# NZCER Submission on NCEA Change Proposal

**September 2025** 

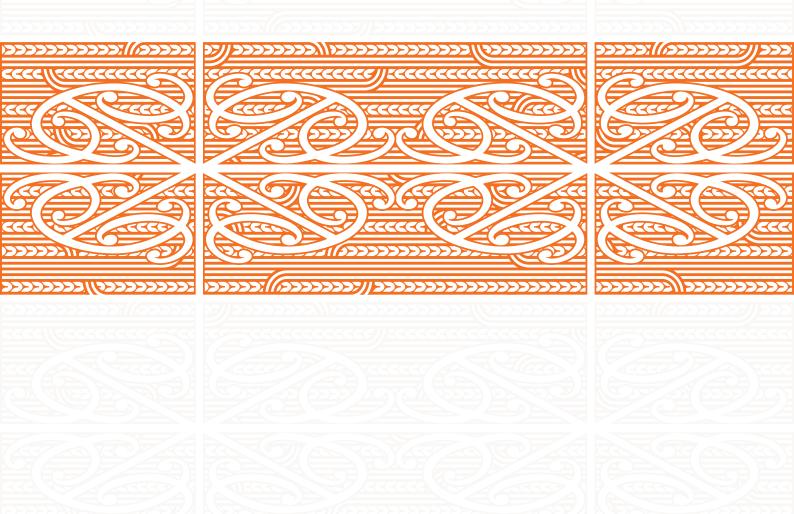




This document details the submission from Rangahau Mātauranga o Aotearoa (NZ Council for Educational Research) on the 2025 proposed changes to NCEA.

The consultation for these changes took the form of a survey, and our submission is presented as responses to the survey questions. NZCER did not contribute to the development of the consultation process or survey design. This document is not a formal research output and is not intended to provide an overall view of NCEA changes and what these should or could look like.

Our submission refers to previous research on the topic of NCEA, all of which can be found in the reference list at the end of this document.



# **About you**

Established in 1934, NZCER is Aotearoa New Zealand's independent research and development organisation, operating for public good in education. Our work spans from early childhood through schooling and tertiary education to adult and community learning, reflecting our commitment to lifelong and lifewide learning. We regularly provide research, resources, and services that advance government and national priorities in education.

NZCER has had extensive research engagement with NCEA and the broader area of senior secondary qualifications systems. This has included studies of early implementation of NCEA (e.g., Hipkins et al., 2005), research to explore NCEA opportunities and challenges over time (Wylie & Bonne, 2015; McDowall & Hipkins, 2019; Alansari & Li, 2022), and equity issues (Smaill et al., 2024; Bright et al., 2023; Lee & Hipkins, 2022; Hipkins & Lee, 2023). NZCER's national survey of secondary schools (2003, 2006, 2009, 2012, 2015, 2018, 2022) provides longitudinal information about NCEA from the perspectives of principals, teachers, boards, and parents (all national survey publications can be found here: http://www.nzcer.org.nz/research/national-survey). For NZCER research on NCEA over the years, see: NCEA | New Zealand Council for Educational Research.

In 2018, the Ministry commissioned NZCER to summarise feedback from public consultation about changes to NCEA. This summary has been cited as part of the rationale for the next tranche of proposed changes. It should be noted that it is not NZCER research as such. In our view, caution is needed in selectively presenting a previous summary of public views as research, and as the basis of change. It is important that the breadth of research into NCEA, including its challenges, strengths, and opportunities be considered.

This submission has been written by a team at the New Zealand Council for Educational Research (NZCER).

What is the name of your group or organisation?

Rangahau Mātauranga o Aotearoa | New Zealand Council for Educational Research (NZCER)

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.

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# **Part 1: Case for change**

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

Somewhat disagree

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.

In principle, we agree that curriculum should lead the direction of learning, and assessment should follow. However, we have chosen "somewhat disagree" because this question is asked without context. There is a larger question of purpose that seems to have been skipped over. What are the purposes for learning and accreditation in the senior years of secondary school? The design of curriculum and assessment in the senior years of secondary school has long been debated (Bolstad & Gilbert, 2008). In part this is because learning at these levels needs to serve multiple purposes, including 1) learning and qualifications that support entry into University, 2) learning and qualifications that support pathways into other tertiary learning, 3) learning and qualifications that prepare learners for employment and 4) recognition and accreditation of learning that is useful for life – enabling learners to develop and cultivate their interests and talents, and preparing them with skills and experiences that support them to be active and engaged citizens, contribute to their communities and society, and so on.

