

## NZATE Submission on the Proposed NCEA Replacement

The New Zealand Association for the Teaching of English (NZATE) appreciates the opportunity to feed back on the proposal to replace NCEA. To develop our response, NZATE reviewed both the discussion document and the Cabinet Paper.

### NZATE's Stance

NZATE supports a coherent qualification that raises expectations and delivers equitable outcomes for all learners. We acknowledge issues of inconsistency within current practice and the need for improvement. However, as framed, the proposal to replace NCEA is unlikely to achieve these aims without causing significant and avoidable harm, particularly for priority learners, and would be better addressed through targeted reform rather than wholesale replacement.

Our stance is that this proposal to replace NCEA does not allow for that.

Our response looks at the following areas:

1. Equity Issues
2. Implementation gaps
3. Pathways & streaming
4. Assessment model clarity
5. Workload & moderation
6. Local context & VET
7. Professional culture

NZATE recommends an improvement pathway that looks to strengthen NCEA's coherence and consistency, lift expectations with scaffolding, and phase in changes with pilot evidence and proper resourcing, rather than replacing the framework outright. We are supportive of external examinations being used to contribute to a student's overall grade and can see ways that this can be done with NCEA without abolishing the whole system.

### 1. Equity Issues

The proposal and Cabinet Paper indicates that there will be a drop in achievement for some of our most vulnerable students. It notes that "Based on current data, officials expect that initially,

attainment rates would like to decline. These impacts are likely to be most significant for students facing socioeconomic barriers, Māori and Pacific learners, and disabled learners.”

<b>Population group</b>	<b>How the proposal may specifically affect this group</b>
Māori	For ākonga Māori learning in a kura, the proposals limit kura autonomy to tailor teaching and learning programmes, as full subjects are required for the new qualification.
Disabled people	The proposals make sure that all disabled learners have access to deep and coherent learning, which they may not currently receive through very individualised approaches. Learners may still need some individualisation, especially in terms of assessments, and further work is needed on how to accommodate this.
Realm Nations	Realm nations use NCEA as their national qualification, predominantly NCEA Level 1. Removing NCEA Level 1 will have a significant impact on learners in these nations, as it will remove their access to a qualification.
Learners in tertiary settings	The proposals make it very difficult for students to achieve the new qualification in tertiary settings as they will no longer be able to ‘top-up’ credits from any standards. They will need to offer full subjects or subject packages, which is very difficult for tertiary providers to offer. There are currently nearly 2,000 learners per annum achieving NCEA after leaving school in tertiary settings. These risks are partially mitigated by incentivising more students to stay in school for longer, which could be achieved by raising the school leaving age.
Learners in alternative education settings	The proposals make it very difficult for learners who may miss large periods of learning e.g., students with health needs, to attain the new qualification. Students will be assessed on whole subjects, including on content that they may have missed.

An initial dip in achievement should be seen as unacceptable. NZATE are left wondering how big the crack these students will slip through is and how long that crack will stay open. Our current NCEA system has the flexibility to close the gaps, although we do agree that the implementation is inconsistent and can be misused to credit count rather than show what a student has learned and is

able to do. This is something that can be remedied with a thorough review rather than a complete replacement.

Any system-level change that predicts greater harm for those already underserved, without a funded mitigation plan, cannot be justified. Equity must be a design gate, not a hoped-for afterthought.

We are particularly concerned with an award labelled “Foundational” that may stigmatise learners if they do not achieve it, and encourage more rigid streaming of cohorts. NZATE can see situations where ākongā may be put in classes that are seen as remedial foundation literacy or numeracy to avoid schools being targeted if their students underperform.

NZATE asks that you look to publish an equity impact statement with funded supports (timetabled literacy staffing, PLD, assistive tech, kaiārahi/mentoring, targeted attendance supports) before any transition dates are confirmed.

