



**FASD-CAN**

Fetal Alcohol Spectrum Disorder  
Care Action Network

## Education Consultation

Ministry of Education

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

11 September 2025

### **FASD-CAN Submission: Proposal to replace NCEA with new national qualifications**

#### About your group or organisation

---

Fill in all the 'about you' questions before answering questions about the proposals.

Your details will remain confidential and will be used only for analysis purposes. Any personal details you share will not be published or made publicly available.

Describe your group or organisation's interests in the NCEA changes

FASD-CAN (Fetal Alcohol Spectrum Disorder - Care Action Network) Aotearoa is an organisation that advocates for the rights and aspirations of people with FASD, and their families and whānau. Our submission on the proposed NCEA changes is based on the collective lived experiences of the people with FASD in the education system.

NCEA was initially introduced to address the glaring inequities of the School Certificate and Bursary systems. It was designed to provide a more flexible, standards-based framework that valued diverse types of knowledge and skills, moving away from a single, high-stakes exam. This shift was intended to create multiple pathways to success for all learners, particularly for those who were previously failed by a rigid academic model. Given this history, we question what has fundamentally changed to warrant a return to a system that will replicate those same exclusionary barriers.

For many learners with neurodevelopmental disabilities, this flexibility is not a problem to be solved—it's a crucial part of their learning journey. Flexibility allows them to focus on their strengths and work around their challenges. For a person with a neurodivergent condition like FASD, core challenges can include working memory, processing speed, and executive function. These skills are essential for high-stakes, timed external exams. The option to complete learning through internal assessments is not a shortcut; it's a way to demonstrate



their knowledge and skills without the intense pressure and anxiety that can overwhelm them in an exam hall.

While the current higher qualifications system may be imperfect, FASD-CAN believes its flexibility and person-centred approach contains essential features that support the success of neurodivergent students, such as people with FASD. We are concerned that the proposed reforms will create yet new barriers and further reinforce the stigma, 'othering' and educational exclusion and underachievement experienced by many people with FASD.

What is the name of your group or organisation?

Name: FASD-CAN Inc. Aotearoa

Where is your group or organisation located? Include the town, city, or area and the postcode.

If you do not have a registered address, write N/A.

Location: 27A Hoskins Avenue, Hillsborough, Auckland, New Zealand, 1042

The following question is needed to verify your submission.

This information will NOT be shared with others and will be used only to verify your submission and/or contact you for clarification if needed.

If you would like more information about how your personal details will be used in the analysis, contact us at [nceaconsultation@education.govt.nz](mailto:nceaconsultation@education.govt.nz)

Provide contact information.

Name: Stephanie James-Sadler

Email: ceo@fasd-can.org.nz



## Part 1: Case for change

---

NCEA was introduced as a flexible, inclusive, and standards-based senior secondary national qualification. It offers a wide range of assessment opportunities, including those leading to vocational pathways like trades, hospitality, and tourism.

Under NCEA, students are assessed against standards that reflect groupings of key skills and knowledge in related areas. These standards are worth a certain number of credits, which students accumulate throughout the year. To achieve NCEA, students must gain 80 credits across their standards, including 20 credits from the co-requisite standards.

However, the flexibility of NCEA has led to some unintended consequences. There are few rules about which standards must be achieved within a subject or across NCEA Levels 1, 2, and 3. As a result, standards have begun to drive what is being taught in classrooms, rather than the curriculum driving the teaching. This has contributed to issues such as ‘credit counting’, where some students disengage from learning once they have enough credits to achieve NCEA.

Changes are needed to address the issues with NCEA and make sure the system is working for **all** students, family, educators, and employers. A strong curriculum should drive teaching and learning, and our national qualifications should clearly reflect student achievement.

This question relates to whether the curriculum should be driving assessments.

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

**Choose one of the following:**

Strongly disagree  
☐

Somewhat disagree  
☐

Neutral  
☐

Somewhat agree  
☐

**Strongly agree**  
☐

Unsure  
☐

*Answer the following question only if you **strongly disagree** or **somewhat disagree**:*

- Describe any concerns you have about the proposed new qualifications assessing against a national curriculum.

We agree that a national curriculum should be the foundation for assessments. However, we still have many concerns, not with the principle of assessing against a national curriculum, but rather with the *method* of assessment (e.g., a subject-based, aggregated approach) that is being proposed.

A subject-based, aggregated approach to assessment is not the most effective way to measure a student’s achievement of the curriculum’s broad goals, especially for learners with neurodevelopmental disabilities. The current, standards-based approach provides a more granular way to assess specific skills and knowledge, which is vital for providing a fair and accurate measure of what an individual student has learned and of their abilities.



This question relates to good things about NCEA that should remain.

What elements, if any, of NCEA's flexibility do you think should be retained in a future design of the qualifications?

There are several key elements of NCEA's flexibility that FASD-CAN believes should be retained in any future design of the qualifications. For learners with neurodevelopmental disabilities like FASD, the most valuable aspects of NCEA are its flexibility and its focus on standards. These elements serve as crucial accommodations that allow students to succeed.

Specifically, the following should be retained:

- **Diverse assessment options:** The ability to earn credits through a variety of assessments, including both **internal and external** components, is vital. The option to complete learning through internal assessments is not a shortcut; it's a way to demonstrate their knowledge and skills without the intense pressure and anxiety that can overwhelm them in an exam hall. We do not see this as a flaw in the system but as a necessary way for all students to be able to truly demonstrate their knowledge without the high-stakes pressure of external exams.
- **A focus on individual standards:** The current system's focus on granular, individual standards is crucial. It provides a more accurate and fair measure of a student's achievement than a single, aggregated subject grade would.
- **The ability to "credit count":** The option to "credit count" by using a range of standards—including small, hands-on ones—is a vital safety net. It provides students who struggle with academic subjects with the confidence and necessary credits to complete a qualification. FASD-CAN would also challenge any argument that students who "credit count" are disengaged or seeking an easy path. Ākonga with FASD do not 'credit count' out of laziness. They do it strategically. This is a deliberate and necessary strategy for academic survival. Instead of being a sign of laziness, it's a way for them to navigate the school system by focusing on subjects and assessments that align with their cognitive strengths and interests, which can include hands-on or practical mahi.

Equally importantly, Aotearoa New Zealand has a commitment to inclusive education as a signatory to the United Nations Convention on the Rights of Persons with Disabilities. This international human rights treaty, which New Zealand has ratified, legally obligates the government to ensure a fully inclusive education system at all levels. It guarantees that disabled people have the right to an education without discrimination and on the basis of equity. This includes ensuring they receive the support needed to facilitate their effective participation in the education system.

In this context, the elements of diverse assessment options, a focus on individual standards, and the ability to "credit count" are all foundational to an inclusive education and Universal Design for Learning (UDL) approach.