If the national curriculum is not designed to meet these diverse purposes as well as it possibly could, then the question of whether national qualifications should assess against the curriculum is not the right question. If the curriculum is narrowed in ways that reduce students' opportunities to engage in meaningful, useful, and relevant learning that serves the diverse needs and pathways of senior secondary learners, then assessing against this curriculum will not necessarily address the learning and accreditation needs of all learners, nor be fit for purpose for the current times.

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

Some of NCEA's strengths as a flexible, standards-based assessment regime include the ability for course innovation, shaping locally and regionally tailored learning programmes that create relevant pathways for a diverse range of students, enabling the design of integrated and interdisciplinary courses of learning, and timetabling innovation. There is also some flexibility in terms of assessment choice, design, and timing.

These strengths are reflected in the evidence – our 2018 review of public feedback on NCEA, cited in the change proposal, found that the public believes NCEA's flexibility provides a range of benefits to learners (NZCER, 2018).

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

Somewhat disagree

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?
  - NCEA uses standards-based assessment. Assessing to a standard is one way that NCEA
    can provide consistent measures of student knowledge and performance, against each
    standard (Hipkins & Darr, 2022).
  - In addition, NZQA has monitoring and feedback mechanisms, including moderation
    processes in relation to internally assessed achievement standards, to further maintain
    this consistency. For example, see https://www2.nzqa.govt.nz/ncea/ncea-for-teachersand-schools/myths-about-ncea-assessment/myth-8/. Moderation processes support
    consistency of teachers' judgements, increase their understanding of the scope of learning
    and the range of possible student responses, and better aligns their own understandings
    of what counts as quality (Hipkins, 2010a).
  - The current requirements of NCEA set a certain number of credits that students must achieve at each level (currently 60) as well as 10 literacy or Te Reo Matatini and 10 numeracy or Te Pāngarau credits. This provides some consistency in the expected amount of learning students need to complete, and be assessed on, in order to achieve the NCEA – while also allowing for more diverse portfolios of learning between students.
  - The current requirements to achieve University Entrance require learners to gain 14 credits
    at Level 3 in each of three approved subjects, plus required literacy and numeracy. The
    specification of at least three 14 credits in each of three subjects on the approved list
    provides a mechanism to ensure learners are building depth in their chosen subject areas.
    This, plus the required literacy and numeracy credits provides some consistency about
    what students must learn and be able to do to be awarded UE, while also allowing for
    diverse portfolios of learning between students.

We are aware there are known assessment issues, including concerns about 'gaming' the system through subject choice offering and streaming. However, we think these are solvable issues, and are not unique to NCEA.

NZCER's 2003 national survey of secondary schools asked principals, teachers, trustees and parents what they thought of the newly introduced NCEA at that time (Hipkins & Hodgen, 2004). Survey respondents, whilst optimistic about NCEA, also had concerns about whether the newly introduced NCEA would create unrealistically high workloads for schools, that NCEA is potentially difficult to understand and navigate by parents, that equity issues may arise if schools begin to 'game' the system, and that the pace of change and associated support was not sufficient for schools to realise the full potential of NCEA. It is worth noting that many of the issues and concerns that were raised back then still ring true today, as we have continued to find similar themes in respondent views in subsequent national surveys.

We note that support for NCEA has steadily increased (Alansari et al., 2022; Hipkins, 2010b; Hipkins & Hodgen, 2004). Issues identified since 2003 have included parental uncertainty, increased workloads, and schools' call for additional NCEA-specific support.

Based on our research, many of these issues and challenges could have been prevented or addressed earlier by listening to schools' concerns and providing more consistent and clear messaging and support about how schools and families can support learners to achieve NCEA, and provide rich, deep, and well-rounded learning that supports diverse student needs and pathways.

The Ministry-funded Competent Learners longitudinal studies highlighted key findings about how students and their families perceived NCEA at age 16 (Wylie et al., 2008). In that study, though parent views about NCEA were mixed, most parents thought their children were positive about it. All but a small proportion of parents thought their children coped well with both internal and external assessment pressures, and most did not indicate their children's intrinsic motivation toward their work was negatively affected because of NCEA assessments. Parents who were satisfied with their child's progress were more likely to have positive views about NCEA. Views about NCEA may not be about the structure of the qualification per se, and instead may be more related to the kinds of information and support provided to parents about NCEA.

Recent NZCER research showed that providing Māori and Pacific families with the knowledge and confidence needed to support their children's education is likely associated with increased understanding and successful navigation of NCEA (Durie & Denzler, 2024).

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?

N/A

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

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

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

N/A

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?

