



SUBMISSION

to the

MINISTRY OF EDUCATION

on

NCEA REVIEW – BIG OPPORTUNITIES

August 2018

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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:

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

This submission is from the PPTA Executive and is on behalf of all of our members, but recognises that many of them, as individuals or through their branches, regions, and interest groups, will also be making submissions, some of which may differ from this.

1. INTRODUCTION

- 1.1. PPTA was an active participant in the design and development of the NCEA from as early as 1996 when the union commissioned an independent panel, called the Qualifications Framework Inquiry, to undertake a review of the Qualifications Framework in consultation with PPTA members. This resulted in the report, *Te Tiro Hou*, published by PPTA in June 1997, which set out a way through the impasse that had developed during the 1990's about secondary school qualifications. That report has been acknowledged to be the basis for the eventual resolution of the impasse in the form of the NCEA, which began to be implemented from 2002.
- 1.2. PPTA was a significant participant in the work of the NCEA Leaders' Forum from 1999 through to its abolition in 2012. The Forum was a major player in the design and refinement of the qualification, and in developing and improving implementation processes. In 2005, the work of the Leaders' Forum was supplemented by the establishment of the Leaders' Forum Qualifications Group (LFQG) whose role was to meet more frequently than the Forum and focus more tightly on implementation of the NCEA. When the Forum was abolished in 2012, LFQG became the Secondary Qualifications Advisory Group (SQAG), and continues in a similar role to the present day. PPTA has made a very significant contribution to those smaller groups, and also to other ad hoc groups such as various reviews of the University Entrance requirement, of Scholarship, of literacy and numeracy requirements, the Standards Review, etc.
- 1.3. PPTA members, and PPTA as an organisation, have had a huge role in ensuring that the NCEA has been as successful as it has. This has been in spite of consistently poor resourcing for implementation and excessive workloads at the school level.
- 1.4. PPTA members recognise that the NCEA, for a wide range of reasons, is a definite improvement on the previous qualifications structure of School Certificate, Sixth Form Certificate, and University Bursaries. On the other hand, few members would claim that it cannot be improved. Whether that improvement needs to be more at the level of

redesign of the qualification, or simply improving the resourcing of its implementation at system and school level, is less clear. It is interesting that most of the Six Big Opportunities are not major changes in the design of the NCEA but rather at the level of tweaks in the current design and in some cases just shifts in school practices that could be happening now, or are already in some cases. On balance, we suggest that there are design changes required, but there are also significant improvements in support required as well.

2. RISKS OF THE CURRENT PROCESS AND THE PERILS OF UNINTENDED CONSEQUENCES

- 2.1. From our considerable experience of the processes used up to now to design and review the NCEA, PPTA can see risks in the broad and inclusive “national conversation” that the government has embarked on to review the NCEA this time.
- 2.2. NZQA regulations require a review of the qualification this year, to ensure that each of the three NCEA certificates “remains useful and relevant and continues to meet the needs of the learners, industry and stakeholders for which it was initially developed”.¹
- 2.3. However, the government has adopted a scope for this review which exceeds that necessary to fulfil these NZQA regulations, and the process has set out to involve in a “national conversation” a much broader range of “stakeholders” than previous reviews of the NCEA have.
- 2.4. This has attracted criticism from some principals. While PPTA has not joined in that particular chorus, we do consider that when the “national conversation” concludes with the close of submissions and other input in October 2018, there is going to be a need for a very different process to do the detailed design work required for this review. We suggest that process should make use of a much smaller group chosen for their knowledge and technical expertise in relation to the design of the NCEA, including at least the following:
 - the extensive history of issues that have arisen since 2002 and how and why they have been addressed in previous change processes such as the Standards Review,
 - the data analysis techniques needed to ensure that unintended negative consequences do not arise, and
 - the practicalities of how the NCEA is enacted in schools.

¹ *Guidelines for the review of qualifications at levels 1 to 6 on the New Zealand Qualifications Framework*, <https://www.nzqa.govt.nz/assets/Studying-in-NZ/New-Zealand-Qualification-Framework/guidelines-review-qualifications.pdf>).

- 2.5. We are not convinced that the new group of teachers and principals that has recently been added to the process has been selected with that kind of knowledge and technical expertise in mind.
- 2.6. PPTA's experience over the years of development and then gradual refinement of the NCEA shows us that it is essential to be prepared for and guard against the perils of unintended consequences of change. We are concerned that we see no evidence of the ideas floated by the Ministerial Advisory Group being tested in any way by the data experts at NZQA or the Ministry of Education. For example, during the Standards Review process initiated in February 2008, there was discussion about (a) requiring that all Level 1 achievement standards be rewritten to Level 6 of the NZC, and (b) refining the literacy and numeracy requirements. Both of these proposals were modelled extensively against NZQA data to try to establish what impact they would have on the accessibility of the Level 1 qualification. It was predicted, correctly, that there would be some drop in Level 1 achievement at least in the short-term. This impact was monitored over the implementation phase, and it was indeed only short-term because schools adapted their practice to the greater challenge for some students. We are concerned that that kind of analysis does not appear to have happened here, and we would at least hope that this kind of modelling will happen in the next phase of the work.
- 2.7. We appreciate that for each Opportunity, some attempt has been made to predict the complexity, implementation time and change management cost and represent this in the form of graphics in the discussion document. This is better than nothing, but these are fairly rough estimates and not always that reliable, in our view. For example, Big Opportunity 6 is rated as low complexity and only a 1-2 year implementation timeframe, and yet one part of this Opportunity is provision of more curriculum support resources, including for students with learning support needs. There is also reference to developing these resources alongside the sector in the form of subject associations. In our experience, development of curriculum support material is always much more time-consuming than one to two years.