- **Inclusive Education:** This philosophy is about creating a learning environment where every student, regardless of their needs, can participate and thrive. The flexibility in NCEA, which allows a student with a neurodevelopmental disability to demonstrate their knowledge through an oral presentation instead of a written exam, is a prime example of an inclusive practice. It removes a barrier to success without lowering expectations for learning itself.
- **Universal Design for Learning (UDL):** UDL is a framework that guides the design of learning environments to be accessible to everyone. It's based on three core principles: multiple means of representation, multiple means of action and expression, and multiple means of engagement. The elements you've highlighted directly relate to the principle of multiple means of action and expression. By offering various ways for students to show what they know, such as through internal assessments, projects, or small, hands-on standards, the system is designed from the outset to be fair and accessible.

The proposed new qualifications, by moving away from this flexibility, are ignoring the commitment to an inclusive education and abandoning the fundamental principles of inclusive design.

---

This question relates to the issues with the current system.

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

**Choose one of the following:**

Strongly  
disagree  
☐

Somewhat  
disagree  
☐

Neutral  
☐

Somewhat  
agree  
☐

Strongly  
agree  
☐

Unsure  
☐

*Answer the following question only if you **strongly disagree** or **somewhat disagree**:*

- Which aspects of the current NCEA requirements do you think provide for a consistent measure of student knowledge, skills, and readiness?

*Answer the following question only if you **somewhat agree** or **strongly agree**:*

- Which aspects of the current NCEA requirements do you think lead to an inconsistent measure of student knowledge, skills, and readiness?

We somewhat agree that there are inconsistencies in the current NCEA system. However, we want to be very clear that our concern is with the inconsistent application of standards, not with the system's flexible design as a 'cause' of inconsistency.

### **Consistency of Method vs. Consistency of Standard**

We argue against **consistency of method**, being the idea that every student must be assessed in the exact same way, such as through a traditional, timed written exam. This approach





inherently disadvantages learners with neurodevelopmental disabilities by prioritising a single mode of expression. Instead, we strongly support a person-centred approach, which allows for different ways to demonstrate knowledge (like oral presentations, projects, or small, hands-on tasks), as a core strength of NCEA that must be retained.

Instead, we argue for **consistency of standard**. By this we mean that a credit earned in one school truly represents the same level of knowledge and skill as a credit earned in another. We maintain that it is a lack of consistent and rigorous **moderation** for internal assessments that can lead to variations in standards between teachers and schools.

The flexibility of NCEA is, in fact, one of its greatest strengths. This system allows for a variety of assessment methods, including internal and project-based options, and it aligns with the principles of Universal Design for Learning and inclusive education. For neurodivergent learners, the ability to demonstrate their knowledge through a different medium is not a shortcut; it is a critical accommodation that ensures a fair and accurate measure of their learning and their abilities.

The inconsistencies arise when there is a lack of rigorous moderation for these diverse assessment methods. If a credit for an internal assessment in one school is not held to the same high standard as a credit in another, it undermines the credibility of the qualification.

The key aspects of the current NCEA requirements that lead to this inconsistency are:

- **Reliance on High-Stakes Exams:** We argue that timed external exams are not a consistent or credible measure of knowledge or capability for all students. For learners with neurodevelopmental disabilities, outcomes are often influenced by non-academic factors like anxiety, processing speed, and executive function challenges, rather than a true reflection of their knowledge and abilities.
- **Inconsistent Internal Moderation:** While internal assessments offer crucial flexibility, the submission notes that a lack of consistent resourcing and moderation can lead to variations in standards across different schools. This inconsistency can undermine the credibility of the overall qualification.
- **Systemic Inequity:** The NCEA system, and the broader education system, has foundational issues with resourcing and inequity that make it an inconsistent measure of success. We suggest that these issues must be addressed before any major reforms are made.

In summary, our position is that the system's flexibility is not the problem; it's a feature that must be protected. The problem is the **inconsistent application** of that flexibility, which can make the qualification unreliable and, therefore, less credible. We argue that the government should put more resources into moderating internal assessments to ensure they are consistent and rigorous across all schools and kura to directly address this point.



Answer the following question only if you **strongly disagree** or **somewhat disagree**:

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

Choose one of the following:

Strongly disagree	Somewhat disagree	Neutral	<b>Somewhat agree</b>	Strongly agree	Unsure
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- The discussion document identifies some problems with the current system. Which of those do you disagree with, and why?

Answer the following question only if you **somewhat agree** or **strongly agree**:

- Which parts of the senior secondary qualification system do you think should be prioritised for improvement?

We agree that the system can and should be improved, particularly in the areas of assessment consistency, credibility, and equity. However, we believe the proposed changes are an **overcorrection** that risks discarding the very elements that make the system work for a diverse range of learners, not just those who are more academically inclined and do well in pressure situations like tests. The solution is not to eliminate flexibility but to strengthen it with better resourcing and consistent moderation of internal assessments.

The current NCEA system suffers from an inconsistent application of standards, particularly with internal assessments. For example, the same credit might be awarded for different levels of work at different schools if there is not enough oversight.

This lack of consistency may undermine the credibility of the qualification. However, our argument isn't that NCEA is completely without credibility, but rather that its credibility is undermined by its inconsistencies, particularly for vulnerable learners.

- **Inconsistent Measurement:** FASD-CAN maintains that for some students, especially those with conditions like FASD, external exams are not a credible measure of what they know. The outcomes are often influenced by factors like anxiety, processing speed, and executive function deficits rather than actual knowledge and ability to apply that knowledge. A qualification that can't fairly measure a student's true abilities isn't fully credible.
- **The Problem with Aggregation:** By shifting to an aggregated, subject-based grade, the proposed system will undoubtedly penalise students who have specific learning challenges. A student who excels in the practical parts of a subject but struggles with the theoretical exam would receive a lower overall grade that doesn't credibly reflect their strengths and abilities.
- **Equity and Inclusivity are Core to Credibility:** Ultimately, we argue that a qualification cannot be truly credible if it is not equitable. When a system unintentionally excludes a significant portion of the student population, it loses its authority as a fair and reliable measure of a nation's educational success.

We maintain that for a qualification to be truly credible and trusted by employers and tertiary



education providers, every credit earned must represent the same standard of achievement, regardless of where or how it was obtained. We also argue that credibility is intrinsically linked to inclusivity, because if we have an education qualifications framework that “streams” different types of learners and which excludes a large group of learners from achieving educational success, it cannot be considered truly credible.

Instead of dismantling NCEA's flexibility, the government should focus on strengthening its credibility by better moderating internal assessments and ensuring more consistent resourcing across all schools.

The Government wants the senior secondary qualification to be coherent, consistent, and credible, including with access to enhanced Vocational Education and Training (VET) subjects. Do you think there are other opportunities for positive change with the new qualifications, outside of what has been raised in the discussion document?

**Choose one of the following:**

Strongly  
disagree

☐

Somewhat  
disagree

☐

Neutral

☐

Somewhat  
agree

☐

Strongly  
agree

☐

Unsure

☐

Answer the following question only if you **somewhat agree** or **strongly agree**:

- Describe other opportunities for positive change that are not covered in the discussion document.

