

**TEU****TERTIARY EDUCATION UNION**
TE HAUTŪ KAHURANGI

Submission of

**Te Hautū Kahurangi | Tertiary Education
Union**

to the

Ministry of Education

on the

Proposal to Replace NCEA

15 September 2025

CONTACTS

Huhana Watene

Te Tumu Whakarae Māori | National President Māori
m: +64 21 618 703
e: huhana.watene@teu.ac.nz

Sandra Grey

Te Pou Ahurei | National Secretary
m: +64 21 844 176
e: sandra.grey@teu.ac.nz

Julie Douglas

Te Tumu Whakarae Tiriti | National President Tiriti
m: +64 21 659 739
e: julie.douglas@teu.ac.nz

Jared Commerer

Te Pou Tūhura
m: +64 21 221 6433
e: jared.commerer@teu.ac.nz

1. Te Tīmatanga | Introduction

- 1.1. Te Hautū Kahurangi | Tertiary Education Union (TEU) welcomes this opportunity to respond to the *Proposal to Replace NCEA*.
- 1.2. The TEU is the largest union and professional association representing 12,000 academic and general/allied staff in the tertiary education sector (in universities, institutes of technology/polytechnics, wānanga, private training establishments, and rural education activities programmes).
- 1.3. The TEU actively acknowledges Te Tiriti o Waitangi as the foundation for the relationship between Māori and the Crown. We recognise the significance of specific reference to Te Tiriti in the Education Act and the emergent discourse resulting from this. We also accept the responsibilities and actions that result from our nation's signing of the UN Declaration on the Rights of Indigenous Peoples.
- 1.4. The TEU expresses its commitment to Te Tiriti by working to apply the four whāinga (values) from our *Te Koeke Tiriti* framework as a means to advance our TEU Te Tiriti relationship in all our work and decision-making – with members and when engaging on broader issues within the tertiary sector and beyond – such as our response to the *Proposal to Replace NCEA*:

Tū kotahi, tū kaha – We are strong and unified; we are committed to actions which will leave no-one behind; we create spaces where all people can fully participate, are fairly represented, and that foster good relationships between people.

Ngā piki, ngā heke – We endure through good times and bad; we work to minimise our impact on the environment; we foster ahikā – the interrelationship of people and the land, including supporting tūrangawaewae – a place where each has the right to stand and belong.

Awhi atu, awhi mai – We take actions that seek to improve the lives of the most vulnerable; we give and receive, acknowledging that reciprocity is fundamental to strong and equitable relationships; and we work to advance approaches that ensure quality public tertiary education for all.

Tātou, tātou e – We reach our goals through our collective strength and shared sense of purpose, which are supported through participatory democratic decision-making processes and structures.

- 1.5. Our response to the *Proposal to Replace NCEA* stems from our commitment to the whāinga expressed above and our wish to see these enacted in the tertiary education sector and in our society and communities.

2. PREAMBLE

- 2.1. TEU recognises the importance of Aotearoa New Zealand's national qualifications system in shaping pathways into further education, employment, and civic life. NCEA has served as an inclusive, flexible framework that reflects Aotearoa New Zealand's diversity and strengths. While reform is sometimes necessary, it must be evidence-based, carefully implemented, and focused on addressing inequities.
- 2.2. We have serious concerns about the government's proposal to replace NCEA. We believe the proposals risk narrowing opportunities, undermining equity, and creating unnecessary disruption. We are especially concerned about the implications for vocational education and training (VET), where policy coherence and genuine investment are urgently needed.

3. TEU POSITION

- 3.1. TEU does not support the *Proposal to Replace NCEA*.
- 3.2. We support the submission put forward by PPTA Te Wehengarua.

4. PROPOSAL 1: Working with industry to integrate Vocational Education and Training (VET) subjects into the senior secondary qualifications

- 4.1. We support greater recognition of vocational learning, but the current proposal lacks clarity and risks replicating past failures. NCEA was originally designed to raise the esteem of vocational pathways, yet that aim has not been achieved in over 20 years. Simply rebranding or reshaping VET subjects will not address the deep structural barriers of underfunding, low status, and inequitable access.
- 4.2. There are four key risks in this area:
 - 4.2.1. **Industry Skills Boards (ISBs)** are proposed as the mechanism for developing VET subjects, but their reduced funding and expanded remit raise serious concerns about capacity and quality.
 - 4.2.2. **Assessment design:** translating competency-based industry standards into percentage-based grading risks devaluing VET learning and undermining authenticity.
 - 4.2.3. **Equity of access:** students in rural, low-decile, and Māori-medium contexts already face limited opportunities for meaningful workplace learning.