3. THE CHALLENGES OF CHANGE

- 3.1. The discussion document recognises in a number of places that culture change will be required. It must be remembered that the NCEA is a very complex qualification system that deliberately enables wide diversity of implementation. The New Zealand school system encourages schools to operate as islands, unfortunately, which means that shifting practice across the system in any consistent way is well-nigh impossible. While there are "islands" on which some of the ideas mooted here are already flourishing, e.g. schools where there are extensive partnerships with employers and tertiary partners, and schools where curriculum stands pre-eminent and students have significant autonomy over their learning and their assessment, these are exceptions rather than the rule, and it is quite likely that the schools down the road from these "islands of good practice" are operating in very different fashion in order to establish a different positioning in the education marketplace.

- 3.2. That being so, it is difficult for PPTA, representing members in all these diverse schools, to establish an unequivocal position on any of these ideas. On the other hand, we have developed over the years a large body of policy on NCEA, and also a set of principles to guide our input on this review. That set of principles is based on the criteria for an educationally valid school qualifications system laid out by the Qualifications Framework Inquiry in 1997, accepted by PPTA's annual conference the same year and then re-endorsed in conferences in 2005 and then in 2017. The criteria are that a qualification must be:
- Manageable
 - Inclusive
 - Constructive
 - Motivating
 - Cumulative
 - Fair
 - Clear
 - Coherent.
- 3.3. These criteria appear in the five principles underpinning the Review of NCEA, as set out in the Terms of Reference:
- Wellbeing (encompassing manageable, motivating)
 - Equity (encompassing inclusive and fair)
 - Coherence (encompassing coherent)
 - Pathways (encompassing constructive, cumulative)
 - Credibility (encompassing fair and clear)
- 3.4. The Big Opportunities largely map to these principles, with BO1 being about wellbeing, BO2 about credibility and coherence, BO3 about pathways, BO4 about wellbeing and coherence, BO5 about credibility, and BO6 about equity. This is useful, and shows a degree of consensus between the profession and the Ministerial Advisory Group about what areas need addressing.
- 3.5. On the other hand, we can see little evidence in these proposals of the manageability aspect of the wellbeing principle, especially in relation to manageability for teachers. PPTA, along with all the education agencies, was involved in a major exercise in 2016 culminating in a report at the end of that year, the *Secondary Teacher Workload Working Group Report*.² In this exercise, teacher workload from NCEA was identified as a key theme, yet very little progress has been made since then in addressing these problems. Most of the work on the specific recommendations from the Workload Working Group report has been halted or re-directed into the work of the NCEA Review. We are disappointed that these Big Opportunities fail to offer any significant amelioration of teacher workload, and this concern underlies our responses to some of the individual Big Opportunities.

² <https://www.ppta.org.nz/dmsdocument/479>

4. THE PROPOSALS

4.1. We now turn to the Big Opportunities themselves, including the discussion of each Opportunity and the challenges posed, plus the supplementary options provided in some cases. At the end of that section, we offer some further proposals of our own.

Big Opportunity 1 – Creating space at NCEA Level 1 for powerful learning

4.2. The proposal here is for reduction of NCEA Level 1 to a 40 credit qualification consisting of 20 credits for literacy and numeracy (strengthened as suggested in Big Opportunity 2) and 20 credits for a project. The paper argues that this will make Level 1 “a broad foundation qualification to prepare them for Levels 2 and 3”. **PPTA does not support this proposal, but we do support Supplementary Option 2.**

4.3. *The project*

4.3.1. We consider that the project part of this proposal would not necessarily achieve “a broad foundation qualification” because (a) students might choose projects that were quite narrowly focused and not cross-curricular, and (b) students may or may not develop their key competencies through the projects they choose. There is always a conflict between allowing students to choose something that they are passionate about and ensuring that in the course of the project they develop the particular knowledge and capabilities that they need to develop. Careful balancing of these two needs is a big challenge for teachers.

4.3.2. Furthermore, we are not convinced that Big Opportunity 1 as currently presented would contribute to the manageability/wellbeing principle for the review, certainly as far as teachers are concerned, and the discussion paper acknowledges this on p.12 under ‘Challenges’: “Ensuring that project workload doesn’t just add to existing workload.” It is our belief that avoiding that would be impossible in most schools, regardless of the support for change that was provided.

4.3.3. While projects of the kind envisaged here are probably current practice in a few schools, for the bulk of teachers they are not and would require very significant change in practice, especially if it was a compulsory aspect of Level 1. Because there is nothing proposed that would significantly reduce teacher workload in the higher levels of the school and therefore provide time for this new work, we are afraid that teachers would actually be even more overloaded than they are now.

4.3.4. The paper is also rather unclear about whether the current Level 1 standards would be abolished or not, but it talks of “getting rid of the need for external exams”. If the Level 1 standards were not removed but the external exams were, presumably turning currently external standards into internally assessed ones, teachers’ workloads in schools that didn’t make the shift to the project approach would rise dramatically.