As indicated above, we agree with the goals of coherence, consistency, and credibility, but believe a new system must be balanced with an equally strong commitment to **equity and accessibility**. This is where there is an opportunity for positive change.

A qualification's true value comes not just from being a reliable measure for employers and tertiary providers, but from being a fair and accurate measure of a student's own potential. If the new system prevents a whole group of learners from accessing a qualification, it is not more credible—it is simply less inclusive.

If the new system prevents a whole group of learners—particularly those with disabilities—from earning a qualification, it will be less inclusive, which ultimately makes it less credible as a system for everyone.

---

## Part 2: Proposals

---

Proposal 1: Working with industry to better integrate VET learning into the senior secondary qualification system

Under proposal 1, Industry Skills Boards (ISBs) will develop clear and consistent Vocational Education and Training (VET) subjects – made up of skill standards – that will be delivered to





students in partnership with tertiary providers and employers. ISBs will have the flexibility to draw on existing content and standards or develop entirely new content for VET subjects, based on industry needs and real post-school opportunities.

Aligning VET subjects with industry qualifications will allow students to work towards achieving the new senior secondary qualifications while potentially also making a meaningful start on a tertiary qualification.

The proposed new senior secondary qualification changes will be phased in from 2028 through to 2030.

Overall, do you support proposal 1? This proposal is that the government will work with industry to create Vocational Education and Training (VET) subjects.

**Choose one of the following:**

Do not  
support  
it ☐

Somewhat do  
not support it ☐

Neutral  
☐

Support it  
☐

Strongly  
support  
it ☐

Unsure  
☐

*Answer the following question only if you **do not support it** or **somewhat do not support it**:*

- 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?

*Answer the following question only if you **support it** or **strongly support it**:*

- What benefits do you think proposal 1 will have for student learning and achievement?

While we are not averse *per se* to the goal of creating high-quality, credible VET subjects with industry input we still have several concerns about Proposal 1. The aspects of the proposal that are of concern us are:

## 1. Concerns About the Approach

We support the idea of creating high-quality, credible vocational subjects with input from industry. However, we are concerned that the proposed changes represent a "hasty return to a past model" of a "tracking" system, where students are pushed into either academic or vocational pathways. Aotearoa New Zealand's previous experiment with a tracking system—firstly with special "technical high schools"—was not successful and was eventually dismantled amid concerns it was replicating existing social inequities, entrenching class divisions, and limiting opportunities for students on vocational pathways. As this approach was unsuccessful in the past, it risks replicating social inequities and limiting student opportunities once again.



Furthermore, even successful dual systems like Germany's have documented problems with "equity and access," reinforcing that a simple copy-and-paste of a model will not work and will likely exacerbate issues for already disadvantaged students [23].

## 2. Teacher Training and Support

A significant practical concern is the lack of a clear plan for teacher qualifications and support. 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.

## 3. Unit Standards

The consultation document notes that a large number of students use a small number of unit standards to meet credit requirements. It suggests this is a problem indicating "incoherent learning." But for many neurodivergent students, this is not a problem at all—it's the **solution**. A student who struggles with academic subjects may successfully complete a hands-on unit standard in health and safety or hospitality. These seemingly small additions can provide the vital credits and confidence needed to complete a qualification. A single-day, practical assessment may be the only way a student can achieve a qualification that they otherwise would not.

We would argue that any new VET framework retains the ability for students to gain credits through a flexible, standards-based approach, in addition to new, structured VET subjects. The proposed reduction from 11,000 to a smaller number of curated standards may close off the exact opportunities that allow some of their most creative and practical neurodivergent thinkers to succeed.

---

The government understands that investment is needed to make sure VET learning is a success. Aside from funding, are there practical or operational implications you think need to be considered for schools to successfully deliver VET subjects?

As indicated above, 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.

For the new system to work, there must be a clear strategy to ensure these educators are properly upskilled and integrated into the school environment. A related concern is a plan for who will fund this upskilling, as it is a crucial investment in the teaching workforce.



## Proposal 2: Foundational Award and new senior secondary qualifications

Under proposal 2, a new Foundational Award will be introduced to replace the current NCEA co-requisite and NCEA Level 1. The Award will accredit literacy and maths or te reo matatini and pāngarau, helping students to build and demonstrate strong foundational skills.

NCEA Levels 2 and 3 will be replaced with the New Zealand Certificate of Education (for Year 12) and the New Zealand Advanced Certificate of Education (for Year 13).

These changes reduce the number of high-stakes assessment years from three to two, allowing Year 11 students to focus on deeper learning of foundational skills and knowledge, and creating more time in the classroom for students.

The proposed new senior secondary qualification changes will be phased in between 2028 and 2030.

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?

Please choose one of the following:

Strongly disagree

☐

Somewhat disagree

☐

Neutral

☐

Somewhat agree

☐

Strongly agree

☐

Unsure

☐

Answer the following question only if you **strongly disagree** or **somewhat disagree**:

- 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.

Answer the following question only if you **somewhat agree** or **strongly agree**:

- Describe the benefits you think a Foundational Award will have in supporting students to prepare for learning in Years 12 and 13.

We strongly disagree with the proposition put forward in this question. For a person with a learning disability such as FASD, dyslexia or dyscalculia, the idea of a mandatory literacy and numeracy award is not only downright ‘frightening’ but misguided in terms of educational engagement and motivation. Ākonga with learning disabilities already struggle with the current NCEA mandatory literacy and numeracy requirements, and a new, potentially high-stakes award feels like a gatekeeper to further education and a qualification.

We see the Foundational Award as a high-stakes gatekeeper that would in fact disadvantage a large portion of the student population. For learners with neurodevelopmental disabilities, a mandatory, standalone literacy and numeracy award is particularly concerning for several reasons:

- It creates a barrier:** These students often struggle with the existing literacy and numeracy requirements. A new, potentially more rigorous award feels like a final obstacle that could



prevent them from accessing a full qualification, despite their capabilities in other subjects.

- **It's demotivating:** A system that doesn't accept students for who they are and nurture their strengths and interests is more likely to turn them away from education than to inspire them. By focusing on a single measure, the proposal risks undervaluing many students and actively pushing them out of the education system.
- **It overlooks flexibility:** NCEA's flexibility and its focus on individual standards have been a crucial safety net for a wide range of diverse learners. Removing NCEA Level 1 and replacing it with a single, mandatory award is viewed as a step backward that eliminates the diverse pathways to success.

Disabled and neurodivergent learners, and those who have experienced trauma, are already more likely to leave school early. This new proposed structure risks leaving them with only an "Award" rather than a meaningful education and qualification. Furthermore, this proposal is demotivating and more likely to turn youth away from education than to drive them towards it. If they are not accepted for who they are, as they are, and their strengths and interests are not valued and nurtured, it raises a fundamental question about what, and who, we value as a society.