Without significant investment in teachers, facilities, and partnerships, inequity will worsen.

- 4.2.4. **Pathway coherence:** qualifications tied too narrowly to current industry needs may quickly become outdated, while broad education must remain a priority.

4.3. We recommend:

- 4.3.1. Substantial new investment in VET infrastructure, teachers, and partnerships.
- 4.3.2. A co-design approach with schools, tertiary providers, iwi, and unions – not just industry.
- 4.3.3. Recognition that vocational and academic pathways overlap, and that all students deserve broad, future-proofed education.

5. PROPOSAL 2: Introducing a new Foundational Award and national senior secondary qualifications for Year 12 and 13

- 5.1. TEU accepts that three years of high-stakes qualifications is unnecessary, and that removing NCEA Level 1 could create space for more innovative Year 11 learning. However, we strongly oppose the proposal to replace it with a high-stakes “Foundational Award” in literacy and numeracy.
- 5.2. Māori, Pacific, neurodiverse, and learners living with disabilities are disproportionately disadvantaged by standardised assessments. Making a literacy and numeracy test a gatekeeper risks entrenching failure, regardless of students’ broader achievements.

5.3. We recommend:

- 5.3.1. Removing Level 1 without replacing it with a compulsory test.
- 5.3.2. Embedding literacy and numeracy within meaningful, culturally responsive learning across the curriculum.
- 5.3.3. Ensuring support, not barriers, for learners who need additional help.

6. PROPOSAL 3: Shifting focus to a structured and subject approach and introducing required subjects in the curriculum

- 6.1. The proposed shift to a rigid, subject-based system requiring five subjects and compulsory English and mathematics is a backward step. It undermines flexibility,

reduces students choice, and disadvantages neurodiverse learners and those with diverse strengths.

6.2. Flexibility is a strength of NCEA. Schools have designed creative, cross-curricular programmes that meet local community needs, including kaupapa Māori and VET-focused pathways. A lockstep subject system risks returning to the inequities of School Certificate, where success was rationed and failure disproportionately fell on marginalised communities.

6.3. We recommend:

- 6.3.1. Retaining flexibility in how qualifications are structured.
- 6.3.2. Recognising the value of cross-disciplinary and kaupapa-based learning.
- 6.3.3. Ensuring any compulsory elements do not narrow options or undermine innovation.

7. PROPOSAL 4: Strengthening the achievement requirements

7.1. TEU supports improving coherence and consistency, but we reject the assumption that this requires more external exams or stricter prerequisites.

7.2. There are three key risks in this area:

- 7.2.1. **External assessment:** increased emphasis on exams disadvantages neurodiverse students, English language learners, and those from disadvantaged backgrounds. Internal assessment allows for authentic, formative feedback and recognition of diverse strengths.
- 7.2.2. **Attendance requirements:** linking qualifications to attendance would unfairly punish students for circumstances often beyond their control.
- 7.2.3. **Equity impacts:** stronger prerequisites and grading systems risk reducing achievement rates in disadvantaged communities, undermining fairness.

7.3. We recommend:

- 7.3.1. Retaining a balance of internal and external assessment, aligned with Universal Design for Learning principles.
- 7.3.2. Strengthening moderation, teacher support, and curriculum alignment rather than narrowing pathways.
- 7.3.3. Rejecting any proposal to tie qualification to attendance.

8. CONCLUSION

8.1. TEU acknowledges the need to continue improving our national qualifications system, but we are not convinced that replacing NCEA with a new framework will achieve this. The proposals risk creating barriers to success, especially for Māori, Pacific, disabled, and other marginalised learners. They also risk undermining the hard-won recognition of vocational education as a valued and integral part of secondary schooling.

8.2. We urge the government to:

8.2.1. Retain the inclusive, flexible strengths of NCEA while addressing legitimate concerns about coherence and credibility.

8.2.2. Invest in and elevate VET through meaningful co-design and resourcing, not by reshaping assessment frameworks.

8.2.3. Prioritise equity and student wellbeing above administrative simplicity.

8.3. A qualifications system must serve all young people. We do not believe the current proposals meet that test.