4.4. Supplementary option 2 – remove NCEA Level 1 altogether

- 4.4.1. It is PPTA's view that this is the better option, to remove the Level 1 qualification altogether and deregister all the Level 1 achievement standards. All that would remain for summative assessment at Year 11 would be strengthened literacy and numeracy requirements (see our comments on Big Opportunity 2) and unit standards from across the wider Framework, including the Supported Learning standards which are used with students with identified special needs.
- 4.4.2. We do not recommend that the abolition of Level 1 should happen instantly, but it should be signalled as to happen at a definitive future date, e.g. in three years' time. Signalling that decision would then trigger the provision of in-depth support to schools to develop new approaches to teaching in Year 11, including the kinds of cross-curricular projects envisaged in the discussion paper under Big Opportunity 1 but as an option and not assessed for NCEA. By removing the Level 1 qualification, the system would give space for teachers to develop for Year 11 much more innovative courses of the kind that they are currently free to provide in Years 9 and 10. We do note however that the backwash effect of the three-year qualifications system influences the whole of secondary curriculum design and delivery. Reducing that backwash effect might well be achieved by confining qualifications assessment to only Years 12 and 13.
- 4.4.3. Currently, some schools run a graduation certificate at the end of Year 10, and use this to incentivise students to show preparedness in terms of work completion, self-management, etc., for NCEA assessment at Year 11. We might start to see this kind of concept shifting into Year 11, with achievement of the literacy and numeracy standards being part of what students are expected to demonstrate. There are problems, however, with these graduation certificates, such as what to do with students who don't meet the requirements by the end of the year, and also the workload implications for teachers. For that reason, we are not recommending this as a national initiative, just as a possible solution for those schools who may say that without a Level 1 certificate, students will not be motivated to work during Year 11.
- 4.4.4. It is PPTA's view that our education system has for too long been obsessed with measuring and reporting what our students know and can do, and encouraging them to see their learning for its transactional value in the job or tertiary education market in the form of credits (or marks under the previous qualification system). Successive governments have given little or no attention to ensuring that our classrooms are enabled to operate in such a way that students are engaged and passionate about their learning for its intrinsic value.
- 4.4.5. In 1989, just before the Qualifications Framework was created, the school leaving age was raised from 15 to 16. An attempt was made at the PPTA

annual conference in 1997 to persuade members to support the abolition of qualifications assessment in Year 11, by not including a replacement for School Certificate in the new system. (This was in the context of debating the recommendations of the Qualifications Framework Inquiry.) Unfortunately this idea failed to gain majority support at that time, although there was a lively debate.

- 4.4.6. However, over the years since then it has become the norm for a large majority of students to remain at school till the end of Year 13. This leaves less and less justification for a qualification at Year 11, when most students have another two years of schooling to run. Only a few students leave at the end of Year 11, and if they believe that their Level 1 NCEA is going to be useful to them in the workplace, they are quite wrong, and it is now well understood that a Level 2 qualification is the minimum required for future success. Retaining a Level 1 qualification conveys a false impression of its value. For those few students for whom a Level 2 qualification is not a viable goal, for example students with special needs, there will still be the ability to accumulate standards and show them in their Record of Achievement as evidence of what they have been able to accomplish.
- 4.4.7. It could in fact be argued, as Professor Paul Black of King's College, London, did in his evaluation of the design of the NCEA in 2001³, that in a system like the NCEA, there is not a lot of justification for the existence of the certificates at all, because they give value to a certain accumulation of credits. "Why give a particular cachet to (say) 80 credits which (say) 75 does not deserve, and to which 90 will be seen to add little?" he asked. We have seen the negative effect of giving this value to 80 credits, with students stopping work once they have achieved 80, even though there are standards they have not yet done which are actually much more useful for their pathways than the ones already achieved. We are not, however, recommending the abolition of all the certificates at this time!

4.5. *Implications of removing Level 1 certificate*

- 4.5.1. PPTA is very conscious that there would be an enormous amount of PLD required to turn around curriculum design and delivery in all secondary schools. In 2009, in the lead-up to the full implementation of the NZ Curriculum in 2010, the union ran regional teacher-only days across the country at which we shared teaching materials prepared by curriculum experts. These materials showed teachers examples of how, by simply changing the pedagogies they used to teach common topics at both junior and senior level, they could be effective in assisting students to develop the

³ Black, P. (2000) Report to the Qualifications Development Group, Ministry of Education, New Zealand on the proposals for development of the National Certificate of Educational Achievement, downloaded from <http://www.minedu.govt.nz/index.cfm?layout=document&documentid=5591&data=>

key competencies. (Dr Rosemary Hipkins of NZCER had provided thought leadership on this for the curriculum experts commissioned by PPTA.)

- 4.5.2. However, we suspect that the influence of this project was limited. Teachers at the regional days were already distracted by the forthcoming revision of the achievement standards to align with the new curriculum – i.e. the backwash effect in action - and it was difficult for our facilitators to get participants to focus on the materials provided on the day. The PLD was not of the kind that has much prospect of changing teacher practice, because there was no follow-up after the regional days, and no cycle of feedback and feed-forward of the kind that we know is required to make significant changes in teacher practice.
- 4.5.3. To our knowledge, this is the only mass provision PLD for secondary teachers that has focused on the “front end” of the curriculum, i.e. the key competencies and the values, rather than on assessment. This is a tragic illustration of the system’s failure to grapple with the big issues of shifting curriculum design and pedagogy to bring to life a curriculum that ministers are always keen to claim as “world-leading”.

4.6. *Supplementary option 1 – encourage a shift from external assessment*

- 4.6.1. This option is presumably an alternative to the main proposal in this section, but we can see no particular benefits in it. There is already, with the moves to digital assessment of external standards, a shift coming in styles of assessment and some challenges to the current distinctions between internal and external assessment. Furthermore, many subjects are using portfolios or reports or projects for assessment of the internal standards.
- 4.6.2. However, any proposal that involves retaining Level 1 as it is but removing exams cannot help but add substantially to teacher workload for no obvious benefit. Certainly it might be argued that for the learners for whom exams are high pressure, one year less of exams could be beneficial, but actually the most high-pressure exams are the ones that count the most for students’ future, i.e. Level 2 and Level 3, and this proposal doesn’t address that.
- 4.6.3. The commentary suggests that it could instead be applied at levels 2 and 3, but again, the negative impact on teacher workload would have to be factored in and we could therefore not support it.