However, the new approach for the NCEA co-requisite Common Assessment Activities (CAAs) shows promise. The success of the 2024 CAAs for over 100,000 year 10 students highlights a key strategy: offering multiple attempts.

For neurodivergent and trauma-impacted students, this option is critical because it removes the pressure of a single, high-stakes test. Instead, it normalizes the learning process and provides opportunities for repetition and mastery. This structure allows students to learn from their mistakes and identify areas where they need more support. By rewarding the process of learning rather than just the final outcome, this approach builds confidence and encourages a growth mindset, which are essential for keeping these students engaged in education.

---

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.

As we do not support the Foundational Award at all, we certainly do not support adding any other areas to such an award. Instead, we argue for expanding the ways in which literacy and numeracy can be demonstrated. It should be possible to be assessed through project-based learning, practical tasks, or oral presentations. This approach recognizes that every learner has a unique way of processing information and applying their knowledge. A single, structured, written assessment could prevent many capable learners from ever getting a qualification, regardless of their other talents.

Furthermore, attendance is driven by many health, mental health, family dynamics, and



social issues, which the proposed changes will not address. For students facing these challenges, a rigid, subject-based system that removes the flexibility of NCEA Level 1 will only make it more difficult to stay engaged and complete a qualification.

Most students will complete the New Zealand Certificate of Education in Year 12. Do you agree it is important for the Government to consider ways to ensure more students stay at school until the end of Year 12?

**Choose one of the following:**

Strongly  
disagree  
☐

Somewhat  
disagree  
☐

Neutral  
☐

Somewha  
t agree  
☐

**Strongly  
agree**  
☐

Unsure  
☐

*Answer the following question only if you **strongly disagree** or **somewhat disagree**:*

- What are your concerns about the Government considering ways to ensure more students stay in school until the end of Year 12?

*Answer the following question only if you **somewhat agree** or **strongly agree**:*

- 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?

FASD-CAN believes it is extremely important to consider ways in which the government can support and incentivise students to remain in school until the end of Year 12, although this would be based on each individual's specific needs.

People with FASD experience dysmaturity and may take longer to mature and be able to absorb the same learning as other students – not due to lack of intelligence or motivation – but due the brain-based challenges caused to executive functions by prenatal alcohol exposure. Allowing them to stay in school longer (even longer than their peers past year 13) is highly desirable for positive educational and social outcomes.

We further note that 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. We agree that the government must take action to enable more students to stay at school, and one way to do that is to ensure our education system is inclusive, supportive of ākonga's specific needs for learning support, and a qualifications system that is engaging, motivating, and works for them.

This will not only require a quantum increase in more teachers, teaching specialists with training in supporting a wide range of disabled learners, but a cultural shift within schools, kura and the teaching profession towards trauma-informed, brain-based teaching, active inclusive education practices, and implementation of UDL across all levels of our education system. There is a long way to go here.

The government must also address the issues in recent ERO reports about violence and





aggression in schools, bullying, and mental health concerns among ākonga that is leading to non-attendance, and really unpacking the reasons for non-attendance in addition to the issues raised here.

---

## Proposal 3: Shifting focus to a structured and subject approach

Under proposal 3, students will focus on learning and achievement across a whole subject, rather than individual standards. Students will also generally be required to take five subjects, including either English and Mathematics or Te Reo Rangatira and Pāngarau at Year 11.

Within each subject, internal and external assessments will be marked consistently and aggregated into an overall grade and score out of 100.

This change will reduce the risk that students are unintentionally limiting their post-school options, for example, by not taking the subjects needed for University Entrance (UE). It also provides potential employers and tertiary educators with a clearer sense of students' knowledge and skills.

The proposed new senior secondary qualification changes will be phased in between 2028 and 2030.

Overall, do you support a subject approach to assessments at Years 12 and 13?

**Choose one of the following:**

**Do not  
support it**

☐

Somewhat do  
not support it

☐

Neutral

☐

Support it

☐

Strongly  
support it

☐

Unsure

☐

*Answer the following question only if you **do not support it** or **somewhat do not support it**:*

- What are your concerns about a subject approach to assessments at Years 12 and 13?

*Answer the following question only if you **support it** or **strongly support it**:*

- What do you think are the main benefits to a subject approach to assessments at Years 12 and 13?

The proposed shift from standards and credits to an aggregated, subject-based grade is a huge step backward for many of our learners with neurodevelopmental disabilities. A student may excel in the practical, hands-on, or creative parts of a subject but struggle with the theoretical or external exam components. However, an aggregated grade out of 100 would punish these learners, mask their strengths and leading to a lower final grade that doesn't truly reflect their capabilities and learning.



Do you agree that it is important for students to engage with the full curriculum (rather than segments) for vocational and general subjects?

**Choose one of the following:**

Strongly disagree  
☐

Somewhat disagree  
☐

**Neutral**  
☐

Somewhat agree  
☐

Strongly agree  
☐

Unsure  
☐

*Answer the following question only if you **strongly disagree** or **somewhat disagree**:*

- What do you think are the benefits of being able to engage with parts of the curriculum (segments) of vocational and general subjects?

*Answer the following question only if you **somewhat agree** or **strongly agree**:*

- Why do you think it is important to engage with the full curriculum for vocational and general subjects?

From a pedagogical standpoint, it is valuable for all students to engage with the full curriculum, as this can provide a well-rounded foundation of knowledge and skills. A broad-based approach can ensure learners are exposed to a wide range of subjects, which can help them discover new interests, develop critical thinking, and be better prepared for a variety of future pathways. This is a sound educational principle that underpins many successful qualifications systems.

However, this principle must be balanced with the reality of individual learning needs, especially for neurodivergent learners. For many people with a neurodevelopmental disability, managing a full course load is simply not feasible. They may need a reduced timetable due to health challenges, processing difficulties, or the cognitive load required to navigate the school environment. A rigid system that forces them to engage with the full curriculum could lead to overwhelming stress and disengagement, rather than success.

The consultation document states that many students don't attempt external assessments. But this isn't always because they have enough credits already as implied. It can be due to a number of factors including overwhelming anxiety, depression, sensory overload in exam environments, or the sheer difficulty of demonstrating complex knowledge within a narrow, time-based format. Taking away this choice would not fix the problem of disengagement; it would likely cause more people to disengage earlier.

The new framework must be designed to accommodate these needs without penalizing students for their circumstances. Without the flexibility of the current system, a mandatory "full curriculum" would become a barrier, not an opportunity, for these students.



Do you support some subjects being required as part of the Year 11 curriculum?  
For example, English and Mathematics or, in Māori-medium settings, Te Reo  
Rangatira and Pāngarau.

**Choose one of the following:**

Do not  
support  
it ☐

Somewhat do  
not support it ☐

Neutral  
☐

Support it  
☐

Strongly  
support it  
☐

Unsure  
☐

*Answer the following question only if you **do not support it** or **somewhat do not support it**:*

- What are your concerns with some subjects being required as part of the curriculum at Year 11?

