



15 September 2025

\$25.20

Submission to the Ministry of Education on the Proposal to Replace NCEA

Introduction

1. The National Council of Women of New Zealand, Te Kaunihera Wāhine o Aotearoa (NCWNZ) is an umbrella group representing around 60 affiliated organisations and 300 individual members. Collectively our reach is over 200,000 with many of our membership organisations representing all genders. NCWNZ has 12 branches across the country.
2. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
3. This submission has been prepared by the NCWNZ 's Education Action Hub and Parliamentary Watch Committee with input gathered from some members, and drawing on existing NCWNZ policy and previous related submissions of NCWNZ.

Summary

4. NCWNZ is pleased to have the opportunity to contribute to this important proposal for change to the country's secondary school qualification pathway and framework.
5. NCWNZ maintains its longstanding interest in the delivery of a quality and equitable education system in Aotearoa New Zealand.
6. NCWNZ acknowledges our country's obligations to the provision of quality education as declared in the international treaties to which New Zealand is a signatory.
7. There is general agreement from NCWNZ that improvements to the current NCEA qualification system are needed.

8. At the same time members have concerns that the benefits of the existing system may be lost in a wholesale change to a new qualification system, and that addressing some of the issues with the current NCEA system would be a more cost-effective approach compared with a complete replacement.
9. NCWNZ supports retaining the existing NCEA system because it acknowledges the diversity of the student population, and provides opportunities for students to demonstrate their learning across a range of subjects, and not exclusively in an academic context.
10. NCWNZ has concerns about the nature of the involvement of Business and Industry in an education setting through the proposed Vocational Education and Training (VET) initiative.
11. NCWNZ agrees the core building blocks to learning – literacy and numeracy, te reo matatini and pāngarau – must be retained, with quality teaching and achievement of the same given priority status in the education qualification framework.
12. NCWNZ recognises the cumulative effect of literacy and numeracy proficiency and achievement well before students reach secondary school, and urges the Government to invest in quality teaching of these critical learning building blocks in primary school and kura.
13. NCWNZ notes with concern the lack of gender analysis or focus given to the proposed replacement to NCEA.
14. NCWNZ is aware of persistent disparities in education achievement outcomes for certain demographic groups. Specifically, NCWNZ is concerned that the proposed changes may negatively impact Māori and Pasifika students, neurodiverse students and disabled students. Inequities between rural and urban education settings may also be exacerbated.
15. NCWNZ has a strong concern for the speed at which changes are proposed to be implemented, the lack of testing of the proposed system, and the absence of sector-wide consultation.
16. NCWNZ urges investment in the teaching profession as a whole, and specifically to adequately resource professional development and support for teaching and support staff to enable effective implementation of the proposed changes.
17. NCWNZ believes that addressing barriers to learning including underlying social inequities, and ensuring access to education for all, must go hand in hand with proposed changes to update the secondary school qualification system.
18. NCWNZ believes urgent work must be undertaken to examine and address factors causing the decrease in engagement of students with the school system.

Background

19. NCWNZ has recorded its support for equitable access to education since the organisation's inception in 1896.¹
20. NCWNZ has regularly participated in reviews of the education system and curriculum through consultation and submissions, and through the development of its own policy resolutions relating to education. Most recently we contributed to the consultation on the draft framework for the teaching of Relationship and Sexuality Education.² We submitted in 2018 in support of the repeal of National Standards.³
21. In addition we made a submission to the Ministry of Education on the NCEA Review in 2018.⁴ In that submission support was recorded for maintaining a strong focus on literacy and numeracy, and ensuring good teaching in these areas. Also reported was a variety of opinion of NCWNZ members on the balance between internal and external assessments. For example, some members believed that NCEA Level 1 should be internally assessed with exams introduced for Levels 2 and 3, and others thought that external assessment was necessary at Level 1.
22. There were also NCWNZ's recommendations for measures to be taken to improve teacher:student ratios, to manage teacher workload, increase teacher numbers, and eliminate barriers to NCEA participation and qualification achievement.
23. NCWNZ continues calls to support a strong focus on literacy and numeracy, and especially to ensure the embedding of these critical foundations in primary school years, well before students are participating in the secondary school qualification pathway.