In our view the priority should be to address persistent equity challenges, issues or barriers that have impacted learners and communities over the years. Reducing persistent inequities or barriers to success with NCEA should be at the forefront and must be incorporated as part of the rationale for system-wide improvements.

These improvement efforts should include:

- Addressing inequities in education and a policy focus on equitable outcomes in education.
- Eliminating system wide barriers to participation and engagement with school, including NCEA assessments (Lee & Hipkins, 2022).
- Addressing power relations and gatekeeping behaviours that work to privilege some learners (opening more doors and pathways) while disadvantaging others (reducing options and pathways), including how school-level guidance practices relate to subject choice and post-secondary pathways (Hipkins & Vaughan, 2019).

- Reinforcing positive messages around the multiple purposes of qualifications, and clear and consistent messages and engagement to help parents and whānau to understand and support their children through NCEA.
- Addressing teacher and leader workload issues so that those who are tasked with improving learners' engagement and success with NCEA actually have the capacity to do so, supported by PLD (e.g. Sheehan, 2014; Alansari & Li, 2022; Alansari et al., 2022).
- Support for whānau, including targeted workshops and resources, to develop confidence and knowledge of NCEA (Durie & Denzler, 2024)

NZCER research that adds insight about why these efforts are important includes studies by Smaill et al (2024) on how schools support ākonga Māori and Pacific students to attain University Entrance, and work that explores subject choice in relation to the future of work (Eyre & Hipkins, 2019; Hipkins & Vaughan, 2019).

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?

### Somewhat agree

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.
  - We support an iterative change approach rather than a one-shot reform (as was the case back in 2003).
  - It is important to focus on clear design principles for coherence, consistency, and credibility (Hipkins & Lee, 2023), while not cutting out features of the current system that are working well for a very broad range of learners and pathways. Partnering with people with deep expertise in assessment design is crucial for developing design principles that are enduring and enable equitable engagement with NCEA.
  - It is important that any senior secondary qualifications system allows for diversity of pathways and learning progressions, rather than becoming narrower and more focused on traditional western academic perspectives than it needs to be.
  - We need the new system to clarify how it will enable opportunities and pathways, and not close doors or create dead-ends for learners, or create more failure through learner disengagement, disconnection, and alienation.
  - Implementing large system-wide changes is not easy or quick. Schools and government might not get 'it' right from day 1. It is vital to create conditions and opportunities for the system to learn from its own evolution.
  - It is our strong view that government must invest in consistent research and evaluation activities that sit alongside any change programme around the curriculum and assessment and qualifications regime.
  - Effective use of research and evaluation can provide insights about what is working well, and for whom, as well as what aspects or areas need fine-tuning, and how to mobilise resources and necessary capabilities to ensure consistent and coherent implementation.

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• This would also enable capturing data that enables evaluative judgements on the extent to which the new assessment has truly and purposefully lifted the educational trajectories of all learners as intended – as well as discovering any unintended consequences that may work against achieving intended outcomes.

# **Part 2: Proposals**

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

### Support it

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?

#### N/A

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?

More detail would be required before fully supporting this proposal. There are risks of privileging academic pathways over VET pathways (or vice versa), effectively re-streaming schools. Any changes should take into account recent changes to Te Pūkenga (both positive and negative), to ensure VET is given mana ōrite to other subjects within NCEA (Lee & Hipkins, 2024).

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?

Career pathways guidance and adequate funding are essential to the success of VET learning. We believe VET pathways should not close off potential access to university study, as there are potential pathways that require students shifting from on-job learning to more academic roles (e.g., management, logistics). It also means that students can shift between VET and academic pathways if they believe that aligns better with their career goals.

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?

# Somewhat disagree

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.

It is not possible to agree with this statement when there is no evidence that supports its efficacy or relative merits. The Foundational Award is assumed to improve outcomes, more so than what NCEA L2 and L3 can do currently – this is an empirical claim that requires an evidence base and a business plan. Currently, as laid out in the consultation document, there is no reason to believe the new award will solve issues of underachievement, under-participation and/or disengagement. Instead, the proposed new award seems narrower in its focus, hence likely to exacerbate differences in the achievement and progress of students in Years 12-13

and through to post-secondary education. A narrower focus risks having more students turned off or disengaged from learning if they perceive the subject choices to be of low interest or relevance to their career aspirations (Hipkins et al., 2005).

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.

N/A

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.

While we support incorporating more than literacy and numeracy areas as part of the foundation award, we disagree that this should include attendance. Attendance is an issue or function that is wider than the curriculum – not even the Attendance Action Plan makes links between attendance and curriculum. This is largely because managing attendance is part of schools' wider practices, and not just about what teachers do in the classroom. Incorporating attendance, as suggested above, makes deficit assumptions about why students might not attend.