*Answer the following question only if you **support it** or **strongly support it**:*

- 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?

While we recognise the intention behind making certain subjects mandatory at Year 11, it is essential that this is not a return to a system where a single exam determines success. While a foundation in subjects like English and Mathematics is crucial for all students, a rigid, compulsory curriculum could be a significant barrier for those with neurodevelopmental disabilities. This is particularly the case if the mandatory subjects are assessed solely through high-stakes external exams that do not account for individual learning styles and challenges.

To be truly equitable and inclusive, any mandatory subjects must be assessed in a variety of ways that do not disadvantage students with challenges in processing speed, working memory, or executive function. This could include project-based assessments, oral exams, or practical demonstrations. Furthermore, an individualised approach is needed, where exceptions or accommodations can be made for learners who are not yet ready to engage with the full curriculum due to their individual health and learning needs. Without this flexibility, a mandatory curriculum, while well-intentioned, could act as a barrier to students gaining a qualification and remaining in education.

---

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?

As we do not support the shift to a structured and subject approach in the first place, we provide no specific answer to this question. However, as stated elsewhere in our submission, we are concerned that this proposed change will create significant barriers for learners with neurodevelopmental disabilities by removing the flexibility that is essential for them to succeed. The focus should be on strengthening the current standards-based system, not replacing it with a model that risks harming our most vulnerable learners.



## Proposal 4: Strengthening achievement requirements

Under proposal 4, achievement will be more consistent and straightforward:

- There will be greater consistency in the way subjects are assessed. For example, internal and external assessments will contribute more fairly to students' grades.
- Terms like 'Excellence' and 'Achieved' will be replaced with marks out of 100 and letter grades such as A, B, and C.
- Students will need to achieve at least four subjects, along with the new Foundational Award, to gain the new qualifications.

These changes incentivise students to study and participate throughout the school year and in all their subjects. For example, students will be strongly incentivised to participate in external assessments where these are offered, because their final subject grades will be based on the combined score from all assessments.

The new grading approach will also align more closely with other marking systems, giving educators and employers a clearer understanding of students' levels of skill and knowledge.

The proposed new senior secondary qualification changes will be phased in between 2028 and 2030.

Do you agree that the proposed achievement requirements for the new qualifications are easy to understand? This includes that students must achieve a passing grade in at least four subjects and achieve the Foundational Award.

**Choose one of the following:**

**Strongly disagree**

☐

Somewhat disagree

☐

Neutral

☐

Somewhat agree

☐

Strongly agree

☐

Unsure

☐

Answer the following question only if you **strongly disagree** or **somewhat disagree**:

- What parts to the proposed achievement requirements do you find confusing to understand?

There is a crucial distinction between something being simple to state and it being simple in practice. While the new proposed requirements (passing four subjects and a Foundational Award) might seem easier to understand on the surface, their actual impact on a diverse student population is highly complex and the implications for equity are complex and concerning.

For neurodivergent learners, this so-called 'simplicity' masks significant barriers. The requirement to pass at least four subjects is a significant step backward from NCEA's flexible pathways. This proposal risks leaving students with health challenges and processing difficulties without a formal qualification, despite their best efforts and achievement in the subjects they do take.



Clear and user-friendly communication about any assessment system is essential. If there is evidence that the NCEA assessment is not clear to stakeholders, then the fault lies in its communication, not the system and framework itself.

Do you agree the four subject requirements should be achievable for most students?

Choose one of the following:

Strongly  
disagree  
☐

Somewhat  
disagree  
☐

Neutral  
☐

Somewha  
t agree  
☐

Strongly  
agree  
☐

Unsure  
☐

Answer the following question only if you **strongly disagree** or **somewhat disagree**:

- Describe your concerns about a four subject requirement not being achievable for most students.

Yes and no. For many ākonga with FASD this will be entirely feasible, but for others this will be an unreasonable requirement. A person with a disability who can only manage two or three subjects a year due to their individual health needs would be unfairly penalized by this requirement. This change would actively prevent them from gaining a qualification and undermine their sense of achievement and self-worth.

Instead we would argue that the solution isn't to create more barriers, but to build a system that is designed to be flexible from the ground up.

Specifically, we suggest:

- **Robust Exception Policies:** Acknowledge that the four-subject rule won't work for everyone. Should they be “punished” in terms of opportunities for educational achievement due to a neurodivergence or disability they do not want and did not ask for? Clearly this is ludicrous. Instead, we call for well-defined exception policies for the four-subject minimum, designed specifically for neurodivergent students.
- **Expanding Assessment Modalities:** We suggest moving beyond a "single, structured, written assessment" and exploring alternative ways to demonstrate skills, such as project-based learning, practical tasks, or oral presentations. This is entirely consistent with an inclusive education and Universal Design for Learning approach.
- **Retaining Flexibility:** We have repeatedly emphasised the importance of keeping the ability for students to earn credits from a wide range of standards. This "credit counting" is seen as not a problem to be solved, but as a crucial lifeline for educational achievement and success.
- **Direct Consultation:** We also argue that the government must directly consult with neurodivergent students and their whānau if there is any next phase of design.

In essence, FASD-CAN maintains we should focus on strengthening the current system with better resourcing and consistency, rather than replacing it with a more rigid model.





---

Aside from additional funding, what other changes, supports, or mitigations do you think are needed to support strengthened achievement requirements?

We suggest that more resources be put into moderating internal assessments to ensure they are consistent and rigorous across all kura. This would strengthen the existing qualification without sacrificing the flexibility that so many of our students rely on to succeed. The government must also address the foundational issues of resourcing and inequity within the system before placing additional burdens on teachers.

Research from the Education Review Office (ERO) confirms that while disabled learners are enjoying school, they are still experiencing exclusion, and many teachers lack confidence in teaching them [5]. This ERO report notes that too many disabled learners are not progressing sufficiently and that their experiences and outcomes are poorer than their peers. A new qualifications system that adds more barriers will only worsen this situation. ERO has also conducted extensive research into alternative education, highlighting that it is a critical pathway for students who have become disengaged from the mainstream system [6, 7]. A new framework that narrows and removes flexible pathways risks creating a larger population of students who will need to seek alternative education.

Furthermore, a separate ERO review on supporting teacher aides highlights the critical role of well-trained and supported staff in enhancing learner outcomes [4]. This research found that positive relationships, collaborative practices, and cultural expertise are key to a teacher aide's success. Any reform that places additional pressure on schools without addressing the need for robust professional development and resourcing for support staff will only exacerbate the challenges faced by their most vulnerable learners and the people who work with them.

---

## Part 3: Implications and next steps

---

Proposals 1-4 are designed to address key challenges with the current NCEA system and ensure that the proposed New Zealand Certificate of Education and New Zealand Advanced Certificate of Education are credible, coherent, and supporting students to develop important skills and knowledge.