## **2. Implementation gaps**

NZATE notes that there is an absence of a credible implementation plan that includes resourcing, timelines that reflect school cycles, moderation system design, and workforce capacity planning. There are unresolved structural questions (e.g., the mooted split of English, Phase 5 scope) and no clarity on how curriculum, assessment, and the assessment replacing the current Common Assessment Activities (CAA) will align operationally across Years 9–13. It is especially concerning that in the Cabinet paper (item 25) it says this will be assessed at year 8 and 9 level and then raised over time to a year 11 equivalency. This is not a reliable indicator for employers about a young person’s foundational literacy and numeracy skills. This shift would also need to be communicated clearly to teachers so that we can adapt as required.

Furthermore, it is problematic to look to finalise a national qualification framework that is touted as aligning with a curriculum when a finalised curriculum document is yet to be released. As with most of this discussion document, NZATE is again left with more questions than answers.

NZATE strongly suggests that the government look to co-design an implementation blueprint with sector bodies that includes phased pilots, national resourcing commitments, moderation capacity modelling, and a multi-year transition with stop-go decision gates.

### **3. Pathways & streaming**

The pathways rhetoric risks hard academic/vocational tracks along with a greater tendency to stream ākonga. This has disproportionately affected Māori in the past as they have been funnelled into more vocational and, often, low-waged pathways. Such streaming is still having an impact on many Māori.

The narrowing of academic subjects risks further marginalising ākonga and so NZATE recommends a protection of broad programmes; fund regional access to VET opportunities so students everywhere can access high quality VET without narrowing English or other learning areas.

Some schools report benefits from stepping back from full Level 1, teaching rich programmes while choosing how to assess. NZATE worries, however, that under the proposal many schools could default to streaming or to “Foundational literacy classes,” recreating the inequities reform is meant to solve.

### **4. Assessment model clarity**

NZATE queries what a letter/percentage actually means for teaching, moderation, comparability, and for employers (e.g., “what does 63% in English demonstrate?”). Current NCEA reporting provides evidence of what a learner can do; generic percentages risk masking capability, and narrowing pedagogy. We believe that our current framework could be further adapted to show more clearly a young person’s ability within a subject.

The idea that parents and whānau do not understand NCEA is outdated; increasingly whānau would have sat NCEA and know the model well. It’s also inaccurate to claim NCEA does not prepare students for higher study in New Zealand or abroad. Too often, these claims echo the messaging of providers promoting a single pathway, not an evidence-based appraisal of NCEA.

### **5. Workload & moderation**

Increased external marking of internals and expanded moderation will add significant administrative workload. NZATE have serious concerns about the reliability of using Artificial Intelligence to mark assessments. Whilst there are public statements about wanting to embrace this wholeheartedly, it seems due to its current lack of reliability and ethical concerns. We would also caution against a compliance drift (e.g., centrally issued lesson plans), which undermines professional judgment and local curriculum. What improves learning is investment and support, not rebranding or micro-prescription. Teachers are adept at developing assessment that meets the needs of their ākonga. NZATE believes that it would be highly beneficial to co-design moderation changes with subject associations, fund release time for assessment design and cross-school calibration, avoiding a one-size-fits-all model, as those who work in the front line of education know that one size fits none.

### **6. Local context & VET**

Members of NZATE Council with VET understandings and experience caution that workload and moderation demands in comparable systems are substantial, and access varies widely by location, raising fairness issues for smaller or remote kura. Lack of funding could also mean that students do not have access to a wide range of VET options.

### **7. Professional culture**

There is sector fatigue and a growing sense that teachers are blamed for system ills while being asked to deliver rapid, under-resourced change. NZATE supports raising expectations. We must emphasise that the raising of the bar can only be done if the government provides the time, PLD, and resources to realise them. NZATE has constantly expressed the faith and trust that we have in our teachers across the motu; we would like to see the same faith and trust in our kaiako to deliver high quality learning and assessment from the government.

### **Conclusion**

NZATE stands ready to partner on a high-expectations, equity-centred improvement kaupapa. But replacing NCEA without a robust plan, resourcing, and safeguards would risk doing harm where we can least afford it. We can, and must, do better by improving the system we have.