Obligations to International Treaties

United Nations Sustainable Development Goals (SDGs)

24. NCWNZ draws the Ministry's attention in particular to **SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all**, along with the following targets:
 - 4.1 By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes;
 - 4.3 By 2030, ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education, including university;

¹ NCWNZ. 2012. 115 years of resolution. <http://www.ncwnz.org.nz/wp-content/uploads/2013/06/115-years-Register-everything-2.pdf>. Policy 5.3.5.1 That this Council is in favour of the present system of free, compulsory and secular education. 1896.

² NCWNZ. 2025. S25.12 Framework for Relationships and Sexuality Education submission. [S25.12 Framework for Relationships and Sexuality Education](#)

³ NCWNZ. 2018. S18.15. Education Amendment Bill 15-1 submission.

⁴ NCWNZ. 2018. S18.35. NCEA Review submission.

4.4 By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship

4.5 By 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situations

4.6 By 2030, ensure that all youth and a substantial proportion of adults, both men and women, achieve literacy and numeracy

25. We note the alignment of some of these goals with some of those declared in the proposal, and acknowledge the Minister's goal of lifting students' reading attainment from 56 percent of Year 8 students reaching expected curriculum levels to 80 percent by 2030.⁵

26. Seeking a significant improvement of literacy levels at Year 8 is a laudable goal and one that ought to have a positive impact for students at secondary school as they enter the qualification pathway from Year 11.

27. We note however, achievement of this goal appears to be at risk, and might also require work on reducing social inequities for the education initiatives to be effective.⁶

United Nations Convention on the Elimination of All Forms of Discrimination (CEDAW)

28. We draw the Ministry's attention to the concluding observations of **CEDAW's ninth periodic report of New Zealand** from 2024 that relate to education, and ask that these concerns are addressed in the development of the new secondary school qualification pathway and framework being proposed.

Recalling its general recommendation No. 36 (2017) on the right of girls and women to education, the Committee recommends that the State party promote the importance of women's and girls' education at all levels as a basis for their empowerment and:

- (a) Ensure the allocation of adequate human, technical and financial resources for key educational programmes, including the Ka Ora, Ka Ako (Healthy School Lunches Programme), and transport assistance for Māori medium schools and women and girls in rural areas;
- (b) Address the barriers to education for girls and women with disabilities by allocating additional resources to improve accessibility, provide inclusive education and increase the number of speech therapists and teacher aides;

⁵ Ministry of Education, New Zealand. Improving Achievement. 23 May 2025.
<https://www.education.govt.nz/our-work/strategies-policies-and-programmes/attendance-and-achievement/improving-achievement>

⁶ Radio NZ. Missing targets: Govt risks falling behind in for key areas. 8 Sept 2025.
<https://www.rnz.co.nz/news/national/572372/missing-targets-govt-risks-falling-behind-in-four-key-areas>

- (c) Address the gender digital divide, improve equal access to reliable and affordable Internet services, broadband and online learning equipment, as well as access to science, technology, engineering and mathematics education for women and girls, in particular rural and Indigenous women and girls;
- (d) Strongly enforce and monitor the implementation of laws and regulations on the protection of women and girls in education, including international students, from harassment, disinformation, cyberviolence and bullying, and raise awareness of the risks of bullying and violence among students, parents, teachers and the general public;
- (e) Take measures to promote the teaching of Pasifika and Indigenous languages and address the shortage of Māori-speaking teachers at all levels of education.

Responding to Consultation questions

General comments

29. There is general agreement from NCWNZ that the current NCEA qualification system would benefit from a degree of reform and improvement.
30. There is no appetite for a return to the rigid exam-only option of the School Certificate era.
31. Members do not wish to return to a system of an industrialised age where education is “organised on assembly line principles (timetables and “subjects”), processed in batches (age group classes), and subjected to end-point quality controls (high-stakes assessments) where those who succeed on the common set of learning terms (officially the curriculum but actually often an examination prescription for a subject) are eligible for further education and those who fail leave school to enter the world of work.”⁷
32. There is agreement that our national qualifications should assess against a national curriculum.
33. Members wish to see English, Maths, Science, and IT included as compulsory subjects in Year 11.
34. NCWNZ views on engaging with parts of, or the whole curriculum are nuanced:
- “Being able to access segments of the curriculum encourages student choice, reduces the pressure of competition and allows students time to think and achieve at their own pace.”
- “The full curriculum would allow students to become fully involved with learning about a set topic earlier than with the above, so they know more about a set subject before they leave school. If linked with a trade, they become skilled earlier in a specific area for work practice.”

