subjects.

This will provide opportunities for students who are not interested in tertiary studies or more academic subjects to stay in school and develop practical skills aligned with industry. (Industry, Survey, R_4XGa1KkogzwTMwF)

4.3.2 Concerns about VET integration



Comments on this topic

There were approximately 20 comments from industry survey submitters related to concerns with VET integration.

ISBs may not be ready or able to deliver the Proposal in the specified timeframe

Some industry submitters raised concerns about implementation timelines. They noted that ISBs are not yet established and questioned their capacity to develop robust VET subjects in time.

Industry Skills Boards (ISBs) are still in the process of being set up and the expected timelines of other deliverables they have been asked to complete leads us to believe they will be significantly resource- and capacity-constrained to implement these reforms in a timely manner. (Industry, Email, EMI-1063)

There are implementation equity concerns for small and rural schools

Some industry submitters emphasised equity concerns, particularly around the ability to deliver new VET subjects, for rural schools, smaller schools, and learners from lower socio-economic communities. Submitters noted that students in these settings may have limited access to specialist teachers, facilities, and local industry partnerships compared to urban schools, potentially widening existing educational inequalities.

Rural schools and smaller schools may struggle to resource new VET subjects, limiting student access. (Industry, Email, EMI-1060)

Streaming and esteem of parity could be unintended consequences

Some industry submitters also expressed concern about the potential for VET pathways to be perceived as having lower status than academic pathways. These submitters noted the risk of creating a two-tier system where a vocational pathway is viewed as a lesser option.

There is a risk the vocational subjects will be seen as subservient in relation to 'academic' subjects and thus create unintended streaming within the secondary school system. (Industry, Email, EMI-1047)

4.3.3 Considerations for implementation



Comments on this topic

There were approximately 102 comments from industry survey submitters related to considerations for implementation.

Successful implementation will require adequate resourcing and capacity

Some industry submitters expressed concern that schools and ISBs would not have adequate resourcing to deliver VET subjects effectively. They noted that ISBs are expected to operate with significantly reduced funding compared to the Workforce Development Councils (WDCs) they replace, while simultaneously taking on expanded responsibilities.

Some submitters highlighted that schools lack the specialist facilities, equipment, and qualified teachers needed to deliver quality VET programmes. They also noted concerns about the shortage of Technology teachers and questioned whether schools could adequately resource specialist vocational learning spaces such as workshops and technical facilities.

Vocational education teachers are not currently trained as secondary teachers, and there is no plan for who will fund their upskilling. A new system cannot work without a qualified and well-supported teaching workforce. (Industry, Email, EMI-1019)

Schools, on their own, often lack the specialist equipment, industry connections, and current trade expertise to deliver VET effectively. (Industry, Email, EMI-1023)

Continue existing programmes that are working well

Some industry submitters emphasised the importance of retaining and building on existing successful initiatives such as Gateway and Trades Academies, and dual enrolment programmes with tertiary providers. These submitters noted that such programmes have proven effective in engaging students and creating pathways to employment and cautioned against disrupting what is already working well.

Retain dual enrolment option. Retain Trades Academies, Gateway and other Secondary Tertiary Programmes. Retain flexibility to develop bespoke and relevant work-integrated and pre-employment subjects. (Industry, Email, EMI-1048)

Effective, sustained industry partnerships will be important

Some industry submitters highlighted the need for genuine, sustained partnerships between schools, industry, and tertiary providers to ensure successful implementation. Submitters explained that effective VET delivery would require meaningful collaboration rather than tokenistic consultation. Further, some submitters noted that partnership must involve ongoing engagement and shared responsibility rather than one-off interactions.

Strong partnerships will ensure that qualifications reflect actual employment opportunities and can be delivered consistently across the country. Without genuine collaboration, there is a danger of fragmented design, duplication of effort, or subjects that fail to gain credibility with students, teachers, or employers. The design of new

VET subjects should be guided by workforce data and sector evidence, not assumptions. (Industry, Email, EMI-1060)

Flexible pathways should be maintained

Some industry submitters also raised the importance of maintaining flexible movement between academic and vocational pathways, as they considered that VET pathways should not close off university options for students who might later choose that direction. Submitters noted the importance of ensuring VET subjects could contribute towards university entrance requirements where appropriate, maintaining flexibility for students whose goals and interests evolve during their secondary education.

You ought to try to maintain elements of the flexibility of the current model. It is such a huge help to people who do not fit tidily into school systems. (Industry, Survey, R_4TYS82qZoq6kMY4)

4.4 Whānau and students



Submitter summary

Most whānau and student submitters were supportive of Proposal 1 as they considered it would create a better bridge between the trades, 'real world' needs, and student education. However, those who were concerned with the Proposal reasoned that it may funnel students into certain pathways and limit their breadth of exposure to other subjects and areas. Also, some submitters raised implementation considerations to ensure equitable outcomes and close partnership, both of which are expected to be necessary for the Proposal's success.

4.4.1 Benefits of VET integration



Comments on this topic

There were approximately 1646 comments from whānau and student survey submitters related to benefits of VET integration.

VET integration would provide meaningful career pathways and learning for students

Many of these submitters considered that VET integration would be beneficial as it provides flexibility for students who prefer hands-on learning or do not want to take an academic pathway to university. Submitters noted that only a minority of students go on to university, and that a focus on VET integration would provide better learning opportunities and clearer vocational pathways for a broader range of students compared to the current system. Further, many whānau and student submitters considered that VET integration, and the opportunity to develop skills with 'real world' relevance, would support student motivation and engagement as it connects learning to career opportunities.

Not all students are headed to university, so strengthening VET subjects provides meaningful, relevant pathways for students interested in trades, services, or hands-on careers. This helps more students see the value in their learning. When students

can see a direct connection between what they're learning and the real world of work, they are more likely to be engaged and motivated especially those who may not thrive in traditional academic subjects. (Whānau, Survey, R_9dNjqLN85wt4n68)

Industry input will create stronger connection between education and 'real world' needs

Some whānau and student submitters supported the Proposal's intent to include industry in the design of VET subjects. They considered industry involvement to be necessary for success as it would ensure that what students learn remains current, meaningful, and linked to job opportunities.

By designing subjects with industry experts, students will learn skills that are directly relevant and transferable to real workplaces. Their learning will become more meaningful and engaging, which may keep them at school longer. They will have smoother transitions into apprenticeships, further study, or direct employment, and gain confidence knowing that what they are learning is valued by employers and leads to real opportunities. (Whānau, Survey, R_4LiBa6LBNQveA9j)

In addition, a few submitters specifically supported the Proposal to ensure industry are involved in the design of VET subjects, as they considered that the Ministry did not have the appropriate understanding of industry to ensure successful implementation.

4.4.2 Concerns about VET integration



Comments on this topic

There were approximately 515 comments from whānau and student survey submitters related to concerns with VET integration.

Students may be prematurely streamed into inflexible pathways

Many whānau and student submitters expressed concern that the Proposal may result in students being pushed into rigid vocational pathways too early, which would limit future options should they change their mind or want to explore other pathways. These submitters noted that students' futures should not be dictated by a decision they make early in secondary school.

I am concerned you plan to pigeon-hole students into pathways too soon. (Whānau, Survey, R_9Q5YMGfVkwE6i2A)

Other whānau submitters were concerned about the risk that vocational subjects would become viewed as less valuable or inferior compared to academic subjects.

The Proposal is too focused on workforce-preparation

Some whānau and student submitters raised concern that VET integration would place too much focus on preparing workforce-ready students based on current industry needs. These submitters considered that secondary school was an important time for students to broaden their education, explore multiple subjects, and be curious learners.

School is not just about getting a career and contributing to the GDP. It should be about preparing for life, for being a contributing citizen, for encouraging interests and developing skills. (Whānau, Survey, R_4U8BUv2kroaqOpH)

The issue with this VET focus is that its reducing students' agency. At the end of the day, it should be about students and what we want from our education system, not [what] industries want their new workers to look like. (Student, Survey, R_9DGplXHD1bibFhE)

Small and rural schools may be unable to deliver on VET integration

Some whānau and student submitters expressed concern that many schools, particularly small and rural schools, would not have the resources or capacity to support a wide range of VET subjects. Submitters noted equity concerns where students who attend these schools would be disadvantaged compared to those who attend larger and urban schools.

If schools can offer this opportunity, it will benefit many, but it is unlikely many schools have the capacity and skills to support this proposal. (Whānau, Survey, R_902cMmvBmbWKwgZ)

There was confusion around why change was necessary

Some whānau submitters questioned what changes the Proposal would introduce as the current system already has VET integrated programmes, such as through Gateway and Secondary Tertiary Alignment Resource (STAR). These submitters viewed the Proposal simply as a rebrand, while others expressed concern that the existing systems they considered to be working well would be discontinued. A few whānau and student submitters wanted to see improvements made to the existing system instead of introducing something new.

I believe this is already in place, with Gateway programmes being offered by secondary schools and options to leave with NCEA level one and go on to polytechnic. [...] However greater funding for vocational tertiary programmes is very necessary, with this sector being squeezed and forced to offer fewer niche programmes due to lack of financial viability - this is where the govt should focus their efforts. (Whānau, Survey, R_9PT5kEdEaTC1LMK)

4.4.3 Considerations for implementation



Comments on this topic

As there was no explicit question in the survey asking whānau or student submitters to provide comments on operational considerations for implementation of VET integration, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from submissions that raised operational considerations whilst discussing the perceived benefits or concerns of VET integration.

Some whānau and a few student submitters raised suggestions to ensure successful implementation, highlighting the need for adequate resourcing and strong partnership.

Retaining equitable outcomes through choice and consistent resourcing is critical for success

Some whānau and student submitters highlighted that students should be able to retain choice without pigeonholing themselves into either academic or vocational pathways.

I think kids should be able to decide from all subjects that a school is able to offer and not remove some from the academic list if they are seen as more vocational. Kids need choice and to be able to work to their personal strengths. (Whānau, Survey, R_4OPi8AtPWjZWY5w)

Some whānau and a few student submitters raised that it will be critical for VET to be adequately resourced across schools and cater for different learning abilities. They warned that without appropriate resourcing, the Proposal could exacerbate inequities, especially for schools with higher socio-economic barriers.

Looks good on paper, but in reality how does this occur equitably? Urban and city schools will be able to provide this kind of choice, but does it work in rural or areas of deprivation? What support or alternatives would there be for schools? Many schools offer VET now, what happens with these subjects? Will schools lose funding because external providers are delivering these subjects? (Whānau, Survey, R_4iUSMlvINxsfuEj)

A few whānau and student submitters suggested that the government consider leveraging pre-existing organisations and funding mechanisms, such as Trades Academies, Gateway, and STAR funding, to create a VET hub. They also recommended that schools that already implement VET subjects through external providers should not be jeopardised or lose funding as a result of this Proposal.

Close partnerships are needed to support student qualification

Some whānau and student submitters stated that close partnership between schools, industry, tertiary providers, and community training groups would be needed to successfully implement VET integration. A few added that industry partnerships should include those with a kaupapa Māori context, such as iwi enterprises, Māori businesses, and marae-based initiatives.

Some of these whānau and student submitters raised that close partnership with schools and industry, in particular, would be critical for creating robust VET-integrated qualifications. A few submitters mentioned that these relationships may already exist and recommended that such relationships should be built upon.

Partnering with tertiary providers and employers ensures that what students learn is current, meaningful, and linked to genuine job opportunities, helping to reduce the gap between school and work. Additionally, it encourages collaboration between schools and industry, fostering environments where students can apply knowledge in real-world contexts. (Whānau, Survey, R_4g2l6kfbmv8Bbot)

A few submitters also acknowledged the difference between education and training, wanting to ensure training is fit for purpose but also is suitable for a school context. These submitters explained that while industry have the content knowledge, schools better understand students, their learning needs, and the education system, and suggested that schools should direct the programme, provided they have funding to do so.

I think there are benefits in having industry involvement in developing standards to ensure that vocational standards remain current and meaningful, reflect current industry best practice and support realistic work pathways beyond school [...] The input of industry is valuable but education and the shaping of qualifications should remain predominantly decisions for education experts. (Whānau, Survey, R_9zi5TYU9h97R942)

Further, a few whānau and students also proposed that the grading onus should be on industry due to their expertise, and to alleviate teacher workload. A few students added that those who partake in VET should be paid the living wage, if they undertake work for a company.

5 Proposal 2: Foundational Award and Years 12-13 qualifications

Discussion Document Overview

Proposal 2 introduces a new Foundational Award in Year 11 that accredits literacy and Mathematics or Te Reo Māori and Pāngarau in place of the current co-requisite requirement. It also introduces two new national senior secondary qualifications – the New Zealand Certificate of Education (for Year 12) and the New Zealand Advanced Certificate of Education (for Year 13). Removal of NCEA Level 1 would focus on two years of high-stakes assessment instead of three.

Key questions posed during consultation included:

- *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?*
- *Do you think any other areas of learning or achievement should be considered as part of the Foundational Award? For example, should a certain level of student attendance be required?*
- *Most students will complete the New Zealand Certificate of Education in Year 12. How important is it for the Government to consider ways to ensure more students stay at school until the end of Year 12?*

5.1 Quantitative survey analysis



Unlike Proposal 1, overall indication of support was not able to be identified for Proposal 2, due to the nature of the questions posed to submitters.

5.1.1 Should a Foundational Award replace NCEA Level 1?

Educators and whānau/students only

Figure 38: 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?

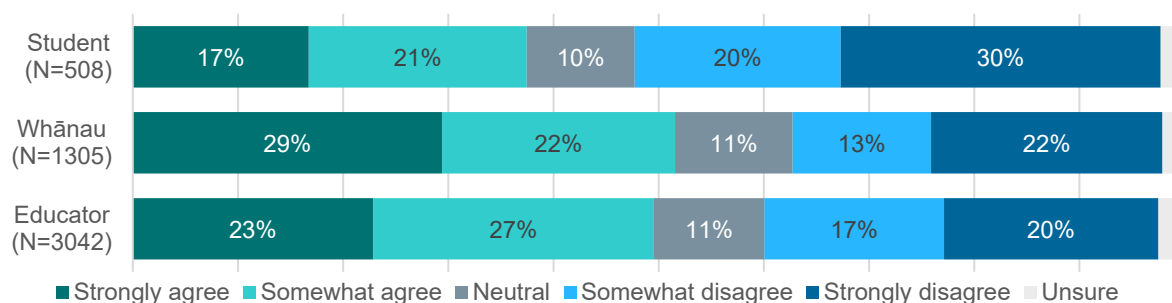


Figure 38 shows that half of responses from educators (50%) and whānau (51%) indicated support for replacing NCEA Level 1 with a Foundational Award, while 35% of whānau and 37% of educators oppose the changes. Significantly fewer students (38%) agreed with this question and half indicated their disagreement. All three groups are divided on supporting this change.

Figure 39: 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? (by teaching area)

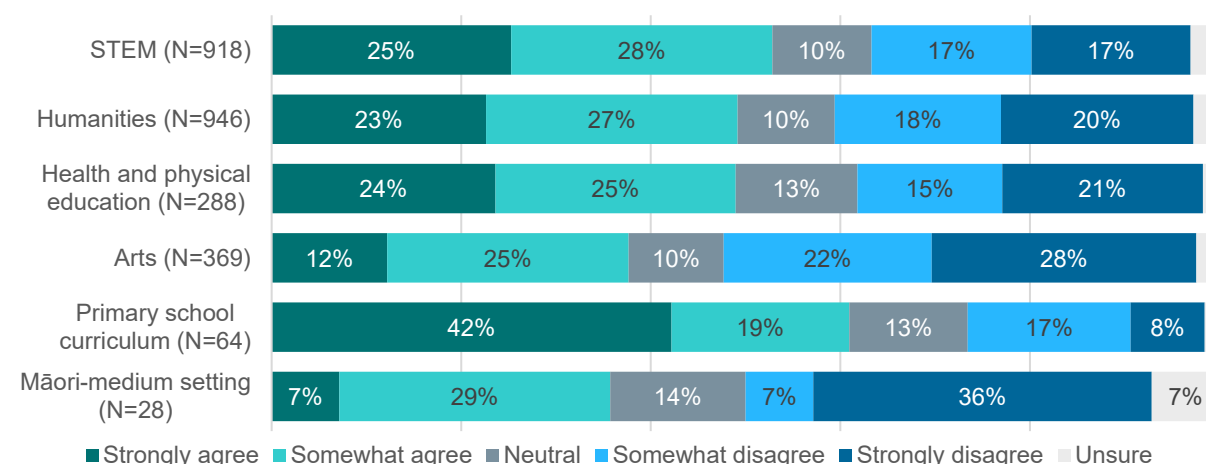


Figure 39 shows that half to most educators across STEM, Humanities, Health and Physical Education, and Primary schools show support for replacing NCEA Level 1 with a Foundational Award in numeracy and literacy (49%-61%). By contrast, 37% of Arts and 36% of Māori-medium setting educators agreed that the Foundational Award was a good way to prepare students for Years 12 and 13. A chi-square test confirms the subgroup differences are statistically significant.

Figure 40: 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? (by school EQI)

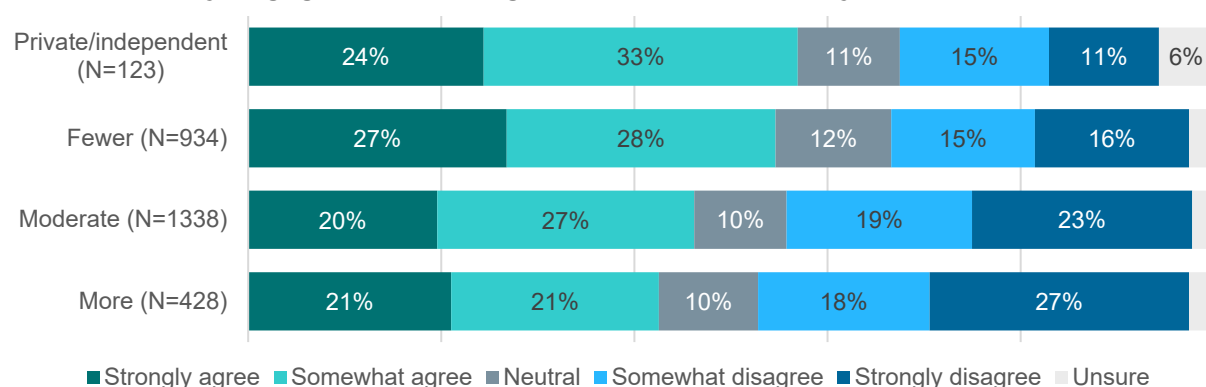


Figure 40 shows many educators from across schools with different EQI levels support the Foundational Award as a good way to prepare students with the basic skills needed for Years 12 and 13. However, educators from schools with more students facing socio-economic barriers are notably divided with slightly more opposition than support (42% agreeing versus

45% disagreeing), including particularly high strong disagreement at 27%. A chi-square test confirms these differences are statistically significant.

Figure 41: 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? (whānau by ethnicity)

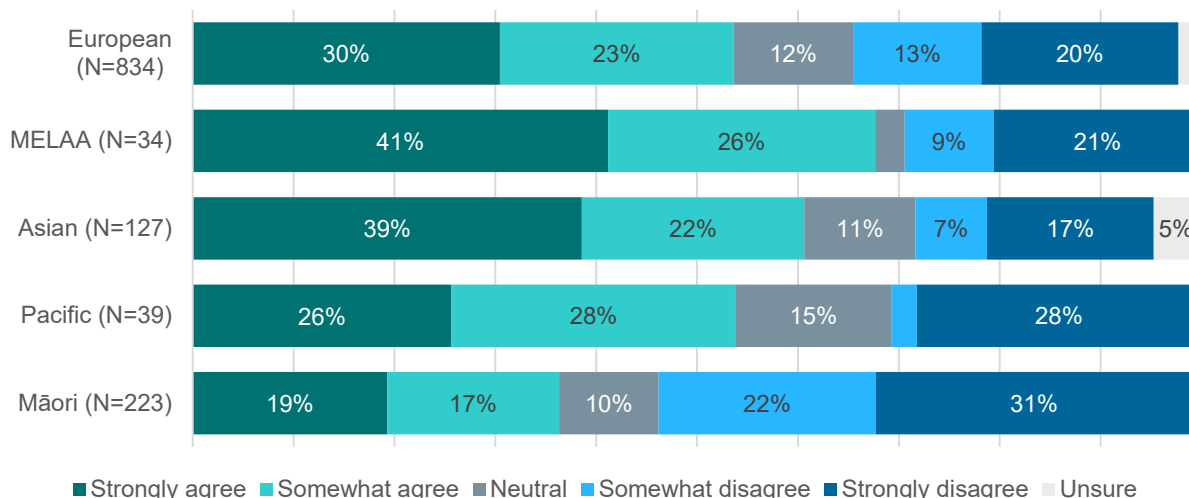


Figure 41 shows most MELAA and Asian whānau (61-67%), and about half European, and Pacific whānau (53–54%) agreed with replacing NCEA Level 1 with a Foundational Award in literacy and numeracy as preparation for Years 12 and 13. Māori whānau were the only group with a majority disagreeing (53 percent), including 31 percent who strongly disagreed.

Figure 42: 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? (students by ethnicity)

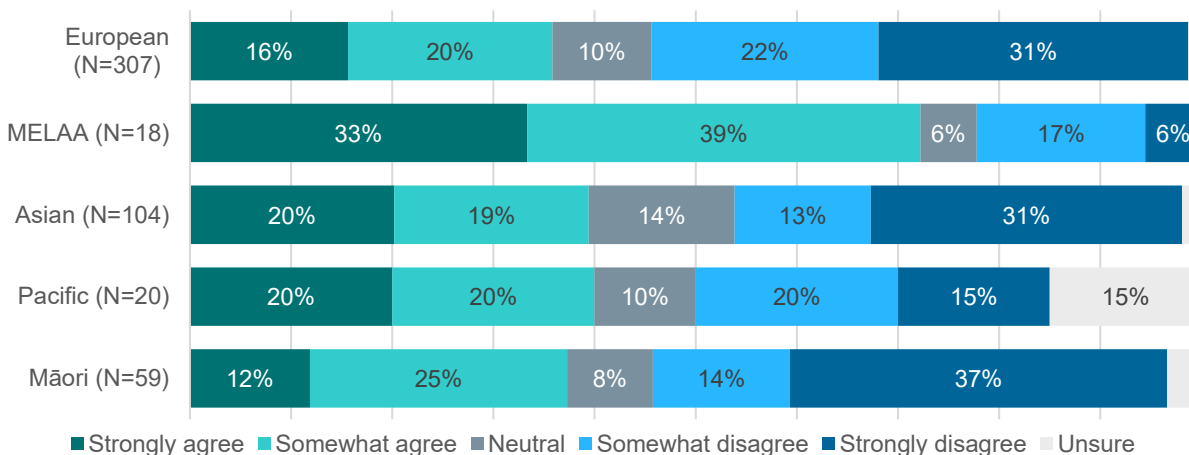
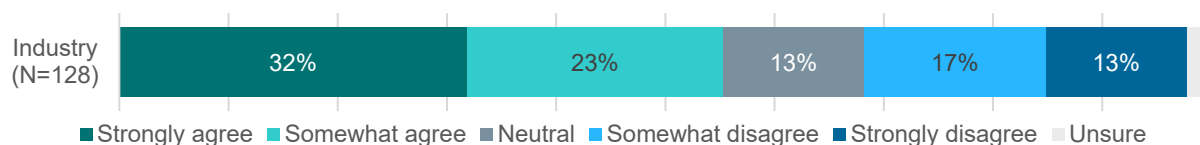


Figure 42 shows most MELAA students (72%) are supportive of this change. However, support amongst other students was significantly less (36%-40%). European, Māori and Asian students indicated more disagreement than agreement (44%-53% disagreement), Pacific students showed similar levels of agreement (40%) and disagreement (35%). A chi-square test confirms these differences are statistically significant.

Industry only question

Figure 43: Do you agree that it would be beneficial to remove NCEA Level 1 and for students to focus assessment effort on the Years 12 and 13 qualifications, having obtained a Foundational Award in literacy and numeracy (in Year 11)?



The survey for industry included a similar question with a slightly different focus. **Figure 43** shows many industry participants support the Proposal to remove NCEA Level 1, with 55% supporting, 30% opposing, and 15% neutral or unsure.

Figure 44: Do you agree that it would be beneficial to remove NCEA Level 1 and for students to focus assessment effort on the Years 12 and 13 qualifications, having obtained a Foundational Award in literacy and numeracy (in Year 11)? (industry by role)

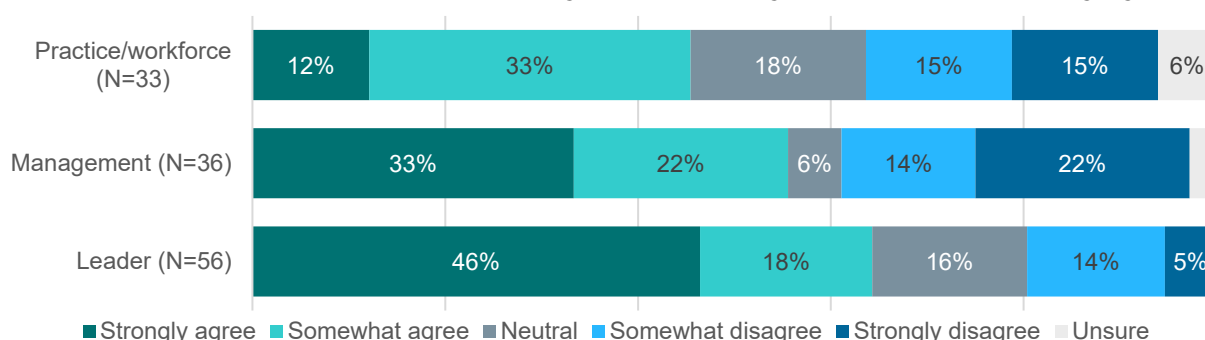


Figure 44 shows that many to most industry submitters across all roles agree that removing NCEA Level 1 and replacing it with a Foundational Award in numeracy and literacy would be beneficial. Leaders were the most supportive (64%), followed by management at 55%, and practice/workforce representatives at 45%. A chi-square test confirms these differences are statistically significant.

5.1.2 Is it important to consider ways to keep students at school until the end of Year 12?

Figure 45: 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?

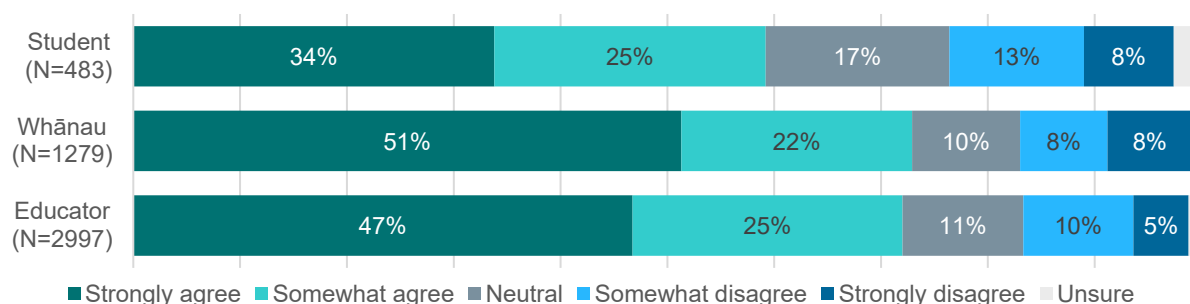
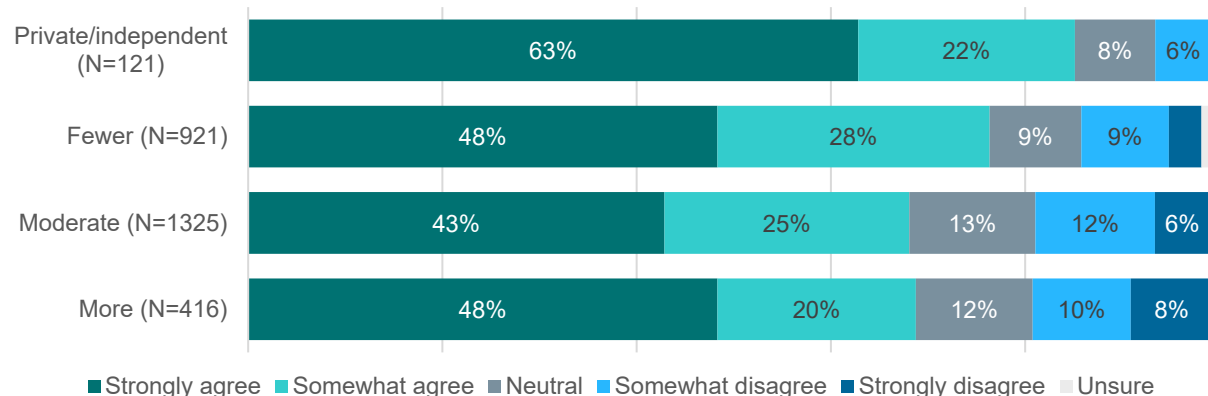


Figure 45 shows that most whānau (73%), educators (72%) and many students (61%) support the Government considering ways to keep students at school until the end of Year 12.

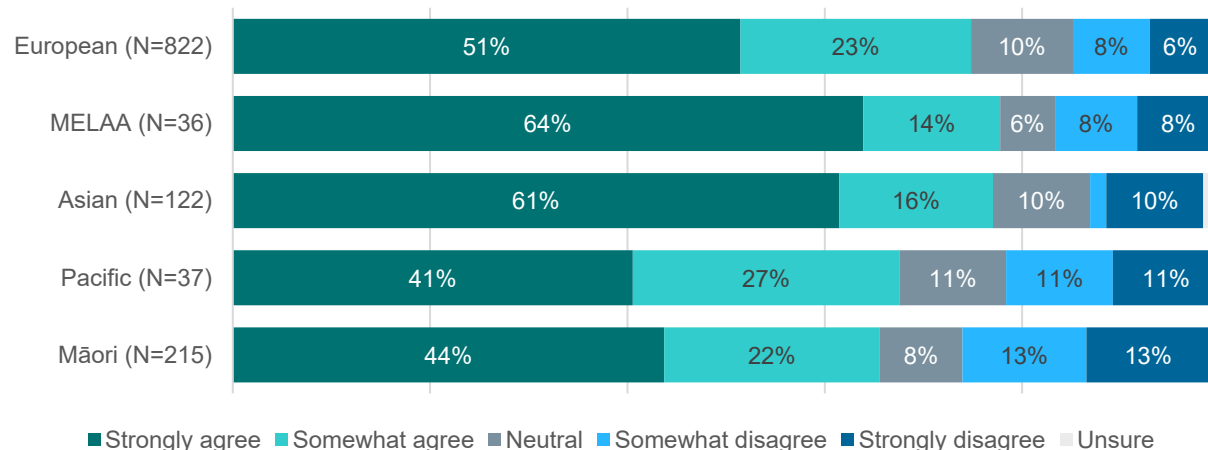
Figure 46: Do you agree that it is important for the Government to consider ways to ensure more students stay at school until the end of Year 12? (by school EQI)



As seen in **Figure 46**, most educators (68%-85%) across the schools with different EQI levels supported the Government considering ways to keep students at school until the end of Year 12.

There is no statistically significant difference between educators by teaching areas for this question.

Figure 47: 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? (whānau by ethnicity)



As seen in **Figure 47**, most whānau across all subgroups supported government consideration of ways to keep students through Year 12. MELAA, Asian, and European whānau show strong support (74-77%), while Māori and Pacific whānau show lower but still majority support (66-68%). The differences were confirmed by a chi-square as statistically significant.

Figure 48: 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? (students by ethnicity)

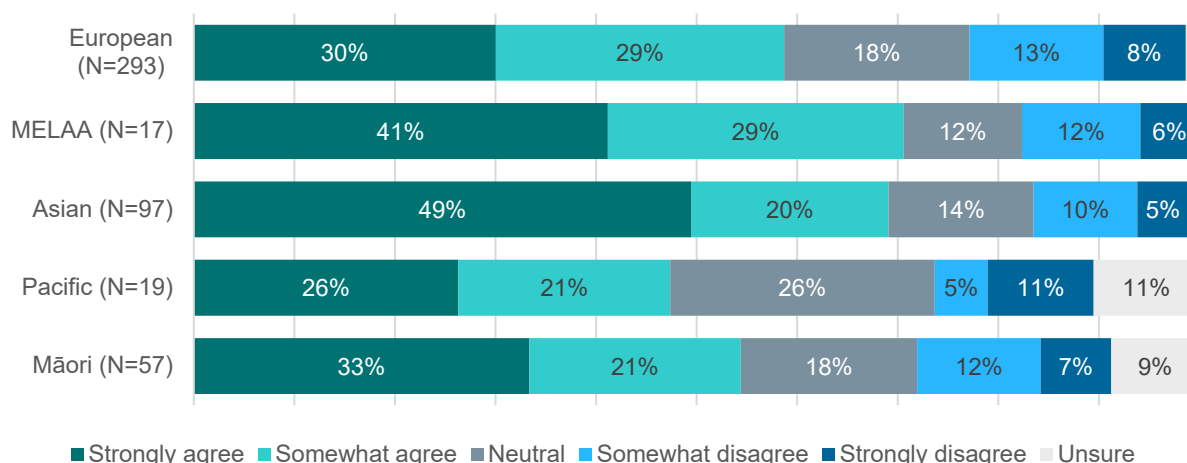


Figure 48 shows that most MELAA and Asian students (70% and 69% respectively) support government consideration of ways to keep students in school until the end of Year 12. While European and Māori students show lower but still majority support (54% and 59% respectively). Pacific students show notably lower support at 47% with high uncertainty (37% neutral or unsure). A chi-square test confirms these differences are statistically significant.

5.2 Educators



Submitter summary

Many educator submitters commented on the benefits and concerns of introducing a Foundational Award. Those who were supportive explained that a Foundational Award could sharpen foundational skills while reducing administrative burden of excessive assessments for teachers. However, those who countered the Proposal were concerned with the potential impacts of reducing students' options to engage with varied learning and that it would decrease the validity of Year 11.

Educator submitters suggested a range of other considerations for inclusion in a Foundational Award, such as attendance, soft skills, and extracurricular activities. They also expressed mixed views on potential attendance requirements, with some suggesting soft skills and extracurricular requirements would be a useful inclusion to a Foundational Award.

5.2.1 Benefits of a Foundational Award



Comments on this topic

There were approximately 1370 comments from educator survey submitter related to benefits of a Foundational Award.

A Year 11 Foundational Award would support deeper learning in literacy and numeracy

Many educator submitters expressed support for a Foundational Award and dropping NCEA Level 1 as they wanted to see foundational skills in literacy and numeracy prioritised during

Year 11. Some of these submitters expressed concern for the literacy and numeracy capabilities of their Year 12 and 13 students, pointing to the substantial leap in difficulty between NCEA Levels 1 and 2, and the lack of preparation Level 1 provides for this transition.

I currently see too many instances of pupils in Years 12/13 who are essentially illiterate and innumerate. Clearly a pupil needs the basic skills in English and Maths in order to proceed to the NZ Certificates. (Educator, Survey, R_9FmK050dDI1Dn6B)

Submitters considered that removing the high-stakes assessments of Level 1 would create more time for deeper learning in these foundational areas and alleviate teacher workload, better equipping students with the skillset required in Years 12 and 13.

The Foundational Award has the potential to strengthen readiness for senior secondary learning by providing a dedicated space to build core competencies in literacy, numeracy, te reo matatini, and pāngarau. (Educator, Email, EME-2721)

The Foundational Award lets Year 11 ākonga build strong reading, writing, and maths (te reo matatini me te pāngarau) first, with less exam pressure and more time to deep dive into the learning. (Educator, Survey, R_4DPi5X6xEktdVyU)

High-stakes assessment in Year 11 was considered unnecessary

A few educator submitters said that three years of high-stakes assessment in secondary school is unnecessary and does not benefit students. Others mentioned that their schools have already removed NCEA Level 1, and have seen improved grades across Years 11, 12, and 13 as a result.

The focus for years 12 and 13 are emphasised. Year 11 no longer feels needed and students are catching on [to] this and losing engagement and interest in level 1 standards. (Educator, Survey, R_4SeRXcs2XFPitas)

In addition, a few submitters said that removing assessments in Year 11 would reduce academic pressure and the negative impact on student wellbeing.

Have more time developing key literacy and numeracy skills. Allow them to 'mature' and be cognitively ready to handle high stake assessments, avoid the mental health issues involved with some students around succeeding at high level stake assessments too early. (Educator, Survey, R_4YrYyIGII09vrwl)

A Foundational Award could reduce teacher workload and increase curriculum flexibility

A few submitters mentioned that removing high-stakes assessments in Year 11 would give teachers space to create more flexible and innovative curriculums for their students. Others considered that removing NCEA Level 1 would ease the workload on teachers.

This reduction could decrease student stress, reduce teacher workload around assessment administration, and allow Year 11 to focus on learning rather than performance anxiety. (Educator, Survey, R_905VN3mGcoleuyi)

5.2.2 Concerns about a Foundational Award



Comments on this topic

There were approximately 1108 comments from educator survey submitter related to concerns about a Foundational Award.

The Foundational Award was seen as inequitable for some students

Some educator submitters, including the PPTA Executive, raised concerns that a Foundational Award was not inclusive and noted that achievement rates are expected to drop for some students. Specifically, as the requirement to achieve the Foundational Award would function as a pre-requisite for all future learning, submitters were concerned that such a requirement would “gatekeep” higher levels of education from students that the system has historically worked against.

PPTA is not convinced that replacing the current co-requisite as a standalone award, with the literacy and numeracy test acting as a pre-requisite for higher qualifications, is fair or inclusive. We note the intention to increase the difficulty over time. For many, the Common Assessment Activities (CAAs) are seen as inequitable, disproportionately affecting Māori, Pasifika, ELL, EAL, and neurodiverse learners. (Educator, Email, EME-2340 PPTA Executive)

Additionally, a few submitters were concerned that the proposed Foundational Award fails to support established teaching and learning approaches in Māori-medium settings, instead prioritising literacy and numeracy for all students.²² There was concern from a few submitters that this approach would fail to provide avenues for Māori students to show their knowledge and capabilities.

NCEA, despite its imperfections, provided avenues for innovation and the inclusion of mātauranga Māori, enabling Māori students to see their culture, reo, and identity valued in their education. The Foundational Award strips this away, narrowing learning to a colonial framework of literacy and numeracy, rather than recognising the multiple literacies, knowledges, and capabilities Māori bring with them. (Educator, Email, EME-2341 PPTA Te Reo ā Rohe)

A few submitters noted that the success seen in some schools that have removed Level 1 should not be used as evidence in support of removing Level 1 across the country, as the same result cannot be replicated in all schools.

Removing Level 1 NCEA as a full qualification is an extremely unfair move, this should be at the discretion of the school because we have kura like our kura where this is a lifeline for many of our students – especially those in lower-income areas who may need to leave school early for reasons out of their control (family, financial support etc.) (Educator, Survey, R_4nIrCIEy1myjZUf)

²² Note that it is not a feature of Proposal 2 to intend to limit learning in Year 11 to literacy and numeracy. This was a misunderstanding by submitters, which has continued to be captured as it informs how these submitters have responded to the wider Proposal 2 questions.

The scope of a Foundational Award may be too narrow

Some educator submitters were concerned that the scope of the Foundational Award would be too narrow, only providing deeper learning in the areas of literacy and numeracy. A few of these submitters wanted to see a more balanced approach to the curriculum with heavier involvement from other subjects. They argued that students should be able to have other skillsets recognised, even if they do not meet the literacy and numeracy pre-requisites.

This [Proposal] risks reducing exposure to a broad curriculum at Year 11, leaving students underprepared for the depth and variety expected in Years 12 and 13. (Educator, Survey, R_4rY6sfKRhMEz03Z)

A Foundational Award and its achievability or perceived value may disincentivise students from further learning

Some submitters expressed concern for students who do not achieve the Foundational Award. They explained it was unclear if there were safeguards in place to prevent these students from stagnating academically, unable to pursue further education until the award is achieved, or leaving school without any officially recognised qualifications if they perceive Years 12 and 13 to be unattainable.

Removing level 1 risks leaving some students without any meaningful formal qualification. We value the ability to choose what's best for our students. (Educator, Email, EME-2117 Open Letter from Principals)

A few submitters noted that the NCEA system rewards student's efforts throughout the year through the internal assessments, however a Foundational Award risks a student's efforts going entirely unrecognised.

SPC is particularly concerned about those who will leave with nothing at all. At present, students can accumulate credits on the New Zealand Qualifications and Credentials Framework, whether or not they eventually receive an NCEA certificate. In the context of the structures envisaged by the proposal, schools will have little flexibility to continue to offer learners alternative programmes outside the new regime and to award Framework credits. It's possible to envisage these learners having no formal record at all of their achievements. (Educator, Survey, EMI-1001 Secondary Principals Council)

Other educator submitters were concerned that employers may not take the Foundational Award as seriously as the NCEA Level 1 qualification, resulting in less incentive for students to complete it.