Big Opportunity 2 – Strengthening literacy and numeracy

- 4.7. It is unclear exactly what the proposal here is. PPTA does not oppose the concept of “strengthening literacy and numeracy”, and we are very aware of the data that shows that the current measurement of literacy and numeracy for NCEA is flawed and this has to be addressed.
- 4.8. However, the paper is somewhat unclear. For example, part of the proposal is to “Clarify and reset expectations about the literacy and numeracy requirements for

NCEA Level 1 [our emphasis]” when in fact, the current requirement is that students meet the literacy and numeracy requirements in order to achieve **any** NCEA certificate. The other part seems to be to review how literacy and numeracy is recognised, currently through specific unit standards or through being credited with certain achievement standards which may or may not require demonstration of literacy or numeracy.

- 4.9. There seems to be another part to the proposal, to consider expanding the notion of literacy and numeracy by adding in skills like digital, financial and civic literacy. There are also hints of a further proposal, which appears to be to introduce further literacy and numeracy requirements for Levels 2 and 3.

4.10. A PPTA proposal

4.10.1. We are responding to this rather unclear set of “proposals” by providing a proposal of our own, as follows:

1. Review the current Level 1 unit standards for functional literacy and numeracy that were written as an alternative to the “achievement standard route” so that they are at a higher level than currently (barely equivalent to Curriculum Level 4). We suggest they should be much closer to Curriculum Level 6, but still be pegged to functional literacy and numeracy rather than English and Maths. While it will probably be largely English and Maths teachers who will carry the lion’s share of deliberately preparing students for them, teachers across the curriculum all have a part in developing students’ literacy and numeracy. The levelling needs to match the correct level of the adult literacy and numeracy levels.
2. Make these standards the only way of achieving literacy and numeracy as a requirement to be credited with any NCEA certificate, i.e. abolish the “achievement standard route” because there are so many credibility issues with it, including among teachers themselves.
3. Levelled correctly as suggested above, there would be no need to develop further standards for Levels 2 and 3, while recognising that the universities will probably continue to impose their preferred literacy and numeracy levels through the university entrance requirement and through other requirements individual universities set.
4. Along with our proposal under Big Opportunity 1 to abolish the Level 1 certificate and achievement standards, introduce the concept of making achievement of these standards the only high stakes assessment goal for Year 11, while recognising that some students might not be ready to achieve them until Year 12 or even Year 13.
5. Establish valid ways of assessing these standards online, in such a way that there would be minimal workload for teachers, and make these assessments available for students to do as and when they are ready, with further opportunities if they fail the first time. The work done by NZCER in piloting an assessment tool for one each of the current literacy and numeracy unit standards could provide a basis for development of a fully online assessment tool for this purpose.

4.11. The other literacies

4.11.1. PPTA does not support the idea of adding other literacies such as financial, civic or digital literacies to the assessment load of schools. Digital literacies are being rapidly developed through the shift in pedagogies to use digital tools, as evidenced by the increasing number of schools embarking on digital assessment for NCEA, which requires that students are already using digital tools in their learning. Financial and civic literacies are part of the trend to asking schools to solve everything in society, and this is simply unrealistic. At any rate, these concepts are part of the junior curriculum already, through Social Studies particularly. Furthermore, the adult literacy and numeracy framework that has been developed has a strong evidential basis, whereas there would be no evidential basis to call on in developing standards for these other literacies.

4.12. Challenges

4.12.1. We recognise that there is a risk that strengthened literacy and numeracy requirements might have a negative effect on NCEA achievement in the short term, however we would argue that by making this the main goal of Year 11, and recognising that some students might require Year 12 as well to reach the standard, this effect would be minimal. It is also preferable to suffer this consequence than to have students deemed by the system to be literate and numerate when they are, in fact, not. That simply results in a major credibility gap for the NCEA.

Big Opportunity 3 – Ensuring NCEA Levels 2 and 3 support good connections beyond schooling

4.13. This Big Opportunity has the potential for huge increases in teacher workload, and we have real concerns about it. While we would support the development of additional standards that provided credits for such “pathways opportunities”, we absolutely do not support making engagement in these a requirement for every student in every school.

4.14. Our reasons are as follows:

- We do not believe it would be possible to ensure equity of access to these opportunities, especially when the proposal is taken up to scale to involve all L2 and L3 students. There would simply not be enough workplaces, community projects, or industry placements available, especially but not exclusively in rural communities. This would introduce an extreme inequity, because students who could not find any kind of placement would simply be unable to achieve Level 2 or Level 3.
- Making this “pathways opportunity” worth 20 credits of what would essentially be a 60 credit qualification, given that the 20 credits for literacy and numeracy are carried forward in all the models provided, leaves only 40 credits for the kinds of requirements that universities and polytechnics impose in terms of curriculum

standards. We can imagine a situation where because of those requirements, many students would be needing to achieve at Level 3 60 to 70 credits from three or four curriculum subjects plus 20 from the pathway opportunity, which would leave them with under even more pressure than they are now.

- We are also worried that connecting 20 credits to a pathway opportunity could lock a student into a narrow area that turns out not to be right for them. Students' courses should look more like braided rivers than narrow streams that take them in only one direction. This is particularly important given the uncertainty of what lies ahead for our students, and because senior secondary school students are at a stage where they frequently have little idea what they want to do in their future, and need to keep their options wide open for as long as possible.
- There would be very significant workload issues for schools in managing this proposal if it involved every student in Year 12 and 13. For example, there would be issues around keeping track of the students, ensuring health and safety requirements are being met, ensuring there is police vetting of people they're placed with, resolving industrial issues that arise, preventing unacceptable conditions of work for students, ensuring sustainability of the partnerships in terms of keeping relationships running long term, to name but a few. There are also issues about who would have responsibility for assessment, and the manageability and quality assurance of this assessment.
- The system also presents obstacles in the way of partial completion of qualifications, as suggested here as one of the "pathways opportunities". For example, tertiary institutions are penalised if they enrol students who don't have any prospect of completing a qualification within a year, and we also have concerns about the impact on students' later access to a fees-free year if they have embarked on tertiary study while at secondary school.