⁷ Hipkins, R. (2007). *Taking the pulse of NCEA*. Wellington: New Zealand Council for Educational Research. <http://www.nzcer.org.nz/default.php>. P56-7.

35. Aside from additional funding, the practical resources and supports NCWNZ believes will be important for learners and schools when shifting to a subject approach include the following:

“There should be nation-wide professional development to develop fully trained and experienced staff, excellent resourcing, efficient moderation practices. Schools should develop strong links to business in their local area. They also should have parent-student evenings where schools can explain to same about the benefits, concerns and consequences of the subject approach. Some schools might need to build and resource specialist classrooms to accommodate learning in subjects.”

Good things about the existing NCEA system

36. NCWNZ members generally support the shift from New Zealand’s previous rigid, exam-focused assessment and qualification model, with one member describing the positive move from “the straightjacket 100% external of School Certificate. NCEA reduced competition between students and encouraged diverse strengths in individual students to engage them. The present NCEA’s grading system shows knowledge and skills that numbers or grades do not. It also has national and international status.”⁸

37. NCWNZ supports the flexibility of the current NCEA system, that allows for the measurement of diverse strengths of individual students via a grading system that reflects knowledge and skills that would not be captured in traditional exam assessment settings. From one member:

“Internal assessments should be retained but could be improved with more strictly regulated and standardised timeframes, rather than being thrown out completely. The moderation for internal assessments should remain but be more tightly standardised, with nation-wide specific assessment topics with 5-6 samples of grades for each assessment, and one chance of moderation for every subject, so every school can align with these. Improvements would require teachers to have professional development, and moderation specialists could be trained in each region to monitor moderation results.”

38. Some NCWNZ members believe the external assessments in STEM subjects, along with external close reading and writing assessments in Humanities subjects, provide a consistent measure of student knowledge, skills, and readiness for future study, training or employment.

Areas of concern with the existing NCEA system

39. Conversely, there is a view from some members that assessments of literacy and numeracy do not consistently measure student skills, knowledge and readiness for

⁸ Graham, J., Meyer, L. H., McKenzie, L., McClure, J., & Weir, K. F. (2010). Māori and Pacific secondary student and parent perspectives on achievement, motivation and NCEA. *Assessment Matters*, 2, 132-157.

future study, training or employment. They believe there has been a loss of academic rigour that has developed within NCEA, with no clear vocational pathway and the insidious “credit farming”. One member states: “If these issues could be addressed rather than throwing it all out, it would be a cheaper and better-quality solution.”

40. NCWNZ is aware of the ability of students to gather credits from a variety of subject areas, and without sitting exams, to gain their NCEA qualification. We acknowledge the accumulation of NCEA credits may reflect the acquisition of a qualification with a breadth, but not a depth, of learning.
41. NCWNZ is also aware of concerns being voiced that NCEA qualifications do not adequately prepare students for tertiary level education and training.
42. Some parents and potential employees find it hard to understand the criteria of assessments. A suggestion of putting a grade or number alongside the criteria would be a straightforward solution.

Areas of concern with the Proposal

Timeline

43. NCWNZ is concerned at the pace and pressure of the proposed timeline for introducing the new initiative, and advises an alternative based on thorough preparation with sector-wide consultation and supported by appropriate funding.

Assessments and achievement requirements

44. Concerns regarding the subject-based approach to assessment in Years 12 and 13 are reported as follows:

“Students cannot be stereotyped. 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. Readiness for learning is also an important aspect to student motivation.”⁹

“Some Humanities and Technology subjects are more difficult to assess consistently because the subjects themselves are not suited to three hour written exams. The solution is not to externally assess them, but provide tighter, well-resourced, well-moderated structures so that schools can maintain effective systems of internal assessment topic choice, timeframes and moderation around internals.”