Some students may feel the Foundational Award is a "lesser" qualification compared to the full NCEA Level 1. (Educator, Survey, R_4rY6sfKRhMEz03Z)

There was confusion around the proposed change

Some educator submitters expressed confusion towards the difference between Foundational Award and the current Year 10 and 11 curricula. They explained that students already get their foundational skills by sitting the CAAs and NCEA Level 1. They were confused around the rationale for change and what exactly the improvement would be.

Is this not the purpose of NCEA Level 1? (Educator, Survey, R_9OkUxXrA7q0hVFD)

Submitters also requested more detail regarding the curriculum for the Foundational Award, often highlighting that they were unable to provide feedback without sufficient detail.

Removing NCEA Level 1 would harm students' preparation for Years 12 and 13, as well as their motivation for learning

A few educator submitters did not support the removal of NCEA Level 1 as they considered this year provides valuable introductory experience to the NCEA structure, including getting students familiar with NCEA's internals, externals, workload, and grading system over the year. Submitters argued that this introduction assists in the transition to the more rigorous high-stakes assessments in Years 12 and 13. These submitters were concerned that removing Level 1 would leave students unprepared for their upcoming assessment years.

By removing this low-stakes environment, we're concentrating all the pressure into Years 12 and 13. Instead of building confidence, this risks making students fearful of failure, which could deter them from taking on subjects they might otherwise enjoy. (Educator, Survey, R_9QSTn8htl9dEahN)

Other submitters were concerned that adding a third non-assessment year after Years 9 and 10 would result in dwindling student motivation due to a lack of high-stakes academic pressure. Submitters observed that some Year 10 students do not take the year seriously due to low academic stakes and boredom, and were concerned that the fatigue would carry over into Year 11 if Level 1 were to be removed.

Students need a target to work towards to find and feel success. Years 9-11 will all be working towards level 2, they need credits to work towards or there will be a huge decrease in work completion as their [sic] is no incentive. (Educator, Survey, R_9SGmEjGpMG3uHL3)

Maintaining or removing NCEA Level 1 should remain optional for schools

A few educator submitters raised that some schools have already dropped NCEA Level 1. While there are mixed views from educator submitters about the efficacy of this change, it appears that educators value the choice to remove or maintain Level 1. They explained that they understand their student's needs and this flexibility enables them to determine whether they benefit from engaging with Level 1 or not.

Keeping NCEA level 1 optional maintains the flexibility of a school environment to be able to offer the qualification as needed, meaning that many students do not actually need to do the qualification because they intend to stay at school. However, there is 11% of the school population that actually needs the Level 1 qualification. (Educator, Survey, R_9znziz7zTOZVlg4)

Furthermore, a few educator submitters, including the PPTA Executive, raised that they agree with removing Level 1, but they did not agree with the proposed Foundational Award.

PPTA's viewed the removal of the Level 1 qualification altogether as a positive option, and considered that removing the Level 1 qualification would give teachers the space to develop more innovative Year 11 courses of the kind they are currently free to provide in Years 9 and 10... PPTA is not convinced that replacing the current co-

requisite as a standalone award, with the literacy and numeracy test acting as a pre-requisite for higher qualifications, is fair or inclusive. (Educator, Email, EME-2340 PPTA Executive)

5.2.3 Alternatives to a Foundational Award



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on alternatives to a Foundational Award, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from submissions that raised alternatives whilst answering other questions relating to a Foundational Award.

A few educator submitters suggested alternatives to a Foundational Award in Year 11.

Most of these submitters recommended that the Foundational Award should be introduced and attempted earlier, in Year 10, instead of Year 11. A few others wanted to see the Foundational Award introduced even earlier, such as Years 9 or 8. Many of these submitters argued that student's foundational knowledge should be solidified well before Year 11.

If we have concerns about our students reading and writing abilities, we need to be looking much earlier than year 11. (Educator, Survey, R_90jmBaUqJzqkeNR)

Some submitters wanted to see the current NCEA modified and strengthened, rather than replaced with a Foundational Award.

A range of other suggestions were raised by submitters, including:

- spread the first qualification of NCEA over two years instead of one
- retain schools' ability to choose whether or not they offer NCEA Level 1
- introduce only two qualifications, one at Year 11 and one at Year 13, skipping high-stakes assessment at Year 12
- introduce a two-year qualification spanning Years 11 and 12, which might reduce pressure and allow for more flexible pacing.

5.2.4 Other considerations of a Foundational Award



Comments on this topic

There were approximately 2684 comments from educator survey submitters related to other considerations of a Foundational Award.

Educator submitters suggested a range of other considerations for inclusion in a Foundational Award, such as attendance, soft skills, and service and extracurricular activities. Some submitters also mentioned specific subjects they would like included in the Foundational Award. Subject-specific responses are discussed in more detail in section 6.2 on Proposal 3.

Views were mixed on whether attendance should be required in a Foundational Award

Many submitters commented on a possible requirement to include attendance in a Foundational Award, with mixed views on whether attendance should be a requirement.

Roughly half of these submitters disagreed that attendance should be required, citing that attendance is not an accurate reflection of a student's abilities and could become a barrier to achievement for students. These submitters, including the PPTA Executive, considered that making attendance a requirement of the Foundational Award raises equity issues, and that such a requirement would unfairly disadvantage those with neurodiversity, disability, health challenges, those who partake in extracurricular activities, and those who face complex situations at home.

We strongly oppose any suggestion that a measure such as student attendance be required for the award. This would be a deeply inequitable policy. For many of our students, inconsistent attendance is a symptom of complex socio-economic issues, family situations, or health problems that are entirely outside their control. Using attendance as a metric of academic potential is not only unfair but also inaccurate. It would punish the very students who need the most support. (Educator, Email, EME-2252)

Conversely, the other half of submitters that supported the inclusion of attendance in a Foundational Award outlined that attendance at school is necessary to instil positive habits such as punctuality and accountability. Other submitters considered that requiring attendance could support increased engagement and participation in learning.

A minimum attendance benchmark (eg. 85–90%), with allowances for justified absences, could be included as a requirement. This encourages consistent engagement and recognises that reliability is valued in both education and work contexts. (Educator, Survey, R_9ktp0mbd2GatXxL)

Including soft skills in a Foundational Award could support students to be better prepared beyond schooling

Some submitters raised that work ready soft skills and broader life skills should be included in the Foundational Award in addition to literacy and numeracy. These submitters considered that such skills would be important for preparing students for a modern world beyond schooling. Submitters suggested a range of soft skills that could be included in an Foundational Award, such as:

- collaboration, communication, critical thinking, and problem-solving
- morality and ethical decision making
- budgeting and financial literacy
- drivers licence / training
- mental health, wellbeing, and resiliency.

Consideration of life skills should be considered. Functional literacy and numeracy along with critical thinking and digital responsibility. What about other life skills such as relational, emotional physical and cultural skills and knowledges that our society

value just as highly as literacy and numeracy. (Educator, Survey, R_9jTePEXvKKTW440)

Community service and extracurricular requirements could support well-rounded students

A few submitters preferred a holistic approach to Foundational Award. They stated that community service and extracurricular activities, such as volunteering, should be a requirement of a Foundational Award to support the development of well-rounded students.

Also, we want well rounded humans at the end of the day, more to life than academic, maybe some type of volunteer work, being a good citizen, help others, show empathy. (Educator, Survey, R_9O3o6Hm6Oxvy5Xh)

Including other requirements in a Foundation Award would make it too broad

A few submitters considered that no other areas should be incorporated into a Foundational Award. These submitters considered that adding too many requirements could make a Foundational Award too broad and detract from a core focus on literacy and numeracy.

Adding requirements such as attendance, digital literacy, or self-management skills could make the Foundational Award too broad and complicated. Its purpose should remain clear and focused on literacy and numeracy, rather than turning into a catch-all measure. (Educator, Survey, R_4YM5EQ8Bn1sljx4)

5.2.5 Alternative qualification frameworks



Comments on this topic

As there was no explicit question in the survey asking submitters to provide suggestions of alternatives to the Proposal 2 qualifications, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from submissions that raised comments whilst answering other questions relating to Proposal 2.

Some educator submitters discussed adopting an international qualification framework as proposed replacements for the Foundational Award in Year 11 and the proposed new Year 12 and Year 13 certificates. These submitters were divided in their responses.

Some educator submitters also highlighted attendance as a possible additional consideration towards the senior qualifications, particularly in Year 12.

Adopting an international qualification framework may be more economical and credible

Some of the educator submitters who mentioned adopting an international qualification framework were supportive as doing so could more easily create a credible, coherent, and consistent framework compared to inventing a new framework. A few of these submitters questioned why a new system should be designed when internationally credible frameworks exist. They commented that it would be expensive and resource intensive to create a unique framework. Submitters provided the examples of Cambridge, International Baccalaureate (IB),

Oxford AQA International Qualifications, Welsh Board, and General Certificate of Secondary Education (GCSB) that New Zealand could adopt.

Why don't we just adopt the Cambridge curriculum? There is nothing wrong with it and it is rigorous and internationally recognised. There is a lot of risk creating our own from scratch...and there are systems out there that work perfectly well and would mean that all of NZ benefit. (Educator, Survey, R_9FFzI9PyeDhtqWV)

Submitters pointed to these programmes as examples which could inform changes to the senior qualifications, highlighting the rigour, relevance, and diversity of learning offered by these programmes.

I teach Cambridge - it's the bread and butter of our curriculum. It allows students to synthesise their skills, or diversify, or engage in diverse subject areas of interest to them. (Educator, Survey, R_9mWgePK7yITeGTn)

Submitters explained that having a similar or identical framework would improve standardisation, benchmarking, and continuity of New Zealand's qualifications between schools and internationally. They commended the in-depth learning associated with international qualification frameworks. A few stated that these frameworks set higher expectations of students, which may help them to excel at university and well equip them for future employment.

My person [sic] preference would be to teach Cambridge or IB instead of having out [sic] own. This way, NZ remains competitive in those highly skilled jobs. (Educator, Survey, R_4CluPcJLGF0Cauf)

International qualification frameworks are considered outdated and do not account for New Zealand nuance

Conversely, some educator submitters who commented on adopting an international qualification framework disagreed with the concept. They indicated that NCEA is credible, promotes critical thinking, is more structured, and is overall more beneficial for students. A few elaborated further, explaining that NCEA develops and prepares students better than the “outdated” international qualification frameworks.

I hated teaching GSCE overseas and the Cambridge system here due to the outdated, irrelevant, and prescribed list of texts that did not reflect the students in front of me. (Educator, Survey, R_4cK9xGUrt3t4gSJ)

A few of these submitters also labelled international qualification frameworks, such as Cambridge, as “colonised” and reiterated that they do not reflect local context, including rich history, nature, and the needs of New Zealand students.

Examinations like the Cambridge and Baccalaureate are not indigenous to New Zealand unique culture and heritage. (Educator, Survey, R_4EKW7yYrl8HeWMD)

Further, a few submitters raised that schools currently have the choice to adopt international qualification frameworks. These submitters had mixed views, with some explaining that choice is beneficial as they know what is best for their students, but others were concerned that this creates a larger divide between schools.

Allowing a few elite schools to do Cambridge exams or the International Baccalaureate undermines the system everyone else uses. (Educator, Survey, R_4ylwWwXTYTpVU5j)

Adopt a hybrid approach to improve resourcing and comparability

Some of the educator submitters that referenced adopting an international qualification framework suggested adopting elements of those frameworks and combining them with NCEA. A few of these submitters highlighted that resourcing and poor communication of system changes are the issues, rather than NCEA as a whole. They outlined that some international qualification frameworks do not share this same pitfall.

I have taught under NCEA, GCSE (U.K) and Cambridge International (Czech Rep.) and NCEA subject areas are significantly under-resourced compared to the others. (Educator, Survey, R_40GB0TiCnFpLED2)

Subsequently, they recommended creating a hybrid of good practice from international qualification frameworks with NCEA. Examples provided included adopting good assessment formats, resources, quality exemplars, good documentation, clear syllabus and grading system, teacher-led internal assessments validated through external moderation, well defined and prescriptive learning outcomes, clear guidance on topics and adequate support for staff and students.

Additionally, we should be looking to systems and curricula used overseas (such as the Cambridge system) and taking the best parts of those and adapting them to our national context. There's no need for us to reinvent the wheel - simply learn from the best and improve upon it! (Educator, Survey, R_4eXkcReYvU8IY7B)

5.2.6 Students remaining in school until the end of Year 12



Comments on this topic

There were approximately 2431 comments from educator survey submitters related to students remaining in school until the end of Year 12.

Students should be required to stay in school until the end of Year 12

A few educator submitters generally agreed that students should be required to remain in school until the end of Year 12. These submitters provided a range of suggestions for how to require students to remain until the end of Year 12, including:

- consider raising the legal age to leave school from 16 to 17
- require an end of year exam that accounts for a large portion of a student's qualification to provide incentive for students to remain in school to achieve that qualification
- require employers and tertiary providers to only hire employees after the completion of Year 12 qualifications.

There needs to be more weight on the external exam. If it was worth 50% of your final credits, it would ensure they are fully engaged until the end of the year. (Educator, Survey, R_4lmbcHKU2OQ7Xkv)

Change the legal ages. All students must stay in school till 17y/o unless completes year 12 at the age of 16. Make it law. Maybe have a trades/military exclusion. (Educator, Survey, R_9dBft6NHBzGJ8we)

A few of the submitters that suggested raising the legal age to leave school further explained that there may be a need to increase the legal age to leave school if Level 1 is removed or not compulsory so that these students do not leave school without a qualification.

Requiring students to remain in school for longer may be ineffective

While acknowledging that remaining in school until the end of Year 12 would be ideal, many submitters expressed concern that forcing students to do so may be counterproductive. These submitters emphasised that some students do not thrive in a school-based or classroom-based environment and cautioned that forcing students to remain in school could create problems for teachers and fellow students, such as increased classroom disruptions. Further, some submitters highlighted that forcing students to remain in school would be ineffective if the root cause of their truancy is not addressed.

The school environment is not a healthy place for every student. Some people need to leave at some point, with an open door policy from the education system to include them elsewhere and/or later. (Educator, Survey, R_4TTeiVUBxc1oW0p)

Creating clear career pathways, and increasing student support could help students stay in school for longer

Some educator submitters said that students are more likely to remain in school for longer when school and learning is relevant, meaningful, and attractive to them. Submitters explained that providing variety, choice, and flexibility for a student's unique needs and interests may encourage these students to engage in their learning and remain in school for longer.

Kids staying at school is about engagement in learning. Social engagement, Behavioural engagement and cognitive engagement. Therefore you need to be able to provide schools with the flexibility to meet the needs of the students so that they can learn to value their education and want to stay to complete Year 12. The 1 size fits all will lead to a decrease in engagement and more students leaving with no qualification. (Educator, Survey, R_9poj4XplyHcYyYf)

Some submitters suggested that more could be done to help students understand the benefits of staying in school, such as clarifying the relationship between increased career options or future pathways. These submitters stressed the importance of supporting students with clear pathways across a range of educational areas to support student aspirations, and in increasing curriculum content that reflects the diversity of and applicability to the 'real world'.

Two issues. 1) Students need to feel that staying in school is to their benefit and 2) is staying in school actually to the benefit of all students? Some young people do not flourish in the school environment and only grow outside it. There needs to be opportunities for those students, and if they are to be required to stay in school, then

they need to see the benefit, otherwise they will just make life difficult for the students who do want to be there. (Educator, Survey, R_4DU8a3kRaLqiEdB)

Some submitters discussed the need to strengthen supports for students to help them remain in school for longer. They noted that this was particularly important for students with different learning needs, socioeconomic barriers to school attendance, and those who are not traditionally academic. Submitters suggested a range of support to help students remain in school for longer, such as:

- mental wellbeing and pastoral care
- additional aid to students who struggle academically
- financial support for vulnerable families, removing pressure for students to leave school prematurely
- improve school lunches
- fund career advisors
- invest in teachers (increase their pay, attract a quality workforce, and offer upskilling so they can advise students on career paths).

5.3 Industry



Submitter summary

Many industry submitters expressed both support and concern for the proposed new qualification structure and introduction of a Foundational Award. They viewed a focus on strengthening core skills as the key potential benefit. However, these submitters also raised concern with the removal of NCEA Level 1, a narrow focus on literacy and numeracy, and the need for comprehensive support for some students to succeed in the new qualification.

Industry submitters expressed mixed views on potential attendance requirements, with some suggesting soft skills would be a useful inclusion to a Foundational Award.

5.3.1 Benefits of a Foundational Award



Comments on this topic

There were approximately 59 comments from industry survey submitters related to benefits of a Foundational Award.

The Foundational Award represents a focus on core skills

Many industry submitters emphasised the importance of strengthening foundational skills in literacy and numeracy and supported the Foundational Award focus on these core skills. Submitters noted that these skills are essential for both employment and further education. Submitters from construction and trades sectors particularly emphasised the need for proficiency in literacy and numeracy. Some submitters noted that core literacy and numeracy

skills are fundamental requirements for apprenticeships and vocational training and agreed that this should be a focus of Year 11.

Apprentices have no literacy or people skills or mathematical knowledge. Can't cope with course work. Terrible at following instructions and meeting deadlines. (Industry, Survey, R_9o9IXsSF3LDAt9)

It would be a welcome change to be able to employ literate, numerate people who can write coherently, speak fluently and listen carefully to instructions as well as know how to learn. (Industry, Survey, R_9VnRqfbo5lAxPc5)

5.3.2 Concerns about a Foundational Award



Comments on this topic

There were approximately 35 comments from industry survey submitters related to concerns about a Foundational Award.

Removing NCEA Level 1 could have an impact on student readiness for Years 12 and 13, disadvantage some students, and reduce motivation for learning

Some industry submitters expressed concerns about removing NCEA Level 1. These submitters noted that this qualification serves as an important stepping stone and provides recognition for students who leave school early.

Level 1 was a fantastic test run for level 2, for most students it was an opportunity to get comfortable with sitting exams and being assessed in that way. My concern with the new award is that it doesn't do that and this could impact learning time in Year 12, which was a key year where a large jump in the level of learning occurred. (Industry, Survey, R_4kO4r3boXFA61K)

Some submitters emphasised that removing Level 1 could disadvantage students from lower socio-economic backgrounds who may need to leave school before Year 12.

Students with greater socio-economic barriers and disabled learners are more likely to leave school early. Removing NCEA Level 1 reduces the opportunities for these students to gain a meaningful qualification before Year 12. (Industry, Email, EMI-1019)

People also raised concerns about the impact that removing NCEA Level 1 may have on student confidence and motivation.

For many students, NCEA Level 1 provides a sense of achievement and helps build confidence, especially for those who may not go on to complete Levels 2 or 3. (Industry, Survey, R_4loQjOCeZcFXPaF)

The Foundational Award scope and focus is too narrow

Some industry submitters considered that the scope of the Foundational Award (focusing solely on literacy and numeracy) was too narrow. These submitters noted that additional foundational skills are essential for work readiness.

We support the introduction of a Foundational Award. However, we recommend expanding its scope to include digital literacy and basic AI awareness. These are essential skills for participation in modern learning and work environments. (Industry, Email, EMI-1004)

Some submitters emphasised the importance of the Foundational Award including broader competencies.

The Foundational Award should recognise areas of learning and achievement that directly influence a student's readiness for senior study, training, or employment. (Industry, Email, EMI-1057)

Students will need comprehensive wraparound support

Some industry submitters emphasised the need for comprehensive support for students struggling with foundational skills. They noted that improving literacy and numeracy required more than assessment changes.

No matter what qualification the government lands on there needs to be a plan around improving literacy and numeracy for our secondary aged students who have missed out on current approaches at primary school. (Industry, Email, EMI-1028)

Some industry submitters highlighted the importance of early intervention and ongoing support.

Students at school have access to opportunities that allow for the development of critical thinking, communication, creativity and skills for lifelong learning. (Industry, Email, EMI-1038)

Year 11 should be a year for exploration

Some industry submitters stated that Year 11 should focus on exploration and skill development rather than high-stakes assessment. These submitters noted that students needed time to discover their interests and strengths.

Providing students with more time to develop foundational learning skills is essential. It allows them to better understand themselves as learners, how they learn best, what motivates them, and where they need support. (Industry, Email, EMI-1028)

Some submitters emphasised the value of career exploration during this year and noted that Year 11 should include exposure to both vocational and academic pathways.

This year should prepare students to be out on apprenticeships, work-based training, employment, or intensive VET for Y12 and Y13. (Industry, Email, EMI-1014)

5.3.3 Other considerations of a Foundational Award



Comments on this topic

There were approximately 106 comments from industry survey submitters related to considerations of a Foundational Award.

Views were mixed around the importance of attendance requirements

Many industry submitters commented on attendance requirements; however, views were mixed. Some submissions disagreed with the inclusion of attendance as an additional requirement of a Foundational Award as attendance can be affected by factors beyond students' control, including health issues, family responsibilities, and socio-economic barriers.

Attendance: student attendance should not be part of this award. There are many different reasons students struggle to attend school regularly and some of these are out of their control. They should not be disadvantaged for this. (Industry, Email, EMI-1082)

Some submissions emphasised that achievement should be measured by learning outcomes rather than attendance. Conversely, some industry submitters did support attendance requirements as part of a Foundational Award, noting that regular attendance demonstrates commitment and reliability.

If a student passes tests/exams, then why is attendance a concern? (Industry, Survey, R_4L8inl9P1XaT6hj)

Yes. Attendance is critical. This can't be yet another soft option opt out. The students have to actually do a full years work to get acknowledgement of their efforts. (Industry, Survey, R_4zCImS2HJ2LomLk)

Soft skills could be a useful addition to a Foundational Award

Some industry submitters suggested that the qualification system should recognise a broader range of competencies beyond literacy and numeracy. Submitters frequently mentioned digital literacy, career planning, and employability skills as useful additions to a Foundational Award.

Digital skills are as critical as reading and maths. By Year 11, students should be competent in using computers, navigating online information, understanding digital security basics, and even grasping simple concepts of computational thinking. (Industry, Email, EMI-1004)

Financial literacy was also commonly suggested by submitters. Some considered that students needed basic understanding of budgeting, tax, and financial management.

Budgeting/Finance - some sort of understanding of real life finances eg. PAYE / Tax / Kiwisaver etc. (Industry, Survey, R_91ZB32IXk8y5BoK)

A few industry submitters noted that skills such as communication, teamwork, problem-solving, resilience, and self-management are highly valued by employers but may not be adequately captured in the proposed qualification structure.

In addition to literacy and numeracy, the Foundational Award should recognise areas of learning and achievement that directly influence a student's readiness for senior study, training, or employment. (Industry, Survey, R_91ZB32IXk8y5BoK)

5.4 Whānau and students



Submitter summary

Whānau and student submitters expressed both support and concerns around introducing a Foundational Award and new Year 12 and 13 certificates. Many whānau and student submitters stated that the focus on numeracy and literacy would create a strong foundation for students. They added that a Foundational Award could have positive impacts, such as improving student wellbeing, create transparent achievement outcomes, and support equitable outcomes. On the other hand, many whānau and student submitters were concerned that a Foundational Award would inadequately prepare students for future learning, reduce their flexibility, and negatively impact students with diverse learning needs.

While whānau and student submitters had mixed views on whether removing high-stakes assessment, and attendance requirements would be beneficial or not. Many tended to agree that the Foundational Award should include soft skills.

5.4.1 Benefits of a Foundational Award



Comments on this topic

There were approximately 669 comments from whānau and student survey submitters related to benefits of a Foundational Award.

A focus on literacy and numeracy would support students in their schooling and future study

Many whānau and student submitters supported the introduction of a Foundational Award, saying that the Award, with its focus on numeracy and literacy, would provide a strong baseline of education that would better prepare students for Years 12 and 13, and support students in any continued education.

By specifically accrediting literacy and numeracy (or te reo matatini and pāngarau), the Award ensures that all students enter senior secondary study with the core skills they need to succeed. This provides a solid platform for more advanced learning in Years 12 and 13 and reduces the risk of students falling behind due to gaps in these fundamental areas. (Whānau, Survey, R_464jZEf4PN1og5w)

Removing high-stakes assessment in Year 11 would benefit student wellbeing

Some submitters agreed with the removal of NCEA Level 1 as they considered this year to be too exam centric, adding unnecessary pressure on students. They commented that removing the high-stakes assessment from Year 11 would positively benefit student wellbeing by enabling students to focus on deeper learning with less stress.

Removing NCEA Level 1 and instead focusing Year 11 on foundational development helps reduce assessment overload. With fewer high-stakes exams, students can spend more time truly understanding the material rather than just preparing for tests. This could lead to deeper, more confident learning, and better long-term outcomes. (Whānau, Survey, R_464jZEf4PN1og5w)

A Foundational Award would improve achievement outcome transparency

Some whānau and student submitters supported a Foundational Award as they thought it would improve the transparency of students' educational outcomes, making it easier for whānau, employers, and tertiary institutes to understand a student's abilities. These submitters often said that achievement under NCEA was unclear and considered the Proposal would be a positive change.

It will set a clear benchmark that signals to teachers, higher education lecturers and prospective employers that the student has reached a basic level of skills and knowledge to be able to succeed in higher levels of learning. (Whānau, Survey, R_4hBgiCeNMIAQmbB)

A few submitters also saw the proposed Foundational Award as comparable to schools in other countries, such as Germany and the United Kingdom.

I can see that having a foundation year and prioritising year 12 and 13 is a good start because it aligns better with other countries curricular like Germany's or that of the UK. (Student, Survey, R_9QSiO7ZZ59RPwbW)

A Foundational Award could support equitable outcomes

A few submitters also commented on potential equitable outcomes of the Foundational Award and the potential for the Award to benefit a broader range of students, particularly those who struggle with high-stakes assessment. These submitters stated that the Foundational Award may better cater to the learning pace of diverse learners, ensuring that these students have sufficient time to reach proficiency in key learning areas before advancing on to senior qualifications.

If implemented well, the Foundational Award could help identify who needs extra support in Years 9 and 10 instead of letting young people drift into senior years without the skills they need to succeed. (Whānau, Survey, R_9QSiO7ZZ59RPwbW)

Some of the submitters who discussed the potential benefits of the Foundational Award also recommended further equity considerations for the Government to implement.

However, it is critical that the design of the Foundational Award's criteria and assessments truly reflect the government's commitment to equity for all students. This means creating standards that are accessible, culturally responsive, and adaptable to diverse learning needs and backgrounds. (Whānau, Survey, R_4YLd80WZGE5Kpds)

5.4.2 Concerns about a Foundational Award



Comments on this topic

There were approximately 635 comments from whānau and student survey submitters related to concerns about a Foundational Award.

Removing high-stakes assessment would not better prepare students for future schooling

Many whānau and student submitters disagreed with the Proposal, noting concerns that replacing NCEA Level 1 with a Foundational Award would not adequately prepare students for future academic requirements. These submitters often said that NCEA Level 1 was a helpful introduction to further assessments at secondary school and university, as it prepared them for the rigour of those assessments. Submitters often highlighted that having high-stakes assessment at Year 11 was crucial for preparing students for further study.

Year 11 for me and many others I know was a vital year to learn what was happening, it was difficult but necessary and I accredit my greater success in year 12 to this experience. I sat exams learnt exam prep, did internals and so the first time I sat an exam was not a fundamental year like year 12 or 13, but a “practise year”. This was crucial and basically writing a second year 10 will take away this experience from a younger generation. (Student, Survey, R_907BIAblm2SNIHX)

Other submitters considered that removing the practice of high-stakes assessment at Year 11 would add greater pressure to students throughout Years 12 and 13. These submitters often said that Level 1 is important, as it contributes to a staggered implementation of more formal learning.

Year 11 will become a wasted year like year 10 is, making students even less prepared for year 12. Year 11 currently is a great way to get students ready for the all important year 12 and 13, having something that matters by the end of it. I predict dropping year 11 NCEA will be a disaster, dragging out the wasteful year 10 scenario for now two years, the most ill-conceived move in all these changes. (Whānau, Survey, R_933Cjx04yhfWEyR)

While it's true that less emphasis on Year 11 exams might seem like an advantage, students in Year 12 would face a greater volume of assessments and expectations to achieve at a higher level, which could be overwhelming. The current NCEA system allows students to gradually build up their qualifications over three years, giving them a better chance to succeed. (Student, Survey, R_4f1UvNVukChvH4D)

A Foundational Award may reduce flexibility

Many whānau and student submitters disagreed with the need to replace NCEA Level 1 and instead highlighted the importance of NCEA Level 1 in its current form to student learning. These submitters considered the flexibility of subject choice in the current system to be important for ensuring students can explore a broad range of subject areas. Submitters were concerned that the proposed changes may restrict student choice.

NCEA Level 1 is a key point where many students can begin to specialize and gain confidence in their learning, particularly in subjects they may want to pursue in more depth at Levels 2 and 3. By consolidating this into a basic literacy and numeracy framework, we may miss the opportunity to support students in identifying and building strengths in areas outside of core subjects like math or language, such as arts, social sciences, or technology. (Student, Survey, R_4f1UvNVukChvH4D)

A Foundational Award may negatively impact students with diverse learning needs

Many whānau and student submitters also said that replacing NCEA Level 1 with a Foundational Award may negatively impact students with diverse learning needs. These submitters highlighted that students with diverse learning needs are more likely to struggle with rigid subject requirements and external assessments.

My main concern is that if the Foundational Award relies too heavily on standardised testing, it will not accurately reflect the capabilities of students who do not perform well in exam conditions but have strong knowledge and skills. This could lead to disengagement and a false impression of a student's readiness for further learning.[...] It may reduce Year 11 learning to a narrow focus on test preparation, rather than fostering the wide range of skills and knowledge students need for success in senior years. (Whānau, Survey, R_9I77sXFOxXLcCI8)

Further, Mana Mokopuna – Children's Commissioner warned that focus on literacy and numeracy could prejudice those who have different learning abilities and needs.

High-pressure literacy and numeracy requirements risk undermining equity by excluding mokopuna who learn differently or need more time and support to succeed. A one-size-fits-all approach does not reflect the diversity of learners in Aotearoa New Zealand and may disadvantage ākonga who need flexible, inclusive pathways. (Student Representative, Email, EMO-5225 Mana Mokopuna Children's Commissioner)

5.4.3 Alternatives to the Foundational Award



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on alternatives to a Foundational Award, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from submissions that raised alternatives whilst answering other questions relating to a Foundational Award.

A few whānau and student submitters suggested alternatives to a Foundational Award in Year 11. Many of these submitters suggested that the focus of literacy and numeracy improvement should be placed on earlier schooling years, such as primary school Years 1-8 or introducing a Foundational Award in Years 9 or 10, as opposed to Year 11.

Secondary School Education results are so low, no[t] because our students are failing our NCEA system, but because our Primary School Education System is failing our students. Students who move from year 8 into year 9 feel extremely overwhelmed. Friends have told me that in primary school they learn nothing. When they start high school, they are unable to write properly and to complete basic maths. How should they manage the skills of secondary school without preparation? (Student, Email, EMW-4216)

Further, some of these submitters also advocated for the retention of NCEA Level 1, prioritising reforms instead of replacement. These submitters often acknowledged the need for improvement in the current system but suggested that the current NCEA Level 1 could be strengthened and refined instead of being outright replaced.

5.4.4 Other considerations of a Foundational Award



Comments on this topic

There were approximately 1386 comments from whānau and student survey submitters related to other considerations of a Foundational Award.

Whānau and student submitters made a range of recommendations regarding other areas of learning and achievement that could be considered as part of the Foundational Award. Many of these submitters focused their comments on the prospect of an attendance standard as a requisite for the Foundational Award.

Views were mixed on whether attendance should be required in a Foundational Award

Many whānau and student submitters were in favour of introducing an attendance requirement as part of a Foundational Award. These submitters were generally concerned with low attendance rates, with some highlighting a correlation with declining academic performance in schools. Submitters often considered that an attendance requirement would build discipline in students and prepare them for the expectations of employers. Some of these submitters also noted the positive relationship between attendance and assessment results.

[Attendance] should definitely be considered as I have evidently seen poor performance in the students who have poor attendance. It is a direct correlation. Poor attendance equals to poor performance. (Student, Survey, R_4GOyOzDeBdn1WzD)

Some whānau and student submitters supported importance being placed on attendance but did not agree that attendance should be made a strict requirement of a Foundational Award. Many submitters were outright opposed to student attendance being considered as part of the Foundational Award, with these submitters describing an attendance requirement as ineffective, inequitable, and unnecessary. Submitters often emphasised health-related and socioeconomic factors as major drivers of low student attendance rates and stated that it would be unfair and counterproductive to punish students for factors outside of their control.

Regarding attendance, while regular participation supports learning, strict attendance requirements could unfairly disadvantage students dealing with health issues or complex family circumstances. Instead, attendance should be encouraged and supported through flexible, compassionate approaches tailored to individual needs. (Whānau, Survey, R_4g2l6kfbmv88bot)

Some submitters noted that students with disabilities and specific learning needs can successfully engage with their studies in different ways from their peers, and that placing attendance requirements on these students may cause more harm than benefit. A few submitters also noted that any punishment would likely affect vulnerable students the most, which may disproportionately include Māori learners.

It would be hugely inequitable for students with disrupted learning. I can imagine that having something like attendance listed would impact on Māori learners, who are more likely to have disrupted learning. Has anyone looked at the BORA implications of documenting something like attendance on an award? (Whānau, Survey, R_4NxJrlx2EtmXoua)

Including soft skills in a Foundational Award could support students to succeed more broadly

Many submitters suggested that soft skills and general skills could be included in a Foundational Award. These submitters considered that such skills would provide a broad foundation of learning that would support students to succeed in both academic and non-academic settings alike.

Key skills like self-management, communication, teamwork, and problem-solving are critical not just for education but also for the workplace. Employers increasingly value these competencies, and having them reported alongside academic progress provides a more rounded view of a student's strengths. (Whānau, Survey, R_464jZef4PN1og5w)

Submitters suggested a broad range of soft and general skills that could be included in a Foundational Award, including:

- critical thinking and problem-solving
- interpersonal skills and wellbeing
- digital and media literacy, including AI
- life skills e.g. financial literacy, cv building
- civics and community-centred learning.

5.4.5 Alternative qualification frameworks



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on the proposed Y12-13 certificates in Proposal 2, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from submissions that raised comments whilst answering other questions relating to Proposal 2.

Similar to educators, some whānau and student submitters discussed adopting an international qualification framework as proposed replacements for the Foundational Award in Year 11 and the proposed new Year 12 and Year 13 certificates.

Adopting an international qualification framework could increase New Zealand's international comparability and compatibility

Some whānau and student submitters favoured the idea that New Zealand should adopt an international qualification framework to create synergy between their qualification and New Zealand's qualification. They explained that better alignment would help grades and abilities to translate internationally, which could be beneficial for students wanting to attend university overseas. A few submitters provided examples of countries to draw inspiration from, such as the United States of America, Australia, and Singapore.

Some whānau and student submitters preferred that New Zealand adopts already established qualification frameworks, such as Cambridge, General Certificate of Secondary Education

(GCSE), or International Baccalaureate (IB). They explained that these qualifications are more traditional, well established with proven efficacy, and have coherency and status. A few added that it would be faster and less costly to adopt a pre-existing framework than creating a new one.

I think creating something new and unproven has the highest risk for the first cohort. I dont [sic] understand why there needs to be a new qualification invented when there are already excellent ones out there from other countries being used by NZ schools. Cambridge and IB are proven and world leading. A change to one of these would not put the first years at risk and would brings us up to International standards. (Whānau, Survey, R_4QzjNezvF9MhbgV)

International credibility - NCEA is not widely recognised overseas because its curriculum is simply not rigorous enough. As someone who has both taken A-levels and NCEA at year 12 and 13 levels, I can see that the content that NCEA misses has a drastic impact on my peers, especially when pursuing tertiary studies. (Student, Survey, R_49iWHJnTlVNrK23)

Adopting an internationally recognised qualification framework could improve academic rigor

Some whānau and student submitters who were in favour of adopting an international qualification framework stated that doing so would help to bring our academic standards on par with international standards. These submitters perceived international qualification frameworks as more academically challenging with more comprehensive subjects, higher expectations, and higher levels of student engagement. They elaborated that these international qualification frameworks better reflect students' learning and ability through more intensive exams and better benchmarking. A few of these submitters added that students who partake in NCEA, versus an international alternative, tend to lag behind with less critical thinking and problem-solving skills.

Consistency which in turn leads to international credibility. I have one child who did Cambridge and one who did NCEA and although we have always been assured NCEA is 'just as good' and 'recognised overseas' I just do not believe it is as rigorous as CIE by ANY stretch. I have seen what is required under each system. (Whānau, Survey, R_9DXMJGQRiHSQfzK)

International qualification frameworks may not accurately reflect New Zealand's context

Alternatively, a few other whānau and student submitters disagreed with adopting an international qualification as it does not consider the New Zealand context. They also argued that these qualifications are only considered more coherent and consistent because they have not been subject to changes, unlike NCEA.

NCEA provides flexibility to learners. I was one of the first students to complete the NCEA system, alongside International Cambridge qualifications. NCEA was better suited to NZ life and culture compared with other, international [sic] and more antiquated systems. (Whānau, Survey, R_45ZP2PTIIKJ2yvK)

A few submitters preferred students to have the choice to opt in to international systems. A few also suggested adopting international qualification frameworks alongside NCEA or making alterations to make it more compatible in a New Zealand context.

Of course, a Cambridge Te Ao Māori course would need to be developed and added to the curriculum, in partnership, for NZ. The whole thing could have a slight re-brand them - to show it's NZ Cambridge. (Whānau, Survey, R_9QYihkoHQZSZTX)

The proposed certificates will better equip students but could be amended to work with the current system

A few whānau and student submitters made comments specific to the certificate changes in Year 12 and Year 13. Of the few submitters that made specific comments about the Year 12 and 13 certificates, many of these submitters were in favour of the proposed changes and highlighted the benefits they expect to see as a result of this change. Namely, some of these submitters considered that achievement of the new senior secondary certificates would reflect a student population that is better equipped with knowledge and proficiency than NCEA.

A strong grounding in specific areas is a positive step - better than jack of all trades, master of none, which seems to be how the NCEA system has turned out for many Tamariki. (Whānau, Survey, R_4TOF0YYOk8KY0PT)

A few of these whānau submitters proposed that an alternative approach to introducing a new qualification in Years 12 and 13 would be to adjust the existing qualifications instead. They emphasised making changes that might enable students in the current system to better achieve the present qualifications.

Look at the present qualification and tweak that. Focus on level 2 and 3 implementation of the new standards and edit some things such as 4 subjects, labeling [sic] subjects vocational and UE approved. To have a vocational or academic NCEA level 2 and 3. Instead of asking our overworked teachers to implement something new in such a tight timeframe. (Whānau, Survey, R_4LKEcPDeqgvXHKEF)

5.4.6 Students remaining in school until the end of Year 12



Comments on this topic

There were approximately 1,036 comments from whānau and student survey submitters related to students remaining in school until the end of Year 12.

Students should be required to remain in school until the end of Year 12

A few whānau submitters generally agreed that students should be required to remain in school until the end of Year 12. A few of these submitters considered that 16 is too young for students to be able to make such decisions about their education.

Require students to complete year 12. It's ridiculous that a 16 year old can make the decision to leave school. (Whānau, Survey, R_9DRQuPdc4CYQat3)

Some of the submitters who agreed with requiring Year 12, suggested that Year 12 be made compulsory for all students. A few of these submitters elaborated that students should remain in school at least until they earn sufficient credits and meet the achievement requirements, while others stated that they should remain for the entire school year.

Make it compulsory to stay at school atleast[sic] until the end of the year they turn 17 or they achieve the year 12 award. Don't give the option to leave school early. (Whānau, Survey, R_4WG7LGSX3tlGRnB)

Other suggestions for how to require students to remain in school longer included making some job opportunities require a minimum of Year 12 qualifications to apply for.

Forcing students to remain in school until the end of Year 12 may be ineffective

Conversely, many whānau and student submitters disagreed with forcing Year 12 on students as they considered this would be ineffective in achieving the desired outcomes. These submitters noted that not all students are inclined towards academics, and that these students should be allowed to leave school before the end of Year 12 to pursue work, apprenticeships, and alternative education. Further, these submitters considered that forcing such students to remain in school would likely not positively affect attendance, achievement rates, or student learning, but instead increase classroom disruption and other negative consequences.

If you want better attendance, better class environments, more engaged learners, then keeping disengaged kids, who are on a non-academic pathway, in a classroom they don't want to be in is disruptive and ineffective. Learning is a choice, by this point if they have decided it's not for them then let them go. (Whānau, Survey, R_9Q5YMGfVkwE6i2A)

The reality is, education isn't a one-size-fits-all experience, and many students are motivated by personal goals, aspirations, and interests. If we push for policies that make staying in school compulsory for everyone until Year 12, we might inadvertently force students who aren't ready or interested in further academic learning to stay in an environment that doesn't suit their needs. This could lead to disengagement, lower morale, and even worse, an increase in dropouts after Year 12 because students feel disconnected from the system. (Student, Survey, R_4f1UvNVukChvH4D)

Additionally, some whānau submitters highlighted that there are other factors that affect student retention and result in students being unable to prioritise their learning. They considered that measures intended to keep students in school until the end of Year 12 would likely prove ineffective for young people from certain areas due to external factors.

