



NEW ZEALAND SECONDARY PRINCIPALS' COUNCIL
OF THE POST PRIMARY TEACHERS' ASSOCIATION

SUBMISSION

to the

MINISTRY OF EDUCATION

on

NCEA REVIEW – BIG OPPORTUNITIES

October 2018

1. ABOUT THE SECONDARY PRINCIPALS' COUNCIL (SPC)

The New Zealand Secondary Principals' Council (NZSPC) represents state and state integrated secondary and area school principals who are members of PPTA. It is made up of regional representatives from around New Zealand along with representatives for Māori principals, women principals and area school principals. As well as negotiating the Secondary Principals' Collective Agreement, NZSPC acts as the voice of secondary and area school principals in New Zealand.

The Secondary Principals' Council welcomes this opportunity to make a submission on this first phase of the NCEA Review, a response to the Ministerial Advisory Group's six Big Opportunities.

2. INTRODUCTION

This submission is from the Secondary Principals' Council, and draws substantially on discussion of the Big Opportunities proposals at a seminar involving about 60 SPC members and other invited principals on Friday 22 June this year. While preparation of the submission has involved a large number of principals from a wide range of contexts, we recognize that principals are as diverse in their views on NCEA as teachers, and for that matter, as students and the wider community.

On the other hand, there is plenty of evidence that principals have largely been consistently strong supporters of the NCEA for most of its history. NZCER's regular surveys of secondary schools have, in every three yearly survey, shown principals to be more positive than teachers in response to the repeated question "I support NCEA". In the latest survey published, 2015¹, 68% of principals chose Strongly Agree, and 27% chose Agree, totalling 95% support for the qualification. That figure was at its lowest in 2003, at 87% support, and has grown steadily since then. In contrast, in 2015 only 22% of teachers chose Strongly Agree, and 47% chose Agree, totalling only 69% support.

Members of the Secondary Principals' Council were heavily involved in advising on the development of the NCEA from 1999, as members of the NCEA Leaders' Forum (which was largely made up of principals and teachers until 2003, when its membership was expanded somewhat). They were also represented on the Forum's subgroup, the Leaders' Forum Qualifications Group, and subsequently are members of its successor, the Secondary Qualifications Advisory Group. Principals have also been important members of other ad

¹ <https://www.nzcer.org.nz/research/publications/secondary-schools-2015>

hoc groups, such as the Scholarship Reference Group, and reference groups for the periodic reviews of the University Entrance requirement.

While there was some dissension over design issues in the Leaders' Forum in the early days, leading to the departure from the group of a few principals, these were not principals representing SPC. SPC has always been committed to working with the decision-making processes, including accepting compromises where necessary to get consensus.

The support and advocacy for the NCEA of secondary principals has been essential to its survival during times when it has been under severe attack from the media and sections of the profession. Principals have had a significant role in educating their Boards and their wider school communities about the NCEA – how it works, why it benefits students, and so on. Many principals have also played a significant role in holding the line in support of NCEA, for example in situations where their Boards were pushing for the school to move to alternative qualifications such as Cambridge or the International Baccalaureate.

This support, however, should not be taken to imply that principals don't believe that the NCEA can be improved. For example in the 2015 NZCER survey², 65% of principals identified NCEA workload for teachers as a major issue. This was a significant increase from responses to the same question in 2012 and 2009: 49% and 39% respectively. The same period (2009 to 2015) saw government policy initiatives combined with a number of changes to the NCEA that together exacerbated teacher workload. These included:

- the alignment of standards to the new curriculum requiring significant rewriting of courses and assessment materials,
- the outcomes of the Standards Review process (including the conversion of some unit standards into achievement standards which expanded the menu of standards in subjects, the new rules limiting exams to three standards, and other changes), and
- the imposition by government of a Better Public Service target that 85% of 18 year olds would have NCEA Level 2 by the end of 2017.

The 2015 NZCER survey³ also showed 41% of principals agreeing or strongly agreeing that the assessment pressures of the NCEA had negative effects on student wellbeing, and these pressures were also highlighted in an Education Review Office report on student wellbeing published the same year.⁴

² Ibid.

³ Ibid.

⁴ Education Review Office (2015) *Wellbeing for young people's success at secondary school*. Wellington: Education Review Office.

It is SPC's strong view that this review must, as its highest priority, find ways to reduce the assessment pressures that are impacting so negatively on students and teachers. We are not convinced that the six Big Opportunities individually or collectively would achieve that, in fact we consider that some of them would actually exacerbate student and teacher workload.

3. THE PROPOSALS

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

SPC believes this Opportunity can be separated into two separate issues, (1) how students' literacy and numeracy should be attested and (2) what assessment, if any, should be done in Year 11.

3.1.1 Literacy and numeracy attestation

SPC is of the view that the current methods of assessing literacy and numeracy for NCEA (the purpose-designed Level 1 unit standards or the achievement standards that are deemed to constitute evidence of literacy and numeracy) lack credibility among teachers and the wider community, and need to be abandoned as soon as possible. (We see this as separate from the issue of literacy and numeracy requirements for University Entrance, which are not part of this review and for which there are fewer credibility issues.)