45. There is support for some reduction of flexibility such as with the 50% external exams. However, it is noted that “internal assessments have been invaluable with students with learning difficulties, non-majority students, and students from lower socio-economic backgrounds.”¹⁰

⁹ Lazarides, R., Viljaranta, J., Ranta, M., & Salmela-Aro, K. (2017). Adolescents’ preparedness and motivation across the transition to post-comprehensive education. *Contemporary Educational Psychology*, 49, 151-159.

¹⁰https://www.researchgate.net/publication/263304935_Neo-tribal_capitalism_socio-economic_disadvantage_and_educational_policy_in_New_Zealand; Strathdee, R. (2013). Neo-tribal capitalism,

46. Regarding the proposed achievement requirements, one member suggests, “It would be simpler and clearer to provide a mark or grade to show business people and some parents what a student is capable of but avoid wiping the criteria – place it alongside the simpler end product (additive not subtractive) so that others can see exactly what skills and knowledge have been achieved.”
47. Concerns regarding the four subject out of five pass requirement in Years 12 and 13 are described by one member here: “The exams for these subjects need to be achievable as this is the benchmark for further learning. It is important to encourage students to keep learning to achieve their full potential, but this involves encouragement, building motivation and giving them choices.”
48. Other changes, supports or mitigants needed to support strengthened achievement requirements include “clearly written assessments which align with the curriculum, professional development for mainstream staff, excellent, nation-wide resources. Extra tuition for specialist teachers of neurodiverse students, migrants and ESOL students.”

Vocational Education and Training at schools

49. In terms of the proposal to include Vocational Education and Training subjects (VET), NCWNZ members had the following to say:

“The proposal does not account for the very different priorities between educators and business people; the government working with business without the inclusion of educators in the equation is asking for trouble. Teachers have been trained to be collegial – not the servants of business.”

“Vocational educators would need to align closely with local businesses, and vice versa.”

“Some geographical areas may be short of businesses where a school can offer VET training, which could lead to urban area schools providing greater opportunities for VET, and rural areas missing out.”

“Some schools might move to streaming classes and become two-tiered: either vocational or academic. A healthy school intake depends on good reputation and exam results, as well as location, so schools might want to specialise for best intakes. This could create problems for student choice in school catchment areas.”

Student engagement

50. With regard to the Government considering ways to ensure more students stay in school until the end of Year 12, members believe “Some students do not have the will, the interest or the parent backing to stay at school. They become a disruption in the classroom and for their fellow students’ learning. All should be encouraged but not all young people need to be.”

socio-economic disadvantage and educational policy in New Zealand. *Journal of education policy*, 28(4), 501-516.

51. NCWNZ is clear that improving assessments is a small part of the wider picture. Focusing on education systems to improve attendance fails to recognise wider socio-economic inequities in our society, which need to be addressed alongside streamlined educational systems.

52. Members suggest:

“Incentives need to be in place to encourage learning, as well as punishment for non-attendance. Resourcing in school facilities, supporting teachers, providing clear goals for success in subjects the students want to learn, good gender and ethnic models of educational success to copy all help, as well as the security of future job opportunities.”

“Repeatedly failing to pass a standardised test can motivate some students who persist, but others lose focus and give up.”

Teaching profession

53. NCWNZ is aware that the teaching profession is already under pressure with a shortage of teachers, especially at secondary school level, decreasing enrolment numbers for teacher training, and teacher burnout due to high workloads, lack of adequate support, and low salaries.

54. Teacher wellbeing, teacher numbers and adequate resourcing, expanded significantly from its current position, must be key considerations woven into the plans for implementing the proposed new system.

Support for aspects of the Proposal

Foundational Award

55. There is general support for the proposed Foundational Award with the caveat from one member “that extensive resourcing is applied to lower equity index schools in order that the students in these schools do not fail in bulk and disappoint whole communities.”¹¹

56. In terms of supporting students to prepare for learning in Years 12 and 13, our members had the following to say:

“It will ensure that all students are able to be at a standard level for success in Years 12 and 13. It will be a help to employers to know the level an applicant has reached.”

“It will be a qualification for students who are entering the workforce, to have.”