Economic pressures, particularly in areas like South Auckland, mean that more and more young people are leaving school early to support their families. The underlying issue here is the rising cost of living, which continues to place stress on households. Until this is addressed, education reform alone won't be enough to keep students in the classroom. (Whānau, Survey, R_9l438Uc9275b5Wk)

Some students need increased support to stay in school for longer

Many whānau and student submitters who offered suggestions on how to increase student retention advocated for higher levels of support, adaptability, and accommodation for students in schools, including personalised learning programmes and significant support for diverse

learners. Some whānau and students noted that students are incentivised to remain in school when that environment is meaningful, understanding, and flexible. They recommended supporting students to engage with subject areas and a curriculum that develops their strengths, rather than highlighting their deficiencies.

To make sure students stay in school until the end of Year 12 and have a better chance of achieving a meaningful qualification, we need to provide flexible and personalised learning pathways. This means allowing students to choose subjects that connect to their passions, such as Māori studies, the arts, or cultural activities, alongside core subjects like English, maths, and science. When students can follow what they love, they are more motivated to stay engaged. We also need strong support systems for students who struggle with school, including mentoring, wellbeing programs, and teaching that recognises different learning styles. (Student, Survey, R_4gMuirMECJ91ujn)

6 Proposal 3: Subject-based approach and required subjects

Discussion Document Overview

Proposal 3 introduces a shift to a structured subject approach where students will focus on whole subjects, and individual standards and assessments will no longer count directly towards the qualification requirements. External and internal assessments within a subject would be marked consistently and aggregated to an overall grade and scored out of 100. It also introduces required curriculum subjects for students at Year 11.

Key questions posed during consultation included:

- *Do you support a subject approach to assessments at Years 12 and 13?*
- *How important is it for students to engage with the full curriculum (rather than segments) for vocational and general subjects?*
- *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?*

6.1 Quantitative survey analysis

6.1.1 Overall level of support for a subject approach to assessments at Years 12 and 13

Figure 49: Overall, do you support a subject approach to assessments at Years 12 and 13?

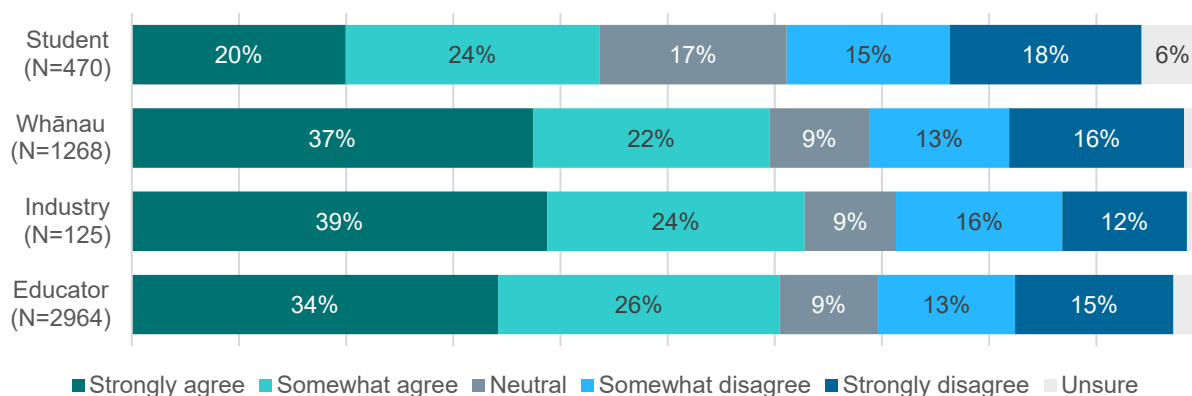


Figure 49 shows that many submitters (44%-63%) across all types support the change to a subject-based approach. Some submitters (28%-33%) across all groups do not support this proposed change. Student submitters also showed higher levels of uncertainty with 23% selecting either neutral or unsure.

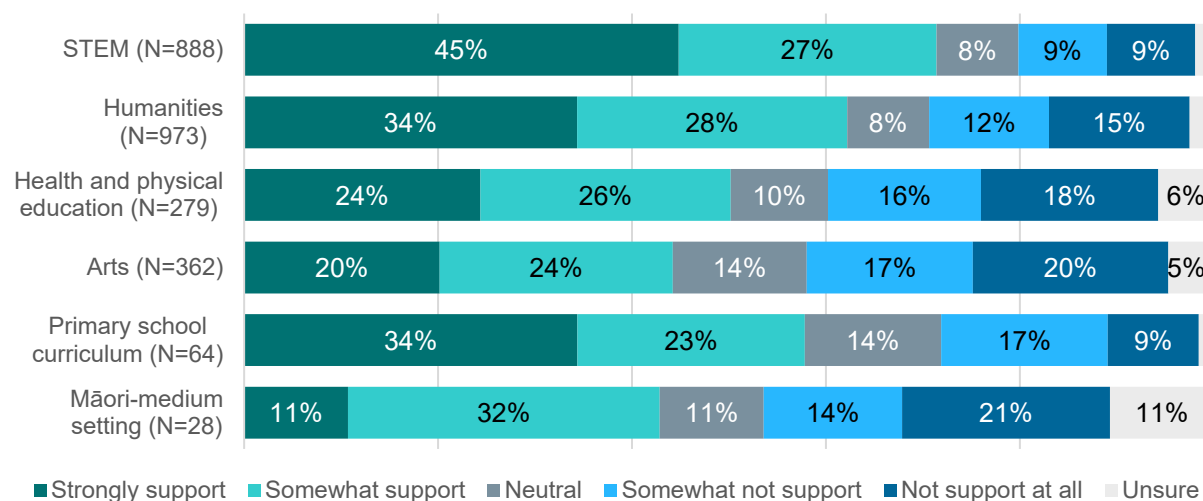
Figure 50: Overall, do you support a subject approach to assessments at Years 12 and 13? (by teaching area)

Figure 50 shows that most STEM educators (72%) and 43% to 62% of educators across other teaching areas agree to varying levels. Concern about this change was strongest for Māori-medium setting, Arts, and Health and Physical Education educators with over a third of each group disagreeing (34%-37%). Uncertainty was also highest with these subgroups with 16% to 22% selecting neutral or unsure. A chi-square test confirms these differences are statistically significant.

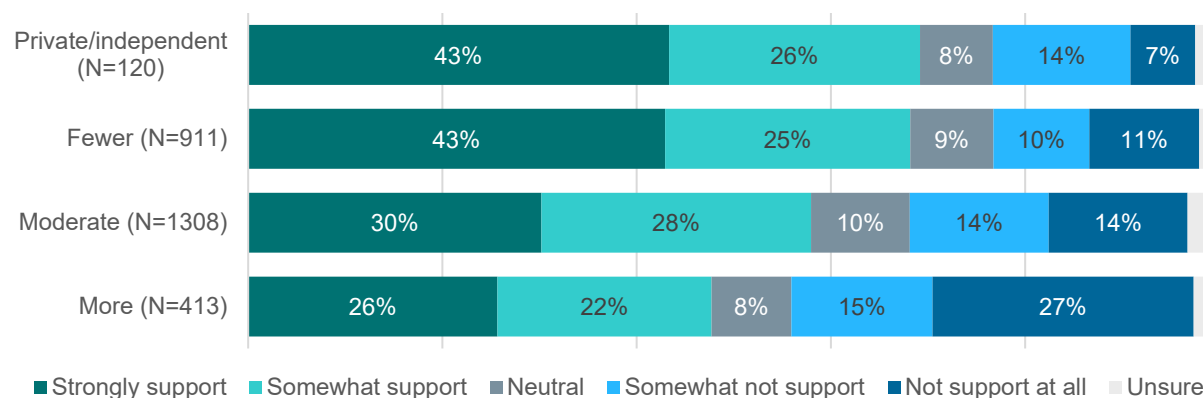
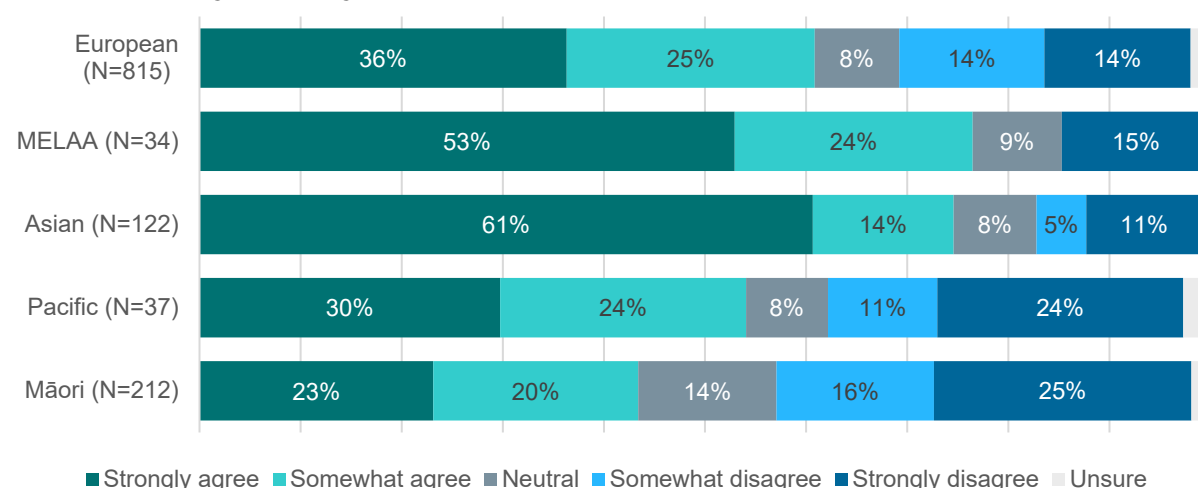
Figure 51: Overall, do you support a subject approach to assessments at Years 12 and 13? (by school EQI)

Figure 51 shows most educators in private/independent schools (69%) and schools with fewer students facing socio-economic barriers (68%) support the change to a subject approach for assessments. Many educators in schools with moderate (58%) or more (48%) students facing socio-economic barriers support this approach. Disagreement with this approach was strongest for educators working in schools with more students facing socio-economic barriers at 42%, including particularly high strong disagreement at 27%. A chi-square test confirms these differences are statistically significant.

The subgroup analysis of industry participants revealed no statistically significant findings regarding Proposal 3.

Figure 52: Overall, do you support a subject approach to assessments at Years 12 and 13? (whānau by ethnicity)

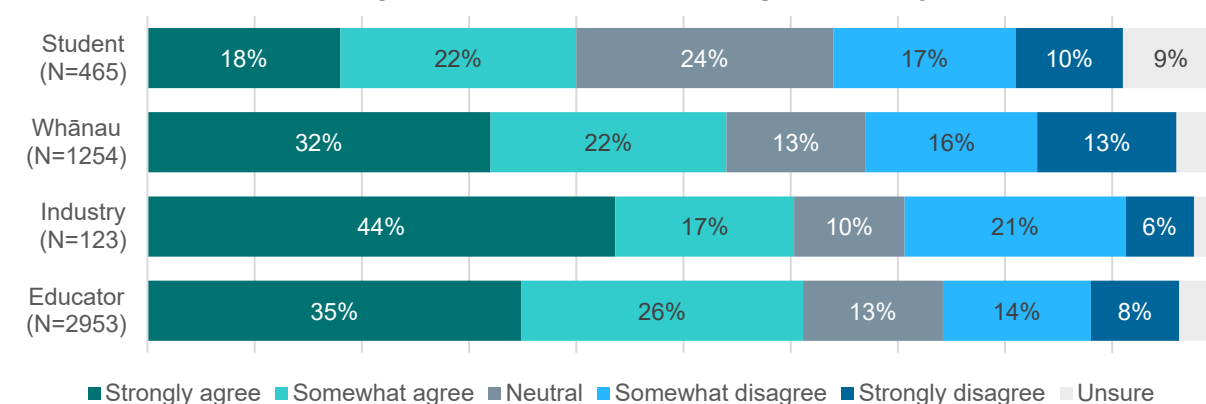


As seen in **Figure 52**, a vast majority of MELAA and Asian whānau (77% and 75%), and most European whānau (61%) support a subject-based approach. While less strong, a substantial proportion of Māori and Pacific whānau (43% and 54%) support this change, however many Māori (43%) and Pacific (35%) whānau disagreed. For Māori whānau, this shows an even split between those that support and those that do not (43% each) with a further 16% being neutral or unsure. A chi-square test confirms these differences are statistically significant.

There was no statistically significant difference in student responses by ethnicity regarding this question.

6.1.2 Is it important students engage with the full curriculum?

Figure 53: Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects?



As shown in **Figure 53**, many to most submitters (40%-61%) across all submitter types agreed to varying degrees that it is important for students to engage with the full curriculum for vocational and general subjects. Support for this was weakest from students with 27% disagreeing and the remaining 19% being neutral or unsure. Industry submitters gave both the strongest support 61% and the strongest disagreement at 27%.

Figure 54: Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects? (by teaching area)

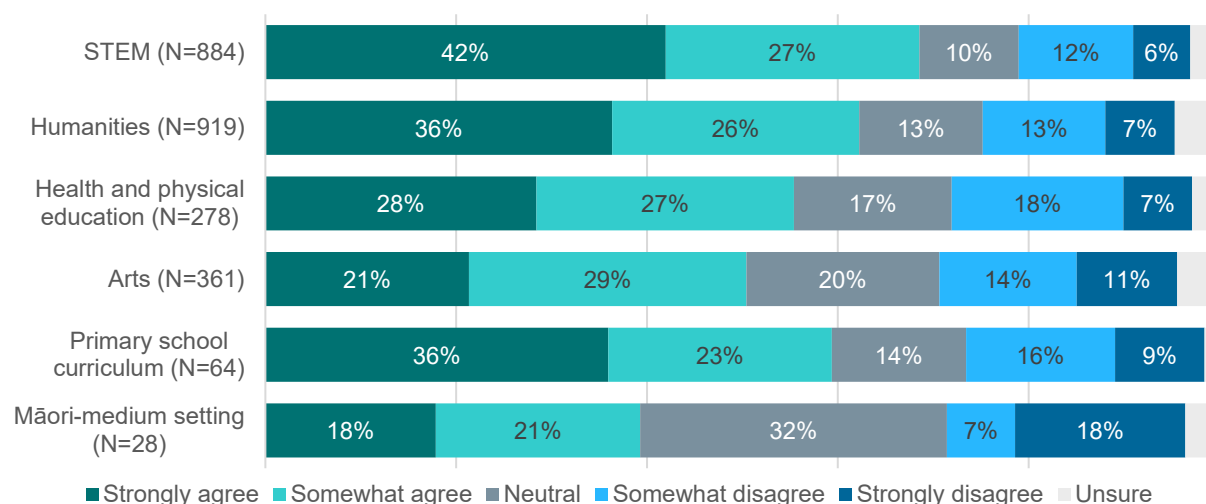


Figure 54 shows most STEM (69%), and many Humanities (62%) and Primary school (59%) educators support engagement with the full curriculum. Support was less strong from educators in other teaching areas, although many did indicate support for engagement with full curriculum (39%-55%). Arts and Māori-medium setting educators also show higher neutrality at 20% and 32% respectively. A chi-square test confirms these differences are statistically significant.

Figure 55: Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects? (by school EQI)

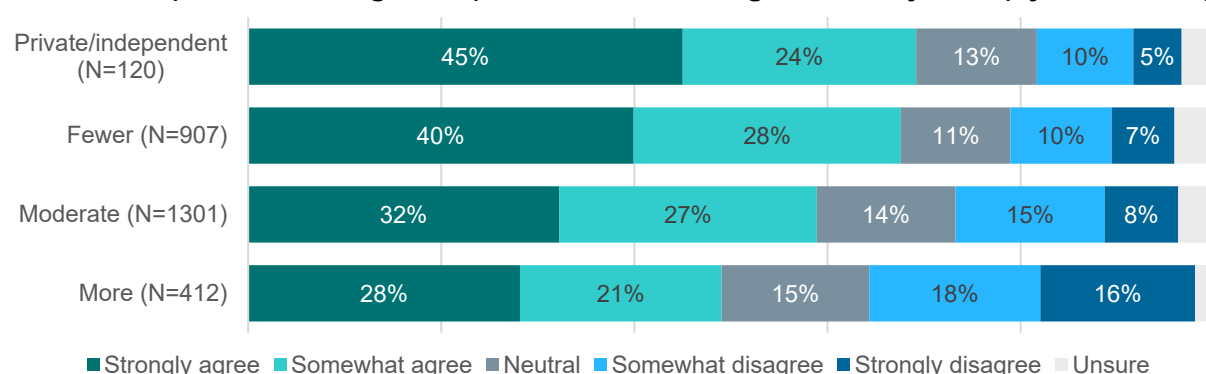
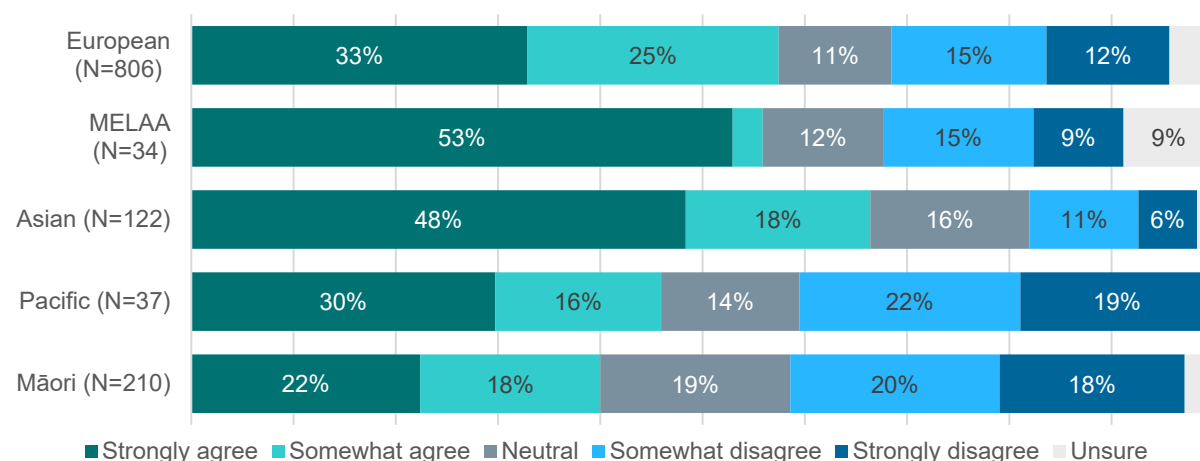


Figure 55 shows differences in support across schools with different EQI levels on student engagement with full curriculum. Most educators from private/independent (69%) and schools with fewer (68%) students facing socio-economic barriers supported this approach. Half to most educators from schools with moderate (59%) and more (49%) students facing socio-economic barriers supported this approach. However, many educators from schools with more (34%) students facing socio-economic barriers disagreed that students should engage with the full curriculum. A chi-square test confirms these differences are statistically significant.

Figure 56: Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects? (whānau by ethnicity)

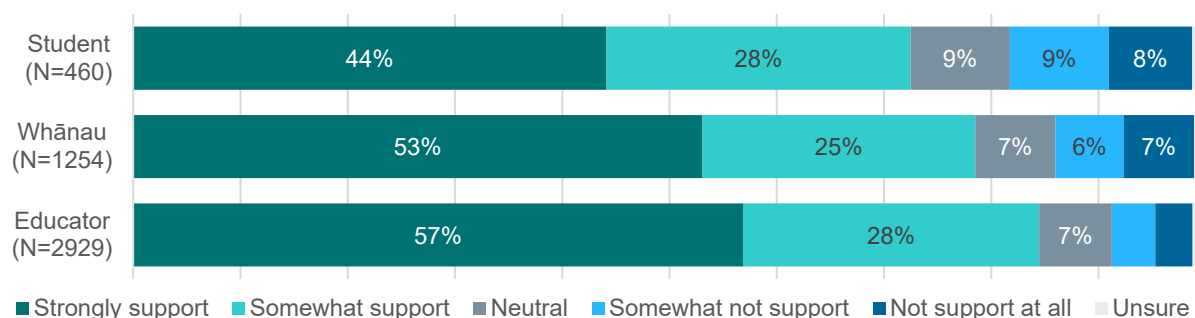


As seen in **Figure 56**, most Asian whānau (66%) and 40%-58% of other whānau show support for student engagement in full curriculum. However, many Māori and Pacific whānau (38% and 41% respectively) disagreed with this change and 22% of Māori whānau were neutral or unsure. A chi-square test confirms these differences are statistically significant.

Student responses on this issue did not vary significantly by ethnicity.

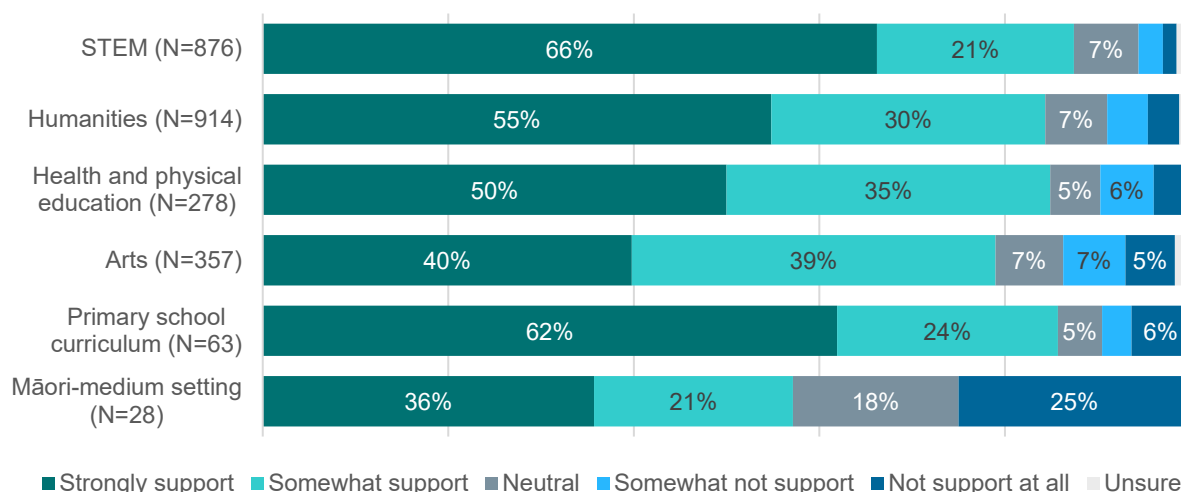
6.1.3 Should some subjects be required at Year 11?

Figure 57: Do you support some subjects being required as part of the Year 11 curriculum? (Educators and whānau/students only)



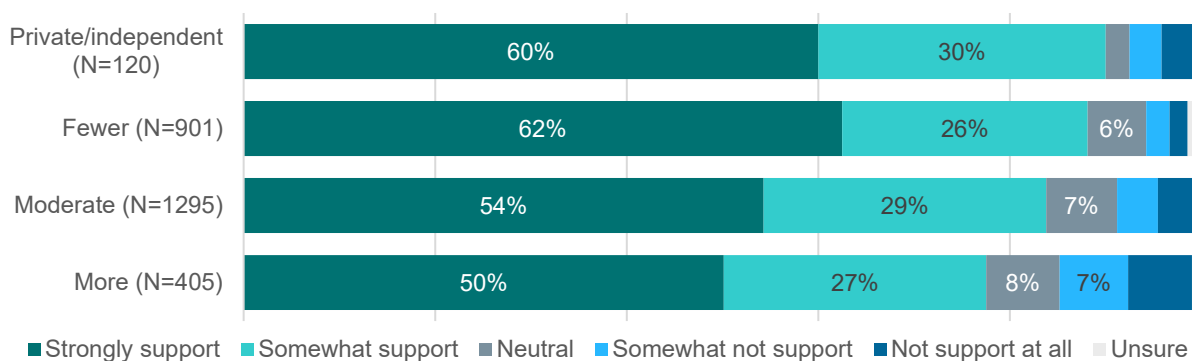
As shown in **Figure 57**, an overwhelming majority of educators and whānau respondents and most students support some subjects being required as part of the Year 11 curriculum (72-85%).

Figure 58: Do you support some subjects being required as part of the Year 11 curriculum? (by teaching area)



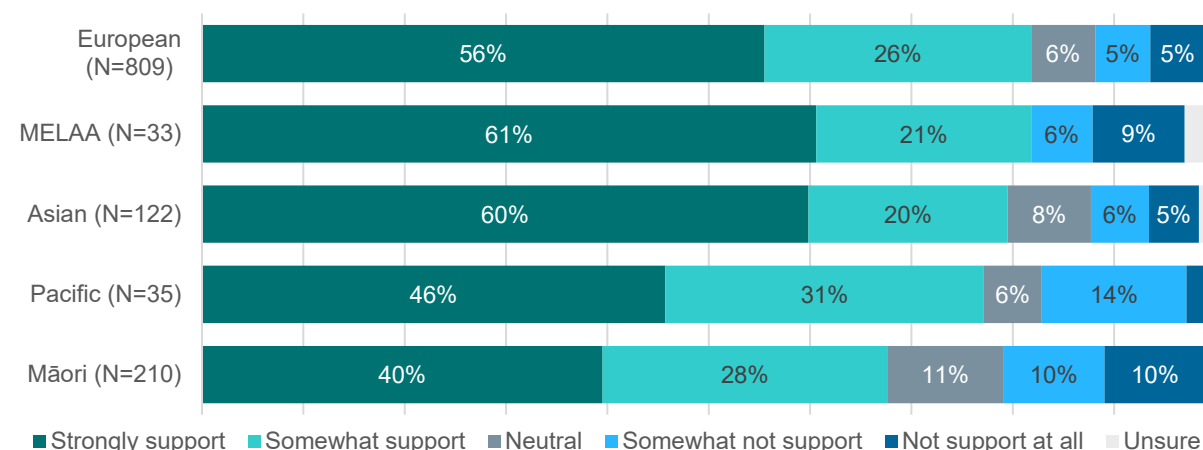
As shown in **Figure 58**, a vast majority of educators across different teaching areas support (79%-87%) some required subjects in Year 11. Māori-medium setting educators show less support for required subjects at 57%, and some (25%) do not support this change at all; this subgroup also has a relatively high neutrality at 18%. A chi-square test confirms these differences are statistically significant.

Figure 59: Do you support some subjects being required as part of the Year 11 curriculum? (by school EQI)



As shown in **Figure 59**, an overwhelming majority of educators (77%-90%) across schools with different EQI levels show support for required subjects in Year 11. Educators from schools with more students facing socio-economic barriers showed the highest opposition to required subjects at 14%. The differences were confirmed by a chi-square as statistically significant.

Figure 60: Do you support some subjects being required as part of the Year 11 curriculum? (whānau by ethnicity)



As seen in **Figure 60**, most Māori whānau (68%) and a vast majority of other whānau across all ethnicities supported some subjects being required as part of Year 11 curriculum. MELAA, Asian, Pacific, and European whānau show the strongest support (77%-82%). Māori and Pacific whānau were the most likely to not support required subjects with 20% and 17% respectively. The differences were confirmed by a chi-square as statistically significant.

Student responses on this issue did not vary significantly by ethnicity.

6.1.4 Is there a need for more consistent approaches to assessment? (Educators only)

Figure 61: Do you agree that we need more consistent approaches to assessment? (by teaching area)

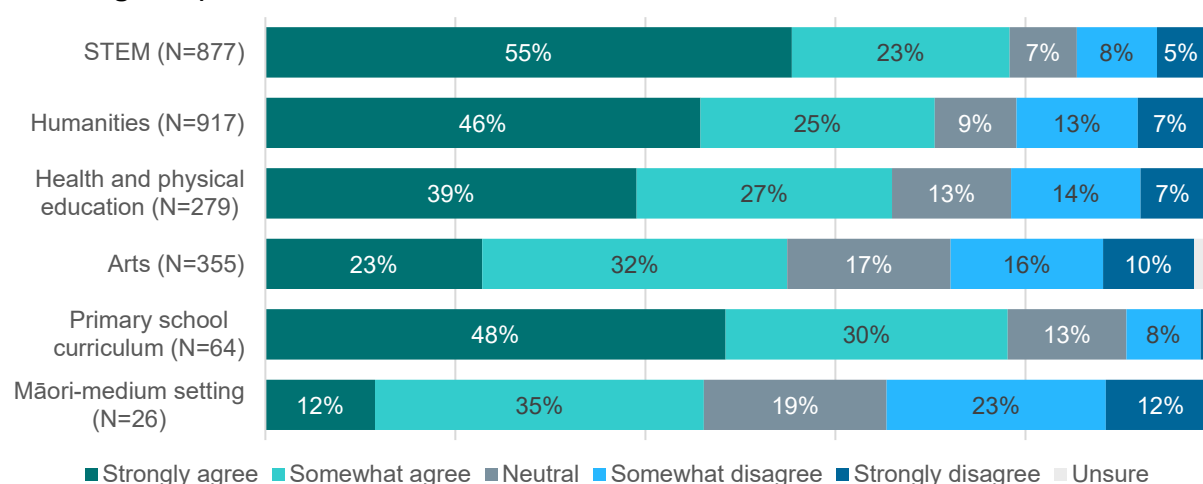


Figure 61 shows most STEM (78%), Humanities (71%), Health and Physical Education (66%), and Primary school curriculum (78%) educators support more consistent assessment approaches (66%-78%). While less strong, many Arts and Māori-medium setting educators also indicated support (55% and 47%). Overall, Māori-medium setting educators were the least supportive with 25% disagreeing and 19% neutral to more consistent approaches to assessment. A chi-square test confirms these differences are statistically significant.

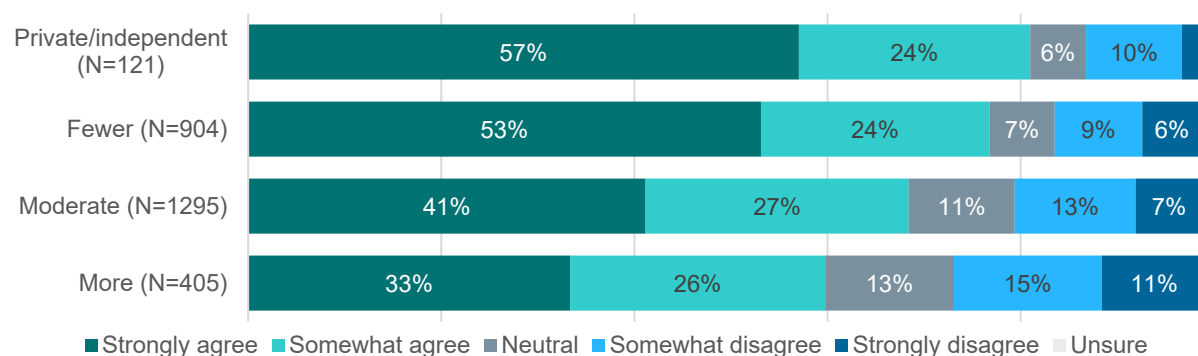
Figure 62: Do you agree that we need more consistent approaches to assessment? (by school EQI)

Figure 62 shows most (68%-81%) educators from private/independent schools, and schools with fewer and moderate numbers of students facing socio-economic barriers support more consistent assessment approaches. While most educators (59%) from schools with more students facing socio-economic barriers were supportive, they also had the strongest opposition at 26%. The differences were confirmed by a chi-square as statistically significant.

6.2 Educators



Submitter summary

Many educator submitters articulated that benefits of a subject-based approach would support consistent, coherent, and deep learning. Conversely, submitters expressed concern that a subject-based approach could limit student choice and opportunity for contextualised learning, which could marginalise certain vulnerable groups and teaching mediums such as kaupapa Māori-medium setting approaches.

Submitters were mixed in their response to taking a whole-subject approach versus maintaining flexibility to engage with parts of a subject, as well as what combinations of subjects should be required at Year 11. Many submitters provided suggestions to improve assessment consistency, as well as operational considerations.

6.2.1 Benefits of a subject-based approach



Comments on this topic

There were approximately 1602 comments from educator survey submitters related to benefits of a subject-based approach.

A subject-based approach would support deeper, less fragmented learning

Many educator submitters said that moving to a subject-based assessment system for Years 12 and 13 will help students develop a deeper, more connected understanding across entire subjects rather than a surface-level understanding of many unrelated or fragmented topics. Some submitters also considered that the proposed approach would provide a proven,

structured way of organising and sharing knowledge that would help students learn to think and communicate effectively about particular subjects.

Students can develop a more thorough understanding of each subject, rather than focusing on isolated standards or smaller units. This supports stronger critical thinking and deeper understanding. [...] Students would be encouraged to build a broader range of skills within each subject area, including research, analysis, and application, rather than just targeting specific assessments. (Educator, Survey, R_96yBVY22CgUy0eZ)

A subject-based approach would support nationwide assessment consistency

Many educator submitters said subject-based assessment would create consistency across schools nationwide. They considered that a standardised subject approach ensures all students studying particular subjects engage with the same essential content within-subjects regardless of their school location or level of socio-economic barriers. Submitters said that this consistency ensures students have the same opportunities to succeed at university by giving them comparable content knowledge to their peers, while also providing employers and tertiary institutions with clear, reliable information about what students actually know and can do.

[T]he current flexibility means there can be a wide variation in what schools offer. Two students can both pass “Level 3 Maths” but have been taught wildly different content, sat very different assessments, and have very different knowledge and skills. You can imagine one being ready for further study and the other very much not, but on paper, both have “passed Level 3 Maths”. (Educator, Survey, R_9QxcrgBrAV4NCbT)

A subject-based approach could reduce credit counting and disengagement from learning, broadening student pathways

Many educator submitters welcomed the end of “credit counting” and “credit farming” practices and considered that a subject-based approach would stop this. Submitters expressed frustration with students who disengage from their learning after they have accumulated enough credits. Additionally, educator submitters noted that students are able to piece together qualifications through “easy credit” pathways, completing random unit standards without developing genuine subject expertise. These submitters considered that subject-based assessment requires sustained engagement throughout the entire year and ensures students cannot cherry-pick easier aspects or avoid challenging but essential content.

Currently, some courses (e.g., “Sociology” at Level 1, 2, and 3) bear little resemblance to the actual discipline. There is no national curriculum or external professional body for “school sociology,” yet these courses often cherry-pick standards from multiple learning areas to deliver large credit hauls from a single assessment (sometimes up to 14 credits). This distorts student subject choice, encourages the pursuit of easier credit pathways, and reduces motivation to engage with more rigorous subjects that require sustained effort for the same credit value. (Educator, Survey, R_9Pnde8XeHsa9Nk8)

A few submitters commented that this assessment approach would help prevent students from unintentionally closing off future pathways.

Many students unintentionally limit their future options under the current model by choosing standards that don't meet University Entrance (UE) or course prerequisites. By requiring students to take whole subjects and ensuring subject pathways are clearly mapped, students will be better positioned for successful transitions into university or other tertiary education. (Educator, Survey, R_4v0uCjcHZ5zPC4t)

Some submitters also noted that subject-based assessment better prepares students for university and workplace expectations. They said that universities expect students entering degree programmes to have comprehensive subject knowledge, not gaps created by standard-selection. Submitters suggested that a subject-based approach mirrors tertiary assessment structures, helping students develop study habits, resilience, and time management skills needed for success beyond school. A few submitters noted that employers will also benefit from clearer understanding of graduates' actual capabilities rather than attempting to decode collections of standards.

The Proposal would ensure the curriculum drives deeper, cohesive learning

Some educator submitters said the proposed change would help ensure the curriculum drives learning. They explained that currently, teachers teach narrowly to specific standards rather than delivering deeper and knowledge rich subject curricula. Submitters said that a subject-based approach restores teacher expertise, allowing educators to design coherent learning sequences that build knowledge progressively. Some submitters noted this would enable proper teaching of subjects like Mathematics, where connectivity between topics is fundamental but currently undermined by siloed standards.

By reducing the number of assessments, a subject-based approach would alleviate assessment fatigue for both students and teachers. Students would have more time for genuine learning, and teachers would have more time for teaching and providing meaningful feedback, rather than constantly marking and moderating. This would create a less stressful and more productive learning environment. (Educator, Survey, R_9tnBPJaXFVuUULN)

A subject-based approach may contribute positively to equitable outcomes

A few educator submitters noted that standardisation promotes equity by ensuring all students access the same core curriculum regardless of school resources or teacher decisions. Currently, some schools offer only "easier" standards, disadvantaging students compared to those at schools offering complete, rigorous programmes. Many of these submitters considered that a subject-based approach allows students to develop genuine expertise in chosen areas, supporting specialisation needed for career pathways and advanced study.

It provides for specialisation and individualisation, which is linked to motivation and better achievement. If schools have good counsellors/knowledgeable teachers (like we do) advising students, then limiting one's options is not an issue. (Educator, Survey, R_4qeXRMkv7OsaQ2J)

6.2.2 Concerns about a subject-based approach



Comments on this topic

There were approximately 810 comments from educator survey submitters related to concerns about a subject-based approach.

A subject-based approach would reduce flexibility and limit contextual learning

Many of these submitters valued NCEA's current flexibility to design courses that respond to students' needs, interests, and local contexts. Some submitters described how their schools successfully combine standards from different subjects to create engaging, interdisciplinary courses, such as combining History and Media Studies, or creating STEM courses that integrate Physics, Mathematics, and Technology. Further, a few submitters elaborated that contextualised programmes of learning can enable holistic and interest-driven learning, which is particularly beneficial for Māori. Submitters considered that these programmes help students see connections between different areas of knowledge, which better reflects how learning and work happen in the 'real world'. Whereas they were concerned that a strict subject approach would eliminate these programmes and flexibility, potentially resulting in decreased engagement and achievement.

Requiring students to take the full subject for the full year in order to get any formal recognition of learning stifles innovation and limits students' options. Many schools currently offer semesterised [sic] and/or cross-subject courses which contextualise learning for students. Innovative course design is important for student motivation and enables schools to be adaptable and to respond to the rapidly changing world. (Educator, Email, EME-2456)

A perceived five-subject restricts subject choice and pathways



Note that while a five-subject limit was not what was proposed by the Ministry, submitters often misunderstood this aspect of Proposal 3. Submitters' concerns have continued to be included below as this will have informed how submitters responded to Proposal 3 questions.

Many educator submitters expressed concern about any potential to limit students to five subjects, noting that this restricts students' ability to explore diverse interests and keep multiple pathways open. They said such a restriction would be particularly problematic for students who have not yet decided on their future direction, or who benefit from taking subjects outside traditional academic areas.

Attendees raised concerns about proposal 3 (subject approach), including that it may exclude non-industry specific skills from qualifications and restrict students to narrow learning pathways. There was a strong sentiment that the subject approach is not supported and the current approach (to achievement standards) should be retained + mentioning decreased achievement and engagement. (Educator, Email, EME-2117 Open Letter from Principals)

Many educator submitters considered that subjects like the Arts, Outdoor Education, Technology, and Social Sciences will be sidelined as students focus on perceived core subjects, resulting in a less well-rounded education, if there were to be a limit.

This narrow focus ignores the richness that many non-traditional subjects can bring. For example, outdoor education teaches amazing leadership and teamwork skills that are hugely valuable in the workplace. Students who are good at tech subjects should be able to showcase this and study more than 1 tech subject to a high level. PE also teaches teamwork and leadership and useful skills and knowledge for working in the fitness, sports and health industries. (Educator, Survey, R_4JxSlgYEaWY2v1L)

This approach may disadvantage some student groups

Many educator submitters were concerned that a subject-based assessment system would harm students who do not fit traditional academic patterns. Submitters noted that the current system allows these students to achieve recognition for what they can do, even if they struggle with certain aspects of a subject. Under the proposed system, students who cannot complete an entire subject would receive no recognition for their learning, effectively setting them up to fail. Similarly, a few educator submitters also raised practical concerns about students who change subjects mid-year, arrive or leave school partway through the year, or need to reduce their course load due to health or other circumstances. These submitters noted the same comparison: that under the current system, these students can still gain recognition for what they achieve, however under the proposed approach, they could end up with nothing.

Also we need to consider students who leave school throughout the year - currently we can get students a qualification (Level 1/2 etc) if they need it, during the year with internals; under the new system they would have to stay all year in order to be assessed for the whole subject, otherwise they leave mid-year with no recognition of the work they have done. (Educator, Survey, R_916GrjS6BiVRr4h)

In addition, some submitters were concerned that smaller and rural schools will not have the staff or resources to offer a wide range of subjects creating unfair disadvantages based on where students live.

