



SUBMISSION

to the

New Zealand Qualifications Authority

on the

University Entrance Review Discussion Document

April 2017

1. About PPTA

PPTA represents the majority of teachers engaged in secondary education in New Zealand, including secondary teachers, principals, and manual and technology teachers.

Under our constitution, all PPTA activity is guided by the following objectives:

- To advance the cause of education generally and of all phases of secondary and technical education in particular;
- To uphold and maintain the just claims of its members individually and collectively; and
- To affirm and advance Te Tiriti O Waitangi.

This submission has been the subject of consultation with PPTA's Executive, and in particular our Curriculum Advisory Committee. We have also taken into account views expressed by our Secondary Principals' Council and Senior Positions Advisory Committee.

We are choosing not to use the online form because of the constraints it might impose, however the submission generally follows the questions in the consultation document.

2. Relevance of University Entrance (Survey question 3)

PPTA notes Recommendation 13.3 of the Productivity Commission, in its report *New Models of Tertiary Education*, that University Entrance (2017) should be abolished leaving all universities free to set their own entrance requirements. We reject this proposal. The University Entrance requirements have proven themselves to be a fairly reliable indicator of the likelihood of student success. Furthermore, universities already have an ability to exercise discretion in individual applicants' circumstances. They also have the ability to apply extra entrance requirements for all or some of their courses, and increasingly do so. University entrance, however, provides an indication to students of the minimum requirements to be considered for a university place.

University Entrance is also used by a number of tertiary institutions for their degree level courses, although the current regulatory framework allows them somewhat more flexibility than universities, which is entirely appropriate.

Our comments here should not be taken, however, as complete support for the University Entrance requirements as they are now – see below.

3. Achievement of Level 3 as a component of the University Entrance requirements (Survey question 4)

PPTA notes the data collected for the current review of University Entrance that shows that Level 3 is a good but not sufficient indicator of likely student success at university. A proportion of students achieve Level 3 but not University Entrance, and if they are allowed to enrol at university they tend not do as well as students with University Entrance. This suggests that the extra requirements beyond Level 3 are a useful guide to likely success.

We supported this addition to the UE requirements during the 2010 review, and we think that there is no reason to change this.

4. Literacy requirements (Survey Questions 5 and 6)

There were some quite significant changes to the literacy requirements at the time of the last review, in particular the addition of “literacy rich” standards from across the wider curriculum at Level 2 and above, and the development of Level 4 English for Academic Purposes that meet the literacy requirement.

It is PPTA’s view that these requirements are at the appropriate level and credit value, but that there is probably room for some tweaking of the list of qualifying standards as referred to in Question 6 of the survey. We also wonder why the English for Academic Purposes standards had to be at Level 4, and would like to see a similar set written at Level 3. While originally these standards were envisaged to be used in schools mostly with English Language Learners, we think that they could have a broader use as an alternative to Level 3 English standards in demonstrating students’ preparedness for the literacy demands of university courses.

University educators regularly complain, including in public, about the literacy competency of students in their classes. However, the data collected for this review shows that it is actually success in approved subjects that is a better indicator of likely success than literacy levels.

On the other hand, there are some credibility issues about some of the standards that were included on the list after the 2010 review. Sometimes concerns reflect a misunderstanding of the list as reflecting standards where literacy is deliberately assessed, whereas the standards were chosen as ones where a student would need a good level of literacy to deal with the content or to present their work. The standards should be seen as reflecting de facto evidence of literacy rather than specific assessment of literacy.

Nevertheless, we have heard teachers express astonishment about some particular standards that are on the list, standards which they know a student can achieve without any substantial writing or detailed reading. Rather than list the particular standards, we suggest that there be a new exercise to more robustly clarify the criteria for inclusion of a standard, and then review the list in the light of those criteria.

5. Numeracy requirements (Survey question 7)

It is important to keep in mind that the numeracy requirements are for the generic University Entrance requirement, and that many university subjects may require a much higher level of numeracy for success, e.g. STEM programmes, social sciences, economics and accounting, and the like. The universities already tend to apply higher requirements for those courses, and should consider doing so if they don’t already.

However, there probably is still scope to increase the numeracy requirement slightly, particularly in relation to the ability for students to use the three numeracy unit standards 26623, 26626 and 26627 for evidence of numeracy for university entrance. These unit standards were developed to enable students with low levels of numeracy to achieve the first step of the NCEA, at Level 1. They are set at roughly Level 4 of the NZC. To allow them as part of the University Entrance requirement as well as Level 1 seems somewhat

counterintuitive. The data generated for this review seems to indicate that this would not have a deleterious effect on student achievement of the UE, because most students achieving UE have at least Level 2 Mathematics.

It is PPTA's view that this minor tweak, of removing the numeracy unit standards from the list, would have no negative effects on students and would somewhat improve the credibility of the numeracy requirement.

6. The requirement for three subjects from the approved list (Survey questions 8 - 11)

This is the area where PPTA would like to see the most change in the requirements. As the survey demonstrates by asking four questions in this area, the issues are complex.