4.15. Vocational Pathways or pathways?

- 4.15.1. PPTA is increasingly disenchanted with the current model of "Vocational Pathways". This project, which has been very poorly implemented by the Ministry, has stalled. Relatively few schools are deliberately using the Vocational Pathways to design their curriculum, and because of the Ministry's failure to grapple with the issues at Level 3, the Pathways have become irretrievably stigmatised. While PPTA has repeatedly articulated the view that all students are on vocational pathways, whether they are aiming for medical school or automotive engineering or a career in hospitality, this is not how the Vocational Pathways are seen by most people.
- 4.15.2. We recommend that the Ministry abolish the current Vocational Pathways, and use the review of NCEA to embed a much broader concept of "pathways for all". The concept here in Big Opportunity 3 of developing NCEA standards that recognise "pathways opportunities" could be part of that work.
- 4.15.3. We recognise that there are schools already that are encouraging students into "pathways opportunities" and we can see the value of this and support the idea of maximising connectivity beyond the school as a principle across the whole review. However, given the concerns we have expressed about

leaping (even if it was across 3-5 years as suggested here) to this being a requirement for all students at Levels 2 and 3, we think these kinds of opportunities should remain optional. There should also be a lot of support provided for schools and for potential partners to help them develop these kinds of approaches. The coalition government's School Leavers' Toolkit work needs to progress alongside this work.

4.16. Supplementary option re NZ Scholarship

- 4.16.1. This proposal was very unclear to us, and we could see no justification for it. NZ Scholarship has been working very well since it was refined from 2004, and it has been a significant factor in keeping some of the schools that would have jumped to Cambridge or International Baccalaureate inside the NCEA tent.
- 4.16.2. If this supplementary option is intended to make a way that students who currently do Scholarship could also have "pathways opportunities" because of the compulsory nature of the main proposal, then it is further evidence that the main proposal should not be compulsory! On the other hand, anyone who has attended the annual Scholarship Awards would be aware that the Scholarship winners are astonishing in the wide variety of activities they manage to fit into their days, and they are often involved in making connections beyond school anyway.
- 4.16.3. It is PPTA's view that NZ Scholarship should be left well alone in this review.

Big Opportunity 4 – Making it easier for teachers, schools and kura to refocus on learning

- 4.17. PPTA could hardly disagree with the basic idea of making it easier for teachers, schools, and kura to refocus on learning, but the devil is always in the detail, and the description here of this Big Opportunity is far from clear about that detail. The way we read the Opportunity, the plan is to talk further with the Ministry and with the profession about how to help teachers design and deliver coherent courses "drawn from across the curriculum", but we are not clear whether this is solely about building cross-curricular courses, or whether it is about developing coherent courses within and across the curriculum. All of the bullet points under 'Our proposal' could be about either.
- 4.18. The concept of providing resources to help teachers with curriculum design is hardly new. PPTA has been asking for this for years, on the grounds that the resourcing currently available is largely focused on assessment, and we can see that providing resources that give examples of whole courses, with ideas about pedagogies that help to build in the "front end" of the curriculum and ways to link up learning into a coherent year-long course, would help shift the focus away from the current obsession with assessment. However, recent governments have been far more interested in pushing teachers to "deliver up credits" for their students, rather than in enabling them to deliver coherent, engaging and meaningful courses.

- 4.19. On the other hand, bullet point 3 about developing a course approval process involving NZQA or ERO does not have any appeal to PPTA. Neither of those agencies has particular skill in that area, and even if it was an available service rather than a requirement, we can't see it as adding anything that could not be achieved by providing really good PLD on course design and then trusting schools to apply what they have learned.
- 4.20. Bullet point 4 about reviewing achievement standards to support coherent courses by increasing their credit value has some merit. The optimal size of standards has been a vexed issue since the beginning of standards-based assessment, and there has been very little consistency applied in the successive phases of writing achievement standards. The decision during the Standards Review to limit the number of standards in an exam to three could have resulted in larger external standards, but in some subjects instead resulted in some of the standards previously examined externally becoming internal, and adding to student and teacher workload as a result.
- 4.21. The problem with making standards larger, i.e. rewriting them to cover more of the curriculum, is that it can lead to more students failing because they can't meet the larger set of requirements of the standard. Over the years the policy has been to move to fewer (usually only one) achievement criteria that is much less specific than previously to allow for more holistic assessment. (In the early years of NCEA when there were multiple achievement criteria for a standard, a student might perform at excellence level on two of the criteria but fail to achieve the third criterion and as a result fail the whole standard. This was unacceptable because it lacked credibility to students and parents.) The more that gets put into an individual standard, the more complex the assessment becomes. Larger standards covering more of the curriculum would require a return to multiple achievement criteria with all the problems that caused.
- 4.22. At the same time, we support the goal of avoiding fragmentation and encouraging coherent courses, and would support further technical work to achieve this without causing new problems.
- 4.23. Related to this, PPTA has been concerned for a long time about whether the Framework rule of 10 hours of teaching and assessment per credit has been properly applied across the achievement standards and across the unit standards in the rest of the Framework. While the teaching profession can have little influence over whether this has been adhered to in the industry unit standards, we can at least ask that during the Achievement Standards Review that is to follow this review, there be robust checking done to ensure that the rule is correctly applied for those standards. This could well result in some standards being allocated more credits, which would raise questions about how many standards there are in some subjects.
- 4.24. The review is likely to find that there are big differences between subjects, with some having very fragmented standards relating to distinctly different parts of the curriculum, and others having very large standards that cover big chunks of the curriculum. There are subjects where the standards are very content-specific, such as Science, and subjects where the standards are very skills-focused, such as English. In the more

skill-orientated subjects, it is easier to create units of work that incorporate a number of standards in quite a seamless fashion. Whether these subject differences can or should be reduced is not clear.