Schools currently have the flexibility to design 'subjects'/courses that meet the constraints of their timetable, staffing and resourcing as well as the learning needs of their students. Losing this flexibility has the potentially to have inequitable outcomes, particularly for smaller schools. (Educator, Survey, R_42n1yfhBbnYTV54)

The Proposal marginalises Māori-medium setting approaches

Some educator submitters said the proposed changes risk marginalising kaupapa Māori approaches to learning and assessment. They noted that this appears to be a return to systems that historically failed Māori and Pacific students and recreates the exclusionary barriers that NCEA was designed to address. They explained that the Proposal is underpinned by an English-medium or “Eurocentric” framework that insufficiently incorporates Māori voice.

By prioritising a narrow, standardised model of achievement [...] the system strips away the flexibility needed to reflect the realities, aspirations, and cultural contexts of our ākonga Māori. [The proposed] model has privileged subjects grounded in dominant cultural norms and undervalued mātauranga Māori, te reo Māori, and kaupapa Māori approaches to learning. This is disturbingly reminiscent of the

inequities entrenched under the old School Certificate system, which systematically disadvantaged Māori learners and constrained Māori educators. Without deliberate structures to recognise a fuller spectrum of achievement—grounded in tikanga, whanaungatanga, and holistic measures of success—the new framework will again underserve those who most need education to work for them. (Educator, Email, EME-2341 PPTA Te reo ā Rohe)

Ngā Kura Ā Iwi o Aotearoa raised that the Proposal lacks explicit reference to the Mana Ōrite principle, kaupapa Māori standards, and investment in Māori resourcing. Some submitters stated that the Proposal limits curriculum breadth, subject choice flexibility, and has an exam-heavy focus, all of which undermine and constrain iwi/hapū aligned pedagogy that hinges upon diverse and holistic learning.

As currently proposed, the reforms risk an erosion of what enables Māori-medium education to flourish: mana motuhake, curriculum breadth, valid assessment, equitable grading, flexibility, and Māori voice in decision-making. (Educator, Email, EME-2868 - Ngā Kura Ā Iwi o Aotearoa)

In particular, the Māori Education Advisory Group noted that the Proposal may result in higher proportion of Māori school leavers without a qualification as the proposed Year 12 structure may be more challenging than the current system. They recommended that earlier delivery of content, such as in Year 11, is necessary to avoid adverse impacts. They also recommended making English an optional subject for ākonga who select Te Reo as their core subject.

To ensure that the Proposal does not further marginalise Māori-medium setting students, some educator submitters stressed that explicit resourcing and sustained investment for Māori-medium setting approaches is vital. Further, while not an intended component of the Proposal, the Māori Education Advisory Group and Te Rūnanga Nui raised that Māori-medium setting students need protection from any possible scaling and potential bias. The Māori Education Advisory Group suggested that the individualised competency approach of NCEA should be retained, rather than a scaling normative bell curve grade distribution. They also recommended making it clear to teachers, students, and whānau, how many notional hours of learning are necessary to successfully complete every subject on offer.

Teachers' autonomy and professionalism is undermined by the Proposal

A few submitters also said the mandated approach undermines teacher professionalism by reducing autonomy in adapting teaching to student needs and interests as well as local contexts. Some other submitters expressed frustration that the Proposal assumes teachers are not already teaching coherent subjects, when in fact most schools already operate with subject-based courses, just with the flexibility to adapt them to their students' needs. One submitter noted:

One of the main benefits of NCEA as it is currently, is that it is flexible and able to be tailored to students' needs and interests. Forcing schools to separate subjects will also greatly disadvantage small schools where there aren't enough students for an entire class for Classics or History class for example, but there might be enough to mix them together. (Educator, Survey, R_9ccuFFUG10SrZMR)

Submitters were concerned about insufficient preparation time, subject and staffing losses, and uneven implementation. Risks of these concerns included slippage in milestones,

inconsistent national rollout, rushed delivery, and inequitable impacts—particularly for neurodiverse learners, Māori and Pacific learners, migrants and ESOL learners, and students with higher learning needs. Further discussion on change implementation can be found in section 8.2.4.

The Proposal was confusing and lacked detail

Some submitters were unclear about what “subject-based” meant in practice and how expectations differed by subject type. Other submitters questioned being asked for detailed input without final curriculum and guidance and sought more information before providing detailed feedback.

It is deeply concerning that an assessment framework is being proposed before the curriculum itself is written. This reverses the natural order of educational design. Assessment should serve the curriculum—not dictate it. Without a clear curriculum, how can we ensure assessments are valid, equitable, and meaningful? (Educator, Survey, R_9P8mIW0kknjRQ8F)

6.2.3 Alternatives to a subject-based approach



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on alternatives to a subject-based approach, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from submissions that raised alternatives whilst answering other questions relating to a subject-based approach.

A few submitters offered alternative approaches to a subject-based assessment approach that could address the government's stated goals while retaining flexibility and equity.

Refine the current system instead of overhauling the assessment approach

Some of these submitters suggested that consistency could be achieved by refining the current NCEA system rather than replacing it entirely. They proposed making existing NCEA assessment more consistent through better moderation, clearer expectations, and improved exemplar resources, rather than creating an entirely new qualification system.

Specifically, they noted that subject endorsements already exist and could be strengthened without dismantling the whole framework. Others suggested requiring all standards within a subject to be attempted, with an overall grade of "Completed with Endorsement" needed to pass, which would ensure course completion without completely overhauling the system.

I note this idea is already available in NCEA with subject endorsement. I appreciate the move away from students getting NCEA through totally disparate unit standards in fork lift driving, scuba, and health and safety. Again this could be managed via a tweak to NCEA rather than coming up with a totally new qualification framework. Just insist that students are endorsed at achievement level in at least four subjects. (Educator, Survey, R_9G8l0DlImjnzTZuv)

Some of these submitters advocated for maintaining flexibility while adding structure. Suggestions for adjustments to the current system included:

- Require students to complete three full subjects while having the fourth be more flexible, allowing them to demonstrate competence in specific skills or topics without needing to pass an entire year-long course.
- Allow ‘semesterised’ or half-year subjects rather than requiring full-year commitment, to help with student engagement and allow broader curriculum exposure while maintaining some structure.

Some of these submitters stressed the need for flexibility in timing and pacing. They proposed that students should be able to achieve qualifications over multiple years if needed due to illness, family circumstances, or other challenges. A few submitters also suggested that students should be able to cross-credit between Year 12 and Year 13, and study subjects at different levels within the same year to accommodate varying abilities and paces of learning.

- **Maintain a cross-curricular approach to better reflect the ‘real world’**

The importance of cross-curricular approaches as evidence-based pedagogy was also highlighted. A few submitters said life does not happen in silos and that many successful courses combine standards from multiple subjects to reflect ‘real world’ applications. Submitters raised examples such as:

- courses preparing students for health professions that integrate Health, Social Studies, and Biology standards
- courses on political leadership that combine History, Writing, Debate, and Law
- Science, Technology, Engineering and Mathematics (STEM) courses combining Physics, Electronics, Technology, and Mathematics
- Social Science courses combining History, Geography and Classics.

These submitters suggested that rather than eliminating such approaches, the system should create pathways to recognise and validate well-designed integrated courses, possibly through a pre-approval process from the Ministry.

Many of our most powerful learning opportunities come through integrated, cross-curricular projects (e.g. Sustainability, Outdoor Education, Agriculture and Science combined). (Educator, Survey, R_4pFLjKQENDr1BJp)

6.2.4 Engaging with whole vs segments of a subject



Submitters were confused by the consultation questions

The consultation document asked:

- *Do you support a subject approach to assessments at Years 12 and 13?*
- *How important is it for students to engage with the full curriculum (rather than segments) for vocational and general subjects?*

Many educator submitters answered these two questions together, raising whole vs part of subject learning and addressing the assessment of this learning as two parts of the same issue. For this reason, the following analysis includes responses provided by submitters to either question.

There was some confusion from submitters about the second question. Some commented in relation to the 'whole curriculum' meaning a range of subjects, and others taking it to mean the 'whole curriculum' for an individual subject. This section focuses on feedback from educators that answered this question as it relates to subject level curriculum.

Not sure if I understand the question. Is this referring to all the info in subject domain or a broad curriculum across domains? (Educator, Survey, R_4I3sMbJRlyV09IQ)

Educators were divided between those supporting a whole-subject approach and those preferring to engage students across multiple subject areas. Some submitters noted that there are benefits to both approaches.

Support for taking a whole-subject-based approach



Comments on this topic

There were approximately 1542 comments from educator survey submitters related to why engaging with the full curriculum for vocational and general subjects is important.

Many educator submitters supported students engaging with whole subjects rather than isolated standards. These submitters stated that this approach would promote deeper understanding and a fuller grasp of the curriculum, ensuring that learning was broad, coherent, and purposeful.

If designed well, the subject should cover all the necessary knowledge and skills that will aid the student in their future. In that case, the whole subject will be important, rather than a few standards and topics. (Educator, Survey, R_4eDKEaXBiqbtQho)

A few submitters highlighted that taking a subject-based approach was particularly important for some subjects, such as STEM.

For STEM subjects (and others) where there is a spiral curriculum that builds on earlier foundational knowledge, if a student is missing some components from earlier levels

of the curriculum for that subject, it makes success at the higher levels increasingly difficult. (Educator, Survey, R_4wcpNDnQ9xBiFnt)

Some submitters commented that whole-subject learning would provide clearer achievement signals for employers and tertiary education organisations, allowing them to better understand students' skills and knowledge. A few noted that this approach would also improve consistency between schools, making it easier for students to transfer without disruption when all schools were covering the same content.

It reduces the gaps that occur when students move between schools and when students move onto higher education. (Educator, Survey, R_4UrR8gi4TFGdhLj)

Some submitters observed that a focus on complete subjects could strengthen students' readiness for further learning, particularly in related tertiary study. A few added that engaging with full subjects would help students think more broadly and retain knowledge rather than compartmentalising it for individual assessments. Some also suggested that this approach would reduce the practice of 'credit farming'.

Learning the full subject, not just small bits, gives ākonga a stronger base, fewer gaps, and clearer pathways to uni, trades, or work. It keeps core skills (reading, writing, maths/digital, kōrero) alive across the year, stops "credit-farming", and makes results easier for whānau, employers and tertiary to trust. (Educator, Survey, R_4DPi5X6xEktdVyU)

Support for retaining flexibility to engage with parts of the curriculum



Comments on this topic

There were approximately 616 comments from educator survey submitters on the benefits of being able to engage with parts of a subject.

As noted above, there was support from many educator submitters to enable flexibility for students to engage with parts of the curriculum rather than whole subjects. Many educators stated that this approach helps students build transferable skills and allows schools to design programmes that are culturally responsive and tailored to the needs of their learners and communities.

Knowledge does not sit in silos. Teachers should be allowed to develop engaging, relevant meaningful teaching and learning programmes. It is about aligning curriculum, assessment and pedagogy. (Educator, Survey, R_4hzgrjW3LOrB6Nj)

Some educator submitters also noted that smaller, focused blocks of learning make it easier for students to engage and succeed, particularly through project-based or multi-level learning in smaller schools.

We need to move from whole subjects (which are in isolation) to project based which embeds whole subjects. Contextualised and meaningful learning. (Educator, Survey, R_4dp4dkM9PxMHdfO)

A few educator submitters raised concern that requiring students to study whole subjects could lead to early streaming into vocational or academic pathways or disengagement for some

students who would find the subject-based structure restrictive. They considered that engaging with subject segments would support better engagement for some students.

Segmental engagement also enables recognition of achievement in smaller, meaningful steps, supporting motivation and ongoing participation. (Educator, Survey, R_9ISwCmEEWMGhLoE)

Some submitters observed that flexibility allows students to gain recognition for their stronger skills, rather than failing a whole subject because they struggle with specific components, describing this as a way of “rewarding progress over perfection.”

A sense of ownership over their learning journey can lead to better attendance, a deeper understanding of the material, and a higher level of achievement. Allowing students to specialize in areas they are passionate about helps them build confidence and develop a strong work ethic that will benefit them in their future careers. (Educator, Survey, R_9h7NznPFP8zdMw9)

A few submitters commented that flexible learning enables students to test subjects without committing to a full year of study, or to change direction if they discover new areas of interest, they wish to pursue further at tertiary level.

Other points raised by educator submitters

A few educators commented that it was difficult to assess the implications of the Proposal without access to the draft curriculum, noting that it was unclear how much content would be expected to be covered within a year.

A few educator submitters suggested that a balanced model could be adopted, where some core subjects such as English, Mathematics, and Science are required in lower secondary, while allowing flexibility to engage with segments in the remainder of the learning programme, or flexibility up to a certain level with a shift to a subject approach in senior secondary.

Not at higher levels necessarily. Primary, intermediate, and Year 9-11, should have a robust curriculum of important skills and knowledge (with flexibility to be responsive to student needs). However, at Year 12 and 13 the point is to begin specializing. (Educator, Survey, R_95XhUBkBDbx6dYP)

I think engaging with a full subject curriculum is beneficial for year 13 students looking to go to university. I think at level 2 the current system generally works well and provides flexibility for diverse learners. (Educator, Survey, R_987cwZ2a41FoEpP)

Many submitters noted that schools already teach across the full curriculum, but not all aspects are formally assessed.

The assumption here is that all of the curriculum needs to be assessed. You can teach curriculum without having to put students through a high-stakes assessment. It also means that learning and courses can be contextualised rather than being delivered in subjects. (Educator, Survey, R_9CVVSpRk5SxOdue)

Some suggested that a whole-subject approach may be more appropriate for academically stronger students, while a more flexible model would better support those who achieve less academic success. A few submitters who supported a whole-subject approach also stated that

students should not be required to sit assessments in areas where they are not yet ready to demonstrate achievement.

A few submitters spoke to the relationship between flexible engagement with learning and the approach to reporting assessment results, highlighting the detail able to be provided about students' skills within a subject.

A standards-based system takes pains to identify, assess and report on components of the curriculum. Knowing that an individual performed well in geometry but less so in algebra was generally agreed to be more valuable than being presented with a score of 52% in mathematics. (Educator, Email, EME-1001 PPTA Secondary Principals Council)

6.2.5 Assessment consistency



Comments on this topic

There were approximately 2404 comments from educator survey submitters related to assessment consistency.

Provide clear and consistent assessments, exemplars, rubrics, and guidelines

Some educator submitters acknowledged that there is a level of subjectivity and inconsistency due to variation in assessment design and marking, particularly with internal assessments. Many of these submitters commented that greater assessment consistency could be facilitated by providing clear, consistent, and standardised materials for teaching and assessment. This included assessments, exemplars (including annotated student work), marking schedules and rubrics, agreed interpretations, and guidelines, for both internals and externals.

Some submitters said that provision of high quality, well-defined materials will reduce ambiguity and increase consistency and transparency. They highlighted the need to have very clear expectations and guidelines about achievement requirements at each level available and accessible nationally – by teachers and students. Some submitters noted that there would need to be some flexibility retained for certain subjects such as Art, and the ability to seek exceptions via centralised approval. Submitters also suggested that teachers would need the ability to raise questions and receive quick, standardised responses.

Greater consistency in assessment can be achieved by ensuring teachers have equitable access to high-quality resources, including clear marking schedules, exemplars, and agreed interpretations of each standard. It is important that the content and expectations of standards are well defined, with supporting examples that reduce ambiguity. (Educator, Survey, R_9QlvTdoPXJGw1WS)

A few submitters noted that there needs to be more clear and regular communication between NZQA and teachers to ensure greater understanding regarding expectations and consistency in approaches to assessment.

End localisation of assessments whereby individual schools create their own assessments and mark them to widely differing standards with minimal oversight. (Educator, Survey, R_4My8JrlfkVQjWk4)

Strengthen moderation processes and increase the use of external marking

Many educator submitters reported that assessment consistency could be increased by strengthening moderation processes and by increasing the use of external marking. Firstly, submitters suggested that moderation processes could be improved by increasing access to moderators (e.g. via workshops), increasing the use of moderation, making internal moderation processes stricter, monitoring school consistency, targeting support for less consistent schools, ensuring regular process reviews, and greater collaboration across schools (e.g. cross-school marking). A few educator submitters noted that moderator feedback could be improved too via increased consistency, detail, and transparency.

I think we need more support, resourcing, and funding for the marking and moderation of assessments. The same issues will continue to arise if the sector continues to be underfunded, under-resourced, and under-staffed. Simply changing the assessments will not create the consistency that you think. (Educator, Survey, R_95XhUBkBDbx6dYP)

Secondly, educator submitters commented that increasing the use of external marking would increase assessment consistency. Some educator submitters suggested that all assessments – both internal and external – should be marked externally. Whereas other submitters reflected that whilst this may be ideal, it would be infeasible due to staffing and funding, instead suggesting simply increasing the use of external markers or panels, particularly for internal assessments. Conversely, a few educator submitters noted that it is crucial for teachers to mark their students work as this supports teaching and feedback and is therefore essential to the learning process.

Internal assessments should be all moderated or marked by external markers. (Educator, Survey, R_4alyTRE2tmqvyp)

Increase teacher professional learning and development, and collaboration

It was said by many educator submitters that increasing teacher professional learning and development (PLD) would support increased assessment consistency. It was said that access to quality PLD is variable and irregular. Specifically, submitters reported the need to increase funding for, access to, and quality of regular and ongoing PLD, both generally and specific to assessment, marking, and moderation processes. Some submitters specified PLD should be NZQA-led and facilitated by subject-specific specialists.

Strengthen teacher professional development: Well-trained teachers will be better equipped to design assessments that align with national standards, providing students with a clearer, more consistent educational experience. (Educator, Survey, R_9ktp0mbd2GatXxL)

Relatedly, a few submitters suggested greater collaboration across teachers and across schools. For instance, via 'best practice' workshops and online hubs or forums to share materials and interpretation. PLD and collaboration is expected to facilitate alignment and 'calibration' with regards to both developing assessments and marking.

In addition, regular national moderation workshops or an online hub where teachers can share interpretations, exemplars, and best practice would ensure alignment across schools. This would build confidence in the system and help ensure students

are assessed consistently no matter where they study. (Educator, Survey, R_9QlvTdoPXJGw1WS)

Increase external assessments or standardise internal assessments



Note that submitters tended to understand “external assessment” as specifically referring to “end of year exams” and “internal assessment” as specifically referring to “assessments set by the teacher and completed throughout the year”. This understanding has informed how submitters have responded to the consultation questions.

Some educator submitters commented that increased use of external assessments would increase assessment consistency, whilst others suggested increasing standardisation of internal assessment processes instead. External assessments were favoured by some submitters who agreed with the proposed 50% of assessments being external, with some even suggesting an increase to 60% or 70% (or more) of assessments.

Get rid of internals. They are compromising at the best of times with teachers expected to be both gymnastics coach and then sprint across the floor to be the judge as well. (Educator, Survey, R_9fMJQrtCtpHki0p)

Whereas other educator submitters reiterated concerns around ‘high stakes’ external assessments, and suggested focusing on standardising internal assessments, by adopting similar practices as external assessments. For instance, set time periods where all schools complete specified assessments; increased consistency with the number of standards per subject, number of credits, and credit weighting; increased use of external marking and moderation, and standardised assessments developed by NZQA.

Organise nationally written internal assessments and have them externally marked throughout the year. (Educator, Survey, R_4JredER9Teif4dM)

Some support for and concerns around greater use of digital tools such as AI

A few educator submitters commented on the use of digital tools such as AI to support greater assessment consistency. Specifically, some submitters were in favour of AI use, some were against, and some raised concerns and limitations. Some submitters reported that AI should be used to mark assessments and therefore remove bias and increase standardisation in grading and moderation.

By getting AI to mark all assessments and take out the human component. One of the aims of NCEA was to have national standard. There is no national standard. Markers and moderators apply their own standards. This often leads to a wide variance in marking. AI can mark and give consistency across the country. (Educator, Survey, R_4rY6sfKRhMEz03Z)

Whereas other submitters reported that teachers should not be using AI for marking, primarily because AI struggles with nuance and higher-order reasoning and this may lead to mismarking. Relatedly, due to the way that educator submitters expect AI to mark, there were concerns that creativity and innovation in writing would reduce as students adapt to write in a

way that AI best understands and would grade highly. Other concerns around AI use for marking included the large energy consumption by AI, tension with not allowing students to use AI, and the importance of marking for teaching and learning.

Marking is an important part of the pedagogical process, and helps teachers give students clear and precise feedback on their work. This will also create a crisis in behaviour management in the classroom, as teachers will be attempting to prevent students using AI in writing their assessments, but the assessments may be marked by AI. I am also concerned that using AI to mark assessments will necessitate less creative standards for assessment. AI is not effective at evaluating original thought. (Educator, Survey, R_4y7Q5GBivruWLKh)

Further, a few submitters also mentioned the value that digital tools could provide teachers. Suggestions here included digital tools that offer secure exam browsers with the ability to conduct real-time assessments and control access to information, as well as tools that allow sharing of resources, tracking grades, streamlining marking and moderation processes, and screening for plagiarism and student AI use (e.g. Assessment Master, Exam.net, Turnitin).

NZQA should be providing a secure digital platform for all schools, rather than leaving it up to individual schools to try and manage authenticity. The wealthy schools can afford the secure platforms like ExamNet and Turnitin, etc, whilst other schools have to just try and make it work with whatever they have access to. Providing a secure digital platform for all schools would take a whole lot of uncertainty and inconsistency away. (Educator, Survey, R_9eLTLdbC325ifhS)

6.2.6 Subject requirements at Year 11



Comments on this topic

There were approximately 2472 comments from educator survey submitters related to subject requirements at Year 11.

General support for required subjects

When asked if educator submitters supported other subjects being required at Year 11, many submitters simply commented “yes” without providing an explanation or indication of which subjects they would support being required alongside English and Mathematics or Te Reo Rangatira and Pāngarau.

Some submitters provided additional comments in support of making English and Mathematics or Te Reo Rangatira and Pāngarau compulsory subjects in Year 11. These submitters considered literacy and numeracy to be foundational skills that are necessary for all educational and post-schooling pathways. Some submitters noted that the Proposal mirrors what currently happens as many schools already choose to require English and Mathematics as subjects in Year 11. However, some of these submitters did not agree with making other subjects compulsory and instead considered that students should have the flexibility to choose their remaining subjects. These submitters considered it important to have a balance of required foundational subjects and the ability to choose other subjects according to each students’ specific needs, interests, and abilities.

Requiring core subjects at Year 11, such as English and Mathematics, or Te Reo Rangatira and Pāngarau, is a sound idea. These subjects provide essential foundational skills that support success across the curriculum and in life beyond school. However, the success of this approach will depend on ensuring sufficient flexibility for students to pursue their individual interests alongside these core areas. (Educator, Survey, R_9FwUI1PJVGJcDbz)

A few submitters supported other required subjects at Year 11 as a way of ensuring students receive a broad and well-rounded foundational curriculum in Year 11. However, submitters also noted the need to strike a balance between required subjects and flexibility to choose subjects based on students' needs, abilities, and interests.

Yes. Requiring additional subjects at Year 11 could strengthen the breadth of learning and better prepare students for senior secondary study. Subjects such as science, social sciences, or digital technologies could provide foundational knowledge and skills that support both academic and vocational pathways. Exposure to a broader range of disciplines can also help students make more informed decisions about future study or career options. (Educator, Survey, R_9gdW0fDFISMwalk)

Suggested additional required subjects

Many submitters provided suggestions on other subjects that they would like to see required alongside English and Mathematics or Te Reo Rangatira and Pāngarau.

Science

Of these submitters, many submitters suggested that Science should be a required subject in Year 11. These submitters considered it increasingly important for students to have an understanding of the world around them, and that requiring a form of Science in Year 11 would support this. Submitters were particularly interested in increasing general scientific understanding to combat the rise of mis- and dis-information in society.

Science is important. Students need to see the importance of Science and gain understanding on how to be discerning and differentiate facts from misinformation, especially in the age of technology tsunami where vulnerable teens are bombarded by an avalanche of information. (Educator, Survey, R_9J9IzgLe2L7UK7m)

Humanities and Social Sciences

Some submitters suggested Humanities subjects, particularly a language or art subject, be required in Year 11. The range of Humanities subjects that submitters suggested included:

- a language other than English, including Te Reo Māori. However, views were mixed regarding whether Te Reo Māori should be compulsory.
- an art or creative subject, including Drama
- Cultural Studies, including Māori Studies
- Media Studies
- Religious Studies or Philosophy.

Yes, learning languages. It is proven that learning a second language (Te Reo, Pasifika or international) can lift levels of achievement in many other subject areas as

well as improve literacy and inter-personal skills. (Educator, Survey, R_4NEYCgTysj4geJ4)

A few submitters suggested that a Social Science subject, such as History, Geography or Civics, should be required in Year 11. These submitters considered such subjects to support literacy and analytical skills.

An understanding of the greater world and how it works is important. Knowing how to think critically and disseminate information is important, students learn some of this in subjects such as social studies. (Educator, Survey, R_4NScqfta2BvTYiJ)

Health and Physical Education

A few submitters suggested that a physical education and health subject, including Nutrition and Sexual Education, should be required in Year 11 to support the health and wellbeing of students and now and into adulthood.

Health/PE - For the benefit of our health system, we need to promote regular physical activity and teach healthy lifestyles/ choice. Food and nutrition can come into this. Health is paramount for teaching life skills (that in an ideal world parents would teach) all students need. Healthy people (physically, mentally, emotionally) are essential for our economy, work force and future NZ. (Educator, Survey, R_LIMMFwNSxXhiEV)

Multiple subjects

Many submitters suggested that a range or combination of other subjects should be required at Year 11. Most commonly, these submitters suggested a combination of Science and Social Science subjects be required. Other common combinations suggested included requiring a Science and a Health or life skills subject, and Science and an Arts subject to ensure students are well-rounded.

I would support a science and a choice of one Arts subject being included. Science provides essential knowledge and skills for understanding the world. The Arts, meanwhile, are vital for creativity, cultural expression, and wellbeing. Requiring both would ensure a balanced foundation for students while still leaving space for choice and personal pathways in other subject areas. (Educator, Survey, R_4i60QlgEU51rlu5)

Other submitters who suggest a combination of subjects said that students should be required to choose at least one of a small range of subjects that work towards similar overarching skillsets, such as requiring one subject out of a small range of:

- Humanities or creative subjects
- Health and life skills subjects
- Science or Social Sciences

I think 1 subject per 'bucket' e.g. a humanities subject, a scientific subject, an artistic subject, a health subject etc. (Educator, Survey, R_4Ftb3enChZFxGOq)

A few submitters suggested that a form of life skills subject, encompassing financial literacy, critical thinking, and practical skills like “Home Economics”, should be required in Year 11 to prepare students with key skills required for participating in society beyond school.

Financial literacy and practical life skills. Understanding money management, budgeting, and everyday problem-solving prepares students for real-life responsibilities alongside academic progression. (Educator, Survey, R_49wTsNDCuZ55MfD)

Concern about requiring subjects

Overall, many submitters expressed opposition or concern with the Proposal to introduce compulsory subjects in Year 11. Many of these submitters simply commented “no” without providing further explanation.

Some submitters did not support any subjects being made compulsory in Year 11 as doing so would restrict flexibility, narrowing student choice too early in their studies. Submitters noted that forcing students to take subjects that do not align with their strengths or aspirations can disengage and demotivate students from their learning.

Forcing students into subjects they do not connect with may lead to disengagement, especially for those who already struggle with traditional academic content. Year 11 should be a time for exploration and confidence-building, not constraint. (Educator, Survey, R_4ljD5YJ9GyWsAHn)

Some submitters raised concern that making English and Mathematics compulsory could devalue other subjects that are less traditionally academic, such as Art, Dance, Music, and Social Sciences. Submitters were concerned that such subjects would be considered less important and that students would be discouraged from pursuing them. A few of these submitters emphasised that all subjects have their place and should be viewed as equally important.

All subjects need to be treated equally. If it is a part of the curriculum, it is an important part of our students’ education process and the career pathways available. (Educator, Email, EME-2412)

Some submitters disagreed with the Proposal to require English and Mathematics in Year 11 as core literacy and numeracy skills can be achieved through cross-curricular links instead of rigid subject requirements. Submitters highlighted a range of other subject areas that can support students to develop proficient literacy and numeracy skills, such as Social Sciences, Science, and Economics.

While literacy and numeracy are essential skills, they are not only taught through English and Mathematics, every subject should help students develop these skills. [...] Instead of identifying “core” subjects, all subjects should contribute to literacy, numeracy, and broader skills, allowing students to choose learning pathways that best suit their interests, strengths, and future goals. (Educator, Survey, R_9GksCYS6auW69Cr)

In addition, a few submitters raised concern with the Proposal’s lack of differentiation between English and literacy, and Mathematics and numeracy. These submitters considered this difference to be important, and that skills in literacy and numeracy are more important than taking English and Mathematics subjects.

English is not the same as literacy and Mathematics is not the same as numeracy; all subjects should take responsibility for teaching literacy and numeracy. (Educator, Survey, R_4y7Q5GBivruWLKh)

A few submitters disagreed with introducing compulsory subjects in Year 11 as they deemed it important for students to have autonomy over their learning, which includes the ability to choose subjects that best meet their needs and interests. Submitters considered that providing students with autonomy and choice supports increased engagement with their learning.

I think you need to allow students to have a holistic approach to their learning, and in order to do this, some student voice and autonomy needs to be included so they are creating an educational pathway that is suitable for their interests, academic goals and individual needs. There also needs to be a wide range of subjects (not just academic) in order for this to be successful. (Educator, Survey, R_4pXw5t2EEP3YM5s)

A few submitters said that they could not provide full comment on what subjects should be required in Year 11 as both the curriculum and approved subject list had not been released at the time of submission.

A critical issue is that we currently lack clarity around two key elements: what the curriculum will look like, and what will be assessed. Without this information, it is difficult to evaluate the proposal or understand how it will meet the needs of diverse learners. (Educator, Survey, R_9FwUI1PJVGJcDbz)

6.2.7 Operational considerations of shifting to a subject-based approach



Comments on this topic

There were approximately 2509 comments from educator survey submitters related to operational considerations of shifting to a subject-based approach.

Most submitters pointed to resources for teachers, students, and classrooms that would make the approach workable and consistent. Time to implement change was identified as the foundation enabling all other supports. Overall, educators focused on what would help them maintain quality teaching and set students up for success.

For the subject-based approach to succeed, the Ministry must provide a comprehensive set of resources and supports that are accessible, relevant, and responsive to the needs of teachers, students, and schools. By focusing on curriculum clarity, professional development, digital tools, student support, and effective feedback mechanisms, the Ministry can ensure a smooth transition and greater consistency across the education system. (Educator, Survey, R_9ktp0mbd2GatXxL)

Sufficient preparation time is needed for successful implementation of a subject-based approach

Most submitters stated that sufficient time would be essential for successful design, transition, and consolidation to a subject-based approach. This included a clear lead-in period to develop programmes, assessments, and relevant further training. They also suggested that this

additional time will enable clear communication, understanding, and engagement with students, whānau, and collaboration with broader education partners, such as Ministry of Education and NZQA. Some submitters highlighted that current workloads left little capacity to absorb change without extra time, especially during any dual-curriculum period.

Schools will need significant time and staffing to redesign curriculum programmes, plan coherent learning pathways, and align assessments under the new model. Teachers will require extensive, subject-specific professional learning and development... There also needs to be time built into timetables for collaboration, moderation, and cross-curricular planning, otherwise the system will become fragmented and unmanageable. (Educator, Email, EME-2012)

Specific professional learning and development will be essential for teachers shifting to a new approach

Many submitters sought professional learning and development (PLD) distinct from regular provision to support new ways of teaching and assessing. This included subject-specific PLD to build depth and address gaps caused by cross-subject teaching and shortages. Some submitters noted that the changes to the assessment approach would also require PLD on assessment expectations, moderation, and the new system.

A few submitters emphasised PLD on culturally responsive practice, including integrating Māori and Pacific perspectives into the subject-based approach to meet the needs of their students and communities.

Teachers will need extensive professional development to become experts in these new subjects and their corresponding assessments. This can't be a one-off workshop; it must be an ongoing, funded program that gives teachers the time and training to feel confident in the new system. (Educator, Survey, R_9QSTn8htl9dEahN)

Teaching resources and other learning support staff

In addition to PLD, most educator submitters asked for high-quality, curriculum-aligned resources for both preparation and ongoing delivery of a subject-based approach. Specific suggestions from submitters included textbooks/workbooks with activities, exercises, and practice tests that map to the curriculum and clarify progression. These would need to be supported with teaching guides, exemplars, sample lesson plans, digital materials and nationally consistent assessments and marking schedules to support subject-based teaching.

There has been a strong shift away from textbooks in recent years in New Zealand. A consequence of this is that teaching, like assessment, has become piecemeal. A return to well-written, coherent textbooks that support a progression through each subject would be great.... other countries are moving in this direction after recognising the negative impact of too much digital technology and the impact of disjointed curriculum resources. (Educator, Survey, R_4y7Q5GBivruWLKh)

Additional subject specialist and support staff will be important during transition

Many educator submitters called for more support staff to sustain learning and wellbeing during transition to a subject-based approach and beyond. Examples included bilingual aides, English for Speakers of Other Languages (ESOL) support, Inclusive Learning Assistants (ILAs), Learning Support Coordinators (LSCs), Resource Teachers: Learning and Behaviour

(RTLBs), Special Education Needs Coordinators (SENCos), and specialist roles (e.g., educational psychologists).

More ILA / teacher aides in school to support students who are going to struggle with a subject approach. With the increased pressure of a subject-based model, schools must have strong academic and pastoral care systems in place. (Educator, Survey, R_9c0ffOtepWKj0gs)

Additionally, many educator submitters highlighted the need for subject expertise to lift consistency and confidence, and fill teacher content knowledge gaps. They proposed that subject specialists or advisors would be needed to strengthen teachers' understanding of a topic, especially for hard-to-staff and vocational subjects. They provided examples of investing to retain, recruit specialist teachers, upskill current teachers, or have advisors to provide on-demand specialist advice.

Many schools — especially in lower-decile communities — are already struggling to staff core curriculum areas. A subject-based approach that requires full subject delivery will be impossible without a national plan to recruit, train, and retain subject specialists, particularly in the arts, languages, and technology areas. (Educator, Survey, R_9iDnQmp2MnXhD8C)

Digital and technology support would be helpful to support transition

Some submitters requested clear expectations for AI use and practical technology supports. While submitters had mixed views on the extent of AI adoption, a few suggested that guidance and training for teachers and students on AI policies, including the level of acceptable AI use would be beneficial. Where appropriate, they sought access to relevant AI-detection tools.

Practical technology support for the shift to a subject-based approach included:

1. improved informative and easy-to-navigate digital platforms that demarcate achievement records, future pathways, aid the transition, and provide subject-specific assistance for teachers and students
2. adapt and enhance remote-learning options
3. PLD webinars for teachers
4. User-friendly Ministry website with online help desk for transition queries.

As the world moves on with AI incorporated learning, funding around resources for teachers and learners with AI tools. (Educator, Survey, R_9QR7EN5T0gWEhZE)

Students will need adequate, consistent supports to navigate the shift in approach

Many educator submitters emphasised nationally consistent, accessible resources for students to successfully navigate the change and best prepare for their future. Examples of these supports included:

5. subject-specific and general study guides, including relevant practice assessments
6. clear tools to support subject selection, pathways, prerequisites, and links to tertiary and careers.
7. digital tools and adapted resources for learners with additional needs
8. extra study supports (e.g., tutoring, catch-ups) and strengthened pastoral care

9. clear tools to support subject selection, pathways, prerequisites, and links to tertiary and careers
10. accessible and easy to understand communication for whānau to understand the education system and how subject choices connect with future pathways

To make a subject approach work, give students clear maps of the year, simple rubrics, examples of good work, and practice papers. Use a tracker that shows progress toward the 100 marks. Keep tasks both paper and digital, and run catch-up and quiet study times. (Educator, Survey, R_4DPi5X6xEktdVyU)

A finalised, detailed curriculum will be essential to understand teaching and assessment in the new approach

Many submitters wanted the new curriculum finalised early, and to be prescriptive, clear, and aligned with subject-based resources and assessment. They saw this as an opportunity to replace what they described as a vague and inconsistent experience under current settings.

Schools need detailed curriculum frameworks that clearly outline what 'whole subject' learning looks like, including learning progressions, essential knowledge, and skill development pathways. Provide extensive exemplars of student work at different achievement levels across the full grade range (A-E) so teachers understand what comprehensive subject mastery looks like at each level. (Educator, Survey, R_4z6ZL5VsQ0NpGBR)

Partnerships with industry, tertiary, community, and subject associations needed to support implementation of a subject-based approach

Many educator submitters supported stronger partnerships to ensure content accuracy, relevance, and currency. They pointed to industry (for vocational pathways), tertiary (for academic pathways), and community groups. There was strong support for working with subject associations across curriculum, assessment, PLD, and implementation guidance.

Collaboration with industry and tertiary providers can provide practical learning experiences, placements, and exposure to current workplace practices, especially for vocational subjects. (Educator, Survey, R_9SqxiaTDbimEalw)

It's really important that the government uses the secondary subject associations to communicate teaching and learning changes and resourcing if shifting to a subject-based approach for senior secondary. [...] Subject-based associations have sector standing, and this provides an opportunity for the government and therefore Ministry of Education to effectively communicate changes. [...] If you could do one thing right, it would be to fund the subject associations to deliver the changes. (Educator, Survey, R_9znziz7zTOZVlg4)

Administrative flexibility

A few educator submitters noted that timetabling, resourcing, and staffing in a subject-based approach would require flexibility. They supported retaining NCEA-style flexibility to meet diverse learner needs and enable smaller or less-resourced schools to adapt. They explained that this type of flexibility benefits the learner as it enables mixed-level classes and integrated learning.

Timetabling and staffing flexibility: Whole-subject delivery and robust assessment may require longer learning blocks, smaller classes, or different staffing structures. (Educator, survey, R_4mJG3hC7NfayQhP)

6.3 Industry



Submitter summary

Many industry submitters expressed support for the subject-based approach to learning at Years 12 and 13. These submitters saw a subject-based approach as providing coherent and deeper learning, and a clearer signal to employers on a student's capability. Some industry submitters were neutral, undecided, or raised other concerns. Namely, submitters concerned by a subject-based approach spoke of a loss of flexibility to tailor learning, impacts to interdisciplinary learning, and an over-reliance on external exams as problematic.

6.3.1 Benefits of a subject-based approach



Comments on this topic

There were approximately 70 comments from industry survey submitters related to benefits of a subject-based approach.

Clearer qualification structure

Some industry submitters suggested replacing the credit-based system with a subject-based approach would provide clearer signals about student capability. Some submissions emphasised that standardised qualifications would improve comparability across students and schools.

[T]he proposed changes will deliver a better enable employers and those selecting students for further education to select appropriate candidates. (Industry, Survey, R_4M2Y61joGMD3CBH)

A subject-based approach will support coherent and deeper learning

Some industry submitters expressed support for a subject-based approach as they considered that this approach would support more coherent and deeper learning. Submitters noted that this approach would ensure comprehensive coverage of topics and provides students with a stronger foundation of knowledge.

Reduces fragmented learning from chasing individual standards. (Industry, Survey, R_90oSR2OFw9nUGwu)

Some submitters emphasised that engaging with full curriculum subjects prevents gaps in understanding.

Students will learn a lot about a subject and be proficient in it rather than a hodge-podge [sic] of knowledge about bits and pieces of subjects. (Industry, Survey, R_9IzSvpcljnZREGW)

A subject-based approach provides clearer signalling for employers

Some industry submitters supported a shift to a subject-based approach as they considered this shift would provide clearer signals to employers about student capability. Submitters noted that standardised subject qualifications would improve comparability across students and schools, making it easier for employers to understand student achievement.

[T]he proposed changes will deliver a better standard of education preparing students for work in our industry. It will better enable employers and those selecting students for further education to select appropriate candidates. It will give employers more confidence in employing a candidate, as the educational record will be relevant. (Industry, Survey, R_4M2Y61joGMD3CBH)

6.3.2 Concerns about a subject-based approach



Comments on this topic

There were approximately 33 comments from industry survey submitters related to concerns about a subject-based approach.

A subject-based approach may result in a loss of flexibility

The most frequently mentioned concern raised by industry submitters related to reduced flexibility in course design. These submitters noted that the current system allows students to tailor learning to their interests and strengths, which is particularly valuable for those pursuing vocational pathways. They noted that while structure is important, some flexibility should be retained to allow students to specialise in areas of strength or interest. These submitters noted that completely rigid subject requirements could disadvantage students with specific learning needs or those pursuing non-traditional pathways.

If a student is really clear about what job area they want to be trained in, a subject approach is fine. Many students want to experience a wider range of subjects before they decide on one particular area. (Industry, Email, EMI-1076)

A few observed that pathways are not always direct into work or training and that learning should reflect this.

This approach may have an impact on important interdisciplinary learning

Many industry submitters expressed concern that interdisciplinary learning would be lost if standards can no longer be combined across subjects. Submitters noted that many modern workplace skills require integration across disciplines. Even for submitters who supported the approach, the call for interdisciplinary learning remained.