SPC would like to see work done identifying the levels of literacy and numeracy that are the minimum required to function in today's workforce. It is likely that this work can make use of what has already been done to develop the Adult Literacy and Numeracy Tool by the Tertiary Education Commission.

Once those levels were identified and agreed, we would see the assessment of literacy and numeracy being separated from the Qualifications Framework, i.e. no longer being through standards, while at the same time attainment of the agreed levels of literacy and numeracy would continue to be a co-requisite for being granted any NCEA certificate.

We would envisage that some students would attain the literacy and numeracy benchmarks in Year 9 or 10, many in Year 11, and some perhaps not until the end of Year 13.

3.1.2 Assessment in Year 11

SPC leans towards the Supplementary Option “Remove NCEA Level 1 altogether”.

It is important to recognise that the three certificates are artefacts that can be seen as separate from achieving individual standards (achievement or unit standards) that will, regardless of whether they contribute to a certificate, still be recorded on the student’s Record of Achievement.

Although there were problems associated with the previous government’s setting of the Better Public Service target that 85% of 18 year olds would have achieved Level 2 by the end of 2017, it did nevertheless remind schools that achievement of at least Level 2 is critical for a student to have a good range of options beyond school. A Level 1 certificate provides entry into very few occupations or ongoing study, and it could be argued that the system is deceiving students by still providing the Level 1 certificate, as if it had real value beyond school.

It is important to remember that Level 1 of the Framework is “open-ended downwards”, which means that currently a Level 1 certificate can be made up of standards that represent learning well below Curriculum Level 6 (the level to which the achievement standards are written). The reason for this feature of Level 1 was explained in a paper to the inaugural meeting of the Standards Review Expert Group in February 2008, under the names of Bali Haque, Michael Johnston, Jim Strachan and Josh Williams:

A number of low level generic unit standards exist in the NQF because initial funding for standards development was targeted at early production of standards accessible by those who were struggling to achieve in existing qualifications. Rather than accepting these as ‘foundation level’ standards, the concept of ‘open-ended downwards’ was applied to NQF level 1: one effect was to depreciate the credibility of qualifications that use what are really foundation level standards, especially following the later creation of graded standards.⁵

Abolishing the Level 1 certificate would ameliorate the credibility problem caused by a Level 1 certificate being able to include standards that are at a much lower cognitive level than the Level 1 achievement standards.

⁵ Haque, B., Johnston, M., Strachan, J., Williams, J. (2008). *Discussion document: Standards Review: Guiding principles for the development and review of assessment standards for New Zealand’s National Qualifications Framework*. Internal NZQA paper to inaugural meeting of Standards Review Expert Group, 26 February 2008, located in PPTA files.

Some people argue that the Level 1 certificate should be retained for the benefit of those students who will never achieve a higher certificate. However, for those students, such as students with special learning needs, the current 80 credit requirement including literacy and numeracy may in fact be more than they can achieve, whereas knowing that they will get recognition on their Record of Achievement for every standard that they have managed to achieve might well work better as an incentive.

The history of the NCEA since its inception has seen excessive emphasis on credit-counting rather than on the quality of learning. At its worst, this has turned into what has been termed “credit shopping” or “credit farming”, where students and teachers seek out the standards that will be most easily achieved and deliver the maximum number of credits, regardless of whether those standards reflect the most important learning for that student. There have been concerns that the 80 credit requirement has led to some students stopping work, including failing to attend external assessments, once they reach that “magic number”.

There have been efforts made to reduce this emphasis on credits, for example by the introduction of certificate and course endorsement in 2007 and 2010 respectively, but they have been only partially successful.

A decision to remove the Level 1 certificate does not necessarily imply removing all the Level 1 achievement standards. However, we would argue that if a decision is made to retain some Level 1 achievement standards but abolish the certificate, these standards should be a revised set of for each subject that reflected the most powerful and foundational knowledge and skills at Curriculum Level 6. We would envisage this being a small set of standards, perhaps three per subject at most, totalling no more than 10 credits. If a decision is made to do this, detailed analysis should be done as to whether these could feasibly be externally assessed standards (with the consequent workload advantages for teachers) or whether they must be internally assessed in order to provide maximum scope for assessment contexts that resonate with students.

These standards would be available for the use of those schools who could not countenance abandoning qualifications assessment in Year 11 altogether, and they would show on students’ Records of Achievement. This would recognise the separation of the certificate as an artefact from the recognition of learning through individual standards.

However, should a decision be made to retain some Level 1 achievement standards, two questions would still remain:

- How is student and teacher workload being reduced in schools that continue to assess against these standards?
- Would the retention of these standards at Level 1 militate against schools moving to maintaining a rich curriculum that focuses on the most powerful learning at Year 11, to provide a foundation that will enable students to succeed in the last two years of schooling?