- 4.25. In the end, the answer to promoting coherence might be about sharing best practice in course design, not creating administrative obstacles for schools.
- 4.26. In this same bullet point is a reference to providing guidance or limits on the amount of evidence to be submitted. NZQA is already working towards this, and it seems a distraction here.
- 4.27. The next bullet point, 5, refers to “streamlining moderation” – if only that could be achieved! One of the recommendations of the Secondary Teacher Workload Working Group was “That NZQA pursue, as a matter of high priority, consideration of whether expectations about ‘sufficiency’ of NCEA moderation could be reduced”. This matter was referred to NZQA’s Technical Overview Group on Assessment (TOGA) with a paper from PPTA listing some options for reducing the amount of internal and external moderation done. It made no progress at all, with TOGA advising that the current level couldn’t be reduced without risking the current high level of reliability of the system. That is where the matter rests currently, however PPTA would be very keen to see it revisited. There is definitely a balance that needs to be struck between reliability of results and manageability, and it is our view that the balance is not right currently. Among strategies that we recommended was a triage approach, i.e. that schools or individual subjects with a strong record of reliable assessment be allowed to do less internal and external moderation, and that the focus of the system be on those schools that needed more support, but this made no headway at the time.
- 4.28. We can’t quite see where bullet point 6, “requiring that every school and kura has a pathways strategy” fits in here – it seems to fit better under Big Opportunity 3. However, we can see that coherence, for an individual student, means that their course is relevant to their chosen pathway. The Labour government’s manifesto, under the heading of the School Leavers’ Toolkit, promised the following: “Labour will also professionalise careers advice and integrate it into learning. Every high school will have trained, skilled careers advice teaching staff. This will cost \$30m a year. Every student will develop a personalised career plan.” PPTA would like to see progress on this promise, because effective pathways work requires the support of skilled careers advisors who have time to do the job of coordinating the school’s approach to pathway and career planning.

4.29. Supplementary option

- 4.29.1. The idea here, requiring every school and other institution offering NCEA to have summaries of their courses quality assured by ERO, NZQA or the Ministry of Education, frankly appals us. We would have no major difficulty with ERO, in the course of their visits to schools, having a look at and commenting on how the school is structuring its curriculum and individual courses, but we could not accept this being a requirement in quality assurance, as ERO don’t visit that often, and are not necessarily experts in this area. Managing National Assessment checks by NZQA look at courses,

but only with an assessment focus, and the School Relationship Managers who do these checks don't necessarily have the skills or don't have a mandate to focus on the broader issues of curriculum coherence. As for the Ministry, they don't have that kind of presence in schools and their regional teams don't necessarily have the necessary skills.

- 4.29.2. As we said above, the answer is to provide really good PLD and then trust schools to make good use of it.

Big Opportunity 5 – Ensuring the Record of Achievement tells us about learners' capabilities

- 4.30. We are astounded that this idea has come this far and not been ruled out by NZQA. It is fallacious to think that the Record of Achievement, which is a quality assured document from NZQA that is created from their results database under strict protocols, could be used in this way.
- 4.31. On the other hand, the Vocational Pathways Advisory Group, in its work on the development of Employability Skills, has talked extensively with the Ministry about the need for a standardised freely available digital CV tool that can be used by all students and school leavers. There is no reason why part of that tool could not be a link to the student's Record of Achievement. PPTA's representatives on the Vocational Pathways Advisory Group have been very frustrated at the Ministry's lack of response to this proposal. They have seemed to be happy to leave development of such a tool to the market and to a few specialist groups such as Comet in Auckland, who have done work in this area.
- 4.32. It is our view that it is every student's right to be able to access a high quality digital tool that (a) they can be taught to use while at school but (b) carry with them after school and manipulate the content for different purposes, and that (c) becomes familiar to all employers. If the agencies were to work together in a coherent fashion to support the development and maintenance of such a tool, it could provide students with the ability to link to their own qualifications results, school reports, other awards, etc. Teachers would be able to provide qualitative comment on students' development of the key competencies, their achievements at school, etc.
- 4.33. Interestingly, there was initial work being done by the Department of Education on such a tool in the latter part of the 1980's and then the development of the Qualifications Framework overtook the project and no further work was done. That early work was of course pre-digital. The ability to produce something really useful for students has increased enormously in recent years, and it is definitely something whose time has come.
- 4.34. Our proposal above is roughly similar to the Supplementary Option provided here under Big Opportunity 5, but we wonder whether the Linked In style of this option would be sufficiently manageable for the wide range of students. We think that might be asking too much of some of our less digitally savvy students, but this could be checked out by piloting various models.

Big Opportunity 6 – Dismantling barriers to NCEA

4.35. There are three aspects to this Opportunity and we are dealing with them separately here.

4.36. *Special assessment conditions (SAC)*

- 4.36.1. The general idea here of improving access to special assessment conditions has already been a major focus for the Ministry and NZQA in recent years, in particular in relation to improving equity of access to SAC by providing more support to the lower decile schools where application rates are significantly lower. There has been work done to enable suitably qualified school staff to do assessments and make applications, but there is still a lot of work involved for those staff. We are not convinced that the answer is to accredit school leaders to determine eligibility. The assessment is skilled work that should be done by specialist teachers, but they need time to do this and there needs to be more teachers who have the relevant training. In terms of the evidence requirements, there has been a lot of work over the last few years to try to make these easier, but more could still be done.
- 4.36.2. In addition, if a student is eligible to access SAC for external assessments, they should also have the same support provided for internal assessments as needed. The demands on schools of providing reader-writers for both internal and external assessments are significant in terms of cost and spaces required. It is hoped that digital tools will become more available to help with this over the next few years.
- 4.36.3. The Ministerial Advisory Group may not be aware that while the Ministry of Education talks often in its material on inclusive education about the value of SENCOs (Special Education Needs Coordinators), there is no staffing allocation for this role and no training provided apart from the ability of teachers to enrol in postgraduate courses in their own time and at their own cost. Schools which have cobbled together staffing from their special education budgets for a SENCO find them invaluable, including for SAC assessments. However not all schools have been able to do this. PPTA believes that there should be additional roll-based staffing for every school to employ one or more SENCOs depending on their roll size, management units to recognise the importance of the role, and free training for new SENCOs (much like the qualifications offered for RTLBs). (The 2016 Select Committee investigation into the identification and support for students with dyslexia, dyspraxia and autism spectrum disorders included a number of recommendations about the role of SENCOs, particularly in relation to staffing, qualifications and support for them, and these have never been actioned.)⁴