We support a subject-based approach to allow depth of learning but subjects should be designed to reflect interdisciplinary skills, such as problem-solving, collaboration, critical thinking, and digital fluency, that are essential in both vocational and general pathways. (Industry, Email, EMI-1004)

Some submitters highlighted that cross-curricular projects and integrated learning experiences are valuable for developing transferable skills and innovation capabilities.

The “siloed subject” approach risks winding back the clock young people need to see how knowledge and skills blend across disciplines, as they do in life and work. (Industry, Email, EMI-1022)

An over-reliance on external exams can disadvantage some students

Some industry submitters raised concerns about an over-reliance on external examinations disadvantaging certain students. Submitters noted that not all students perform well under exam conditions, regardless of their actual knowledge or skills. Some submitters emphasised that practical and portfolio-based assessments are essential in creative and vocational subjects where external exams may not effectively measure competency.

Portfolio and performance-based assessments must be retained, especially in creative fields and applied vocational training. (Industry, Email, EMI-2490)

There were mixed views on how a subject-based approach presents as a return to previous qualification systems

A few submitters commented on similarities between the proposed changes and previous qualification systems such as School Certificate and Bursary. Views were mixed. Some expressed concern that the Proposals represented a return to the previous system that was replaced due to known limitation, including barriers for diverse learners and an over-reliance on high-stakes exams.

The proposal risks a hasty return to a past and out-dated education model that was known for creating significant barriers for learners with diverse needs. (Industry, Email, EMI-1019)

Conversely, other submitters viewed this positively, including welcoming a return to clearer grading.

The old bursary / scholarship worked well and was easy to understand. (Industry, Survey, R_9qaz6NIZ2vXzm82)

6.3.3 Engaging with whole vs segments of a subject



Comments on this topic

There were approximately 95 comments from industry survey submitters related to engaging with whole subjects or segments of a subject.²³

Support for taking a whole-subject-based approach

Some industry submitters supported students engaging with whole subjects as they considered this approach to provide deeper, more coherent learning that would reduce

²³ The two questions posed to industry submitters were: “In terms of post-school work or training, what do you think are the benefits of being able to engage with parts of curriculum subjects (segments)?” and “In terms of post-school work or training, why do you think it is important to engage with full curriculum subjects?”

potential gaps in their knowledge. These submitters raised concern with the ability for students to choose to only engage with some parts of a subject, particularly when these parts are chosen based on difficulty level.

Shifts the focus from achieving "enough credits" to having a well-rounded understanding of a subject, potentially with fewer weak areas. (Industry, Survey, R_4soT1n7Ju7htV6f)

Other submitters noted that this approach would help employers to get a more accurate gauge of the extent of a student's knowledge in specific subject areas.

[We believe] that students should engage with the full curriculum for VET subjects in order to provide assurance and clarity for future employers. If students were only to engage with part of a subject, there would be possible gaps in their learning and confusion around the extent of their knowledge. This could lead to employers being unwilling to employ school leavers. (Industry, Email, EMI-1005 MITO)

Support for retaining flexibility to engage with parts of the curriculum

A few industry submitters supported retaining some flexibility to engage with parts of the curriculum as they saw flexibility as important to meet their learning needs and career aspirations. These submitters noted that enabling students to engage with parts of a subject can support personalisation and specialisation where students can focus on and develop skills most relevant to their chosen career aspirations. They raised that requiring whole subjects may result in students learning content that is irrelevant to them, potentially impacting engagement in learning. Further, some submitters noted that many students who engage in a vocational pathway already only engage in parts of subjects most relevant to their chosen pathway.

Students can focus on learning the specific skills and knowledge that are most relevant to their chosen career or training pathway, rather than having to complete an entire subject that may include unrelated content. This approach allows students to customise their learning to suit their interests and goals, making education more meaningful and motivating. (Industry, Survey, R_4loQjOCeZcFXPaF)

Additionally, a few industry submitters noted that cross-disciplinary learning and subject design are beneficial and can better prepare students for the realities of the workplace.

Allowing students to engage with segments of the curriculum allows for course design and innovations that can integrate learning from different disciplinary areas. The benefits of curriculum integration and transdisciplinary programmes may be diminished if these options are not available. (Industry, Email, EMI-1066)

6.4 Whānau and students



Submitter summary

Many whānau and student submitters considered that a subject-based approach would provide students with more cohesive knowledge, which could expose them to more potential pathways. They also explained that it could create transparent assessment outcomes, improve consistency across schools, and discourage credit chasing. On the other hand, many whānau and student submitters were also concerned that a subject-based approach would reduce flexibility to tailor learning to a student's strengths, needs, and aspirations which would have adverse outcomes for vulnerable students as well as student wellbeing more generally.

Submitters tended to be confused by the consultation question regarding whole-subject versus segment approach. They tended to have mixed responses around which approach was more important, as well as what combination of subjects should be required at Year 11.

6.4.1 Benefits of a subject-based approach



Comments on this topic

There were approximately 733 comments from whānau and student survey submitters related to benefits of a subject-based approach.

A subject-based approach will provide for deeper, more cohesive learning

Many whānau and student submitters supported the shift to a subject-based approach as they considered this approach provides the potential for deeper knowledge and comprehensive learning. They viewed a subject-based approach as promoting a more thorough understanding rather than superficial knowledge acquisition. Some student submitters noted that the current standards-based system encourages learning specific content for isolated assessments, with some reporting they never studied important concepts simply because these topics were not included in their chosen standards.

In year 11 physics and previous years we didn't learn any mechanics or waves, instead focusing on only electricity. This led to us being very underprepared for this year, with many people struggling in physics. (Student, Survey, R_9cc9Rz0QkCA8qg9)

Many whānau submitters echoed these concerns, observing that the current "pick and mix" approach leaves students with fragmented knowledge rather than solid foundations. These submitters noted that understanding whole subjects better reflects how life works.

Learning the parts and assessing after each topic does not give one the correct understanding and allow one to develop knowledge of how the parts contribute to the subject. Imagine learning and being tested on how to build a house roof, but not understand how the framing holds it up? (Whānau, Survey, R_5S63uxQ8g79EgPx)

Additionally, many whānau and student submitters saw the proposed approach as beneficial in supporting career planning and enabling specialisation. They said that by focusing deeply on specific subjects aligned with their interests and goals, students could develop expertise in areas relevant to their intended post-school pathways. Other whānau submitters said this focused approach would help students discover their strengths while building knowledge and skills in areas that matter for their future aspirations.

A subject-based approach with assessments at Years 12 and 13 allows students to develop deeper knowledge and specialised skills in areas that interest them, which better prepares them for further study or employment pathways. (Whānau, Survey, R_9YQ422K6uJnkrD3)

A subject-based approach will improve transparency around assessment outcomes

Many whānau and student submitters valued the potential clarity and transparency they considered that a subject-based assessment would bring. They considered that the aggregated grading approach, which combines internal and external assessments into a single score out of 100 for each subject, would make results easier to understand for students, whānau, employers, and tertiary institutions.

Universities and training providers often require specific subjects and achievement levels. A subject-based system aligns well with tertiary entrance requirements, making it easier for students and institutions to understand and plan progression. (Whānau, Survey, R_4aPtXpnJBtfmD3P)

Many whānau submitters expressed frustration with the current system's complexity, noting that they struggle to interpret what various credit combinations mean about their child's knowledge.

It's easier to understand what a student is learning and how they're progressing when it's tied to a full subject. As a parent, this model helps me better support my child's learning and subject choices. (Whānau, Survey, R_9dE41oE0YkR69Ey)

Other whānau submitters considered that greater transparency would help them better support their children's learning and make informed decisions about subject choices and future pathways. A few students also felt this approach would provide clearer feedback on their overall achievement in a subject, helping them understand exactly where they stand and set appropriate goals for improvement.

Consistency across schools and regions may improve under this approach

Many whānau submitters supported the potential to improve consistency across schools and better prepare students for tertiary education. Whānau submitters were particularly vocal about concerns that schools currently pick and choose which standards to teach based on factors that maximise pass rates rather than preparing students comprehensively. Many noted that a consistent subject approach would better prepare students for tertiary education, where courses are organised by subject and assume comprehensive foundational knowledge.

School are picking and choosing which parts of the curriculum to cover based on something that isn't clear to me [...] By having a consistent subject approach, there will be better consistency across school as to what is covered in a subject. This makes

it easier when moving schools and creates more certainty for tertiary study as to what has been covered at school. (Whānau, Survey, R_9gH61aIPsNYjB1T)

Some student and whānau submitters observed that the subject-based approach mirrors university structure, making the transition smoother. Others highlighted that a subject-based assessment was closer aligned to international academic approaches than the current approach.

A subject-based approach could prevent unintentional pathway limiting

Many whānau and student submitters expressed support for a subject-based approach as it may help prevent students from unintentionally limiting their future options. Many whānau submitters noted that young people at Year 11 often do not know what career path they want to pursue and may make subject choices that later limit their options.

Requiring a consistent set of subjects, including literacy and numeracy, ensures students maintain a strong foundation while still having room to explore specialised areas. This approach may also reduce confusion around subject selection and help prevent students from unintentionally limiting their post-school options. (Whānau, Survey, R_4huNCUNBS6bDm2I)

Some whānau submitters valued the requirement for students to continue with core subjects like English and Mathematics, as they considered such subjects to contain skills critical to all future pathways. A few noted that dropping these subjects too early can severely restrict post-school opportunities.

Credit chasing and disengagement could be prevented or reduced

Many whānau and student submitters also highlighted a reduction in credit-chasing behaviour and increasing student engagement as important benefits of the proposed approach. A subject-based approach was seen as addressing this issue by making every assessment count toward an overall subject grade. Whānau and student submitters noted this would encourage consistent engagement throughout the school year and help students develop better study habits.

The whole subject approach avoids the cherry picking that can happen where the focus is on gaining enough credits to get the award. That cherry picking also does a disservice to the students as they fail to gain a full appreciation of the merits and values of a subject and that short-changing will haunt them through their careers. (Whānau, Survey, R_4j0uu51bscRR03L)

6.4.2 Concerns about a subject-based approach



Comments on this topic

There were approximately 489 comments from whānau and student survey submitters related to concerns about a subject-based approach.

A subject-based approach would reduce flexibility and student autonomy over their learning

Many whānau and student submitters expressed concern that the proposed shift would reduce flexibility and student choice in their learning. Many student submitters considered that a subject-based approach would limit their ability to tailor their education to their interests, strengths, and career goals. They noted that requiring students to take complete subjects rather than selecting relevant standards would not allow them to specialise in areas important for their futures. Many whānau submitters echoed these concerns, noting that students benefit from having control over their learning pathways and that mandatory subjects may cause disengagement. They said their children remained motivated at school specifically because they could choose subjects they enjoyed, and that removing this flexibility risked pushing students to leave education early.

It could limit students' ability to specialize and explore subjects they are passionate about, potentially reducing the depth of their learning. (Student, Survey, R_4f1UvNVukChvH4D)

A rigid subject-based system may discourage students from developing a broader set of capabilities. Standards-based assessment benefits all students, including those who struggle in certain areas, because they can still gain credits in subjects they do well in. (Whānau, Survey, R_4NDOGyo3LhVztaX)

Some other whānau and student submitters pointed out that subjects like Music or Arts contain diverse components, and requiring mastery of all aspects would exclude students who excel in specific areas but struggle with others. Additionally, they noted that not all pathways require mastery of specific subjects and considered that requiring such subject mastery would be detrimental to students seeking pathways that require breadth of knowledge over depth.

I can understand trying to teach the subject as a whole in year 11, but at year 12 and 13 you can't just make everyone do everything. (Student, Survey, R_9WTKl4fmLtrbOud)

[A] student planning on going on to university and studying engineering may benefit from a mastery of maths. However, a student not planning on any tertiary education would be better suited to have an appropriate understanding of maths, and also a wider range of knowledge in other areas, which they could not achieve if their time is tied up in forced mastery. (Whānau, Survey, R_4VfLOglhLKdXrcF)

The Proposal could have a negative impact on students with diverse learning needs

Many whānau and some student submitters raised concern with the potential impact on neurodivergent and diverse learners. Many whānau submitters considered that the current standards-based system allows students with different learning needs to demonstrate competence in areas where they have strengths, even if they struggle with other parts of a subject. Submitters noted that aggregating all assessments into a single subject grade would penalise students with uneven capabilities.

This severely disadvantages learning-disabled students, including those with Autism and or AuDHD [...] Being able to build credits throughout the year in smaller pockets of learning in less-pressured settings is vital for the short and long term progression

and success of these students, who are often highly-intelligent, but disabled. (Whānau, Survey, R_9qcoWLHLXuyUDtf)

A few whānau submitters referenced obligations under the New Zealand Disability Strategy and the UN Convention on the Rights of Persons with Disabilities, claiming that the proposed system would create barriers rather than providing equitable access. Some student submitters also expressed concern that exam-focused assessment disadvantages those who perform poorly under pressure. A few whānau submitters were concerned the system would be designed primarily for neurotypical, university-bound students at the expense of all others.

This is a big step backwards and will create a barrier to many students. It's an entirely unnecessary change and not evidence-based. I am particularly concerned about the impact on disabled and neurodivergent students. Neurodivergent students particularly can have a unique mix of strengths and areas of challenge and giving more opportunity to gain achievement in areas of strength is important. (Whānau, Survey, R_4myqVoCxNxUgtvG)

A subject-based approach does not cater to Māori-medium students, which could decrease their achievement rates

Similar to educators, a few whānau and student submitters were concerned about the potential impacts on Māori and Pacific students. They raised that the proposed subject-based approach would decrease Māori and Pacific student achievement rates and increase Māori and Pacific student early leaving rates. A few whānau, also stressed that the rigidity of a subject-based approach would prevent holistic and cross-disciplinary teaching and learning styles of kaupapa Māori, mātauranga Māori, and iwi-led pathways.

This approach could reduce flexibility for Kura Kaupapa Māori to design assessments that reflect local kaupapa, if subjects and grading are heavily standardised. High-quality reo Māori resources, assessment tasks, and moderation processes would need to be developed in partnership with Māori-medium educators to ensure fairness. The focus on a small number of set subjects could limit opportunities for kaupapa Māori projects, wānanga, and cross-curricular work. Consistent national marking could risk losing cultural responsiveness if assessors do not have a deep understanding of reo, tikanga, and mātauranga Māori, potentially disadvantaging Māori-medium students in achieving accurate and culturally aligned results. (Whānau, Survey, R_9HfKf2Ok252oZCF)

The proposed approach may increase stress and reduce student wellbeing

Many whānau and student submitters identified increased stress from high-stakes assessment as a significant concern of the Proposal. A few students expressed concern about having their entire year's work judged by aggregated scores, noting that one poor performance could drag down their overall achievement in a subject despite competence in other areas. They noted that New Zealand already has high rates of youth mental health issues and suicide, arguing that increased pressure through subject-based grading would worsen these problems.

I am concerned about pushing students to prepare for tertiary education when some students aren't actually planning on doing it. This could lead to unnecessary stress and a decline in student's mental health. (Student, Survey, R_9QlfWGMcfnay9AO)

Some student submitters described how the current system allows them to recover from setbacks and continue earning credits, whereas the proposed approach would make failure in one component potentially catastrophic for their overall qualification. Whānau submitters shared these concerns, with many noting that their children already struggle with stress and that concentrating assessment into fewer, higher-stakes events would be detrimental.

With a subject approach, there will be anxiety amongst students about what certain parts are weighted at, and this could result in students spending a lot of time studying and practicing aspects they may never understand, than doing their best in the things they do understand or are challenged by. (Whānau, Survey, R_92nflrAAb4mGbZ)

A subject-based approach may have an impact on pathway flexibility

Some whānau and student submitters questioned how compatible the proposed approach would be with vocational and non-university pathways. Some student submitters noted that only a minority pursue tertiary education and that forcing university-focused subjects on students planning to enter trades or direct employment makes little sense. Submitters emphasised that students interested in vocational pathways should be able to focus on relevant learning rather than completing academic subjects they will not need. Some whānau submitters expressed similar views, noting that the emphasis on university entrance and traditional academic subjects marginalises students with other aspirations and skills.

This is obviously beneficial to those students who wish to go on to tertiary study. However, this approach does not at all suit those who are not interested in tertiary study. Those who are intending on going on to tertiary study will always ensure they are taking the subjects that will enable this path. Those who are on a path to trades or non-tertiary-based paths should have subjects available that are suited to their areas of interest. (Whānau, Survey, R_4f2hRwyv23D8mbz)

A few whānau submitters members considered that the focus appeared to be primarily on employer and university needs rather than on what best supports student learning and development.

6.4.3 Engaging with whole vs segments of a subject



Submitters were confused by the consultation questions

As with educator responses to these questions, the majority of whānau and student submitters responded to the question about 'whole or part curriculum engagement' as being about multiple subjects. Most whānau and student submitters that answered these questions understood the 'whole of the curriculum' to be subjects across all learning areas.

Unless you are intending to extend the school day by hours their [sic] is no way that students can do the whole curriculum. That is the whole point of secondary school - to focus on interest areas/required subjects. (Whānau, Survey, R_9doiCIVTEIFoeQs)

What you have here is a contradiction!! If students are obliged to take only specific subjects within a Learning Area then they cannot possibly cover the full curriculum. (Whānau, Survey, R_9JTVXyBtMmLWdqN)



Comments on this topic

There were approximately 1016 comments from whānau and student survey submitters related to engaging with whole or segments of subject.

Support for taking a subject-based approach

Some whānau and student submitters supported a whole subject approach noting that it would support deep subject learning in each subject, reduce the risk of gaps in knowledge, and give employers confidence in the awards as they would know what is covered by each subject.

Learning the full subject helps students understand things properly, not just bits and pieces. It shows how ideas connect and gives them skills they can actually use in work, study or everyday life. It also makes it easier for teachers to see what students know and where they need help. (Whānau, Survey, R_9aqOafJDlxVltZf)

A few whānau and student submitters specifically considered that engagement with the full curriculum for subjects would make qualifications more credible and support students to identify clear pathways to further study or employment. They thought that this was important for both general and vocational subjects. A few whānau submitters identified that core foundational subjects will broaden and develop students' skillsets, which will be helpful regardless of their future career path. They provided the examples of Science, English, Mathematics, and History.

For example, Outdoor Education only delivers its real benefits when students experience the full programme. Its value lies in the combination of theory, practical learning, and teamwork, which together build resilience, confidence, and transferable life skills. Keeping the full curriculum intact protects these outcomes. (Whānau, Survey, R_9kLhLWjjgFWHsFg)

A few whānau and student submitters also raised the importance of consistency across schools as a benefit of taking a subject-based approach.

It ensures consistency between schools and students. If a student achieves a qualification, they will have covered the same curriculum as a student from another school. It also ensures that students engage with all learning opportunities within a subject; this allows them to build a broader skillset. (Student, Survey, R_4IK3egtclcRAEq5)

Support for retaining flexibility to engage with parts of the curriculum

Some whānau and student submitters that supported being able to engage with parts of subjects spoke to the benefits of allowing schools to be flexible and cater for individual students. These submitters said that flexibility to engage with parts of a subject would be particularly beneficial for students with diverse learning needs as it would enable these students to choose study based on their strengths and learning needs.

Not every learner fits neatly into one pathway, and being able to mix and match segments allows them to build on their strengths while still developing areas they may find challenging. (Whānau, Survey, R_9Vyn7uEamXA6CjL)

A few whānau and student submitters that supported this approach also suggested that engaging with parts of subjects allows for development of broader, diverse skills that can better prepare students for life beyond secondary education.

Segmented curriculum engagement also enables practical, skill-based learning that can be applied directly in work or community settings, particularly in vocational pathways. It allows students to build confidence incrementally and tailor their education to their post-school aspirations. (Whānau, Survey, R_4g2l6kfbmv8Bbot)

Some whānau and student submitters commented that there are benefits to both approaches and that schools should be able to retain some flexibility to meet the needs of their students.

It is important to have cohesive rather than disjointed learning. However, some schools have created very successful, cohesive and relevant subjects that reflect the curriculum but are not represented as a “subject” in the curriculum and utilise a mix of credits. Schools need flexibility to teach to their students and context. (Whānau, Survey, R_4DZfaJA4Khm2iUv)

6.4.4 Subject requirements at Year 11



Comments on this topic

There were approximately 1355 comments from whānau and student survey submitters related to engaging with subject requirements at Year 11.

General support for required subjects

When asked if whānau or student submitters supported other subjects being required at Year 11, some submitters simply commented “yes” without providing an explanation or indication of which subjects they would support being required.

Some whānau and student submitters commented in support of making English and Mathematics or Te Reo Rangatira and Pāngarau compulsory in Year 11 as they considered such skills to be necessary for success in life. Both whānau and student submitters tended to note that English and Mathematics are already a requirement in Year 11 in some schools and so did not see how this Proposal would change current practice.

Yes- though from my understanding as secondary student, english and mathematics is already required in many schools if not the curriculum at Year 11. I don't understand this "plan". (Student, Survey, R_495tti4LdFrQMoj)

Similar to educator submitters, some whānau and student submitters supported the proposed two compulsory subjects but emphasised that students should have the flexibility to choose remaining subjects to retain some autonomy over their learning.

Allowing students to focus on English/Te Reo Rangatira and Mathematics/Pāngarau, while choosing other subjects based on their interests, gives them flexibility, supports engagement, and allows them to specialise in areas that align with their strengths and future pathways. (Whānau, Survey, R_40xkWud91FqYvXT)

Besides English and Maths (or Te Reo and Pāngarau), I think students should have freedom to choose subjects that interest them. Requiring more subjects might limit that flexibility and make school less enjoyable. (Student, Survey, R_9QrIK8lo1IRVP8T)

Suggested additional required subjects

Many whānau and student submitters provided suggestions on other subjects that they would like to see required alongside English and Mathematics or Te Reo Rangatira and Pāngarau.

Science

Of these submitters, many whānau and student submitters suggested that a form of Science should be a required subject in Year 11. These submitters both considered general Science to be important for opening up further study options, and in ensuring that students have an understanding of the world around them.

Foundational Science should also be included to ensure students have essential science knowledge and skills, supporting success in both further study and everyday life. (Student, Survey, R_9mW8sYZgVnqyK9b)

Having a science subject as a requirement ensures that all students build essential scientific literacy, critical thinking skills, and an understanding of how the world works, which are valuable no matter what pathway they choose later. (Whānau, Survey, R_9YQ422K6uJnkrD3)

Humanities and Social Sciences

Some whānau and student submitters were supportive of a form of Social Science, particularly History, Geography, and Civics, as compulsory in Year 11.

I feel that social sciences like history and geography should be part of the requirements. [...] They need to understand how we got to this point in humanity and how to deal with real life problems like climate change, political instability and inequality in the past and how it impacts and affects modern society (Student, Survey, R_4sgHEMkLNPOs3Pc)

Some sort of general social studies type subject covering economics, democracy, politics, human rights. (Whānau, Survey, R_4iA7E8N7MiJvahP)

A few whānau and student submitters suggested that a second language should be required in Year 11. In particular, these student submitters were interested in Te Reo Māori being compulsory. Whereas whānau submitters were more likely to object to Te Reo Māori being compulsory.

Requiring another language, whether a heritage language, a foreign language, or Te Reo Māori for those not already studying Te Reo Rangatira, helps students develop communication skills, cultural awareness, and global competence. Together, these requirements would help strengthen the overall standard of our curriculum and better prepare students for a rapidly changing world. (Whānau, Survey, R_9YQ422K6uJnkrD3)

Multiple subjects

Some whānau and student submitters suggested that a range or combination of other subjects should be required in Year 11. Most commonly, student submitters suggested a combination of Science and Social Science be required. Whānau submitters tended to suggest a broad combination of subjects should be required in Year 11.

Science and possibly some sort of social science as they are core subjects to know. (Student, Survey, R_9hqmhcaS94IHiiR)

All core subjects should be compulsory at year 11 - English, maths, science, social studies, PE/health, a language. (Whānau, Student, R_4fwVnJk7tQOTZ7f)

Other subjects raised by whānau and student submitters as suggestions for required subjects in Year 11 included Health or Physical Education-based subjects, or practical and life skills, such as cooking and financial literacy.

Concern about requiring subjects

Overall, some whānau and student submitters expressed opposition or concern with the Proposal to introduce compulsory subjects in Year 11. A few of these submitters simply commented “no” without providing further explanation of why they opposed this Proposal.

Some whānau and student submitters did not support any subjects being made compulsory in Year 11 as they considered that students, with input from their whānau, should have the flexibility to choose subjects based on their interests and career aspirations. They noted that forcing students to take subjects that do not align with their strengths or aspirations can disengage and demotivate students from their learning.

Forcing students to learn things that they do not need to is the root of why kids drop out. They need choice and to be treated as the young adults they are. (Whānau, Survey, R_4Do5GKZ1E9nTm0q)

No, I don't support some subjects being mandatory in Year 11. Students learn best when they have choice and can focus on subjects that interest them or match their future goals. Making certain subjects compulsory could limit flexibility and might make learning less engaging for some students. It's better to allow more freedom so students can build their own learning pathways. (Student, Survey, R_9lFrlpr1OPzFCcr)

A few whānau submitters raised concern with the Government dictating which subjects students should study.

It is not the Ministry of Education (Govt) role to decide for the students or families. If each student is valued as per the curriculum outline then they should be able to decide what is best for themselves/with family or caregiver guidance. (Whānau, Survey, R_4OE5hck22wPHRXr)

A few whānau submitters highlighted that compulsory subjects, like Mathematics, could disadvantage students with different learning needs, like neurodiverse students.

I think students should have choice. Making subjects compulsory ignores the fact that some students will always struggle with them. For example, not all students with dyscalculia should not be forced to do mathematics, not all students with dyslexia

should be forced to do English. The standardised approach completely ignores the fact neurodiversity and disability exist. (Whānau, Survey, R_4myqVoCxNxUgtvG)

A few whānau submitters raised concern with the lack of differentiation between English and literacy, and Mathematics and numeracy. These submitters considered it inappropriate to require English and Mathematics as compulsory subjects. They noted that literacy and numeracy skills can be developed across a range of subject areas, rather than strictly English and Mathematics.

When you talk about literacy and numeracy this is different to subjects like English and Mathematics. When it comes to literacy and numeracy, what we really want for learners, is for them to be able to understand a text and a question, and be able to respond to that. With numeracy, it is the ability to apply mathematical knowledge and skills to real-world situations and make well-founded judgements in daily life, work, and society. Whereas mathematics focusses on more complex concepts. [...] Going with the stock standard "English and Mathematics", is not the way to go. (Whānau, Survey, R_4exRWFvaH4YjfEt)

7 Proposal 4: Strengthening achievement requirements

Discussion Document Overview

Proposal 4 introduces changes to grading and how students achieve qualifications. This includes replacing terms like 'Excellence' and 'Achieved' with more straightforward subject marking and requiring students to achieve a passing grade in at least four subjects, as well as achieve the Foundational Award, to achieve the qualifications.

Key questions posed during consultation included:

- *Do you find the proposed achievement requirements for the new qualifications easier to understand than NCEA? This includes that students must achieve a passing grade in at least four subjects and achieve the Foundational Award.*
- *Do you think four subjects is a reasonable requirement to gain a secondary qualification?*
- *Aside from additional funding, what other changes, supports, or mitigations do you think are needed to support strengthened achievement requirements?*

7.1 Quantitative survey analysis



Similar to Proposal 2, overall indication of support was not able to be identified for Proposal 4. This was due to the nature of the questions posed to submitters.

7.1.1 Are the achievement requirements easy to understand?

Figure 63: Do you agree that the proposed achievement requirements for the new qualifications are easy to understand?

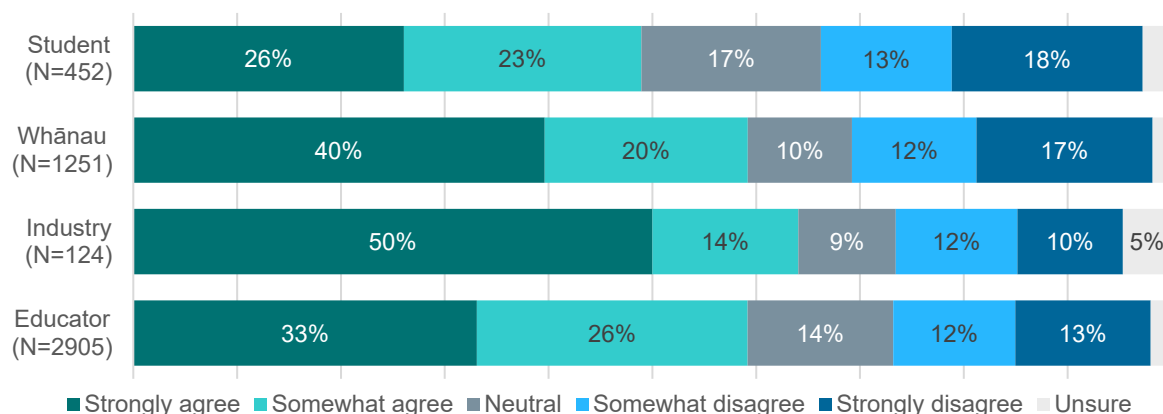
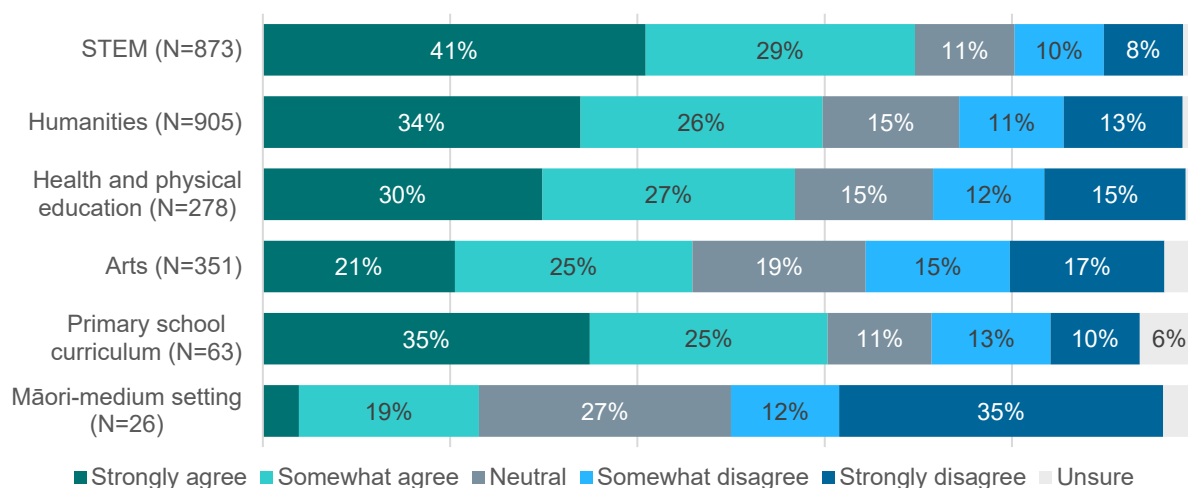


Figure 63 reveals notable differences in how clearly different stakeholder groups perceive the achievement requirements. Industry representatives express greater agreement that the requirements are easy to understand, with 64% combined agreement. Whānau and educators

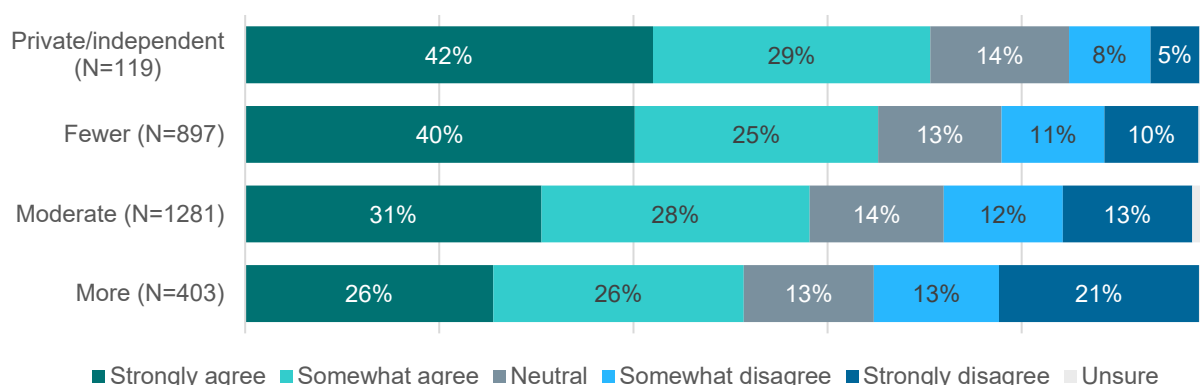
show a similar level of overall agreement at 59-60%. Students stand apart from the other submitter groups, reporting considerably less agreement. About half (49%) of student submitters agree they are easy to understand, with 31% disagreeing. Students also express the most uncertainty, with 20% selecting neutral or unsure.

Figure 64: Do you agree that the proposed achievement requirements for the new qualifications are easy to understand? (by teaching area)



As shown in **Figure 64**, STEM educators find the proposed requirements most understandable at 70%, while Māori-medium setting educators show strong disagreement at 47% (with particularly high strong disagreement at 35%), with only 23% agreement and 27% neutrality. Arts educators are split on this issue, with 46% agreeing and 32% disagreeing. Differences are statistically significant. We expect that most responses were based on the level of support educators had for the achievement requirements overall.

Figure 65: Do you agree that the proposed achievement requirements for the new qualifications are easy to understand? (by school EQI)



As shown in **Figure 65**, educators from private/independent schools and schools with fewer or moderate numbers of students facing socio-economic barriers show strong support (59-71%). While educators from schools with more students facing socio-economic barriers are divided with more support than opposition (52% agreeing versus 34% disagreeing). Differences are statistically significant.

Figure 66: Do you agree that the proposed achievement requirements for the new qualifications are easy to understand? (whānau by ethnicity)

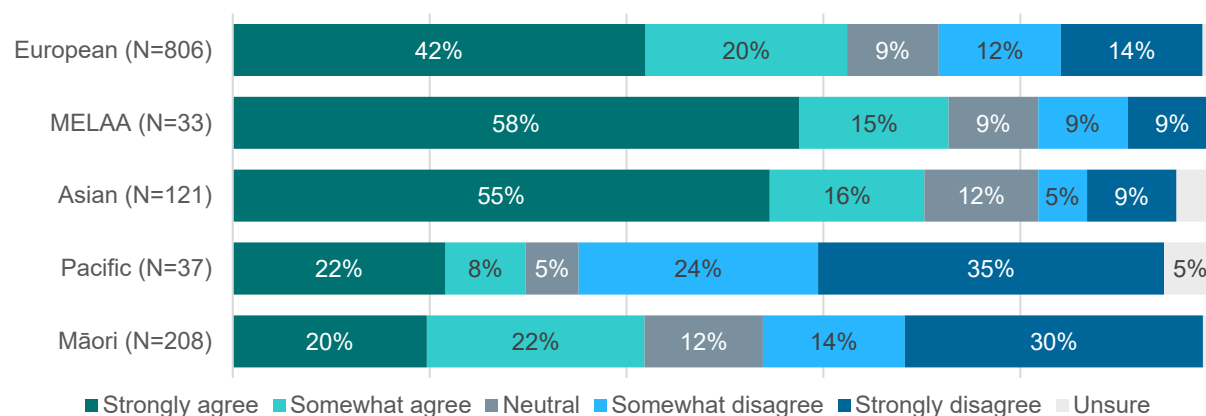
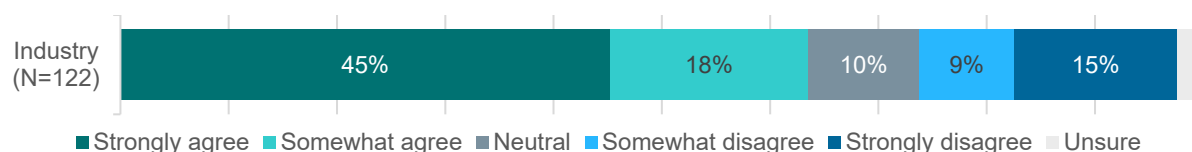


Figure 66 shows a pattern where MELAA and Asian whānau find the proposed requirements most understandable (73% and 71% respectively), European whānau show understanding at 62%, while Pacific and Māori whānau express much greater concerns about clarity, with Pacific whānau showing majority disagreement at 59% (with only 30% agreeing) and Māori whānau nearly evenly split at 42% agreement versus 44% disagreement. A chi-square test confirms these differences are statistically significant.

Note that there is no significant difference in student responses by ethnicity.

7.1.2 Will the achievement requirements provide employers with a clear record? (Industry only)

Figure 67: Do you agree that the proposed achievement requirements will provide employers with a clearer record of student knowledge, skills, and achievement?



The industry survey asked a second, more nuanced, question and as shown in **Figure 67**, most industry respondents (63%) agreed that the proposed achievement requirements will provide employers with a clearer record of student knowledge, skills, and achievement, with 24% disagreeing.

Figure 68: Do you agree that the proposed achievement requirements will provide employers with a clearer record of student knowledge, skills, and achievement? (by industry)

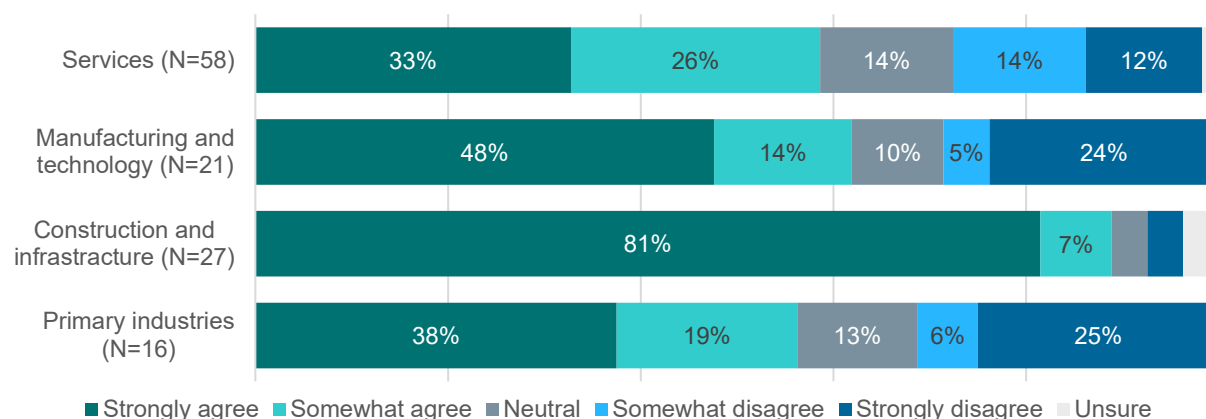


Figure 68 shows varying levels of confidence across sectors on whether the proposed achievement requirements will provide employers with a clearer record of student knowledge, skills, and achievement. Construction and infrastructure industry shows strong agreement at 81%, while other industries show more moderate support (57-62%) with notably higher disagreement (26-31%). A chi-square test confirms these differences are statistically significant.

This is the only subgroup finding from the industry survey that shows significant differences in response to questions about Proposal 4.

7.1.3 Are the four subject requirements achievable for most?

Each of the surveys asked a slightly different question about whether the achievement requirements at Years 12 and 13 were reasonable and/or achievable.

Educator only questions

Figure 69: Do you agree the four subject requirements should be achievable for most students?

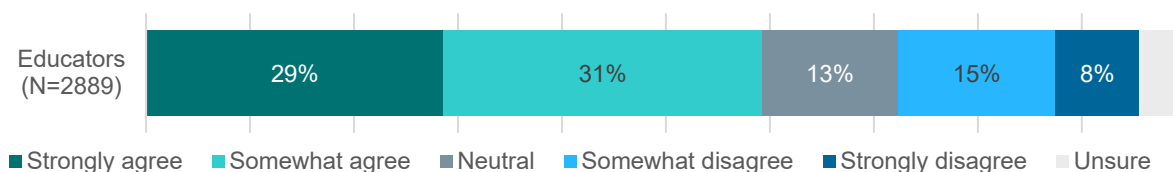
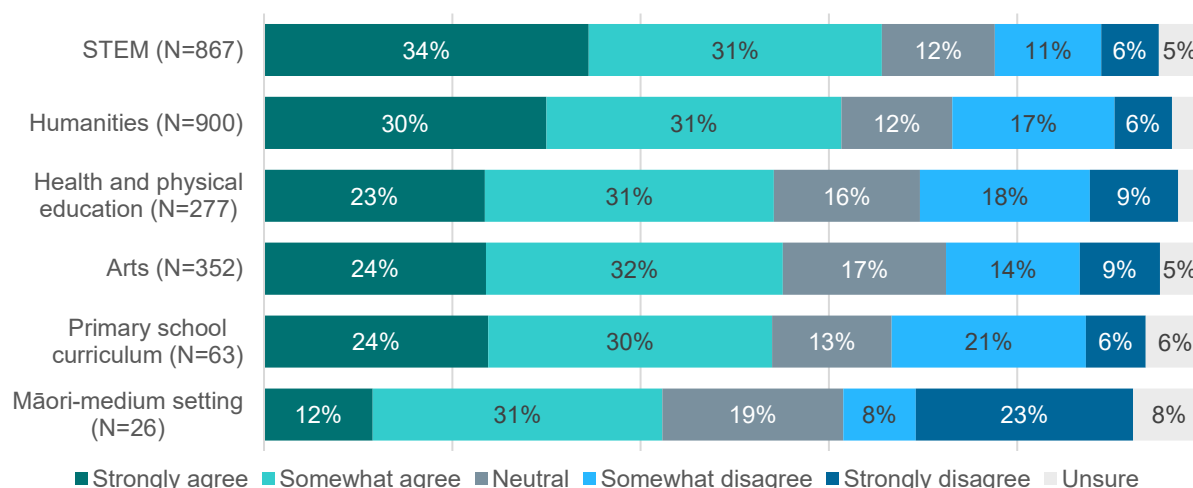


Figure 69 show a majority of support from educators for the four subject requirements, with 60% supporting and 23% not supporting.