“All need this level whether going on to tertiary education, doing the study and exams for apprenticeships or even for living a useful life.”

“A Foundational Award as a baseline test for literacy, numeracy and science is a good cornerstone and sets the bar for future student learning in whatever context.”

¹¹ The New Zealand Herald. Opinion: Axing of NCEA needs to proceed with caution. 19 August 2025. [Opinion: Axing of NCEA needs to proceed with caution – Patrick Walsh - NZ Herald](#)

57. There is a view that setting a requirement for a level of attendance in order to gain the Foundational Award is helpful, as long as funding is supplied to schools to support them in this area.

Vocational education

58. With regard to vocational education, members point out that:

“Vocational experiences exist at the moment with Gateway and Technology assessments, so VET could build infrastructure around these, to ensure more varied authentic workplace training than at the moment. Students would gain a clearer sense of future work options, especially in the trades.”

“Students will be learning and be assessed on the knowledge and skills which employers are looking for and needing. Employers will be able to understand the student’s qualifications – what has been achieved in the skills and knowledge they are seeking.”

59. NCWNZ considers the main benefit of a subject approach to assessments in Years 12 and 13 is that this method will provide benchmarks in circumstances where a student is really clear about what career and work area they want to be trained in.

Recommendations for the Proposed Qualification Pathway and Framework

60. Any new assessment system must be aligned with the curriculum. The rewrite in Maths and English should be covered for all subjects so that every subject’s curriculum and assessment is in sync.

61. Increased, efficient resourcing for internal assessments could help avoid burnout of teachers, and less effective moderation.¹²

62. Improving grades in low equity index schools is a much bigger hurdle than just rearranging assessments; the answer lies elsewhere. There are massive historical and contemporary systematic barriers to gender and ethnic equity that need to be tackled alongside increased student support in underprivileged areas, such as free bus passes, family benefits, boarding allowances for rural learners, edible free lunches, to name but a few.¹³

63. Parts of the senior secondary qualification system NCWNZ believes should be prioritised for improvement are English, mathematics, writing. Literacy and numeracy should be compulsory for all, but assessment must not disadvantage neurodiverse students or ESOL students.

¹² Barrett, J. (2008). *The impact of the NCEA on teacher collegiality* (Doctoral dissertation, The University of Waikato).

¹³ Arnerich, A. (2024). *Experiences of NCEA: The challenges and limitations* (Doctoral dissertation, The University of Waikato).

64. One member states: “There needs to be some regulated improvements to the NCEA infrastructure as mentioned above, such as preventing the ability of students to avoid all external exams, putting vocational and academic grades on the same level and teaching to assessments instead of the wider curriculum. Having passes depend on a 50% external exam would reduce some teacher workload and encourage limited student competition.”

Conclusions

65. NCWNZ believes that addressing the issues with the NCEA system would be a more cost-effective approach than a replacement system as proposed.

66. We support amendments to the existing NCEA system that will:

- allow for flexibility of learning and assessment and will mitigate inequity and disadvantage of students in vulnerable demographic groups, including those learning at schools in rural locations; and
- encourage depth of learning through a subject-based approach in Years 12 and 13.

67. There is support for measurement of skills and knowledge of students to be recorded and reported in a way that is understood by potential employers.

68. NCWNZ urges a focus on lifting literacy and numeracy achievement in primary school in order that students are ready for education at secondary school level.

69. NCWNZ wishes to see a focus retained on English, Maths, Science, and IT as key foundation subjects in the secondary school qualification pathway and framework.

70. Involvement of businesses and industries in schools through vocational education programmes should be treated with caution, with full consultation to avoid unintended consequences.

71. NCWNZ is concerned at the absence of full consultation and the short timeframe proposed for implementation of a new system. Implementation of improvements will depend on adequate resourcing and professional development for teachers, to support quality teaching and to attract and retain quality teachers at secondary school level.

72. NCWNZ urges an examination of, and a resolution sought to the issues of, decreasing engagement of students with the school system, and the persistent disparities reflected in education achievement outcomes for Māori and Pasifika students, disabled students, neurodiverse students, and students from low socio-economic backgrounds.



Suzanne Manning
NCWNZ Board



Bernice Williams
NCWNZ Parliamentary Watch Committee