⁴ https://www.parliament.nz/resource/en-NZ/51DBSCH_SCR71769_1/cd88907f3c87d07b8b1db046417ed1e43fcd3e85

- 4.36.4. There is also a need for PLD for all teachers so they know how to identify and help students with learning disabilities. It is actually only about a decade since the Ministry of Education finally capitulated and recognised that there are such conditions as learning disabilities, and there has been very little done to ensure that teachers (a) can recognise that a student may have a learning disability, and (b) have some basic skills in working with such students, and (c) have specialist services to which they can refer such students for further help. Far too many students over the years have been dismissed as having “behaviour problems” or being “lazy” or “just not listening” when in fact they have a diagnosable learning disability that can be addressed. This will continue to happen until all teachers have access to PLD in this area, and there are trained and qualified SENCOs in all schools.
- 4.36.5. We are also concerned about any implication that the process of diagnosing learning disabilities can be short-circuited, such as through the idea of allowing “accredited school leaders to determine learners’ SAC eligibility”. It is important for a student that a detailed diagnosis is done by someone with the necessary technical expertise, because this would also identify the particular approaches that should be used with that student to enable them to succeed. The process should not just be about authorising access to special assessment conditions, but about identifying strategies and techniques for learning success.

4.37. Abolition of NCEA fees

- 4.37.1. This is an excellent idea, one that PPTA has supported for many years, but NZQA is a cost-recovery agency so it would have to be funded by the government as a special allocation to NZQA. It is a strange idea that school students should have to pay for the evidence of their learning, and we understand that school qualifications in other countries are largely free.
- 4.37.2. We do not support the supplementary option of lowering to \$0 the NCEA fees for those who apply for financial assistance only. The process of applying for financial assistance is complicated, especially when there are a number of students in a family and even worse if they are across different schools. This raises equity of access issues, with some families simply failing to apply and either suffering financial duress as a result of coming up with the fees, or their children missing out on getting their results because the fees haven’t been paid.
- 4.37.3. Simply shifting to free access to NCEA would be by far the simplest and most effective option to ensure equity. It would also remove a major source of stress for schools in our poorer communities, where the task of extracting fees and applications for financial assistance from families can take staff involved a whole year of constant effort. Perhaps the reduction in assessment costs by removing NCEA Level 1 would free up money to remove fees from NCEA.

4.38. Curriculum support materials

- 4.38.1. One of the obvious areas where there are very few curriculum support materials is in the special needs area, where teachers are expected to provide programmes for individual students who are operating at curriculum levels well below the rest of the class. A secondary teacher may not be at all familiar with what Curriculum Level One involves in their subject, and will struggle to envisage what to provide. This is where a skilled SENCO can be an invaluable support, but materials would also be really useful.
- 4.38.2. There will be many other areas which are poorly provided for currently, and this is a useful focus for work.
- 4.38.3. General
- 4.38.4. We notice that this Big Opportunity is given only one star for complexity, only a 1-2 year implementation timeframe, and only three dollar signs for cost, which we think is understating what really needs to be done. The provision of curriculum support materials, for example, is a major project.

5. OTHER IDEAS TO BE CONSIDERED

Credit value of Levels 2 and 3

- 5.1. The Big Opportunities paper makes the presumption that Levels 2 and 3 will continue to be 80 credits, of which 20 can be carried forward. PPTA considers that it is time for this to change, because it is one of the aspects of the NCEA that causes confusion, and it has also always been anomalous that achieving Level 1 requires 80 credits, whereas in practice, achieving Level 2 or 3 require only 60 new credits to be achieved. The recommendation would need to be tested against current data for its effects, but we suspect it would make little practical difference to the vast majority of students.
- 5.2. Our recommendation is as follows:
 - Abolish the ability to carry forward 20 credits from a lower level.
 - Require that to achieve a certificate, a student requires 60 credits at the level or higher, e.g. 55 Level 2 credits and five Level 3 credits = Level 2 certificate. (If those five Level 3 credits were used to gain Level 2, they would not be able to be used again for Level 3 because of removal of the 20 credits carried forward rule, but the likelihood is that a student who is able to gain some Level 3 credits in Year 12 will easily gain enough further Level 3 credits in Year 13.)
 - Make the 20 literacy and numeracy credits separately attested and not part of the credit count for any certificate, but a requirement to gain any level certificate.
- 5.3. This recommendation assumes that the Level 1 certificate would be abolished, as we have recommended above, but could apply equally to Level 1 if it was decided to retain it, whether at a 40 credit size or a 60 credit size.