Figure 70: Do you agree the four subject requirements should be achievable for most students? (by teaching area)



As shown in **Figure 70**, STEM and Humanities educators show high agreement that four subject requirements are achievable (61-65%), followed by Arts, Health, and Primary school educators (54-56%), while Māori-medium setting educators show the lowest agreement at 43% with notable disagreement at 31%. Differences are statistically significant.

Figure 71: Do you agree the four subject requirements should be achievable for most students? (by school EQI)

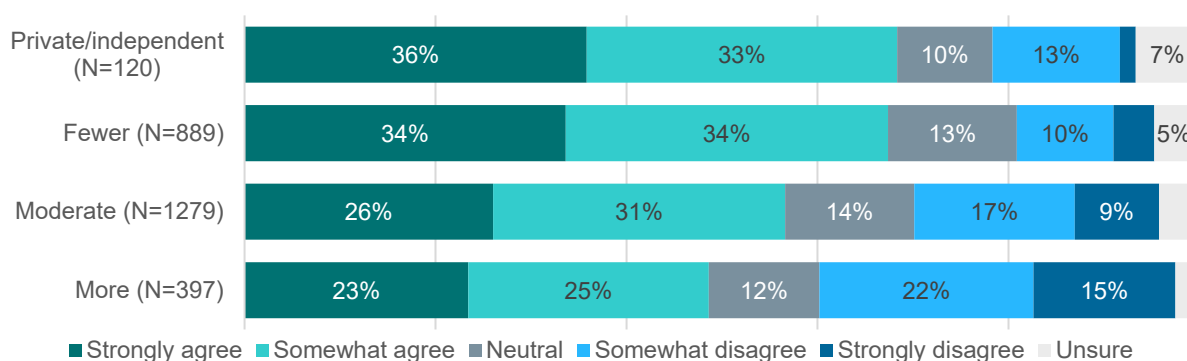
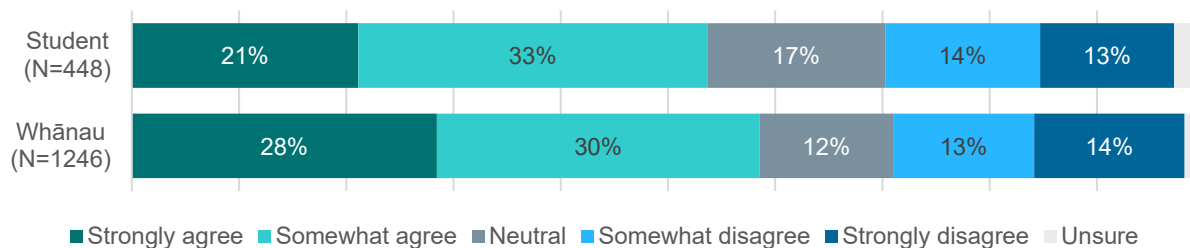


Figure 71 shows divided opinions across all schools with different EQI levels on the achievability of the four subject requirements. Educators from private/independent and schools with fewer or moderate numbers of students facing socio-economic barriers show modest to strong support (57-69%). While educators from schools with more students facing socio-economic barriers are divided with slightly more support than opposition (48% agreeing versus 37% disagreeing). A chi-square test confirms these differences are statistically significant.

Whānau and student only questions

Figure 72: Do you agree that four subjects would be a reasonable requirement to gain a secondary qualification?



As shown in **Figure 72**, most whānau show support for the four-subject requirement (58%), while students show somewhat lower but still substantial support (54%).

Figure 73: Do you agree that four subjects would be a reasonable requirement to gain a secondary qualification? (whānau by ethnicity)

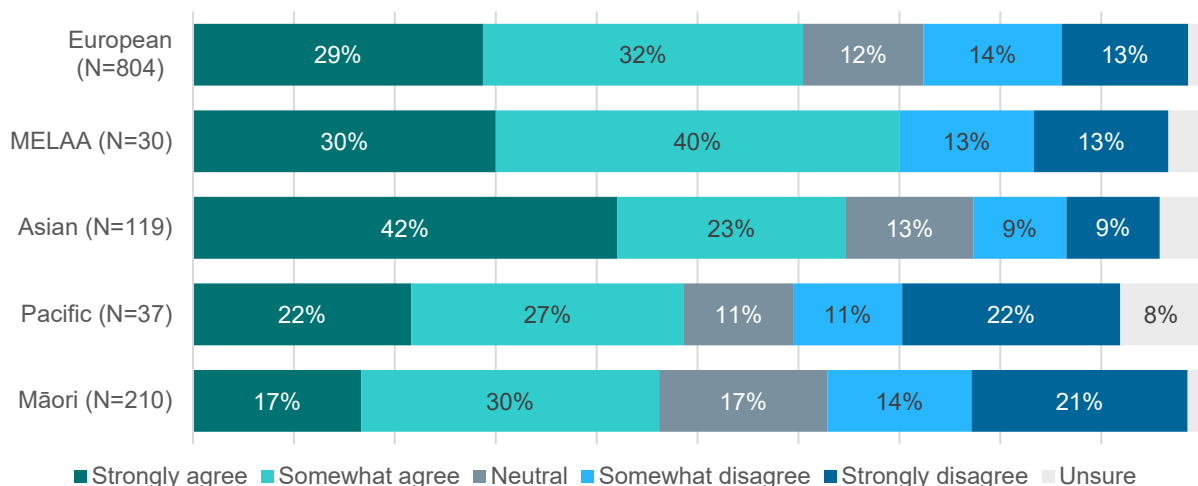


Figure 73 shows varying levels of support across whānau groups on whether four subjects would be a reasonable requirement to gain a secondary qualification.

Most MELAA, Asian, and European whānau agree four subjects is a reasonable requirement (61-70%). While Pacific and Māori whānau are more divided (47-49% agreement versus 33-35% disagreement), with both Pacific and Māori whānau showing high strong disagreement at 22% and 21% respectively. A chi-square test confirms these differences are statistically significant.

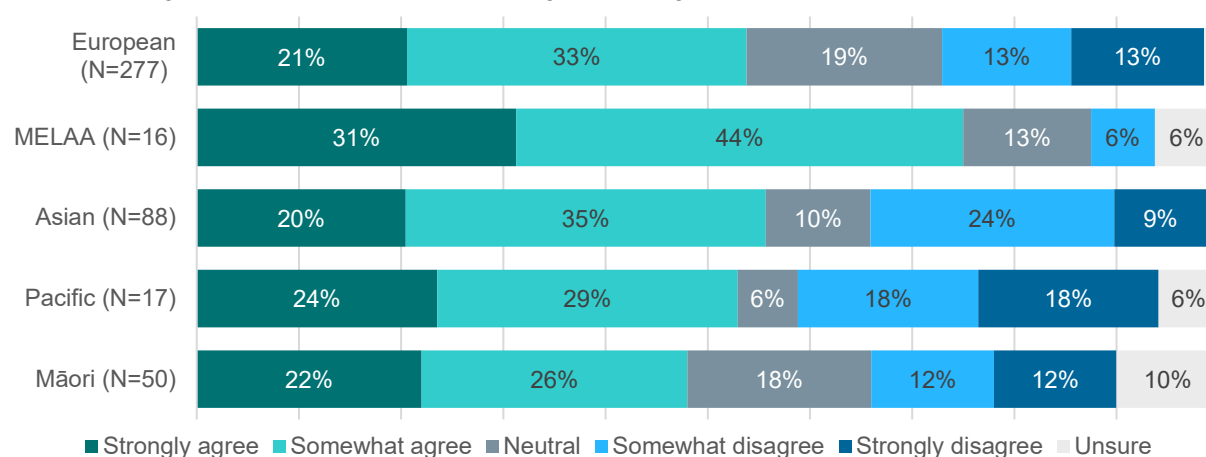
Figure 74: Do you agree that four subjects would be a reasonable requirement to gain a secondary qualification? (students by ethnicity)

Figure 74 shows varying levels of support with most student groups divided on viewing four subjects as a reasonable requirement. MELAA students show strong support at 75%, while other ethnic groups are more divided with support ranging from 48-55%. Asian and Pacific students show high disagreement (33% and 36% respectively). Māori students show the highest uncertainty at 28% (neutral or unsure) and moderate disagreement at 24%. A chi-square test confirms these differences are statistically significant.

7.2 Educator



Submitter summary

Overall, many educator submitters were concerned with the proposed achievement requirements with very few educator submitters expressing support for this Proposal. Submitters explained that the proposed achievement requirements may not accurately represent learning, disadvantage some students, and sought further clarity on several elements of the Proposal. Many educator submitters provided suggestions to improve the learning experience for teachers and students.

7.2.1 Support for proposed achievement requirements



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on why they support the proposed achievement requirements, approximate numbers of submissions that commented in support are unable to be provided. The following themes were drawn from submissions that raised comments in support throughout the Proposal 4 questions.

A few submitters made comments about why they supported the proposed achievement requirements, specifically the requirement to achieve at least four subjects and introduce a grade out of 100. These submitters considered that a four-subject requirement would be

achievable for most students. Those who supported the grading changes considered these changes would improve consistency and clarity and improve international comparability.

A mark out of 100 is clear and easy to understand. No subjectivity as with Merit, etc (Educator, Email, EME-2097)

A few submitters also supported a compulsory external assessment component to ensure a more balanced overall assessment of skills and knowledge, and to protect against the rise of AI use.

7.2.2 Concerns about proposed achievement requirements



Comments on this topic

There were approximately 1342 comments from educator survey submitters related to concerns about the proposed achievement requirements.

Requirement to achieve four subjects may increase the risk of failure

Of the educator submitters that raised concerns about the Proposal, many of these submitters reported that the requirement to achieve at least four subjects may recreate the problems of an outdated system, specifically higher failure rates. Submitters likened this new requirement to an 'all or nothing' approach that would not provide the opportunity for all students to succeed. Submitters reported that the current three subject requirement was hard enough for students and therefore the change to four would be unrealistic for many. These submitters considered that there was a lack of rationale behind such a change.

From my perspective, the requirement to pass four out of five subjects is deeply concerning and is absolutely not achievable for most students. It's a return to an outdated, hierarchical system that is built to fail a significant portion of the student population. (Educator, Survey, R_9QSTn8htl9dEahN)

As well as an increased failure rate, submitters expected that the requirement would decrease engagement, increase stress and overwhelm, and increase dropout rates among students. Additionally, submitters stated that the requirement may cause students to choose easy subjects to increase their chance of passing and would unfairly impact students at schools with less subject options.

This rule might cause more students to drop out or give up, instead of helping them succeed in areas they're good at. It's important to make sure there are other options and support for students who might not be able to pass four subjects. (Educator, Survey, R_96yBVY22CgUy0eZ)

A few submitters also pointed out that requiring students to pass four out of five subjects may be demotivating and not reflective of students' abilities. They illustrated that a student who demonstrates strong learning and skills in three subjects but struggles in the other two would fail to gain any qualification.

These strict achievement requirements may disadvantage vulnerable or high needs learners

Many submitters were concerned that the proposed achievement requirements are a rigid 'one size fits all' approach, and as such would disadvantage and create additional barriers to success for already vulnerable students. Submitters reported that the strict requirements to pass four subjects and the Foundational Award would worsen inequalities and learning outcomes.

The changes proposed will comprehensively disadvantage a number of priority learners who find success difficult. (Educator, Survey, R_9pWj9zUB5s2TkJA)

The proposed grading approach is an inaccurate demonstration of ability and does not work well for all subjects

Some submitters, including the Open Letter from Principals, raised concern with shifting to a grading approach out of 100 with A-E scores as they considered that aggregating all assessments into a single percentage was not an accurate demonstration of a student's knowledge and skills. These submitters noted that the current standards-based approach with Achieved, Merit and Excellence were simple to understand and are a better demonstration of ability than a percentage out of 100. A few of these submitters considered that the proposed grading approach reflected a backwards step towards an out-dated grading system that did not work well in the past.

The shift to letter grades and percentages is a regression to outdated, hierarchical models that will likely lead to scaling, bell curves and league tables. (Educator, Email, EME-2117 Open Letter from Principals)

The current standard based approach clearly expresses what an individual must know or be able to do. Assessment against the standard identifies whether the individual knows it or can do it. By contrast the proposal to report learner outcomes by a 100-point scale leaves it to the general public to interpret what (say) 72 marks means. (Educator, Survey, R_987cwZ2a41FoEpP)

Some submitters raised concern that the proposed grading changes would not work well for practical and portfolio subjects where a student's work is not easily scored out of 100.

How do you give a mark to a piece of carving or art work, competence of students learning Hort or Ag skills, or music performance, a drama production, a speech, a dance routine or in-depth discussion of an action plan to solve an issue? Criteria based assessment there is the only way to go. (Educator, Survey, R_46IJDap7UKutKO5)

There was some confusion over the details of this Proposal

Some submitters reported general confusion over the definition of what constitutes a 'pass', saying the information provided in the consultation document was too limited. Submitters noted specific confusion around the grading, how many marks would be required, which subjects would be included and required (if any), how assessments would be weighted, and how the two requirements (at least four subjects and the Foundational Award) interact.

Which subjects will students be required to pass? Will this include a variety of academic and VET subjects? How will the grading system work where students are

near passing but need to resit a whole year to go to the next certificate? (Educator, Survey, R_4VvKYJgrvxOD8sy)

Unclear weighting of internal versus external assessments



Note that submitters tended to understand “external assessment” as specifically referring to “end of year exams” and “internal assessment” as specifically referring to “assessments set by the teacher and completed throughout the year”. This understanding has informed how submitters have responded to the consultation questions.

Some submitters raised concerns with a possible reliance on external examinations. Educators questioned what the weighting of internal and external assessments would look like and said that the role of external assessments in a ‘pass’ was unclear. Submitters commented that an increased focus on external examinations would decrease student engagement and increase stress and failure rates, as not all students perform well in exam settings. Submitters also noted that external assessments are not genuine measures of skill and understanding and do not reflect the ‘real world’.

You cannot put every person into the same box and expect them all to be successful. It is going to be harmful to those who struggle with exams. It is not fair for students to risk failing courses over an exam that has too much weighting, let alone making others stressed or anxious when they shouldn't need to be. (Educator, Survey, R_9HOqnQcCpKtC6X)

7.2.3 Other changes or supports needed to strengthen achievement requirements



Comments on this topic

There were approximately 2216 comments from educator survey submitters related to other changes or supports needed to strengthen achievement requirements.

The curriculum and assessment frameworks need to be clear and consistent

Many submitters commented that there will need to be clear, consistent, and robust curriculum, guidance, materials, exemplars, and assessment frameworks when considering a shift to the proposed achievement requirements. Submitters said that it is important that these resources are developed and trialled early by teachers who are in the classroom or have been in the classroom recently. Educator submitters reported that the curriculum and resources will need to be standardised across schools and not open to interpretation. They said that helpful resources would include a mixture of online and hardcopy (i.e. textbook) formats.

Curriculum and Assessment Resources [including] Access to exemplars, model tasks, rubrics, and assessment templates aligned to new standards. Digital tools to support assessment design, feedback, and tracking progress. Curriculum planning resources that bridge current NCEA with new standards. (Educator, Survey, R_9pDQoQ2O7hldRp7)

Achievement requirements should consider Māori-based assessment

A few submitters suggested broadening the scope of what success looks like to incorporate a Māori worldview and that there are safeguards to protect bias from achievement requirements. They also suggested developing a pathway for recognition so that Kaupapa Māori qualifications (such as kapa haka, marae, traditional arts) are incorporated in the system.

100-point clarity is good but Māori-medium needs protection from any possible scaling system and potential bias. (Educator, Email, EMO-5226 Ngā Kura Kaupapa Māori)

Marking and moderation systems need to be robust and transparent

Many submitters reported that the marking and moderation systems need to be particularly robust, given the higher stakes with the requirement to achieve at least four subjects. Specifically, submitters said that the grading system and marking guidance must be transparent, with the differences between grades clear and consistent. Suggested guidance and resources include sample assessments, exemplars, interpretations, and best practice workshops. A few submitters noted the need for MOE and NZQA to be aligned in the development of the guidance and resources. As above, submitters said that resources must be developed by teachers who are active, or recently active, in the profession. There was some expectation that moderation will need increased support to be faster and more reliable than current, and to avoid excessive burden on teachers.

Good, teacher-made (so they are realistic) and teacher-trialled (so they are bug checked) resources to be used across schools in the country, rather than each school make their own. (Educator, Survey, R_9zuQi8gvgesNMRS)

Increase support for students with additional learning needs

Some submitters commented that the requirements of Proposal 4 would necessitate increased support for students with additional learning needs so that all students can succeed. Increased supports could include pastoral care, counselling (including increasing school counsellors), tutoring, mentoring, special assessment conditions, reader/writers, and culturally responsive teaching and assessment. Further, submitters highlighted the need to track and identify students at risk of not meeting requirements early, in order to proactively provide tailored interventions and supports. Some submitters also noted the need to support students specifically who do not perform well in external examinations.

Stronger support for at-risk and diverse learners: Implement targeted interventions and specialised programs for learners at risk of not meeting the strengthened achievement standards, including Māori, Pasifika, and students with disabilities or learning challenges. (Educator, Survey, R_9ktp0mbd2GatXxL)

This theme is also discussed in section 8.2.4 more broadly as it is relevant to the other Proposals.

Address external factors that impact learning and engagement

Some submitters stated that there is a need to address wider, societal issues that impact on learning and engagement. Societal issues referred to here include homelessness, poverty, financial stress, and mental health. Specifically, submitters reported that supports for vulnerable students could include targeted pastoral care, mental health and wellbeing support,

and school lunches. Submitters also said that increased collaboration between schools, families, and communities would support addressing barriers to learning, including attendance and socio-economic factors.

Addressing non-academic barriers: support for addressing socio-economic, health and wellbeing challenges that impact learning. (Educator, Survey, R_4AF0uKLoTDEHRvP)

7.3 Industry



Submitter summary

While some industry submitters considered the proposed changes would introduce greater clarity and credibility to the qualification system, many industry submitters raised concern with the proposed achievement requirements. They questioned the proposed shift in grading system, considered a four-subject pass requirement would be unachievable for some students, and cautioned against an over-reliance on external examinations. Some industry submitters wanted to see a better balance between flexibility and structure of achievement requirements.

7.3.1 Support for proposed achievement requirements



Comments on this topic

There were approximately 58 comments from industry related to support for proposed achievement requirements.

The proposed achievement requirements will introduce clearer standards and consistency

Some industry submitters commented that they supported the proposed changes to achievement requirements as they considered such changes would create clearer, more comparable qualifications. These submitters noted that standardised achievement requirements would make it easier to understand student capability across different schools, providing clearer comparable qualifications. Several of these submitters emphasised that consistent standards and achievement requirements would improve the credibility of qualifications.

External and internal assessments within a subject will provide potential employers and tertiary educators with a better sense of students' knowledge and skills in key learning areas. (Industry, Email, EMI-1017)

The changes would make it easier for employers to understand student abilities

Some industry submitters stated that the proposed achievement requirement structure would be simpler for employers to interpret than the current system. They noted that letter grades and percentages would be more familiar to many employers than the current NCEA descriptors. In addition, these submitters highlighted that clearer achievement indicators would support better hiring decisions.

Students finishing their study years with a clear, quantifiable and comparable set of results will help us then have confidence in hiring and further educating/training. (Industry, Survey, R_4AwlknnDOYQuYQV)

The proposed changes would support a recognition of comprehensive subject knowledge

Some industry submitters stated that requiring achievements across full subjects would ensure students gained complete knowledge rather than a selective understanding.

It gives a far more accurate picture of the student's ability, including retention, and capacity to apply a wider body of learning to a more practical, relevant, 'real world' assessment. (Industry, Survey, R_4M2Y61joGMD3CBH)

7.3.2 Concerns about proposed achievement requirements



Comments on this topic

There were approximately 91 comments related to concerns about the proposed achievement requirements.

Changes to the grading system may not improve clarity

Some industry submitters questioned whether moving to letter grades and percentages would actually improve clarity. These submitters noted that the current NCEA system already provides clear information about specific achievements and were not clear on the benefit of the proposed changes.

There is no guarantee that the creation of a new qualification which returns to the old model of numeric or alphabetical scales applied for each subject will make it any easier for an employer to understand the skills and knowledge a job candidate has in any given subject. (Industry, Email, EMI-1030)

Some submissions emphasised that generic percentages risk masking specific capabilities and may not meaningfully indicate workplace readiness.

A four-subject requirement may disadvantage some students

Some industry submitters expressed concern about the requirement to pass four subjects. These submitters noted that requiring a pass in four subjects could create barriers for some students, while potentially being insufficient for others. Specifically, submitters expressed concern about the impact on Māori, Pacific peoples, neurodiverse, and disabled learners.

Passing 4 out of 5 subjects may exclude many from getting the qualification. (Industry, Survey, R_43x8zXBbCiqzjD4)

Our industry employs many extremely bright neurodiverse people. I do not believe this system serves them. (Industry, Survey, R_4TYS82qZoq6kMY4)

There was concern about an over-reliance on external assessment

Some industry submitters raised concerns about an increased use of external assessment, which may disadvantage certain learners. They noted that exam-based assessment does not suit all students and may not accurately reflect their knowledge or skills, and internal assessment is valuable for demonstrating practical skills and 'real world' application.

Portfolio and performance-based assessments must be retained, especially in creative fields and applied vocational training. (Industry, Email, EME-2490)

[I]nternal assessments have been invaluable with students with learning difficulties, non-majority students, and students from lower socio-economic backgrounds. (Industry, Email, EMI-1076)

7.3.3 Other changes or supports needed to strengthen achievement requirements



Comments on this topic

As there was no explicit question in the survey asking industry submitters to provide comments on changes or supports to strengthen achievement requirements, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from submissions that raised comments throughout the Proposal 4 questions.

There needs to be a balance between flexibility and structure

Some industry submitters suggested that a middle ground between the current system, and the proposed changes might be preferable. These submitters noted that while greater structure could be beneficial, completely removing flexibility from achievement requirements would create new problems.

[T]he government must provide robust, well-defined exception policies for the four-subject minimum and other requirements, designed specifically for neurodivergent students. (Industry, Email, EMI-1019)

A few industry submissions emphasised that different industries value different capabilities, and the qualification system should allow for this diversity while maintaining consistent standards.

There is a need to retain subject choice and availability

Some industry submitters also raised concerns about ensuring adequate subject choice and availability. These submitters noted that limiting students to five subjects could restrict opportunities, particularly if schools cannot offer a full range of options. They noted that subject availability often varies significantly between school, with smaller schools and those facing resource constraints typically offering fewer options.

[H]ow many subjects students will be able to choose between Year 11-13. It has been identified that they need to pass four subjects, but how many subjects will they be able to choose? (Industry, Email, EMI-1083)

Recognition of partial achievement should be continued

A few submitters emphasised the importance of any new system being able to recognise what students have achieved even if they do not meet the full qualification requirements. These submitters noted that the current system allows students to demonstrate achievements in specific pathways even without a complete qualification and considered this to be positive.

7.4 Whānau and students



Submitter summary

Many whānau and student submitters were concerned about the proposed achievement requirements, with few indicating support. Submitters critiqued the proposed achievement requirements as having the potential to increase student failure rate, disadvantage vulnerable cohorts, and restrict combination of academic and vocational pathways. Some submitters added that whānau and students are familiar with the NCEA grading approach, so changes would be confusing and unnecessary.

The few submitters who agreed with the Proposals outlined that the proposed grading changes would be more accurate of a student's ability, clearly demarcate different students and their performance, and create consistency.

7.4.1 Support for proposed achievement requirements



Comments on this topic

As there was no explicit question in the survey asking submitters to provide comments on why they support the proposed achievement requirements, approximate numbers of submissions that commented in support are unable to be provided. The following themes were drawn from submissions that raised comments in support throughout the Proposal 4 questions.

A few whānau and student submitters commented that they were supportive of the better recognition of overall achievement offered by the aggregated scoring system. Some submitters noted that under the current system, a single error can result in dropping from Excellence to Achieved, despite otherwise strong performance. The points-based system was viewed as more forgiving of minor mistakes while still rewarding excellence.

Students get credited for what they do know, rather than penalised for where they have knowledge gaps, compared to currently missing out on all credits because some areas of the achievement standard couldn't be met. (Whānau, Survey, R_9P4Q64lvEnpQCOS)

A few whānau and student submitters said they particularly valued that the new approach. They explained it would distinguish between different levels of achievement more clearly, providing more meaningful differentiation that better reflect students' actual knowledge and capabilities. Others agreed with the proposed change to a percentage and letter grading system as they considered that this would align with universities and offer better differentiation of marks.

I believe sorting each assessment into an overall grading system of 100 will be beneficial to create an understandable and coherent grading schedule. By additionally creating an overall grade for that subject, it will allow students to focus on overall achievement and doing their best rather than solely focusing on one assessment, which is the current case. (Student, Survey, R_4GIZ8NOQC3Onhel)

Have a different grading system other than achieved, merit or excellence. I think there is more ability to differentiate between the children's marks if they go back to percentages like the universities still use. (Whānau, Survey, R_4DOyyen6Bi521za)

Others indicated that they supported the intent of the Proposal to improve consistency by setting clearer national expectations and recognition of achievement.

7.4.2 Concerns about proposed achievement requirements



Comments on this topic

There were approximately 854 comments from whānau and student survey submitters related to concerns of the proposed achievement requirements.

Inflexible achievement requirements are expected to increase student failure rate

Many whānau submitters considered that the proposed achievement requirements and an increased focus on external assessments will set more students up for failure. Submitters said that this approach would be too narrow, inflexible, and not reflective of 'real life' settings. Whānau submitters commented that the approach is 'one size fits all' and will disadvantage more students and create much unnecessary stress and anxiety. Submitters stated that the approach is not nuanced enough to recognise the differences in how students learn, the different pathways (i.e. academic and/or vocational) students may take, or the diversity of learning needs.

I just think it will disadvantage kids who narrowly miss out on two subjects not achieving [sic]. It needs to be more nuanced, not just 'sorry, you don't get ANYTHING because you had a bad exam' (Whānau, Survey, R_4LfUwV1IbKfDBrX)

In a similar vein to whānau submitters, many student submitters reported that the achievement requirements and increased focus on external assessments will increase stress and failure rates. Students stated that without multiple ways for students to succeed, the requirements are rigid, unfair, and do not fully recognise a student's ability. Students echoed concern from educators that a student could perform exceptionally well in three subjects, but two weaker subjects could cause them to fail overall. These submitters said that such circumstances would likely result in increased dropout rates.

I think that it is unfair to say that students need to pass every single thing in four subject to gain a qualification. everyone is different and will do well in some topics but not in others, it wouldn't be a good idea because students should be able to have multiple ways to succeed. I don't understand why you would make it more difficult for them (Student, Survey, R_4ReKgg6MLWutADn)

Some whānau submitters were also concerned that requiring students to pass four out of five subjects would result in more young people leaving school with nothing, particularly those who struggle academically or face challenging life circumstances. They noted that under the current system, students can accumulate credits even if they do not pass all standards, providing recognition for what they have learned. The proposed pass-fail approach for entire subjects was seen as setting up vulnerable students for failure.

If students believe their entire year's work will be judged by one final mark and score, those who do not perform well in exam conditions may feel they have little chance of success. This could particularly affect students who are already at risk of leaving school early, especially those whose strengths are in practical, creative, or applied learning rather than traditional test-taking. (Whānau, Survey, R_9177sXFOxXLcCI8)

The proposed changes are unnecessary and will be like 'taking a step backwards'

Many whānau submitters commented that the proposed changes are regressive, unnecessary, and will not accurately reflect a student's ability or achievements.

This is a step backward and neglects the bias of those proposing it. A score out of 100, as anyone with any kind of interest in data would come to the conclusion that this quantifiable approach lends itself to hierarchies and tables. (Whānau, Survey, R_91LkCXIdnmYnC8b)

Students who are vulnerable or have higher learning needs will be disadvantaged by the uniform approach to achievement requirements

Some whānau and student submitters commented that the achievement requirements take a uniform approach to learning and will subsequently disadvantage students who are vulnerable or who have higher learning needs. Specifically, submitters noted that the proposed requirements introduce additional barriers for these students and may widen educational gaps. Submitters questioned how these students will be supported.

The increased emphasis on external exams will only make it harder for many students, particularly Māori and Pasifika, to achieve success. This risks widening the educational gap instead of closing it (Whānau, Survey, R_91438Uc9275b5Wk)

Making changes to the grading approach is confusing and unnecessary

Some whānau submitters said that the proposed changes have no clear benefit and will introduce confusion, when current conventions of Achieved, Merit, and Excellence work well. They explained that the current conventions are easy enough to understand and convey more meaning than a percentage. These whānau submitters cautioned that New Zealand should not go backwards to an outdated grading system that was changed for a reason. They also noted that most parents are now very familiar with NCEA having gone through it themselves.

It is already straightforward. The current system of Excellence, Merit, Achieved and NA is easy. The premise of NCEA being too hard to understand is ridiculous. The system is fine the way it is and this is just another waste of tax payer money. (Whānau, Survey, R_4dgJlaM1TwR27HO)

Requirements will restrict students from combining academic and vocational pathways

Some whānau and student submitters commented that the proposed achievement requirements will narrow pathways and restrict students from combining academic and vocational pathways. They also questioned whether vocational subjects would be valued in the same way as more traditional, academic subjects. These submitters raised concerns that students may be funnelled down certain pathways that may not align with their strengths, interests, or potential career pathways. Student submitters reported that pressure and poor mental health would increase whilst motivation and engagement would decrease.

But the rigidity risks excluding or discouraging students who thrive outside the traditional subject mix or who make progress more unevenly. (Whānau, Survey, R_4hswltMrBHKpzB8)

A lot of people I know take classes where they study outside of school multiple days a week, but gain a large amount of credits from that course. So requiring students to pass 4 subjects would mean those taking vocational courses (eg trades) wouldn't be able to focus as much on what they actually want/need to do. Forcing them to take other classes that are irrelevant to their future careers is a waste of time. (Student, Survey, R_9UVhij6HyrfBoPX)

8 Implications and other comments



Discussion Document Overview

Finally, views were sought on the implications of the proposals and what needs to be considered for successful implementation, such as comments on the proposed rollout timeframe and other support needed.

Key questions posed during consultation included:

- *Do you agree that the proposed changes will improve the coherence, consistency, and credibility of the national senior secondary qualifications?*
- *What other changes or supports do you think would be helpful to make sure students can successfully complete the new qualifications?*
- *Is there anything else that you would like to say about the proposals?*

8.1 Quantitative survey analysis

8.1.1 Credibility and coherence of national senior secondary school qualifications

This section of the survey asked one question that was shared across all submitter types and two questions each for educators and industry.

Figure 75: Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications?

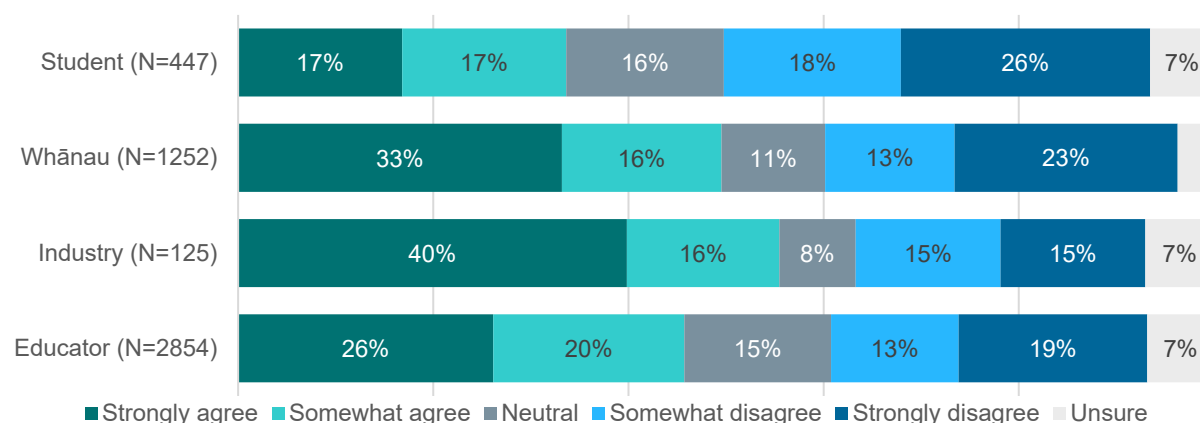


Figure 75 shows 46% to 56% of whānau, industry and educator submitters agreed to varying degrees that the proposed changes will improve credibility and coherence of senior qualifications. While some students (34%) agreed, there were more students (44%) that disagreed that these changes would improve credibility and coherence. Some submitters across all types (15% - 23%) indicated they were neutral or unsure about whether the intended outcome would be achieved.

Figure 76: Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications? (by teaching subject)

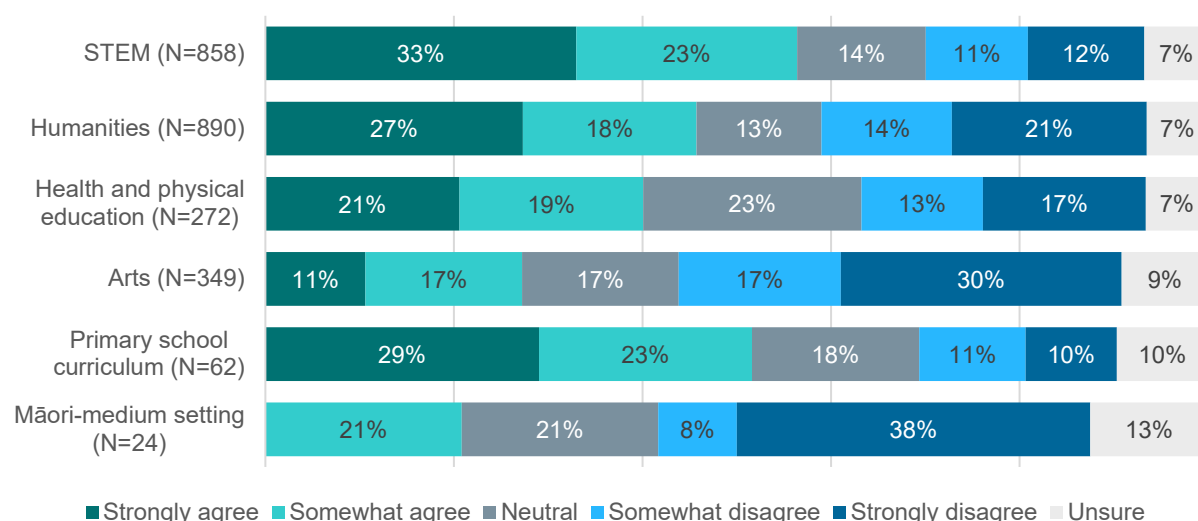


Figure 76 show divided opinions across all subjects on whether the proposed changes will improve the credibility and coherence of the qualifications. STEM and primary school curriculum educators show the most confidence in the proposed changes (56% and 52% respectively), while Arts and Māori-medium setting educators are notably sceptical (47% and 46% disagreement respectively, with particularly high strong disagreement at 30% and 38%). A chi-square test confirms these differences are statistically significant.

Figure 77: Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications? (by school EQI)

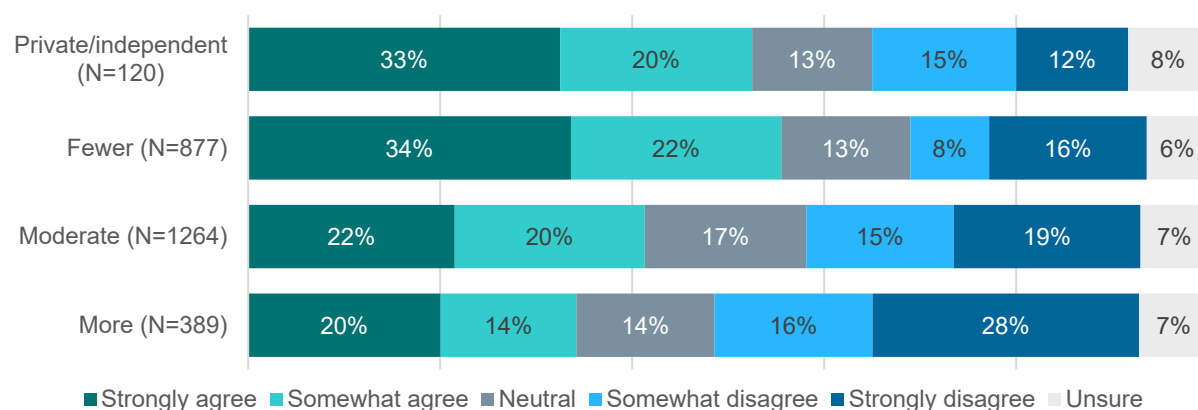


Figure 77 shows divided opinions across schools with different EQI levels on this issue. About half of educators from private/independent schools and schools with fewer students facing socio-economic barriers show confidence (53-56% agreement), while educators from schools with more students facing socio-economic barriers are notably sceptical with 44% disagreeing versus only 34% agreeing. This suggests that educators in schools with more students facing socio-economic barriers have significant concerns about whether the proposed changes will genuinely improve credibility and coherence. A chi-square test confirms these differences are statistically significant.

Figure 78: Do you agree that the Proposals will improve the credibility and coherence of the national senior secondary qualifications? (by role of industry representative)

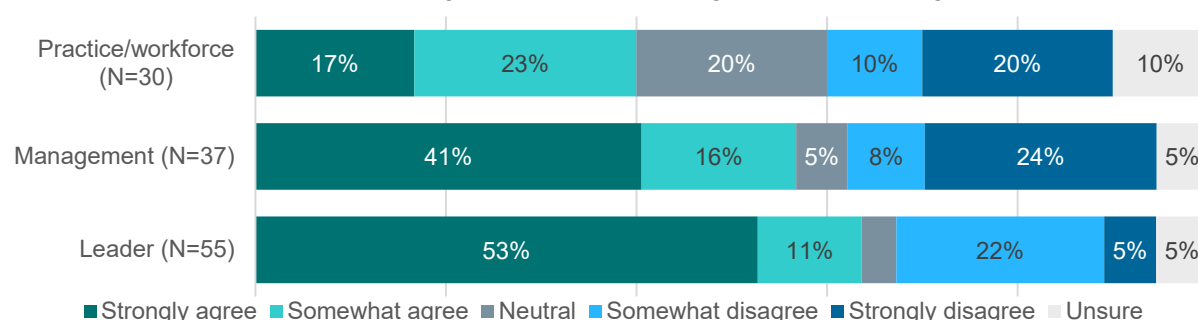


Figure 78Figure 77 shows divided opinions across schools with different EQI levels on this issue. About half of educators from private/independent schools and schools with fewer students facing socio-economic barriers show confidence (53-56% agreement), while educators from schools with more students facing socio-economic barriers are notably sceptical with 44% disagreeing versus only 34% agreeing. This suggests that educators in schools with more students facing socio-economic barriers have significant concerns about whether the proposed changes will genuinely improve credibility and coherence. A chi-square test confirms these differences are statistically significant.

Figure 78 shows that the confidence in the Proposals' ability to improve credibility and coherence increases with the hierarchical level. Leaders show 64% agreement (with particularly high strong agreement at 53%), followed by management at 57%, while practice/workforce representatives show the lowest confidence at 40% with high neutrality at 20%. A chi-square test confirms these differences are statistically significant.