However, a lot will need to happen between now and 2028 to prepare for these changes. The Ministry of Education is inviting feedback to help shape the final design and implementation. Once consultation closes, the Ministry will carefully consider feedback before reporting back to Cabinet.

Before the qualifications are introduced, there will be a strong focus on quality implementation, ensuring that teachers have the right resources and supports to confidently deliver the new



qualifications.

The changes will be phased in between 2028 and 2030, ensuring that students and educators are well-prepared.

Do you agree that the proposals will create better alignment between the curriculum and assessments when compared to NCEA?

Choose one of the following:

Strongly disagree

☐

Somewhat disagree

☐

Neutral

☐

Somewhat agree

☐

Strongly agree

☐

Unsure

☐

Answer the following question only if you **strongly disagree** or **somewhat disagree**:

- What concerns do you have about the proposals creating better alignment between the curriculum and assessments when compared to NCEA?

Our concerns are not about the *idea* of alignment *per se*, but about what the proposed changes are aligning to. Instead of strengthening the current system, 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. A new framework based on academic competition and high-stakes exams will not produce a credible result for all students. It fails to account for the fact that exams are not a fair measure for all, as outcomes can be influenced by factors like anxiety and personal circumstances. Ultimately, this shift risks turning the national qualification into a less inclusive one, which is a step backward for the entire country.

Do you agree that the proposed changes will improve the credibility and coherence of the national senior secondary qualifications?

Choose one of the following:

Strongly disagree

☐

Somewhat disagree

☐

Neutral

☐

Somewhat agree

☐

Strongly agree

☐

Unsure

☐

Answer the following question only if you **strongly disagree** or **somewhat disagree**:

- What concerns do you have about the proposals improving credibility and coherence of the national senior secondary qualifications?

While the proposals are intended to improve the coherence, consistency, and credibility of the qualifications, we strongly disagree that they will achieve these goals. This proposed gain in clarity comes at the direct expense of equity and inclusion. A system that intentionally or unintentionally excludes a significant portion of its student population cannot be considered truly credible. This proposal undermines the very principles of fairness and accessibility that should be at the heart of our education system.



Aside from additional funding, what further changes or resources do you think would be helpful to make sure students can successfully complete the new qualifications?

Aside from additional funding, a successful shift to a new qualifications system will require significant changes to policy, pedagogy, and community engagement.

Firstly, the government must provide robust, well-defined exception policies for the four-subject minimum and other requirements, designed specifically for neurodivergent students. These must be simple to access and not create new bureaucratic hurdles for schools. Teachers must also be given the training and autonomy to implement alternative assessment modalities, such as oral presentations, project-based learning, and hands-on tasks. This would ensure that students are not unfairly disadvantaged by high stakes written exams.

Secondly, the Ministry of Education must foster a cultural shift in schools towards trauma-informed, brain-based, and strengths-based teaching. This requires a systemic change in how we approach learning and behaviour, recognising that students with disabilities often have unique challenges that require a flexible and compassionate response. The education system must be supported by a well-resourced and well-trained workforce, including teachers and teacher aides, who have the professional development to provide these specialised learning supports.

Finally, any new qualifications system must be developed in direct and genuine consultation with neurodivergent students, people with disabilities, and their whānau. A qualifications system cannot be truly credible if it is not designed in partnership with the very people it is intended to serve.

With appropriate resources, do you agree that the proposed timeline is achievable? The proposed timeline includes introducing the Foundational Award in 2028 and the two new senior secondary qualifications in 2029 and 2030 for Years 12 and 13 respectively.

**Choose one of the following:**

**Strongly disagree**

☐

Somewhat disagree

☐

Neutral

☐

Somewhat agree

☐

Strongly agree

☐

Unsure

☐

Answer the following question only if you **strongly disagree** or **somewhat disagree**:

- What concerns do you have about the proposed timeline being achievable and what do you think is a reasonable timeline?



The proposed timeline for these reforms is not something that can be determined in a top-down fashion; it must be decided in genuine consultation with educators, who are already grappling with an immense workload and a lack of detail about the proposed changes [23]. As noted by Senior Lecturer Lisa Maurice-Takerei, a paradigm shift will be required for these reforms to succeed, and this cannot happen without genuine consultation with teachers and industry experts.

We also note that the consultation document acknowledges the risk of an initial drop in achievement rates, particularly for students who are already disadvantaged. In these circumstances, if the government is already aware of this risk, it must already have a solution and plan to mitigate it by providing necessary resourcing and support. Nor can support or investment be on the basis that "one-size-fits-all." Any support programmes must be tailored specifically to the needs of **all** learners and designed in consultation with stakeholder communities, including the disability community, rather than it being an afterthought as is the case here.

FASD-CAN's position is that the timeline is unrealistic because the proposed reforms are built on a flawed foundation. In summary, we make the following points about the feasibility of a quick implementation:

- **Ignoring Foundational Issues:** These reforms take a "fix-it" attitude that overlooks deep-seated problems like resourcing and inequity. A new system cannot be successfully rolled out on an already strained and under-resourced education system. Rushing the timeline without first addressing these fundamental issues would likely lead to a chaotic and failed implementation.
- **Creating New Barriers:** High-stakes exams are not a credible measure for all students due to factors like anxiety and personal circumstances. Pushing forward with a timeline that prioritises these assessments without first developing fair and inclusive alternatives would create significant new barriers for disabled and neurodivergent learners. This would lead to widespread student disengagement and require significant, time-consuming policy changes after the fact, making the initial timeline meaningless.
- **Breaching Legal and Ethical Obligations:** We also maintain that the proposal is a breach of Aotearoa New Zealand's obligations under the UN Convention on the Rights of Persons with Disabilities and fails its commitment to Te Tiriti o Waitangi. Rectifying these legal and ethical shortcomings is a complex and lengthy process that requires genuine consultation and the creation of new frameworks. Trying to meet a quick timeline, while politically driven and expedient for ministerial legacy, would mean these critical issues are not properly addressed, making the reform unworkable and legally problematic from the start.

In short, the proposed timeline is unachievable because the reform is not a genuine solution. Instead of fixing the root causes of inequity, it proposes a fast-tracked overhaul that will create



new problems and violate fundamental principles of inclusion, which will ultimately require a much longer and more deliberate process to correct.

Is there anything else that you would like to say about the proposals?

### **The “Consultation” Approach**

The structure and tone of the consultation document suggest that the core policy decisions regarding the system's overhaul have already been made, and that this process is largely a formality. This is very disheartening. We are also concerned that the consultation process appears to be disingenuous, as the questions are phrased and the background information is presented in a way that leads participants toward a predetermined answer. A critical issue is the lack of balanced counterarguments or a neutral presentation of the evidence, which is essential for eliciting a truly informed and independent response from the public.