Require a minimum content of achievement standards to gain an NCEA certificate

- 5.4. The developers of the NCEA back in the late 1990s and early 2000s did not anticipate the extent to which providers other than schools would cobble together unit standards from all over the Qualifications Framework to form them into an NCEA certificate. Nevertheless, there was support (in the Joint Advisory Group which preceded the Leaders' Forum) for requiring a minimum proportion of credits at each level from achievement standards – see minutes of JAG meeting 8 April 1999. It is PPTA's view that the later decision not to have such a requirement has proven to be a mistake, and that some element of NZ Curriculum/Marautanga-referenced achievement needs to be retained in what is predominantly a secondary school qualification. We believe that this would contribute to the coherence principle set for this review, and it would also help to address perceptions of unfairness in relation to credit values of achievement standards versus some unit standards.
- 5.5. Furthermore, this could help to address the issue of all students needing to have access to 'powerful knowledge' in the disciplines represented by the learning areas, something which is raised as a major issue for coherence in *NCEA in Context*.⁵
- 5.6. Dr Michael Johnston, in a presentation to PPTA's NCEA Review forum for principals on Friday 22, cited Michael Young's 2014 paper *The curriculum and entitlement to knowledge*⁶ in which he describes epistemic knowledge as "powerful knowledge". Johnston explained that epistemic knowledge is important because it:
- Fosters critical thinking
 - Provides tools for testing truth claims
 - Fosters intellectual independence
 - Enables us to "think the unthinkable and the not-yet thought" (Bernstein).
- 5.7. He argued that "Together with aesthetic disciplines (the arts and literature) and language, the epistemic disciplines form the core of *culture*. Culture serves psychological and social well-being" and therefore all students should be given access to this powerful knowledge. Students whose assessment programmes (and therefore their curriculum provision) are entirely based on unit standards are unlikely to be exposed to powerful knowledge. (Interestingly, he also argued that this epistemic knowledge is far more likely to be developed and measured by internally assessed achievement standards than through externally assessed standards.)
- 5.8. It is PPTA's view that requiring a minimum number of achievement standards to qualify for an NCEA certificate would ensure that all students had opportunities to access "powerful knowledge".
- 5.9. We suggest that the number of credits from achievement standards required could be quite low, e.g. 20. As with our first recommendation, and all the other ideas in the Big

⁵ Hipkins, Johnston and Sheehan, 2016, NZCER Press <http://www.nzcer.org.nz/nzcerpress/ncea-context>

⁶ <http://www.cambridgeassessment.org.uk/Images/166279-the-curriculum-and-the-entitlement-to-knowledge-prof-michael-young.pdf>

Opportunities paper, this proposal would need to be run against current data to see what its impact would be.

Consider ways to give more weight to the current rules on offering further assessment opportunities

- 5.10. PPTA took a leading role some years ago in tightening up the rules about offering further opportunities for assessment and resubmissions. We are reasonably happy with how the current rules are worded, but we have seen evidence that they are not being followed consistently in many schools, largely as a result of the pressure put on schools to deliver up credits so the system could reach the 85% target. Teachers and students are being put under the pressure of offering a full further opportunity (which the rules require must follow further teaching) when if assessment had been deferred till much later in the year when students had had more time to learn the skills, they would have achieved to the best of their ability on the first opportunity.
- 5.11. We are conscious that teacher workload would not be alleviated if all internal assessment was deferred until the very end of the year, but we think there needs to be a much better balance found. One of the problems has been schools demanding that teachers show that students have gained some credits as early as by the end of Term 1. In subjects where students might have completed in Term 1 a unit of work that is self-contained and the knowledge and skills involved won't be returned to again later in the year, this makes sense. But in many subjects, the knowledge and skills develop across a range of pieces of work, and assessing in Term 1 is not giving students sufficient opportunity to learn before they are assessed. If assessment is done too early, in fairness a further opportunity should be offered, but this can be avoided by assessing students when they have had sufficient opportunity to learn, and are quite clear that this will be their only opportunity.

6. CONCLUSION

- 6.1. PPTA is not convinced that the Six Big Opportunities are sufficient to address the major issues with the NCEA. While there is merit to involving many people in the review process and gaining a diverse range of views, expert opinion and the experience of the practitioners on the ground should not be minimised as a result. There will be a real need to engage seriously in the design of any changes with those who have an in-depth understanding of the qualification, and can focus on addressing technical issues, including identifying and addressing these through careful data analysis.
- 6.2. For example, data highlighted by the NZ Initiative report *Spoiled by Choice*⁷ shows that there are significant equity issues in the NCEA, particularly in terms of the content of different groups of students' certificates, with Māori and Pasifika students more likely to gain NCEA on the strength of disparate standards that do not constitute clear pathways to further qualifications. This is likely to be a large part of the explanation

⁷ Lipson, B. (2018) *Spoiled by Choice*. How NCEA hampers education, and what it needs to succeed. New Zealand Initiative, available from <https://nzinitiative.org.nz/reports-and-media/reports/spoiled-by-choice-how-ncea-hampers-education-and-what-it-needs-to-succeed/>

why Level 2 achievement rose steadily during the term of the last government, but Level 4 achievement remained static. There is nothing in these proposals to address this inequity.

- 6.3. As a further example, that same report raises serious questions about whether the NCEA has led to inordinate levels of “teaching to the test”, whereby we have lost the element of “surprise” in the previous system, in which students didn’t know exactly what they would be required to know and demonstrate and therefore had more incentive to learn broadly across the curriculum. It can be argued that the push for “transparency” of students’ achievement that underpinned some of the pressure for the shift to standards-based has resulted in a system where students have learned to do only as little as they need to do to gain specific standards, rather than to learn broadly across the curriculum. This issue is also not really addressed in these proposals.
- 6.4. We are also concerned that the very significant issue of teacher and student assessment workload is not addressed in any of the Big Opportunities, and that instead some of the Big Opportunities, in particular Numbers 1 and 3, would cause major increases in teacher workload. There is also nothing in these proposals that would reduce the compliance workload for teachers and schools associated with the NCEA.
- 6.5. We hope that somehow, out of the myriad of submissions that will be received on this discussion paper, some clarity will emerge about how to address these, and other, serious questions. However, we reiterate our comments above under the heading ‘Risks of the current process and the perils of unintended consequences’, that the next stage will require a much more focused process using people with high levels of technical knowledge and practical expertise.