Figure 79: Do you agree that the Proposals will improve the credibility and coherence of the national senior secondary qualifications? (by firm size)

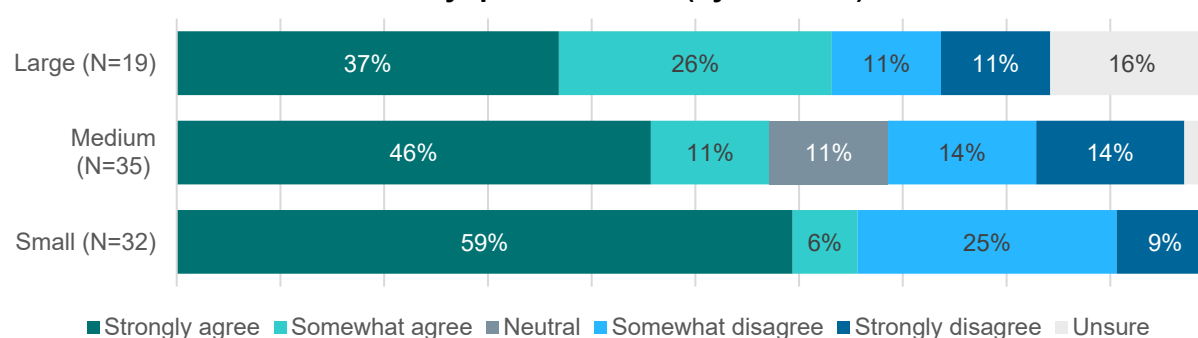


Figure 79 shows varying levels of confidence in the Proposals' ability to improve credibility and coherence by organisation size. Small firms show the highest confidence at 65% (with 59% strongly agreeing), followed closely by large firms at 63%, while medium-sized firms show the lowest confidence at 57% with higher disagreement at 28%. A chi-square test confirms these differences are statistically significant.

Figure 80: Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications? (whānau by ethnicity)

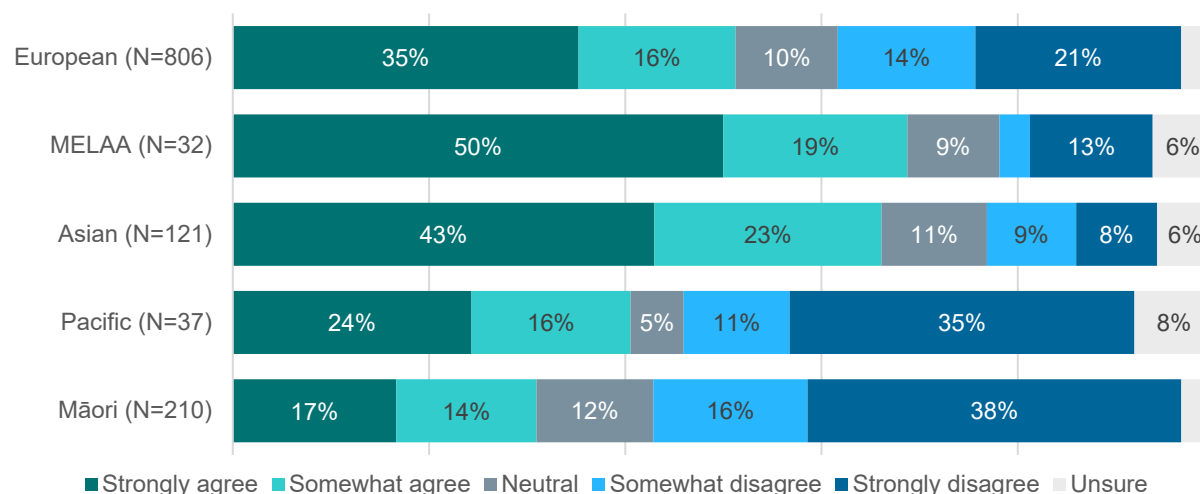


Figure 80 shows significant variation of confidence across ethnic groups of whānau in the Proposals' ability to improve credibility and coherence. MELAA and Asian whānau show strong confidence in the Proposals (69% and 66% respectively), half of European whānau show support at 51%, while Pacific and Māori whānau are notably divided with Pacific whānau response showing 46% disagreement and Māori showing about half opposition at 54% disagreement. A chi-square test confirms these differences are statistically significant.

Figure 81: Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications? (students by ethnicity)

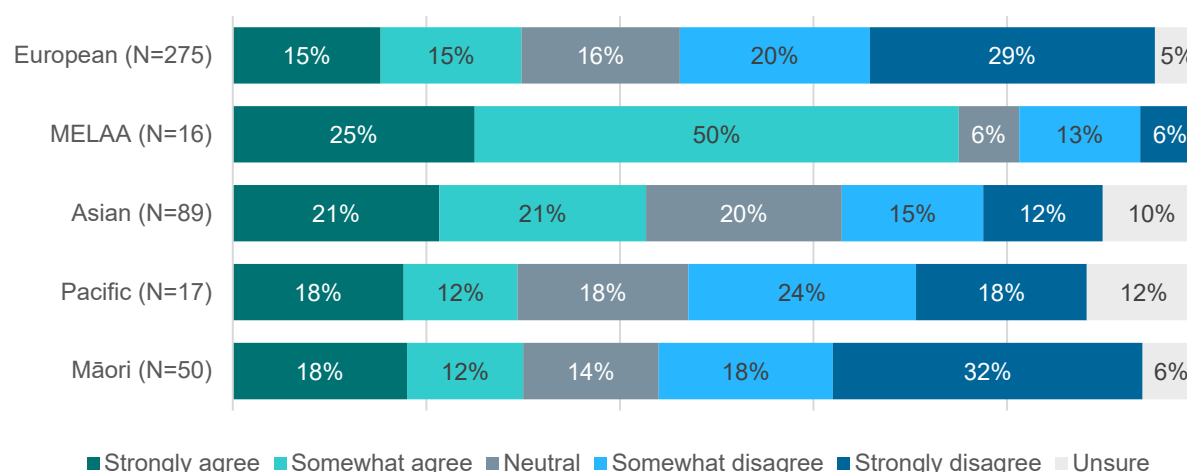


Figure 81 shows significant variation of confidence across ethnic groups of students in the Proposals' ability to improve credibility and coherence.

A vast majority of MELAA students are optimistic at 75% agreement, many Asian students show support at 42% (with 20% neutrality), while European, Pacific, and Māori students are all sceptical with only 30% agreement each and high disagreement (49%, 42%, and 50% respectively). Māori and European students show particularly high strong disagreement at 32% and 29% respectively. A chi-square test confirms these differences are statistically significant.

Industry specific question

The industry survey asked a second question regarding the ease of understanding the Proposals.

Figure 82: Do you agree that the Proposals will make it easier to identify what knowledge and skills a job candidate has, when compared to the current NCEA?

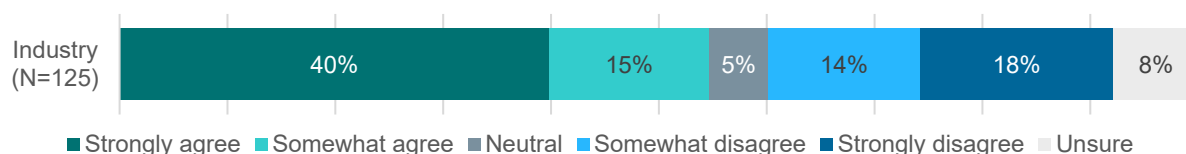
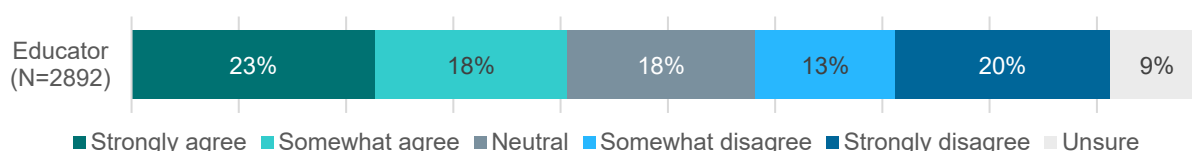


Figure 82 indicates that over half of industry representatives (55%) believe the proposed changes will improve their ability to assess candidates' qualifications compared to the current NCEA system, while there is a 32% disagreement, suggesting divided views within the business community on this issue.

8.1.2 Better alignment between the curriculum and assessments

Figure 83: Do you agree that the Proposals will create better alignment between the curriculum and assessments when compared to NCEA?



As shown in **Figure 83**, educators are split on whether a better alignment can be achieved via the Proposal, with 41% agreeing, 33% disagreeing, and 18% neutral.

Figure 84: Do you agree that the Proposals will create better alignment between the curriculum and assessments when compared to NCEA? (by teaching subject)

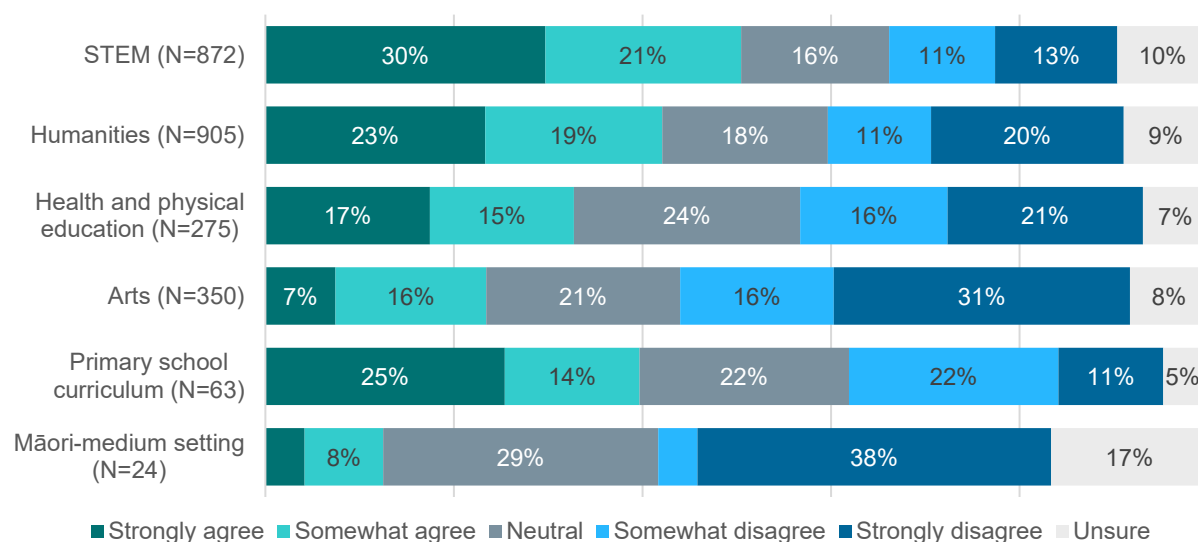


Figure 84 shows divided opinions across all subjects on whether a better alignment can be achieved via this Proposal.

STEM educators are divided with 51% combined agreement versus 24% disagreeing and notably high uncertainty at 26%. Humanities educators and primary school curriculum educators are also divided with 42% and 39% agreement, versus 31% and 33% disagreeing respectively and high uncertainty at both 27%. Arts educators show stronger opposition at only 23% agreement with 47% disagreeing and 29% uncertain. Māori-medium setting educators show the strongest opposition at only 12% agreement with 42% disagreeing and notably high uncertainty at 46%. A chi-square test confirms these differences are statistically significant.

Figure 85: Do you agree that the Proposals will create better alignment between the curriculum and assessments when compared to NCEA? (by school EQI)

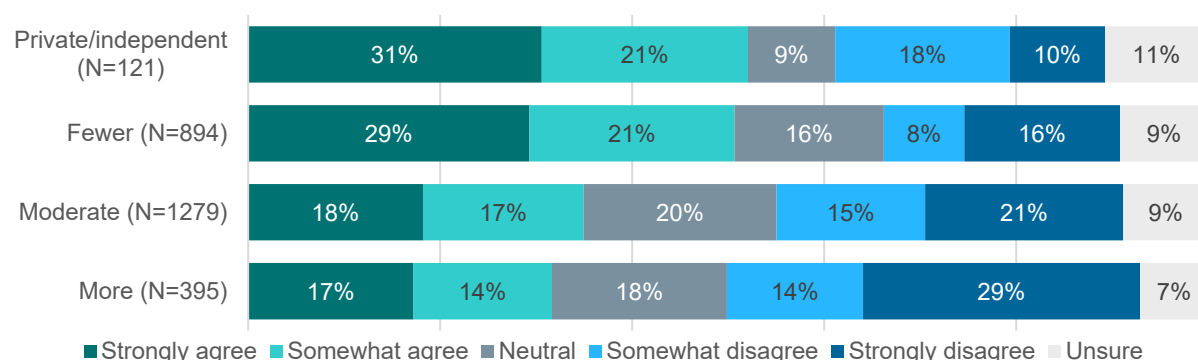
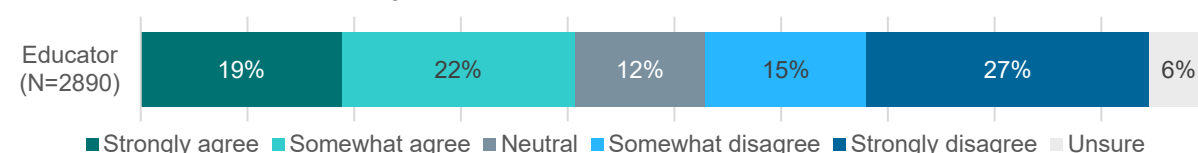


Figure 85 also shows divided opinions from educators from schools with different EQI levels on whether better alignment can be created. Half of educators from private/independent schools and schools with fewer students facing socio-economic barriers show support (50-52%), while educators from schools with more students facing socio-economic barriers are sceptical with 43% disagreeing (including particularly high strong disagreement at 29%) versus only 31% agreeing. A chi-square test confirms these differences are statistically significant.

This suggests that educators in schools with more students facing socio-economic barriers have significant concerns about whether the Proposals will improve curriculum-assessment alignment.

8.1.3 Achievability of the proposed timeline

Figure 86: With appropriate resources, do you agree that the proposed timeline is achievable? (Educators only)



Educators are notably divided on the perceived achievability of the proposed timeline, with 41% combined agreement versus 42% disagreeing and 12% neutral (**Figure 86**).

Figure 87: With appropriate resources, do you agree that the proposed timeline is achievable? (by teaching subject)

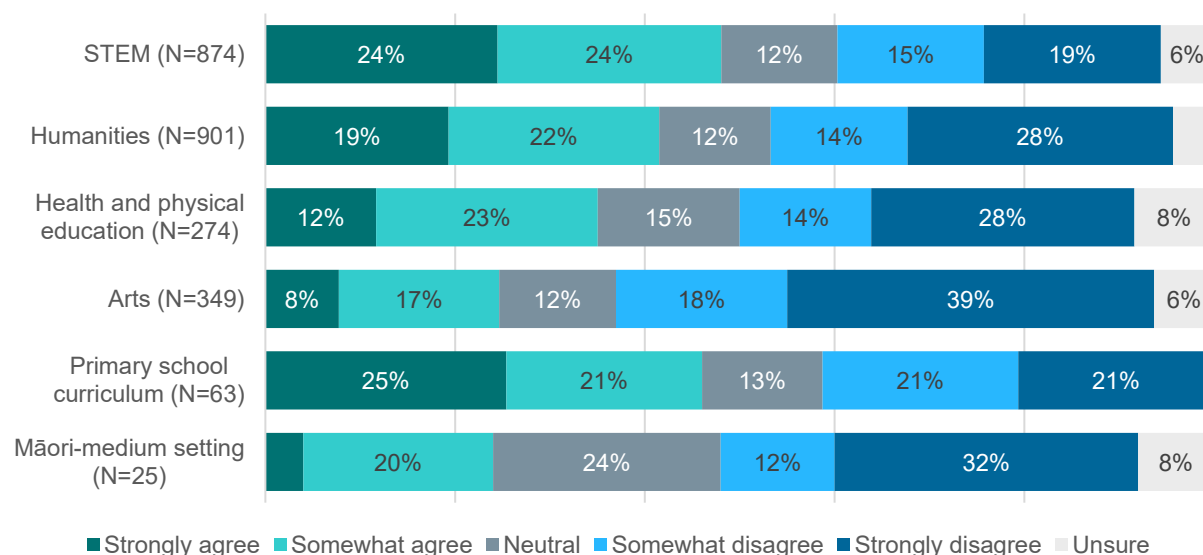


Figure 87 shows divided opinions across all subjects on whether the proposed timeline is achievable. STEM and primary school curriculum educators show the most confidence in the timeline (48% and 46% respectively), while Arts and Māori-medium setting educators are sceptical (57% and 44% disagreement respectively, with particularly high strong disagreement at 39% and 32%). A chi-square test confirms these differences are statistically significant.

Figure 88: With appropriate resources, do you agree that the proposed timeline is achievable? (by school EQI)

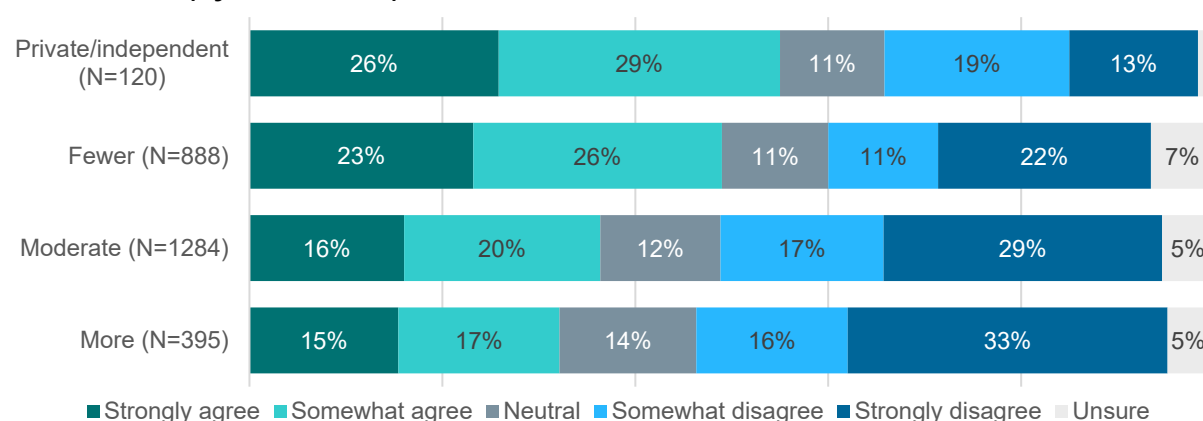


Figure 88 shows divided opinions across schools with different EQI levels on the proposed timeline. Educators from private/independent schools and schools with fewer students facing socio-economic barriers show more confidence in the timeline (55% and 49% respectively), while educators from schools with more or moderate numbers of students facing socio-economic barriers are notably sceptical with 49% and 46% disagreement respectively (including particularly high strong disagreement at 33% and 29%). A chi-square test confirms these differences are statistically significant.

8.1.4 Benefits of the proposed changes for businesses

Figure 89: Do you agree the proposed changes (Proposals 1-4) will be beneficial for your business in the future?

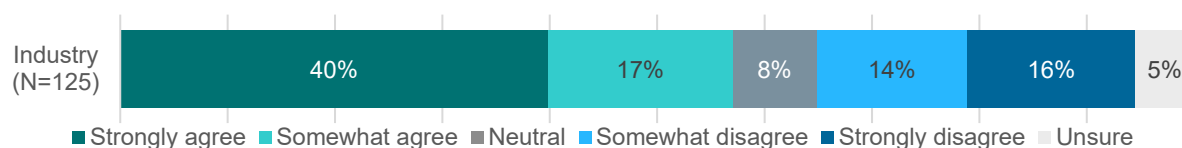
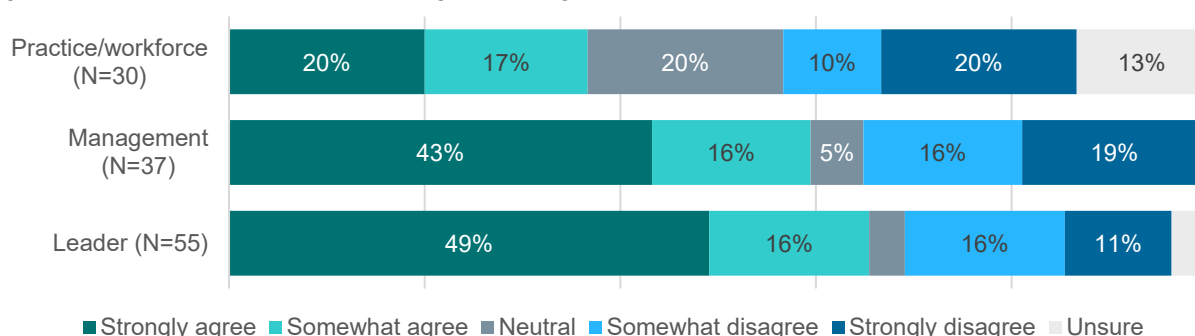


Figure 89 suggests that while most industry representatives (57%) see potential benefits from the proposed changes, there is still substantial disagreement at 30%, suggesting mixed views within the business community about whether these reforms will serve their business needs.

Figure 90: Do you agree the proposed changes (Proposals 1-4) will be beneficial for your business in the future? (by industry role)



As shown in **Figure 90**, agreement that the proposed changes will be beneficial for businesses in future increases with the hierarchical level. Leaders show 65% agreement (with high strong agreement at 49%), followed by management at 59%, while practice/workforce representatives show the lowest support at 37% with high neutrality at 20%. This suggests that industry leaders and management are more optimistic about the benefits of the Proposals. A chi-square test confirms these differences are statistically significant.

Figure 91: Do you agree the proposed changes (Proposals 1-4) will be beneficial for your business in the future? (by firm size)

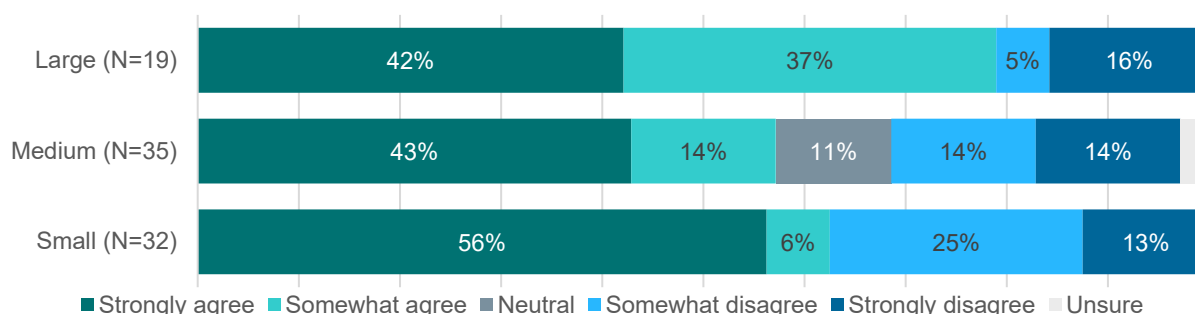


Figure 91 shows vary levels of agreement regarding benefits of the proposed changes for businesses in future. Large firms show the highest overall support at 79%, followed by small firms at 62% (with exceptionally high strong agreement at 56%), while medium firms show the lowest support at 57% with higher disagreement at 28%. A chi-square test confirms these differences are statistically significant.

8.2 Educators



While the quantitative analysis indicates that there may have been support among submitters for the Proposals, the qualitative analysis reads less positively. This is because submitters were more often asked to provide additional comments based on their concerns with specific Proposals.



Submitter summary

Overall, many educator submitters expressed concern with the Proposals, and few provided comment on general support when prompted about whether the Proposals create better alignment, credibility, and coherence.

Most of these concerns reiterated points from prior sections of the Proposals. Many submitters considered the proposed timeline is too short and unachievable. Submitters called for more time to ensure appropriate and robust preparation, including professional development, adequate resourcing, and other additional supports.

They also provided other comments, including urging that changes to the education system need bipartisan agreement, highlighting the need for stability in the education sector, and raised concerns for student and staff wellbeing.

8.2.1 General support for the Proposals



Comments on this topic

As there was no explicit question in the survey asking submitters to provide additional general comments on why they support the changes, approximate numbers of submissions that commented in support are unable to be provided. The following themes were drawn from submissions that raised comments in support throughout the implications and next steps questions, most commonly from the final question asking if submitters had anything else to add.

A few educator submitters commented general support in favour of the proposed changes, however many comments provided little additional context or detail. Submitters said that the education system is overdue for reform and that the proposed changes are welcome ones. A few submitters asked if the changes could be implemented sooner.

However, some of these educator submitters commented their support with caveats that successful implementation will need to 'iron out the details', consider increasing the timelines, and ensure the provision of sufficient teacher training and resourcing. Other submitters expressed support for change but noted that the new system will need to be flexible and equitable, in other words retain these good aspects of NCEA.

Overall, I like the proposals and something has to change with the current format of NCEA. But at the same time don't chuck the baby out with the bathwater. We should retain what is working well. (Educator, Survey, R_4cWtNcd6vEFXMXf)

8.2.2 General concern for the Proposal



Comments on this topic

There were approximately 1729 comments from educator survey submitters related to whether the Proposals create better alignment, credibility, and coherence.²⁴ Many of these comments reiterated their expressions of concern made throughout the Proposals.

Lack of evidence that NCEA is as fraught with issues as the Proposals suggest

Many educator submitters reinforced previous points and reported that they have not seen sufficient or accurate evidence that NCEA is as fraught with problems as the discussion document suggests. Submitters said there is insufficient data and evidence to suggest that NCEA is not cohesive, consistent, credible, or of great international concern. Educator submitters acknowledged that there are issues with NCEA, but that the true issues are different than that suggested by the proposed changes. Submitters considered that the proposals are trying to fix something that is not broken, that the proposed overhaul of NCEA is not backed by evidence, and that the Proposals will create new, bigger issues.

It's rather impressive to claim these proposals will improve the credibility and coherence of senior secondary qualifications—especially when no actual data has been released to show that there's a problem in the first place. One might almost think we're supposed to blindly trust that the current system is somehow failing, without any evidence whatsoever. (Educator, Survey, R_4YM5EQ8Bn1sljx4)

Further, educator submitters reported that one key issue with NCEA is that, despite the system having been around for over twenty years, older generations have not put effort into learning and understanding it. Submitters also noted that a large and increasing proportion of the workforce and parents now will have studied NCEA, therefore these changes will create more confusion.

NCEA is credible and coherent enough. The only people who find it confusing are people too old to have taken it, and very soon it will be the generation of people who did who will be the parents and employers of future students. Fundamentally changing the system now will only create confusion for that generation of parents and employers who understand NCEA. (Educator, Survey, R_9MyQGgPuHRShPJL)

Lack of evidence the proposed changes will make the expected improvements

Extending from the point above, many educator submitters reported that there is also a lack of evidence that the proposed changes would achieve the expected improvements.

²⁴ For reference, the questions were as follows: “What concerns do you have about the proposals creating better alignment between the curriculum and assessments when compared to NCEA?” and “What concerns do you have about the proposals improving credibility and coherence of the national senior secondary qualifications?”

Specifically, submitters do not expect that the proposed changes will be able to effectively improve alignment between curriculum and assessments. Submitters said that alignment can only be improved by increased funding and resourcing for teachers, such as enabling teachers to attend adequate teacher training and develop consistent teaching materials.

The government's claim that NCEA's "inconsistency" is the problem is a red herring. The real issue is the lack of funding and support for schools and teachers to deliver a consistent, high-quality education. Trying to fix this with a rigid, top-down structure is a superficial solution that will only create new problems. (Educator, Survey, R_9QSTn8htl9dEahN)

Proposed changes are outdated, inflexible, and will worsen teacher and student experience

Many educator submitters reiterated previous statements that the proposed changes represent a regression to an outdated and inflexible system that was reformed for good reason. They said that the changes seem less focused on children and their learning and focused more on (older) employers and their needs. Submitters stated that the changes will reduce education pathways, disproportionately disadvantage vulnerable students, increase failure rates (as well as increased dropout rates and decreased attendance), increase the number of struggling students, and worsen student and teacher wellbeing. They added that the adverse impacts on schools have not been well considered.

Don't force outdated models with proven failure rates onto a modern, diverse, and complex education system. We need a system that evolves and improves what we have — not one that scraps it in favour of a rigid, inequitable model that will push more students out than it brings in. (Educator, Survey, R_9iDnQmp2MnXhD8C)

The Proposals will increase inequity

Further, the proposed changes were described by some educator submitters as a 'eurocentric' or 'colonial' model of teaching and assessment. These submitters commented that the proposed model will not allow for localised, culturally responsive approaches, meaning that teachers will be unable to tailor learning for their students. Specifically, submitters anticipated that Māori, Pacific, and ESOL students would be penalised as a result. Submitters emphasised that it is important to ensure that New Zealand's education system is able to recognise the different learning strengths, weaknesses, and pathways of all New Zealand children.

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. (Educator, Email, EME-2342 PPTA Te Tiriti o Waitangi Komiti)

There is too much emphasis on high-stakes external examinations

Specifically, some educator submitters commented that the Proposals problematically place too much emphasis on high-stakes external examinations. They considered this focus to be

especially regressive, outdated, and likely to increase failure rates, as outlined above. These submitters noted that not all students perform well in examination settings and are therefore being set up to fail. Further, educator submitters noted that studying for and sitting examinations do not reflect how we learn or apply knowledge in 'real life'. They explained that examinations are not considered well suited to assess things like deeper understanding and critical thinking.

On the surface, it might sound like a tidy way to measure achievement — one big test, same conditions for everyone, and see who comes out on top. But life, and learning, don't work like that. For some students, exams are fine. They have the resources, support, and environment to handle the pressure. But for many — especially those living with anxiety, trauma, or daily stresses that most never see — the playing field isn't level. When a system decides your worth based on how you perform on one particular day, it stops seeing the whole person. (Educator, Survey, R_4XDdCbWajDvcTpT)

Proposals will be disruptive and stressful for teachers, compounding their existing workload and increasing teacher attrition

Many educator submitters stated that successful implementation of the Proposals would be extremely challenging for teachers to manage on top of their high workload. They explained that the sector is currently experiencing high burnout and low morale. They warned that intensive work required of teachers during the transition will further impact teacher shortages further as well as lowering attraction into the profession.

New Zealand teachers are experiencing unprecedented workload pressures and reform fatigue that threaten both individual wellbeing and system-wide educational effectiveness. OECD data consistently show that our teachers report among the highest levels of assessment-related stress internationally. The current proposal ignores these professional realities and risks creating a workforce crisis that compromises educational quality across the system. (Educator, Email, EME-2487)

General comments opposing or expressing concern about the Proposals

Some educator submitters commented general opposition to and concern regarding the Proposals, with little additional detail or context for their commentary. These submitters simply implored the government not to make the proposed changes. Some comments here urged that the changes should not be made without taking more time to consult more broadly, especially with teachers. They also required that any subsequent decisions have a strong evidence-base.

Don't do it. I am disappointed with these changes no part of this is acting in good faith. (Educator, Survey, R_4Ow8wBuVPi27YvA)

8.2.3 Timeline considerations



Comments on this topic

There were approximately 1142 comments from educator survey submitters related to the proposed timeline.

The proposed timelines are too short and considered unachievable

Most educator submitters considered that the proposed timelines for implementation are not long enough and are unachievable. They said that the timelines are insufficient to support the planning, development, and training required to set both teachers and students up for success. Other submitters said that the timelines are rushed, unplanned, and are not proportionate to the large change required. Many submitters stated that the timelines should be between five to ten years with a phased approach to implementation.

PPTA members, including principals, consistently ask for time. Time isn't just a resource - it's a prerequisite for trust, stability, and success. There needs to be time given to planning course design, understanding curriculum changes, and unpacking new standards. Teachers need space to learn, adapt, and collaborate. Time is necessary for clear, consistent, and early communication from NZQA and MoE with the sector. There certainly needs to be time to ensure communication with learners, whānau, employers, and tertiary providers is sound. (Educator, Email, EME-2340 PPTA Executive)

Some educator submitters noted that recent changes to NCEA Level 1 were smaller and had longer timelines. Yet, these changes took longer than anticipated and did not go well. Some submitters stated that they do not have trust that the Ministry can meet these timelines. A few submitters referred to the timelines as requiring educators to develop and implement simultaneously, with one comparing the timelines to 'building a plane whilst it is taxiing down the runway'.

Developing an entirely new curriculum and preparing teachers to implement it effectively requires significant time, support, and resources, which do not appear to be accounted for. The current timeline seems unrealistic given the scale of the changes, the need for professional development, and the extra workload on teachers. A more reasonable timeline would allow for careful planning, piloting, and staged implementation to ensure the system works effectively for students and educators. (Educator, Survey, R_9kCVWEWsDjjKscp)

Considerably more time is needed to plan, develop, and implement the changes

As detailed in the previous section, many educator submitters emphasised that the currently proposed timelines are not sufficient for an effective transition, due to the large-scale change required. Submitters said that the timelines should be increased from two years to at least five years or more. Educator submitters reinforced their concern for teacher workload, pressures, and potential of burnout from the proposed changes, expected to be exacerbated by the proposed timeframes.

TIME before implementation to learn the changes. TIME to practice marking of exams. TIME to learn and understand the new grading system. DON'T expect teachers to learn this as they are teaching it. (Educator, Survey, R_90oeokgBVZiSx7Q)

Piloting is needed prior to nationwide implementation

Some educator submitters suggested that a thorough pilot of the curriculum, standards, assessments, moderation process, and resources is needed prior to nationwide implementation. They said that the major changes proposed require careful planning,

development, assessment, and review. Submitters said that sound testing, piloting, and evaluation could be expected to take up to three years.

The timeline does not allow for the necessary time to create, pilot, and refine the new curriculum and assessment materials. It takes years to develop high-quality resources, and a rushed rollout will mean that teachers are left to develop them on their own, leading to even greater inconsistency than the government claims is happening now. (Educator, Survey, R_9QSTn8htl9dEahN)

The first cohort will be unfairly and repeatedly disadvantaged

Some submitters reported that the first cohort will be repeatedly disadvantaged by going through changes three years in a row. It was said to be unfair and harmful to treat one cohort like 'guinea pigs' when there could be a staggered start instead. Referencing the aforementioned content, these submitters repeated that the current timelines are unrealistically short, unnecessarily urgent, and will penalise one student cohort too much.

The same year/group of students will be treated as the "test" year level for every new standard each year. This will provide an unstable education throughout their time in high school as they will be going into a new curriculum etc each year until year 13. (Educator, Survey, R_4Nq6O3FOyHrmMdx)

8.2.4 Implementation considerations



Comments on this topic

There were approximately 2366 comments from educator survey submitters related to other changes or resources needed to deliver the new qualification.



Note that implementation considerations were raised throughout the feedback received. A summary of the implementation considerations of educators is provided below, with considerations specific to individual proposals included in the relevant sections above.

Clear and robust curriculum and grading system with associated resources

As in section 7.2.3, many educator submitters reported that it is crucial that the curriculum and grading system (such as guidance, materials, exemplars, assessment frameworks) are clear, consistent, and robust. Further, they said that it is important that all resources are inclusive, high quality, specific and not ambiguous, practical, and transparent. Submitters restated that educators must receive all resources well in advance of being required to teach with them.

High-Quality Curriculum and Assessment Materials: The new system is supposed to be underpinned by a "new national curriculum". Schools and teachers will need high-quality, fully developed curriculum and assessment materials ready well in advance of implementation. (Educator, Survey, R_9QSTn8htl9dEahN)

All documentation, as well training and resources, are required well in advance of rollout

In addition to the robust curriculum and grading system mentioned above, many educator submitters reemphasised that they need quality resources and systems in place advance to the rollout. In particular, they mentioned the following would include:

- quality resources and guidance – the curriculum and associated documentation, quality exemplars, and textbooks
- time – Ministry days and sufficient non-contact teacher time to understand the proposed changes and develop resources for the transition
- collaboration and partnership – collaboration between teachers and schools, mentoring, and clear communication
- training – meaningful and subject-specific PLD, pedagogy-related training, strategies to help support diverse learners and subject-specific training.

Professional development needs to be a priority in schools. Teachers who have never taught any other way than NCEA are going to find this a huge shift. The workload increase will be significant. While the minister says it is 'business as usual', it really is not. [...] The overhaul of curriculum and assessment will increase teacher workload significantly over the next 5 - 6 years. (Educator, Survey, R_4kmEzFkBuUQUg9R)

They specified that these should be provided at least a year prior to when they would be required to teach it, otherwise it risks resembling the 'shambolic' recent roll out of NCEA Level 1 refresh.

I think the Ministry has failed to roll out the Level 1 refresh successfully. Teachers are exhausted and really trying to get it right. These proposals need to roll out better, we need to be better equipped. There should be no guessing in meaningful teaching and learning. (Educator, Survey, R_9ercr7rmTsSG2mk)

However, submitters reported that they had very little confidence that they would receive the necessary resources and training in a timely manner to support a smooth and effective transition.

Based on what has happened with previous changes in curriculum and assessments, teachers have had limited and confusing support and advice from the government. Please provide timely, concise, useful information which can be used in the classroom. (Educator, Survey, R_4zdnZVjw5n0g2V6)

Smaller class sizes and more educators, including specialist staff

Again, many educator submitters emphasised the importance of smaller class sizes, as well as the need for more educators, including specialist staff such as specialised subject teachers and teacher aides. Submitters said that these changes are needed to accommodate the implementation and to better support all students and facilitate their success.

Extra staff or specialist support will help manage the increased workload and assist students with learning or behavioural challenges. (Educator, Survey, R_4Q6My2Ca03HpFsi)

Further, submitters said that teaching needs to be made to feel like a valued and viable profession, with workload and remuneration key to attracting new educators and retaining current educators.

To attract and retain skilled educators, teacher workload, pay, and well-being must be addressed. (Educator, Survey, R_4pXw5t2EEP3YM5s)

Robust and nationwide access to digital tools to support learning

Some educator submitters said that robust and nationwide access to digital tools are a key change needed to support implementation. Submitters said that it was important that all educators and students can access the appropriate technology and digital tools to support effective learning. This includes access to internet connectivity, devices, and online resources such as exemplars and textbooks. Additionally, submitters mentioned digital tools for educators to be able to track student progress towards requirements.

Robust digital infrastructure, including access to hardware, software, and online platforms that support teaching and assessment. This includes reliable and robust nationwide accessibility. (Educator, Survey, R_9ktp0mbd2GatXxL)

Ensure supports are available for students with additional learning needs

Some submitters reemphasised the need to ensure that there are supports available for students with additional learning needs, to ensure all students can succeed in less flexible system. Submitters again noted that it will be key to be able to offer interventions or alternative pathways for students who choose the wrong subjects, are at risk of not meeting requirements, and do not perform well in external examinations, as well as those who fail requirements.

support to make it accessible - increased support for those with dyslexia, anxiety and so on that will have to try to succeed in a less flexible system (Educator, Survey, R_4JxSlgYEaWY2v1L)

Clear and accessible information required for students and whānau

Submitters also commented that clear and timely communication with students and their families around the new system and related requirements and expectations will be important to support a transition. Suggestions included translated resources, shared progress check-ins, and accessible digital explanations of how the new system works and its pathway implications. A few educator submitters stressed that all communication information needs to be clear and written in plain-language.

Develop comprehensive, accessible resources explaining the new system to students and families. This includes plain-language guides about how grades are calculated, what different achievement levels mean, and how the qualifications support different pathway options. Many families will be confused by the change from familiar NCEA approaches (Educator, Survey, R_905VN3mGcoleuyi)

8.2.5 Other comments



Comments on this topic

There were approximately 2212 comments from educator survey submitters in response to the “Do you have anything else to add?” question.

The approach needs to have bipartisan agreement

Many educator submitters emphasised that regardless of the approach taken, it must have bipartisan agreement from all political parties. With an impending election, submitters raised the question of what will happen if there is a change of Government. Educator submitters said that teachers and students are tired of education being treated like a ‘political football’, with significant changes with every government change. Submitters stated that any education reform needs to be expert-led and not politicised and used to serve short-term interests of politicians. Educator submitters urged the government to take their time, consult widely, and ‘get it right’.

It is very important that this is agreed to by all political parties and not just changes that are proposed and then changed and amended every time we get a new government. Everyone needs to agree to these. We are sick of being a political football. Our students and teachers deserve better! (Educator, Survey, R_4AFFmuaDwCdQ4)

There is a need for stability, not constant change

Related to the previous theme, many educator submitters commented that constant change creates much instability. They said that this instability damages the credibility of the education system and makes it very difficult for teachers to plan and students to succeed. Submitters considered it unreasonable and unfair that the education system changes so regularly and drastically. Educator submitters also described the unnecessary burden such changes place on teachers and noted the proposed changes do not have the best interests of students in mind. Submitters noted that teacher morale, retention, and attraction suffer with each change to the education system.

A few educator submitters referenced the ‘Education Conversation’ which was intended to lead to a pan-political 30-year plan for education, characterised by deep planning, deep thinking, research, and successful models of education.

Education should not drastically change with each newly elected government. It is simply not fair to keep dumping changes to our curriculum and method of assessment. Keep the students at the centre and keep asking, what is best for them? (Educator, Survey, R_9eLTLdbC325ifhS)

Negative impact on student wellbeing expected

A few submitters re-emphasised that the proposed changes are not in the best interests of students and will negatively impact on their achievement and wellbeing. Educators stated that the changes impose higher expectations and do not set students up for success. Therefore,

the changes are expected to create additional pressure and stress which will have adverse impacts on wellbeing.