Concerted and cross-agency efforts are needed to address attendance issues, and it would be concerning if this was pushed onto teachers or became yet-another-responsibility of theirs (particularly when out-of-school factors like poverty and transport may be driving truancy).

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?

Somewhat disagree

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?

Poverty and other out-of-school factors are forcing young people to leave school too soon, so it is important to not make sweeping generalisations about why students might not regularly attend school.

It is also important to relate problematic attendance to school engagement: why should students come to school if they don't find it engaging, joyful, and relevant to their lives? The reasons and strategies to keep ākonga in school past Year 12 depends on the context and rationale behind doing so. There needs to be a stronger emphasis on making teaching and learning more relevant, engaging, and authentic.

It is also important to ensure that socioeconomic barriers to participation and engagement are addressed so that the decision to stay in school past Year 12 is not hampered by such barriers.

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?

N/A

Overall, do you support a subject approach to assessments at Years 12 and 13? Somewhat do not support it

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?

We are aware of existing concerns about NCEA being too flexible, with inadequate guidance to both parents and teachers about how to navigate the qualifications system. However, clearer advice to schools and to parents, and eliminating some of the excessive flexibility in the system could mitigate this, without needing to fully remove NCEA. It should be noted that in the 2018 NCEA review, flexibility for a wide range of learners was seen as something that was working well.

If the rationale is to reduce hyper-flexibility in NCEA, then that is solvable and does not need a system overhaul. We have concerns that a subject approach to assessment could limit transdisciplinary learning and innovation, and the extent to which teachers can deliver the new curriculum in exciting and different ways. It may risk reinforcing subject hierarchies, and may inadvertently increase rigidity too much.

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?

N/A

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

Somewhat disagree

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?

Allowing students to engage with segments of the curriculum allows for course design and innovations that can integrate learning from different disciplinary areas. The benefits of curriculum integration and transdisciplinary programmes may be diminished if these options are not available – provided courses are well-designed.

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?

N/A

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.

Somewhat do not support it

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?

Early feedback on the draft curriculum documents for English and Mathematics & statistics indicates concerns that some learners' needs will not be adequately met. Teachers have expressed concerns that the proposed direction for course design will create roadblocks and disengagement for some students, and that schools will be limited in their ability to shape courses/programmes that both meet literacy/numeracy requirements, and support students' engagement, interests, and aspirations. The specification of certain subjects, with rigid specification about what is to be taught and how, could be seen as privileging some groups of students over others. While these subject specifications may work well for some students, they may not work well for others. This approach also assumes that learners must cover all the material in a subject area to benefit from learning. While there are benefits to full coverage in a subject area, the draft curriculum documents we have seen suggest that senior English, Mathematics and statistics courses may be geared towards learners who are on a university pathway. Some learners may benefit from opportunities to develop skills and knowledge from these subject areas, without covering every aspect of the material in those learning areas. We have yet to see updated curriculum documents for other learning areas.

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 Pangarau?

N/A

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?

Ongoing investment in teaching and learning, subject-specific PLD, factoring in 'review processes' and 'check-ins' to allow the system to develop and change when it becomes clear when it doesn't work for certain students. Having research and evaluation investment alongside this so that we learn about the impacts of such changes on teaching and learning, and how to fine tune these. Prioritising communities and families when working through this change.

We suggest that any proposed shifts be grounded in a careful understanding of the perspectives of students. teachers, and whānau. For equity reasons, a priority focus should be to look at what works for learners and whānau who experience more barriers to success in their education and have also raised concerns about navigating NCEA since its implementation (Hipkins & Hodgen, 2004). Fast, top-down decisions and approaches are unlikely to serve the needs of all learners and communities unless deep groundwork has been done to understand and design for a system approach that works for all.

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.

### Somewhat disagree

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?

Our national surveys point to potentially different views reported by different groups, with principals being more positive than teachers and parents. Our 2018 national survey data suggests that principals believe that the existing achievement requirements are easy to understand. Teachers and parents want more support, clarity, and time to unpack these (Bonne & MacDonald, 2019). Any proposed changes to the achievement requirements must build in adequate support for teachers and parents so that they can support learners.

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

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.

It's not a matter of it being 'achievable', it's whether the new system is effective in raising the achievement of students through a 4-subject requirement, more so than what we currently have in place. And that's what's currently lacking from the current consultation document and proposal: Where/What is the evidence that this new approach is likely more effective? Is the emphasis here on the number of subjects, or the type of subjects, or how will it be assessed? How will all these be reviewed and evaluated through an iterative process of improvement?