We also see the proposed reforms as aligned with the values and approach of private, elite-focused consultancies, which prioritize academic competition and global comparability. This approach, while potentially benefiting a small, high-achieving minority, threatens to undermine the core principles of public education in Aotearoa New Zealand. The return to a system that strongly favours high-stakes, end-of-year external exams and rigid subject requirements is reminiscent of the exclusionary models of the past (e.g., School C and UE exams) and creates a dangerous precedent.

This reform comes across as a "fix-it" attitude driven by political ideology rather than driven from the bottom-up by educators. Furthermore, it fails to address the foundational issues of lack of resourcing and inequity within the system. It also fails to account for the fact that exams are not a credible measure for all students, as outcomes are often influenced by factors such as anxiety, gender, and personal circumstances on the day of the exam.

The lived experience of FASD-CAN's members highlights Aotearoa New Zealand has much more fundamental problems in our education system than changing one of the few flexible approaches that meets the needs of ākonga with FASD. This includes widespread concern from the education sector itself that the proposed changes will add to the immense workload and stress on teachers who are already grappling with multiple reforms and a significant staffing crisis [1].

While the current system may be imperfect, FASD-CAN believes its flexibility and person-centred approach contains essential features that support the success of neurodivergent students, such as people with FASD. We are concerned that the proposed reforms could unintentionally create new barriers and further reinforce the stigma and educational exclusion and underachievement experienced by many people with FASD.





## FASD and Best Practice in Education

Fetal Alcohol Spectrum Disorder (FASD) is a lifelong neurodevelopmental disability that results from prenatal alcohol exposure. It affects every aspect of a person's life, and its impacts on learning are often misunderstood. The brain of a person with FASD is wired differently, impacting foundational cognitive abilities. International research and clinical guidelines identify key areas of challenge and best practice for supporting *ākongā* with FASD [14, 15, 16].

Challenges often include:

- **Executive Function:** Difficulty with planning, organising, and problem-solving. This makes it hard for students to manage complex, multi-part assignments or to study independently for exams [14].
- **Working Memory:** A limited capacity to hold and manipulate information in the short-term. This impacts the ability to follow multi-step instructions, do mental maths, or remember what they just read [15].
- **Attention:** Difficulty with sustained attention, which can make it hard to focus in a classroom setting, especially for long periods [17].
- **Processing Speed:** Slower processing of information, both auditory and visual. This means a timed exam or a fast-paced lecture can be a significant barrier to demonstrating knowledge, even if the student knows the material [18].
- **Abstract Thinking:** A more concrete style of thinking, which can make it hard to grasp abstract concepts, cause and effect, and consequences [19].

International best practice for supporting students with FASD is not about lowering expectations; it's about providing the right support to meet them. This includes:

- **Relational-Based Learning:** Building strong, consistent, and trusted relationships with a key adult in the school. A positive relationship acts as a "scaffolding" that helps a student manage their challenges [20].
- **Trauma-Informed and Strengths-Based Approaches:** Recognising that the behaviours of students with FASD are often a result of their brain injury and not a choice [21]. Education should focus on a student's strengths and interests to build confidence and engagement.
- **Individualised and Flexible Learning Plans:** The "one-size-fits-all" approach does not work. Students need individualised learning plans that include flexible assessment options, a reduced course load if necessary, and alternative ways to demonstrate skills and knowledge, such as oral or hands-on projects [15, 22].
- **Structured and Predictable Environments:** A consistent routine and clear, simple instructions reduce anxiety and cognitive load. The unpredictability of a new, complex qualification system without a clear pathway for them would be very challenging for their learners [22].



Without a system that is intentionally designed to be flexible and accommodating, any new qualification structure risks further marginalising students with FASD, preventing them from achieving their full potential.

So, what has changed in our educational environment that would warrant such an abrupt change away from equitable outcomes and an inclusive education framework? In our opinion, the proposed changes are a step backward from a more inclusive and equitable framework.

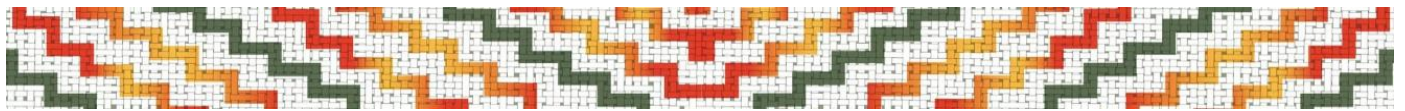
- **Flexibility is not a flaw; it's a feature:** We reiterate that for many students, "credit counting" is a strategic and necessary act of self-advocacy. It allows them to demonstrate their strengths while managing their challenges, particularly with conditions that affect working memory, processing speed, and executive function.
- **A "one-size-fits-all" approach is exclusionary:** A push for "consistency" through a rigid, subject-based approach is fundamentally at odds with the principles of inclusive education. A qualification's value should be measured not just by its uniformity, but by its ability to fairly and accurately assess a diverse range of learners.
- **High-stakes exams are not a true measure of knowledge:** While exams are a good measure for some students, for others they are a measure of anxiety, not intellect. We note that external factors like anxiety, sensory overload, and personal circumstances can significantly impact performance on the day of the exam. This makes exams an unfair and unreliable metric for many.

The stated "problems" with the current NCEA system are the very things that make it inclusive and equitable, and that is what we should be aiming for in our country.

## **ERO Findings: A Systemic Critique**

The Education Review Office's recent observational studies on NCEA implementation confirm many of these concerns [8, 19]. ERO's report, based on extensive surveys and interviews, found that NCEA Level 1 is not yet a reliable measure of knowledge and skills, with three in five teachers and nearly half of school leaders reporting it to be unreliable [8, 19]. The studies highlight a key issue: the remaining flexibility in the system leads to variations in difficulty between subjects and schools. This suggests that the solution is not to eliminate flexibility but to standardise assessments more effectively, which can be done through robust moderation of internal assessments.

ERO also found that students are not always motivated to achieve as well as they can under the current system, with some disengaging early, and that NCEA Level 1 is not adequately preparing students with the knowledge they need for Level 2 [8]. The report also found that the recent changes to NCEA Level 1 had resulted in "unmanageable" workloads for school leaders and teachers, who felt they were "building the plane while flying it" due to a lack of clear guidance and resources [19]. These findings underscore the need for foundational resourcing and support, rather than a top-down overhaul that places more burden on an already stressed workforce.



## Historical and Local Precedent

Aotearoa New Zealand's previous experiment with a tracking system—firstly within secondary schools and then with the introduction of special "technical high schools"—was not successful. It was eventually dismantled amid concerns it was replicating existing social inequities, entrenching class divisions, and limiting opportunities for students on vocational pathways. This is a critical historical lesson that should inform any new reforms. [23]

## A Breach of Rights

For many, like ourselves, this proposed reform is not just poor educational policy—it is a breach of our obligations under the United Nations Convention on the Rights of Persons with Disabilities [21], which guarantees disabled people equitable access to inclusive education.