These changes are unnecessary and are based in politics not in the best interests of students, their wellbeing and success. (Educator, Survey, R_4MZhyKta2O9vNIL)

8.3 Industry



While the quantitative analysis indicates that there may have been support among submitters for the Proposals, the qualitative analysis reads less positively. This is because submitters were more often asked to provide additional comments based on their concerns with specific Proposals.



Submitter summary

Many industry submitters raised concerns about implementation, particularly regarding timelines and resourcing. Some supported the direction of the reforms, provided that implementation was well planned and adequately resourced. Others provided additional comments on communication, monitoring, and transition planning.

8.3.1 General support for the Proposals



Comments on this topic

As there was no explicit question in the survey asking submitters to provide additional general comments on why they support the changes, approximate numbers of submissions that commented in support are unable to be provided. The following themes were drawn from submissions that raised comments in support throughout the implications and next steps questions.

Some industry submitters supported the direction of the reforms, provided implementation is well planned and adequately resourced. Submitters noted that successful delivery would depend on clear communication, strong support for teachers, and realistic timelines. Most emphasised that professional development for teachers would be essential. Respondents stated that educators needed comprehensive training to effectively deliver the proposed reforms.

Success will depend on strong professional development, adequate resources, and ongoing collaboration between schools, tertiary providers, and industry. (Industry, Survey, R_90oSR2OFw9nUGwu)

Many highlighted the need for ongoing partnership between schools, industry, and tertiary providers. Submitters stated that effective implementation required genuine collaboration rather than tokenistic consultation. Some submitters expressed confidence that the reforms

would create clearer qualifications for employers. These respondents noted that standardised requirements would make it easier to understand student capability and make hiring decisions.

8.3.2 General concern about the Proposals



Comments on this topic

There were approximately 69 comments from industry survey submitters related to general concerns with the Proposals.²⁵

The changes may impact teacher workload and wellbeing

A few industry submitters highlighted specific concerns about teacher workload and wellbeing. They said that increased assessment demands and system changes would add significant administrative burden.

School teachers I know are very stressed by the changes. They have crazy-high workloads and are further overwhelmed just at the thought of more change. (Industry, Survey, R_4C2mdSMi9AH9CQV)

Appropriate support and resources must be available

A few industry submitters also noted uncertainty about what resources and support would be available. Submitters stated that schools needed clear information about funding for facilities, specialist equipment, and professional development.

Time, resourcing and PD for teachers needs to be at the forefront. Who will teach VET subjects? This may require an extensive teacher recruitment and training programme. (Industry, email, EMI-1059)

[A] significant practical challenge that needs to be addressed for the successful delivery of Vocational Education and Training (VET) subjects or training is the lack of a clear plan for teacher qualifications and support, and the length of time it will take to build up an appropriately skilled workforce able to offer meaningful VET qualifications. (Industry, Email, EMI-1019)

Careful operational planning is necessary

A few submitters emphasised that operational planning needed careful attention. They noted concerns about timetabling, staffing, subject availability, and coordination of industry partnerships.

VET programs often require flexible scheduling to allow for off-site learning, work placements, or block courses. Schools need support to adjust timetables and staffing

²⁵ For reference, the questions were as follows: “Describe your concerns about the proposals making it easier to identify what knowledge and skills a job candidate has.” and “Describe your concerns about the proposals improving credibility and coherence of the national senior secondary qualifications.”

in ways that won't disrupt the rest of the curriculum. (Industry, Survey, R_4loQjOCeZcFXPaF)

8.3.3 Timeline considerations



Comments on this topic

As there was no explicit question in the survey asking industry submitters to provide comments on timeline considerations, approximate numbers of submissions that commented are unable to be provided. The following themes were drawn from industry submissions that raised timeline comments whilst answering other implications and next steps questions.

The proposed timelines will not give educators enough time to prepare and embed changes

Many industry submitters stated that the proposed timeline for implementation was too rushed. They noted that developing quality VET subjects, retraining teachers, and establishing robust assessment systems required more time than proposed. Several emphasised that a rollout in the proposed timeframes was unrealistic given the scale of change required.

The proposed reform timeline is ambitious but rushing development risks producing poorly designed subjects that are difficult to implement. Schools need lead in time to plan timetables, resource staffing, and engage with new content. (Industry, Email, EMI-1060)

Two years is not enough time to develop full industry linked subject curriculums [sic] and assessments for VET subject. (Industry, Email, EMI-1058)

Most expressed concern about whether teachers and schools would have adequate time to prepare. They noted that educators were already stretched by recent curriculum changes and would struggle to adapt to further major reforms without sufficient lead time.

Teachers will struggle to make the changes and adapt so at least for a while students won't reach their best as teachers work to catch up. (Industry, Survey, R_4kO4r3boXFA61Kh)

Submitters also noted insufficient consultation and development time, particularly in relation to the parallel but incomplete work on the curriculum redesigns. They emphasised that adequate time is needed for meaningful engagement.

8.3.4 Implementation considerations



Comments on this topic

There were approximately 99 comments from industry survey submitters related to implementation considerations.



Note that implementation considerations were raised throughout the feedback received. A summary of the implementation considerations of industry is provided below, with considerations specific to individual proposals included in the relevant sections above.

Communication must be transparent and widespread

Some industry submitters emphasised the importance of clear communication with all stakeholders. They noted that whānau, students, employers, and schools needed transparent information about how the new system would work and what changes to expect.

The 4-subject rule plus Foundational Award is simple to explain but will need clear communications for whānau and employers. (Industry, Email, EMI-1062)

Some submitters stated that qualifications needed to be easily understood by employers. Submitters noted that moving to a new system risked creating confusion rather than improving clarity if not well communicated.

I don't believe most employers fully understand the current NCEA system, so introducing an entirely new structure is unlikely to make things easier. Instead, it risks creating even more confusion as they will have to learn and interpret a different framework from scratch. (Industry, Survey, R_9nwrqsyqtugCrDN)

Implement monitoring and evaluation of the changes

Many industry submitters called for robust monitoring and evaluation of the reforms. Submitters suggested that the government needed to track impacts on achievement, equity, and work readiness to enable adjustments based on evidence.

It is our strong view that government must invest in consistent research and evaluation activities that sit alongside any change programme around the curriculum and assessment and qualifications regime. (Industry, Email, EMI-1066)

Some submitters emphasised that implementation success should be measured against clear outcomes. They noted that evidence-based decision making would be essential to avoid unintended consequences.

Comprehensive transition planning will be needed

Some industry submitters raised concerns about managing the transition period between systems. Submitters noted that students, teachers, and employers would need support to navigate changes and understand how the new qualifications compared to current ones.

The new qualifications will be phased in from 2028-2030, with limited time for creative subject teachers to redesign curricula and assessment approaches to fit the new rigid subject structure. (Industry, Email, EMI-1056)

A few submitters suggested that phased implementation with adequate transition support would reduce disruption. Respondents stated that allowing time for systems to become established would improve outcomes.

A phased approach would allow for piloting, feedback, and refinement before full national rollout. This would reduce risks for students, teachers, and employers, and increase the likelihood of long-term success. (Industry, Email, EMI-1037)

International comparability needs consideration

Some industry submitters questioned how the new qualifications would align with international standards. They noted that New Zealand students needed qualifications that would be recognised overseas for university entrance and employment.

Please consider how these qualifications will compare with international standards and for University entrance for vocational degrees. (Industry, Survey, R_4OxAlqgUzIWT193)

The changes should balance structure with flexibility

Some industry submitters emphasised the need to balance structure with some flexibility. They stated that while clearer standards were valuable, the system should not become so rigid that it disadvantages diverse learners or prevents schools from meeting local needs.

You ought to try to maintain elements of the flexibility of the current model. It is such a huge help to people who do not fit tidily into school systems. (Industry, Survey, R_4TYS82qZoq6kMY4)

Teachers need comprehensive support and professional development

Some submitters highlighted the need for comprehensive teacher support. Submitters noted that teachers are already stretched by recent curriculum changes and would require substantial professional development to effectively deliver the proposed reforms.

There is sector fatigue and a growing sense that teachers are blamed for system ills while being asked to deliver rapid, under-resourced change. (Industry, Email, EMI-1074)

Submitters emphasised that teacher workload, time for preparation, and access to high-quality professional learning would be essential. Some noted that teacher retention and wellbeing should be prioritised alongside system change.

8.4 Whānau and students



While the quantitative analysis indicates that there may have been support among submitters for the Proposals, the qualitative analysis reads less positively. This is because submitters were more often asked to provide additional comments based on their concerns with specific Proposals.



Submitter summary

Many industry submitters raised concerns about implementation, particularly regarding timelines and resourcing. Some supported the direction of the reforms, provided that implementation was well planned and adequately resourced. Others provided additional comments on communication, monitoring, and transition planning.

8.4.1 Support for Proposals



Comments on this topic

As there was no explicit question in the survey asking submitters to provide additional general comments on why they support the changes, approximate numbers of submissions that commented in support are unable to be provided. The following themes were drawn from submissions that raised comments in support throughout the implications and next steps questions.

A few whānau submitters expressed general support for the proposed changes. These submitters reported that the proposed changes are positive and are welcome improvements to the current system. A few submitters added that they support the changes, so long as they are executed well. They explained there should be appropriate levels of expertise and resourcing, and with a clear and consistent approach. These submitters wanted to see the changes come in sooner rather than later.

It is a brave move and will involve a lot of expertise, effort and resourcing for it to be a success. The need for this is immense and change is long over due. (Whānau, Survey, R_4FexqAo8PFoB6uZ)

Similarly, a few student submitters also reported general support for the proposed changes. These submitters said that they expect the new approach would be an improvement on the current and expect that it would better align with international approaches.

I think it is great and much needed! NCEA is not credible. At majority of schools in Auckland kids are choosing to do Cambridge and IB, which really shows the flaws in the system which we must address. (Student, Survey, R_4yd5PSivdIMuj5E)

8.4.2 General concern about the Proposals



Comments on this topic

There were approximately 1750 comments from whānau and student survey submitters related to general concerns with the Proposals.²⁶

The Proposals could have adverse impacts on student wellbeing

Some whānau and student submitters, including Mana Mokopuna – Children’s Commissioner as a representative of students, said that the proposed changes create uncertainty, add unnecessary stress and pressure to teachers and students alike. They were concerned about the impacts to the ‘guinea pig’ student cohort, especially if there were not enough teachers or adequate resources to implement the changes. Whānau submitters also questioned who the change was for, given the adverse impacts to students and that most whānau and employers (under the age of 35) coming through now are very familiar with NCEA.

Education experts including kura kaupapa leaders are concerned that mokopuna will experience increased stress due to inadequate time to adapt to changes, inflexibility, along with the proposed high-stakes literacy/numeracy assessments. (Student representative, Email, EMO-5225 Mana Mokopuna Children’s Commissioner)

Implementing significant changes to the curriculum and assessment structure without adequate time, resources, or training will create additional strain, to the detriment of both teaching quality and student outcomes. (Whānau, Survey, R_4fAToicuM5VW2MF)

This adverse impact to student wellbeing is in addition to the repeated concern that the proposed approach lacks flexibility and inclusivity, and risks increasing failure and dropout rates. Student submitters expressed concern for their peers with additional learning needs who they expect will be disproportionately disadvantaged.

Students who succeed in NCEA will be fine with the new proposal. its the students who already struggle with school that this proposal will fail. learning isn't black and white, you cant teach everyone the same way. Historically, that hasn't worked. ncea allows for flexibility and different learning styles (Student, Survey, R_4zTlxt20rz1e1eK)

The Proposals may not improve credibility or coherence

Some whānau and student submitters noted that they do not anticipate the changes to increase qualification credibility or coherence. These submitters raised concerns about unnecessarily creating such large change, complication, and instability for students and

²⁶ For reference, the question was as follows: *Describe any concerns you would have about the proposed changes improving the credibility and coherence of the national senior secondary qualifications.*

teachers. They expected to see struggle, confusion, and chaos if the Proposals were implemented.

I don't agree that the proposed changes will improve credibility and coherence. The current NCEA system is well understood and flexible, which helps many students succeed. The proposed changes seem confusing and risk making the system more complicated. Instead of improving things, they could reduce clarity and make it harder for students and teachers to navigate the qualifications. (Student, Survey, R_9IFr1pr1OPzFCcr)

Further, a few whānau submitters noted that it seemed as though the Proposal discards many of the positive aspects of NCEA and, if anything, retains the negative aspects.

Credibility and coherence are important, but they should not come at the expense of accommodating diverse learner needs. Without strong emphasis on maintaining flexibility, equitable access, and tailored support, the new system may limit opportunities for many students. (Whānau, Survey, R_4g2l6kfbmv8Bbot)

Proposals do not adequately target core concerns in the education system

Many whānau submitters reported concern that the proposed changes were creating burdensome, disruptive, and resource-intensive change for the sake of change. Many whānau and student submitters stated that the Proposals seem rushed, not fully thought out, overly simplistic, narrow, and regressive. Student submitters also said that the Proposals do not address the core issues of misinformed parents (and employers), barriers to accessing quality education, nor adequately remedy poor literacy and numeracy. Student submitters also reported that the Proposals were not crafted with the students' best intentions or needs in mind.

We should not change a school system because parents and employers 'can't understand it'. Students have to suffer the changes you are making, and it will not be a positive change. (Student, Survey, R_4DJFssBlzncrMoV)

'Reinventing the wheel' when resources would be better invested elsewhere

Echoing the sentiment from educators in section 3.2.2, they said that resources (i.e. time and money) would be better invested into the current system, including increasing school funding and appropriate teacher resourcing and compensation.

The existing NCEA change programme represents significant, evidence-backed opportunities for improvement and should be strengthened not discarded, avoiding a wasteful, disruptive "start from scratch" approach. (Whānau, Survey, R_9By8rBXCLauMi8U)

8.4.3 Implementation considerations



Comments on this topic

There were approximately 1147 comments from whānau and student survey submitters related to other changes or supports needed to help students successfully complete the new qualification.



Note that implementation considerations were raised throughout the feedback received. A summary of the implementation considerations of whānau and students is provided below, with considerations specific to individual proposals included in the relevant sections above.

Teacher support needs to increase

Reinforcing prior points from educator submitters, many whānau and student submitters commented about the need to increase support for teachers via smaller class sizes, increased number of teachers and teacher aides, better pay, improved access to better resources, and greater investment into professional development. Whānau submitters noted that teachers are already overworked and are leaving the profession (and leaving New Zealand). They added that implementation considerations should alleviate pressure and work in with their workload, rather than becoming more burdensome.

Your teachers are not fully equipped to provide quality learning because there are shortages, they are over worked, under paid, class number are over, and the number of qualified teachers out there that are quality teachers are little. This is why private schools do well because they pay their teachers more so get the quality teachers. Do better for our teachers! (Whānau, Survey, R_4tKKMzB5oduleRV)

These submitters said that increased support for teachers would have a greater positive impact on students and their learning. They also cautioned that a lack of support would compound confusion, complications, and stress for students and teachers.

More support for teachers means more support for us. they clearly need it. (Student, Survey, R_42SCU7JH53y44dG)

Resources needed for diverse learners to ensure equity and inclusion

Many whānau submitters reported that stronger supports will be needed for learners with additional needs, to ensure equity and inclusion. They said that students who struggle in mainstream learning environments due to social or homelife challenges or learning challenges also need to be able to achieve an education. The proposed changes as they stand would be more difficult for these learners and so greater flexibility, tailored pathways, additional tutoring, as well as culturally responsive programmes are suggested.

Support for students who struggle in mainstream learning environments. Maybe due to learning challenges, maybe due to social challenges (home life environment, financial struggles, domestic violence, lack of parental support etc.) to be able to learn

and achieve, even if not in the mainstream academic areas. (Student, Survey, R_9Y0cUsrV7BdpB9D)

Ensure the curriculum and assessment processes are clear, consistent, and transparent

Some whānau submitters commented about the need to ensure that the resources and processes around the curriculum, assessments, and moderation are all clear, consistent, and transparent. Specifically, with regards to teaching content, teaching materials, and what constitutes a 'pass' and 'fail', both within and across schools.

I think it is important that marks/grades need to be clearly understood by students - they need to know what they need to do in an assessment to achieve a certain grade - there should be no mystery around this. (Whānau, Survey, R_4fpm5wJ6tnxSdkt)

Similar to educators, a few whānau and student submitters referenced the poor roll-out of NCEA Level 1. Some submitters suggested a phased implementation approach is adopted to ensure that resourcing and communications expectations are met and to create a smooth transition.

I think the change is happening too quickly for the required resources to be in place. Resent changes to NCEA Level 1 were very disruptive to learning and were put in place before supporting resource could be developed.

Likewise, student submitters reported the need for standardisation, clarity, and transparency around teaching materials, assessments, and grading.

I am disabled and i would strongly appreciate a clearer everything in regards to guidelines[sic] and explanations. i want exemplars to be easily accessible. i want explanations for why i should take these standards to be easily accessible. no human person hates learning, they just hate being shut down after asking "why" or "how". (Student, Survey, R_9CqvdXavvzRa0Qq)

Use student-centred design to develop achievement requirements

Similarly to educator submitters, some whānau submitters reported that it is important that the achievement requirements do not take a 'one size fits all' approach. They commented that changes will be needed with regards to external examinations, flexibility around subjects and pathways, vocational options, and opportunities to re-sit assessments. Whānau submitters noted that there will need to be increased flexibility and tailoring to better support students and learning outcomes. Student mental health and wellbeing were raised as concerns that need to be considered due to the increased pressure and decreased flexibility of the proposed approach.

Whatever the new qualification, there has to be enough flexibility to meet student needs and not turn them off from education. We all lose out if that happens. The current proposals are not the solution as they are too ridged[sic]. (Whānau, Survey, R_40bs1UFc126l1vb)

Student submitters also reported that there needs to be greater consideration of individual learning styles, strengths, and education needs. Particularly greater flexibility around subject

selection, in recognition that students are autonomous, need to remain engaged, and will have different career pathways.

DIFFERENT PATHWAYS FOR PEOPLE WITH DIFFERENT NEEDS!!! One size does NOT fit all. (Student, Survey, R_4M4o4dFkR2A7c0o)

Clear and regular communication with whānau and students is needed

Some whānau submitters stated that any change will need to be accompanied by strong, clear, and regular engagement with students and whānau. Suggested communication aides included a website, forums, webinars, parent teacher evenings, and accessible documentation. They said that it was important that whānau are communicated with about the changes and timelines, as well as about assessments and assessment criteria. Whānau submitters noted that all communications will need to be easy to understand and available in different languages and formats.

Transparency and open communication from schools and teachers around assessments and timeframes so parents can be aware and work with their kids to guide them along the path to success - if we don't know we can't help. (Whānau, Survey, R_4L7FsZTxAGsLQ0)

8.4.4 Other comments



Comments on this topic

There were approximately 1147 other comments from whānau and student survey submitters in response to the “Do you have anything else to add?” question.

Repeated and emphasised previously raised concerns with the proposed changes

Some whānau submitters took this opportunity to reemphasise their previously raised concerns around the proposed changes. These submitters again highlighted that an overhaul is not needed when strengthening and resourcing the current system would be a better use of time and money. Further, whānau submitters reemphasised that the proposed changes are regressive, inflexible, and inequitable, and subsequently are expected to increase fail rates and decrease student and teacher wellbeing.

I strongly urge the government to reconsider the proposed replacement of NCEA and instead build upon the robust, evidence-based progress already achieved through the existing change programme. Wholesale reform risks wasting significant investments, destabilising schools, and undermining the flexibility and equity that have been fundamental strengths of NCEA. (Whānau, Survey, R_9By8rBXCLauMi8U)

Similarly, student submitters referred to previously raised concerns regarding the unnecessary change, expected stress for teachers and students, and that the Proposal seems to be reverting to an outdated system. These submitters stated that resources would be better used to strengthen the current NCEA system, rather than overhaul it, and to better resource teachers and schools. Student submitters said that the consultation needs to listen to student voices, and that any changes need to better consider and centre the needs and wellbeing of

students and teachers. Student submitters advocated for change that is incremental and considers the individual.

I am disgusted with the lack of care in regards for our future generations' wellbeing that went into these ridiculous and unnecessary proposals and changes. The current system works efficiently and accessibly and any attempt to change that, especially in this way, is indicative of backwards thinking, going back about 50 years. (Student, Survey, R_9VmUsJ9Gfsgv0J5)

Ensure bipartisan support before changing our education system

As mentioned by educator submitters in section 8.2.5, some whānau submitters commented that changes to our education system, such as the proposed, need to have bipartisan support. These submitters were concerned that children's education has become part of a political performance or game 'at the mercy' of political and economic interests.

I VERY STRONGLY EXPECT there to be bipartisan support for these changes. We are sick of changes in the education sector and do not want our children to be at the mercy of political ideals being changed just because of a change in government. We expect our students to be able to work together to solve problems and I EXPECT THE SAME FROM OUR GOVERNMENT. Please work together on this one. Thanks for your consideration. (Whānau, Survey, R_9ya2w3RD41MycNP)

9 Outdoor Education



Comments on this topic

There were 1,012 submissions received specifically focused on Outdoor Education.

This is in response to the announcement that Outdoor Education would not be available for Year 11 in the new curriculum. It will be vocational only for Years 12 and 13, with responsibility for developing the curriculum, assessments and resources moving to the relevant ISB. While not yet confirmed, submitters understood that as a vocational subject Outdoor Education would not contribute to university entrance and much of the feedback received was driven by this understanding.



Submitter summary

Outdoor Education was raised by educator, industry, and whānau and student submitters who provided broader feedback on the Proposals, as a key part of their feedback on implementation and next steps. Submitters raised a wide range of reasons for their support for the retention of Outdoor Education as a senior subject. Some described their personal experience or that of someone in their family, or students from their school.

Outdoor Education supports personal growth and wellbeing

Submitters emphasised that Outdoor Education develops empathy, communication, judgement, and self-esteem, while fostering connection with nature. Submitters noted that these skills are linked to improved wellbeing and resilience and can be particularly important for youth mental health.

Outdoor education develops skills in leadership, problem solving, risk management, student agency, survival, ecological and environmental understanding and much more. It provides a classroom in the real world that enables students to challenge themselves in ways that no other subject area can and engage with our environment in ways that will ultimately benefit students wellbeing and the environments health too. (Educator, Survey, R_9eHrh4X2MsEGJ0J)

Outdoor Education is academically rigorous and research-based

A few submitters described Outdoor Education was a well-established academic discipline, underpinned by strong research and critical engagement with leadership, sustainability, and decision-making theory. Some of these submitters highlighted that it is endorsed by seven of the eight New Zealand universities and supports clear tertiary pathways.

It has a unique body of knowledge, academic models and theories, extensive research library and can be sequenced /stepped and assessed. Students need access to this valuable learning. (Whānau, Survey, R_9JCi6jmYfu2fajD)

Outdoor Education enhances employability and workforce skills

Some submitters noted that Outdoor Education provides transferable skills valued by employers, particularly leadership, teamwork, and problem-solving. A few submitters noted

that corporate organisations often invest in outdoor learning experiences for staff, recognising the value it has on business performance.

Corporates see the value in Outdoor education for their staff, often holding team and capability building using outdoor education providers because the benefits of these sorts of experiences lead to high performing teams. This is all really well known information with lots of evidence behind it. (Whānau, Email, EMO-5191)

There is cultural and economic value of outdoor learning

Some submitters highlighted Outdoor Education as an integral part of New Zealand's cultural and educational identity and plays a core role in the education of people working in many of the country's key industries, including Tourism.

Outdoor Education builds the skilled talent pipeline necessary to sustain New Zealand's tourism, conservation, and regional economies. (Educator, Email, EME-2222)

Outdoor Education can be a drawcard for international education

Some submitters noted that Outdoor Education was a significant drawcard for international students seeking a distinctive, holistic schooling experience and that removing it from the university entrance subjects could impact schools' ability to attract international students. They said that this would have an impact on wider educational delivery.

Outdoor Education is a major draw for senior international learners. It is essential that schools retain Outdoor Education and other vocational subjects as senior options and there is continued curriculum and resource support for these subjects from the Ministry of Education. These courses are highly valued by international learners and represent a key component of the value proposition for all schools enrolling senior international students. (Educator, Email, EMO-5206 SIEBA)

Changes to Outdoor Education risks reducing support and resourcing

Many submitters were concerned that Outdoor Education would be under-resourced if it was only a VET subject, and that its integrity and accessibility could be compromised if it is not prioritised or supported as a university entrance subject within the proposed new qualification structure.

10 Consultation process



Comments on this topic

As there was no explicit question in the survey asking industry submitters to provide comments on the consultation process, approximate numbers of submissions that commented are unable to be provided. Comments on the consultation process were raised by educator, whānau, and student submitters throughout both survey and email submissions.

10.1 Educators

This is not a genuine consultation, and broader consultation is needed

Many educator submitters thought that the consultation was rushed; unnecessary; a waste of time, money, and resources; disingenuous; not robust; not transparent; and pointless as they viewed the decisions have already been made. These submitters commented that the consultation had been conducted in 'bad faith' and had lost trust and buy-in from educators, who are said to be feeling uneasy. Educator submitters questioned whether true and meaningful consultation had been conducted as they said that the Proposals do not reflect the true needs of students.

They said that a slower, more rigorous, much broader consultation needs to be conducted with (current) teachers, students, and education experts i.e. those 'at the coalface' (or 'chalk face'), as well as community groups. Some educator submitters noted that they were disappointed to have found out about the consultation via media coverage.

Educator submitters were concerned that the consultation is rushed;

Instead, decisions about education should be based on thorough consultation with experts, teachers, students, and communities, as well as on sound research and evidence. Education deserves a stable, well-considered approach that puts learning and student wellbeing at the centre, not political gain. (Educator, Survey, R_96yBVY22CgUy0eZ)

The consultation survey questions were leading and biased

Many educator submitters considered that the consultation survey questions were leading, biased, and skewed towards the views of the current Government and their agenda. These submitters critiqued the question phrasing, noting that it made it hard for them to disagree or accurately provide genuine or authentic feedback. These submitters also noted that they felt the consultation was designed as an opportunity to collect information to justify the changes. They said that the survey was long, repetitive, and poorly designed.

The consultation survey is vague, filled with leading questions and cherry picked data. (Educator, Email, EME-2472)

I feel this survey is biased and leading in its questions. The questions are framed like it is happening the way you want it and are more a matter of 'to what degree'. This

feels like it is not robust consultation just like the decision making to come up with this is not evidence based and or robust. (Educator, Survey, R_9pseh2NjJ3xnmOg)

Insufficient information to made it difficult to provide informed feedback

Many educator submitters reported that they struggled to provide feedback without having access to sufficiently detailed information regarding the proposed changes. They expressed frustration at being asked to provide feedback based on such limited information, particularly regarding the curriculum, subjects, and assessment structures. For example, educator submitters ideally would have seen the revised curriculum and the subject lists (including which are compulsory and vocational) prior or in tandem to this consultation. Some of these submitters noted that they were unable to offer much specificity in their feedback.

The lack of detail makes feedback impossible - how can I say anything on nothing!! (Educator, Survey, R_9n8YhiOBZx1bAoZ)

10.2 Whānau and students

The change is rushed and is not backed by evidence or informed by the right people

Some whānau submitters reported that the change is very rushed and is not based on evidence or information from education and industry experts. They commented that the consultation period was too short. They said it was biased given the lack of wider appropriate and meaningful consultation, specifically with teachers, students, and the groups expected to be disadvantaged (i.e. neurodiverse, disabled, and Māori and Pacific students).

These submitters urged the government to slow down and take the time to genuinely consult and listen to the appropriate people, and to properly plan and map out any changes. They said that the proposed changes appear to be under advised and out of touch, and that much more rigor and research is needed.

I am also concerned that this change is being rushed and has not been truly planned or mapped out properly. The current Education Minister appears to be making changes for the sake of making changes, without listening to teachers, schools, and communities, or spending meaningful time on the ground in schools to interact with families and understand the real reasons why some students are not staying in school or gaining the qualifications they need. (Whānau, Survey, R_9I77sXFOxXLcCI8)

Similarly, some student submitters stated that the consultation needed greater input from teachers and students. They commented that students need to be consulted more widely on these changes and that their feedback needs to be listened to. They commented that students are the people currently experiencing the system and are the people who will be most impacted by any change, so the student voice needs to be heard.

Student voice is just as important as any other voice. I will have left school by the time this new proposal is introduced but the future education of others is important to me as well. Please get feedback from younger students who this WILL affect as well. There are a lot of students who want to do well in this country so it's only fair for them that they know what is happening. (Student, Survey, R_4fcwJ3FOWGMdJIJ)

This is not a genuine consultation

Some whānau submitters commented that the consultation does not seem genuine, saying that it seems to be 'lip service' with decisions already made. There was a lack of belief that the feedback would be read and listened to.

This whole consultation appears to lip service at best. It appears to be a done deal.
(Whānau, Survey, R_4U8BUv2kroaqOpH)

A lack of information limited the ability to respond

Some whānau submitters reported that they feel unable to provide fully informed feedback when the consultation did not provide sufficient information about what the changes would look like. These submitters reiterated that the consultation lacked detailed information, for example around subject options, vocational pathways, and the curriculum.

How can we change the secondary qualifications system when we don't even know what the new curriculum changes are going to be. Let's move in order please and mind that a lot is being asked off teachers without much consultation with them.
(Whānau, Survey, R_4rqtIVlcuGwdmFC)

Some student submitters similarly reported the need for more detailed information to enable them to form an understanding and be able to provide targeted feedback.

More information should be released before getting feedback because there is only a broad overview of the changes and not enough to form a proper understanding.
(Student, Survey, R_4WCK6Uq7zqD93Jh)

The consultation questions are leading

Further, a few whānau and student submitters highlighted that the consultation questions were leading, not truly open, and gave a false impression of choice.

This survey is extremely and obviously attempting to skew viewpoints and contains leading questions and insulting, incongruous follow up questions that I have pointed out. This is rushed and entirely unnecessary change for ideological reasons.
(Whānau, Survey, R_4G3OASePGAt0oAF)

10.3 Next steps

This report summarises views from consultation on the proposed changes to NCEA and sits alongside other consultation activities conducted by the Ministry of Education. This report will contribute to information provided to the Minister of Education and Ministry of Education on proposed reform to the education sector. The final decision as to whether, when, and how the proposed changes proceed remains the responsibility of the Minister of Education.

Appendix A: Survey questions

Educator survey

Consultation section	Likert-scale questions	Written response questions
Case for Change	Do you agree that our national qualifications should assess against a national curriculum?	- Describe any concerns you have about the proposed new qualifications assessing against a national curriculum. - What elements, if any, of NCEA's flexibility do you think should be retained in a future design of the qualifications?
	Do you agree that the current NCEA requirements do NOT consistently measure student knowledge, skills and readiness for future study, training or employment?	- Which aspects of the current NCEA requirements do you think provide for a consistent measure of student knowledge, skills, and readiness? - Which aspects of the current NCEA requirements do you think lead to an inconsistent measure of student knowledge, skills, and readiness?
	Do you agree that the senior secondary qualifications system needs to improve?	- The discussion document identifies some problems with the current system. Which of those do you disagree with, and why? - Which parts of the senior secondary qualification system do you think should be prioritised for improvement?
	Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document?	Describe other opportunities for positive change that are not covered in the discussion document.
Proposal 1: VET Integration	Overall, do you support Proposal 1?	- Which aspects of proposal 1 do you have concerns about, and why? For example, do you have concerns about a particular aspect of proposal 1 or the entire proposal? - What benefits do you think proposal 1 will have for student learning and achievement? - Aside from funding, are there practical or operational implications you think need to be considered for schools to successfully deliver VET subjects?

Consultation section	Likert-scale questions	Written response questions
Proposal 2: Foundational Award and Years 12-13 qualifications	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?	- Describe any concerns you have about the Foundational Award being able to prepare students for learning in Years 12 and 13. For example, if you consider there are better ways to do this. - Describe the benefits you think a Foundational Award will have in supporting students to prepare for learning in Years 12 and 13. - Do you think other areas of learning or achievement should be considered as part of the Foundational Award? For example, should a certain level of student attendance be required? Describe these areas of learning or achievement.
	Most students will complete the New Zealand Certificate of Education in Year 12. How important is it for the Government to consider ways to ensure more students stay at school until the end of Year 12?	- What are your concerns about the Government considering ways to ensure more students stay in school until the end of Year 12? - 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?
Proposal 3: Subject-based approach	Overall, do you support a subject approach to assessments at Years 12 and 13?	- What are your concerns about a subject approach to assessments at Years 12 and 13? - What do you think are the main benefits to a subject approach to assessments at Years 12 and 13?
	Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects?	- What do you think are the benefits of being able to engage with parts of the curriculum (segments) of vocational and general subjects? - Why do you think it is important to engage with the full curriculum for vocational and general subjects?
	Do you agree that we need more consistent approaches to assessment?	- What concerns would you have about a proposal to increase consistency in approaches to assessment? - How could we ensure greater consistency in approaches to assessment?

Consultation section	Likert-scale questions	Written response questions
	Do you support some subjects being required as part of the Year 11 curriculum?	- What are your concerns with some subjects being required as part of the curriculum at Year 11? - Would you support other subjects being required as part of the curriculum at Year 11, aside from English and Mathematics or Te Reo Rangatira and Pāngarau? - 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?
Proposal 4: Strengthening achievement requirements	Do you agree that the proposed achievement requirements for the new qualifications are easy to understand?	What parts to the proposed achievement requirements do you find confusing to understand?
	Do you agree the four subject requirements should be achievable for most students?	- Describe your concerns about a four subject requirement not being achievable for most students. - Aside from additional funding, what other changes, supports, or mitigations do you think are needed to support strengthened achievement requirements?
Implications and next steps	Do you agree that the proposals will create better alignment between the curriculum and assessments when compared to NCEA?	What concerns do you have about the proposals creating better alignment between the curriculum and assessments when compared to NCEA?
	Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications?	- What concerns do you have about the proposals improving credibility and coherence of the national senior secondary qualifications? - Aside from additional funding, what further changes or resources would you (or your school) need for you to deliver the new qualifications?
	With appropriate resources, do you agree that the proposed timeline is achievable?	- What concerns do you have about the proposed timeline being achievable and what do you think is a reasonable timeline? - Is there anything else that you would like to say about the proposals?

Industry survey

Consultation section	Likert-scale questions	Open text questions
Case for Change	Do you agree that our national qualifications should assess against a national curriculum?	Describe any concerns you have about the proposed new qualifications assessing against a national curriculum.
	Do you agree that it is difficult to understand the value of NCEA?	- Which aspects of the current NCEA requirements do you value as a clear indication of readiness for work or training? - Which aspects of the current NCEA requirements do you think lead to an inconsistent measure of student knowledge, skills, and readiness? - The discussion document identifies some problems with the current system. Which of those problems do you disagree with, and why?
	Do you agree that the senior secondary qualifications system needs to improve?	Which parts of the senior secondary qualification system do you think should be prioritized for improvement?
	Do you agree there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document?	Describe other opportunities for positive change that are not covered in the discussion document.
Proposal 1: VET Integration	Overall, do you support Proposal 1?	- Which aspects of proposal 1 do you have concerns about, and why? For example, do you have concerns about a particular aspect of proposal 1 or the entire proposal? - What benefits do you think proposal 1 will have for student learning and achievement? - The government understands that investment is needed to make sure VET learning is a success. Aside from funding, are there any practical or operational implications you think need to be considered for schools, in partnership with Industry Skills Boards (ISBs), to successfully deliver VET subjects?

Consultation section	Likert-scale questions	Open text questions
Proposal 2: Foundational Award and Years 12-13 qualifications	Do you agree that it would be beneficial to remove NCEA Level 1 and for students to focus assessment effort on the Years 12 and 13 qualifications, having obtained a Foundational Award in literacy and numeracy (in Year 11)?	- Describe any concerns you have about the Foundational Award replacing NCEA Level 1. - Describe the benefits you think a Foundational Award will have in replacing NCEA Level 1.
		Do you think other areas of learning or achievement should be considered as part of the Foundational Award? For example, should a certain level of student attendance be required? Describe these areas of learning or achievement.
Proposal 3: Subject-based approach	Overall, do you support a subject approach to assessments at Years 12 and 13?	- What are your concerns about a subject approach to assessments at Years 12 and 13? - What do you think are the main benefits to a subject approach to assessments at Years 12 and 13?
	Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects?	- In terms of post-school work or training, what do you think are the benefits of being able to engage with parts of curriculum subjects (segments)? - In terms of post-school work or training, why do you think it is important to engage with full curriculum subjects?
Proposal 4: Strengthening achievement requirements	Do you agree that the proposed achievement requirements for the new qualifications are easy to understand?	What parts of the proposed achievement requirements do you find confusing to understand?
	Do you agree that the proposed achievement requirements will provide employers with a clearer record of student knowledge, skills, and achievement?	What parts of the proposed achievement requirements are you concerned about as an indication of student knowledge, skills, and achievement?
Implications and next steps	Do you agree the proposed changes (proposals 1-4) will be beneficial for your business in the future?	Describe why you consider the proposed changes will not be beneficial for your business in the future.

Consultation section	Likert-scale questions	Open text questions
	Do you agree that the proposals will make it easier to identify what knowledge and skills a job candidate has, when compared to the current NCEA?	- Describe how you consider the proposed changes will be beneficial for your business in the future. - Describe your concerns about the proposals making it easier to identify what knowledge and skills a job candidate has.
	Do you agree that the proposals will improve the credibility and coherence of the national senior secondary qualifications?	- Describe your concerns about the proposals improving credibility and coherence of the national senior secondary qualifications. - Is there anything else that you would like to say about the proposals?

Whānau and students survey

Consultation section	Likert-scale questions	Open text questions
Case for Change	Do you agree that our national qualifications should assess against a national curriculum?	- Describe any concerns you have about the proposed new qualifications assessing against a national curriculum. - Are there aspects of NCEA that have supported you or your family member's learning and achievement? What are these aspects and benefits?
	Do you agree that NCEA is difficult for parents and students to understand?	- Which aspects of NCEA do you think are simple and easy to understand, and why? - Which aspects of NCEA are most difficult to understand?
	Do you agree that the senior secondary qualifications system needs to improve?	- The discussion document identifies some problems with the current system. Which of those do you disagree with, and why? - Which parts of the senior secondary qualification system do you think should be prioritised for improvement?
	Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document?	Describe other opportunities for positive change that are not covered in the discussion document.
Proposal 1: VET Integration	Overall, do you support proposal 1: Working with industry to better integrate VET learning into the senior secondary qualification system?	- Which aspects of proposal 1 do you have concerns about, and why? For example, do you have concerns about a particular aspect of proposal 1 or the entire proposal? - What benefits do you think proposal 1 will have for student learning and achievement?

Consultation section	Likert-scale questions	Open text questions
	Do you agree that access to enhanced Vocational Education and Training (VET) subjects would be a positive change in the design of the new qualifications?	- What concerns do you have about having enhanced access to Vocational Education and Training (VET) subjects as part of the new qualifications? - What benefits do you think enhanced Vocational Education and Training (VET) subjects will have for student learning and achievement?
Proposal 2: Foundational Award and Years 12-13 qualifications	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?	- Describe any concerns you would have about the Foundational Award being able to prepare you or your family member for learning in Years 12 and 13. For example, if you consider there are better ways to do this. - Describe the benefits you think a Foundational Award would have for supporting you or your family member to prepare for learning in Years 12 and 13. - Do you think any other areas of learning or achievement should be considered as part of the Foundational Award? For example, should a certain level of student attendance be required? Describe these areas of learning or achievement.
	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?	- What are your concerns about the Government considering ways to ensure more students stay in school until the end of Year 12? - 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?
Proposal 3: Subject-based approach	Overall, do you support a subject approach to assessments at Years 12 and 13?	- What are your concerns about a subject approach to assessments at Years 12 and 13? - What do you think are the main benefits to a subject approach with assessments at Years 12 and 13?
	Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects?	- What do you think are the benefits of being able to engage with parts of the curriculum (segments) of vocational and general subjects? - Why do you agree that it is important to engage with the full curriculum for vocational and general subjects?

Consultation section	Likert-scale questions	Open text questions
	Do you support some subjects being required as part of the Year 11 curriculum?	- What are your concerns about some subjects being required as part of the curriculum at Year 11? - Would you support other subjects being required as part of the curriculum at Year 11, aside from English and Mathematics or Te Reo Rangatira and Pāngarau?
Proposal 4: Strengthening achievement requirements	Do you agree that the proposed achievement requirements for the new qualifications are easy to understand?	What parts of the proposed achievement requirements do you find confusing to understand?
	Do you agree that four subjects would be a reasonable requirement to gain a secondary qualification?	Why do you have concerns about a four subject requirement being reasonable to achieve?
Implications and next steps	Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications?	- Describe any concerns you would have about the proposed changes improving the credibility and coherence of the national senior secondary qualifications. - What other changes or supports (if any) do you think would be helpful to make sure you or your family member could successfully complete the new qualifications? - Is there anything else you would like to say about the proposals?



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