We also have concerns that this new approach could disadvantage some groups over others if not well implemented. The 2018 NCEA review showed that perceived credibility issues with NCEA were not due to the system itself, but the implementation of said system. We also have concerns about whether the proposed 4-subject requirement would prevent the design of innovative courses that integrate across subjects (e.g., curriculum integration and innovative timetabling practices; McDowall & Hipkins, 2019; Eyre & Watson, 2021).

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

We must be aware of the risks of rigidity, there must be better deployment and use of regional offices and the support they offer to school leaders. The majority of secondary principals we surveyed in 2022 who had interacted with regional offices indicated that regional staff were responsive, constructive in their approach, and understood their school contexts (Alansari et al., 2023).

# Part 3: implications and next steps

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

Somewhat disagree

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?

The curriculum change needs to come before the finalisation of a qualification system. Curriculum itself needs to be appropriate for the breadth of learning that ākonga need to succeed, not to narrow their pathways or opportunities later in life. Unless the curriculum fulfils these requirements, is finalised, and is positioned to be flexible and responsive to needs, implementing a wholesale change to secondary qualification may make the system more restricting for young people. Curriculum first, assessment second.

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

Somewhat disagree

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?

We would need to see evidence behind the current proposal to provide more informed comment. Our data suggests some positive views of the current system (in the sense that schools find it generally credible and coherent, with reservations and ongoing calls for improvement). Additionally, the 2018 review cited in the proposal showed that 51% of the public viewed NCEA as a valuable qualification, with 25% neutral. The same review shows that 84% of the public understood how NCEA works. While there are concerns about the implementation of NCEA, there does not appear to be consistent evidence suggesting the credibility and coherence of NCEA is in question. It is also important to note that we might not see improvement in views of secondary qualifications if the new system becomes simply a rebrand of previous qualification systems.

Finally, if the new system does not distinguish between curriculum and assessment, it is very conceivable that the new system will create a new version of streaming.

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?

Focus on equity, supporting student/whānau/communities who are experiencing the greatest barrier to participation and achievement, solve economic inequities and barriers to engagement, invest in the workforce and provide more support, invest in quality teaching and leadership, high degree of focus and wrap around support for wellbeing.

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.

### Strongly disagree

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 proposal includes massive change happening in a very short time frame. The change proposal does not have sufficient evidence, consultation or co-design for NZCER to support it.

Principals and teachers have been consistently concerned about the pace of change (Alansari et al., 2023; Li et al., 2025), which is a finding we have seen across nearly 30 years of surveying schools. We believe adding this NCEA overhaul to an already overworked sector will not result in the engagement or quality of consultation required for this proposal to support ākonga.

At the very least, the proposal for this change should not be introduced or opened for consultation until the full secondary curriculum is finalised, gazetted and its implementation robustly evaluated.

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

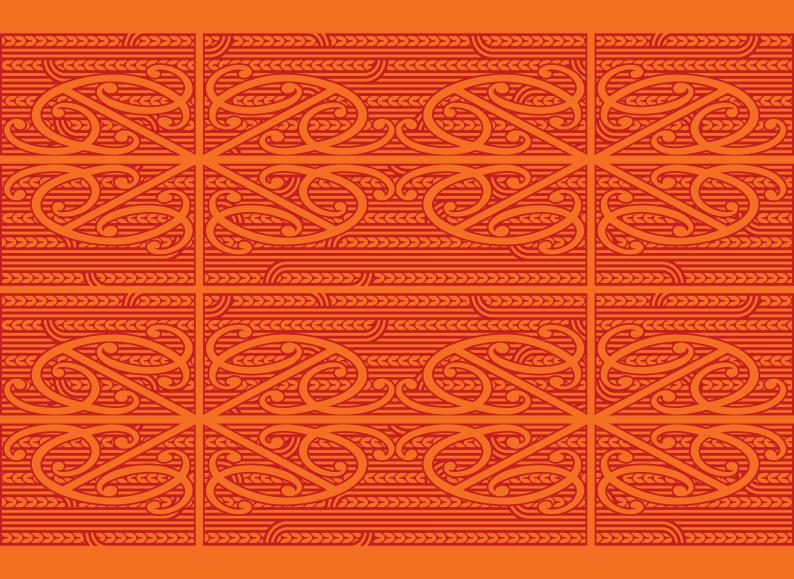
We provide below a list of the references to the research materials cited within our submission.

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