## Undermining Te Tiriti o Waitangi

The proposal also has serious shortcomings regarding its commitment to Te Tiriti o Waitangi. The document is largely silent on how the reforms will give effect to Te Tiriti, as required by the Education and Training Act 2020. The brief mention of working with *kaupapa Māori* settings ignores the significant number of Māori students in mainstream English-medium contexts. The proposed VET subjects, without a clear equity framework, risks replicating past institutional racism where Māori and Pasifika students were steered away from academic pathways and into vocational streams. The proposal actively devalues culturally responsive practices like *ako*, *whānaungatanga*, and *manaakitanga*, which have been identified as fundamental to ensuring Māori student success [12]. The new system is likely to increase existing achievement gaps for Māori, Pasifika, and low-socioeconomic students by "rationing success" to a smaller, more advantaged group [22].

## Conclusion and Recommendations

If the government proceeds with these proposed changes, it will demonstrate a profound indifference to learners who do not fit a specific, traditional learning mould. These reforms risk significantly limiting the educational opportunities and future pathways of ākonga with FASD and other disabled learners, undermining the very principles of fairness and accessibility that should be at the heart of our education system. By prioritising a model of academic competition over inclusive design, Aotearoa New Zealand will be taking a major step backward in its journey to become a truly equitable and inclusive society.

Whatever the outcomes of the proposals to replace the NCEA qualifications framework, it must include an equally strong commitment to equity and accessibility. A qualification's true value comes not just from being a reliable measure for employers and tertiary providers, but from being a fair and accurate measure of a student's own potential. If the new system prevents a



whole group of learners from accessing a qualification, it is not more credible—it is simply less inclusive and effective in meeting the needs of all New Zealanders. We would like to see much more than the current proposals by designing a system where flexibility is not just an "exception" but a core feature.

Anticipating the outcomes of this consultation are largely pre-determined, we still ask that you consider the following recommendations:

- **Retain and value internal assessments** as a legitimate way for students to demonstrate their knowledge and skills.
- **Expand the assessment modalities** for literacy and numeracy, moving beyond traditional written tests to include oral, practical, and project-based options.
- **Ensure that the new VET framework retains flexibility** and does not eliminate the ability for students to gain credits from a wide range of standards that meet their individual learning needs.
- **Reconsider the subject-based grading system** for those with diverse learning needs, or introduce alternative pathways that allow students to receive credit for specific skills mastered within a subject, without the need for an aggregated final grade.
- **Provide robust, well-defined exception policies** for the four-subject minimum and other requirements, designed specifically for neurodivergent students and people with health-related learning challenges.
- **Consult directly with neurodivergent students and people with FASD** and their *whānau* during the next phase of design. Their perspective is crucial to building a system that truly works for everyone.

## References

1. A tired teacher critiques the proposed NCEA overhaul. (2025, August 6). *The Spinoff*.
2. Canadian Medical Association. (2018). *Fetal Alcohol Spectrum Disorder: The Canadian Guideline for Diagnosis*. Canadian Medical Association.
3. Cuddles, E. P., & O'Toole, L. P. (2019). *FASD-Informed Education: A Guide for Teachers*. FASD Research Centre, University of Washington.
4. Education Review Office. (2020). *Supporting Teacher Aides to have the most Impact*. Education Review Office. Retrieved from <https://www.ero.govt.nz/our-research/category/supporting-teacher-aides-to-have-the-most-impact>
5. Education Review Office. (2022). *Thriving at School? Education for Disabled Learners in Schools*. Education Review Office. Retrieved from <https://evidence.ero.govt.nz/documents/thriving-at-school-education-for-disabled-learners-in-schools-summary>





6. Education Review Office. (2023a). *An alternative education: A guide for educators and alternative education providers*. Education Review Office. Retrieved from <https://www.ero.govt.nz/our-research/an-alternative-education-a-guide-for-educators-and-alternative-education-providers>
7. Education Review Office. (2023b). *Young people talk about learning in alternative education*. Education Review Office. Retrieved from <https://www.ero.govt.nz/our-research/young-people-talk-about-learning-in-alternative-education>
8. Education Review Office. (2024). *Set up to succeed: How well is NCEA Level 1 working for our schools and students?*. Education Review Office. Retrieved from <https://evidence.ero.govt.nz/media/ogsj4ax1/set-up-to-succeed-how-well-is-ncea-level-1-working-for-our-schools-and-students.pdf>
9. Green, E., & Pepler, D. J. (2018). *Supporting Students with Fetal Alcohol Spectrum Disorder: A Best Practice Handbook for Educators*. FASD ONE.
10. Jirikowic, T., Gendler, D., & Thorne, J. (2015). A qualitative study of school-based occupational therapy services for students with fetal alcohol spectrum disorders. *Journal of Occupational Therapy, Schools, & Early Intervention*, 8(3), 256–270.
11. Kautz-Turnbull, B. (2017). The Role of Relationships and a Structured Environment in the Education of Students with FASD. *Journal of Rural Community Mental Health*, 4(1), 45-56.
12. Office of the Auditor-General. (2012). *Education for Māori: The role of Te Puni Kōkiri*. Office of the Auditor-General.
13. Pomeroy, D. (2025, August 6). *NCEA isn't perfect but NZ shouldn't forget why it was introduced in the first place*. RNZ.
14. Popova, S., Lange, S., & Canadian FASD Research Collaborative. (2017). *Understanding the Educational Needs of Children and Youth with Fetal Alcohol Spectrum Disorder*. *Journal of Population Therapeutics and Clinical Pharmacology*, 24(2), 1-13.
15. Pringle, M., Pepler, D. J., & Green, E. (2016). Trauma-informed care in the classroom: a narrative review of FASD and school success. *Journal of Social Work in Disability & Rehabilitation*, 15(3), 209-228.
16. PPTA. (2025). *PPTA News*.
17. Rasmussen, C. (2005). Executive functioning and attention in children with Fetal Alcohol Spectrum Disorder. *Journal of Population Therapeutics and Clinical Pharmacology*, 12(3), 13-17.
18. Riley, E. P., Infante, M. A., & Warren, K. R. (2011). Fetal Alcohol Spectrum Disorders: An Overview. *Neuropsychology Review*, 21(2), 73-89.
19. Shinoda, R. (2024, November 25). *NCEA Change Programme: Education Review Office report slams rollout of revised NCEA Level 1, says it's not fair or reliable*. NZ Herald.





20. So many issues but alright, I guess: What students actually think of NCEA. (2025, July 29). *The Spinoff*.
21. United Nations. (2006). *Convention on the Rights of Persons with Disabilities*. United Nations.
22. Van Dijk, N. (2025, August 14). *We should be renovating NCEA, not demolishing it: What it could mean for disabled ākonga*. The D List.
23. Maurice-Takerei, L. (2025, August 27). *NCEA reform: how will schools decide who takes an academic or vocational path?*. The Conversation NZ.