Three subjects from the approved list with 14 credits in each:

The change after the 2010 review, to abolish what used to be called "the third circle" whereby a student could gain 14 of the 42 credits required from a grouping of standards across subjects, was a highly negative outcome and one which we vigorously opposed. In our submission at the time, PPTA said the following:

Removal of this "third circle" and requiring that three distinct "approved subjects" be represented in the student's results would act as a conservative influence on school curricula.

There has been a lot of work put into developing a model of Course Endorsement that does not stifle innovation in secondary schools. Course endorsement allows schools to develop courses made up of standards from a range of "subjects", and PPTA predicts that this option will be used more and more by schools over the next few years. Tightening the university entrance requirement will present a counter-force to such innovation, leaving schools facing difficult choices.

There are also situations where schools are forced to develop composite courses to meet students' needs, e.g. a small school that is unable to mount a viable class for a "pure" version of a subject, but can mount a viable class for a composite course such as Performing Arts (Media Studies and Drama), or a Maths class covering both Statistics and Calculus standards.

We suggested a compromise change, "that students must achieve at least 42 Level 3 achievement standard credits within their required 60 Level 3 credits. This retains flexibility, while ensuring that students are doing substantial study in *NZ Curriculum*-derived subjects." This was not accepted because of the weight of university opinion.

The same conflict, between university and school thinking, exists today, and in this review no change is being proposed.

Worse than that, an inequity has developed between learning areas, with the "generic" subjects of Mathematics, Science and Technology being free to develop composite courses, but the rest of the learning areas languishing behind. This is grossly unfair and there is no obvious rationale for it.

It is PPTA's view that

- a) **At the very least**, a composite course of achievement standards from different "subjects" within a learning area should be able to meet the 14 credit "subject" requirement. This would mean that a composite performing arts, or social sciences, or health and physical education course, could be created without this negatively impacting on students' chances of achieving University Entrance. Such courses would have clear coherence by virtue of the standards being drawn from one learning area, would reflect a 21st century understanding of learning, and would not in any way stop students succeeding at university. In fact, they could increase their chances of success by broadening their learning while still maintaining rigour.

The publication of the proposals to enable Te Marautanga Level 3 standards to be credited for University Entrance presents a challenge to the current insistence on three "subjects". The Marautanga standards are written to learning areas, not to individual subjects within learning areas. If these standards are to be recognised for UE, and we will be strongly supporting that they be recognised, then so should courses which include standards from within a learning area in English Medium.

- b) As our preferred option, we would like to see schools able to register coherent courses that draw standards from across learning areas and have these courses credited for the 14 credit "subject" requirement. We believe that schools are quite capable of developing composite courses across learning areas that would be just as coherent as courses that use standards from within one "subject", and the push for Agribusiness courses is one example of this. The fact that the Agribusiness proponents are having to develop achievement standards for what is a composite subject to avoid negative impacts at University Entrance is clear demonstration of how ludicrous the current rules are.

We do not, on the other hand, oppose the requirement of 14 credits over three "subjects" per se. The data does show that students who do better are those who achieve well across a number of subjects, and in fact those who do well in four or five subjects do even better than those who succeed in three. But University Entrance is a minimum requirement, and increasing the number of credits or "subjects" would be likely to prove a barrier to some students.

Retention of the 'generic' subjects

While it is probably obvious from the view we express above about "generic" or "composite" subjects, PPTA would certainly not want to see the current "generic" subjects disappear. In fact we are saying we want all learning areas to be able to have "generic" subjects.

Regular review of the list of the "approved subjects list"

If the 2010 review had taken up PPTA's recommendation that the "approved list" simply consist of all subjects with achievement standards, such a review would not be necessary. If a subject has achievement standards by virtue of being recognised in the NZ Curriculum or Te Marautanga o Aotearoa, then it should be part of the approved subjects list. This is roughly the situation now or will be once the review of the place of Te Marautanga standards

is completed, but there is still a process whereby the approved subject list is published each year and changes slightly, presumably in response to reviews of individual standards.

What it might be more useful to review is the process of decision-making, largely by the Ministry of Education, as to which subjects can have achievement standards. At the moment this is not very transparent, and decisions appear to be more related to the ability of NZQA to design an exam timetable and the capacity of the subject to contribute to the writing of the standards than to objective criteria such as “Is this subject reflected in the NZ Curriculum or Te Marautanga o Aotearoa?” Psychology and Sociology are good examples of this. Only Psychology, after a long struggle by a very energetic and well-organised subject association, has succeeded in persuading the Ministry of Education to write achievement standards for it, even though it is listed as a Social Science subject on p.30 of the NZC. Sociology, listed in the same place and taught in a number of schools but without a well-organised subject association, has not gained achievement standards. Both subjects, however, are taught at universities and are very popular.

7. Other issues (Survey question 12)

PPTA wishes to put on record here its concern that the universities continue to have so much influence over the curriculum in the senior school by their position on University Entrance requirements. This seems grossly unjust, considering that individual universities are increasingly imposing their own different requirements for many or all of their courses. This means that University Entrance is proving to be more and more a minimum requirement that will not suffice for most universities but is a useful guide for other degree-offering institutions. Although we would not go as far as the Productivity Commission in recommending its abolition, we do object to the amount of power that universities have over the detail of the University Entrance requirements.