In the paper to the Standards Review Expert Group in February 2008 referred to above is the following comment on the issue of Level 1:

Many overseas systems have abandoned their middle secondary certification to avoid the negative effects on curriculum and learning that are an inescapable part of one-off, time-bound, end-of-year external examinations. Others modified this to focus only on key learning skills, recognising that many domains of achievement would be superseded by subsequent learning and reported in leaving certificates. The NQF has not been free of such debates: for instance there was considerable debate in the formative stages of the standards-based system as to whether there should be a level 1 certificate, or whether learner achievement should be reported solely on the record of learning.⁶

3.1.3 *The project*

The idea of a project as a compulsory requirement for achieving Level 1 does **not** appeal to SPC.

Firstly, our members see these projects as presenting a huge administrative challenge, especially when they would involve the whole of Year 11, or at least all of those students seeking to achieve a Level 1 certificate. They would especially pose a problem for our most vulnerable students, those who are transient during their NCEA years, where maintaining commitment to a major project would be endangered by their transience.

Secondly, introducing a project as a new requirement for achieving a Level 1 certificate is counter to SPC's preferred position of moving to the abolition of the Level 1 certificate.

However, should the decision be made to retain the Level 1 certificate, perhaps at 40 credits as proposed in Big Opportunity 1, we would not be averse to the development of some new standards that could be used to assess the skills demonstrated in pulling

⁶ Haque, Johnston, Strachan and Williams op cit.

together a cross-curricular project of the kind envisaged, as long as those standards were optional and a project was not a requirement for all students.

3.2 Big Opportunity 2 – Strengthening literacy and numeracy

As indicated in our response to Big Opportunity 1, SPC does **not** consider the current methods of attesting to students' literacy and numeracy credible, so agrees with the Ministerial Advisory Group that work needs to be done in this area. However, we don't agree with the MAG's solutions.

Firstly, the achievement standards that are deemed to be evidence of literacy and numeracy do not function well for that purpose, as evidenced by a 2014 TEC study that sought to evaluate, amongst other things, the predictability of the achievement standards pathway in relation to students meeting the requisite levels on TEC's Literacy and Numeracy for Adults Assessment Tool.⁷ Secondly, the same evaluation showed that the unit standards pathway to literacy and numeracy had even less correlation with students achieving the requisite levels on the TEC tool, and those standards are clearly too low level to be used for their current purpose.

The discussion document asks two questions:

- Whether we favour continuing to confine literacy and numeracy to reading, writing and mathematics, and
- Whether there might be increasingly challenging literacy and numeracy requirements for Level 2 and 3 certificates.

On the first question, SPC does not wish to see an extension of literacy and numeracy into such areas as digital, financial or civic literacy. We believe that the focus at the moment should be on strengthening the current scope of literacy and numeracy. The other areas mentioned are all specific parts of the curriculum, and in the case of digital literacy, schools are already heavily engaged with enabling teachers to shift to greater student use of digital tools right across the curriculum.

On the second question, consistent with our preference for removing the Level 1 certificate, we would instead favour the literacy and numeracy requirements for

⁷ Thomas, G., Johnston, M. and Ward, J. (2014). Alignment of literacy and numeracy measures. Research for the Tertiary Education Commission, 25 August 2014. Maths Technology Limited. Downloaded from <http://tec.govt.nz/assets/Reports/Alignment-of-Literacy-and-Numeracy-Measures.docx>

students to “participate fully in information-rich societies”⁸ being clearly defined, and an assessment tool developed, preferably on-line, that can be used to assess students as and when they are ready, whether it be as early as Year 9 or as late as Year 13. We accept that more robust literacy and numeracy requirements may, in the short term at least, mean that fewer students achieve them in Year 11. However separating them from the NCEA, except as a co-requisite to being credited with any certificate, would convey the message that they are an important goal to work towards over whatever time is required, rather than something that most students receive almost by accident through achieving particular achievement standards.

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

SPC are **not** in agreement with making pathways experiences a compulsory feature of all students’ programmes to achieve Levels 2 and 3 NCEA. While we recognise that the current opportunities to experience work and/or tertiary study have proven valuable for many students, we do not see this as something for everyone, nor do we see why there should be a minimum number of credits associated with this.

A number of principals at the seminar questioned how this could be seen as “a big opportunity for NCEA”. Their understanding was that the current review was primarily to refine the rules for NCEA, and currently there is ample scope for students to generate a flexible number of credits from such pathways, without this needing to be a compulsory feature of the qualification.

One area some principals do believe could be developed, perhaps in the form of some optional achievement standards, would be an ability for students to gain credits from community-focused projects, similar to the “service learning” model that is common in the Australian education system. Currently, a student is able to earn ITO credits in their out-of-school placement, but if they are doing community service projects, there is usually no way of credentialing this. Being able to recognise community service would be a way of raising the value of civic participation, however this should only be optional because the logistics of it could be quite onerous.

Principals are interested in ways that schools can better support development of the Employability Skills. While these in some ways relate to the Key Competencies of the NZ Curriculum and the Graduate Profile of Te Marautanga, they are much more

⁸ Ibid.

specific to the competencies required to succeed in the adult working world. There have been various attempts to build the Key Competencies into the standards themselves, but these have not been successful. The Employability Skills and Key Competencies are best developed through the pedagogies adopted in classrooms, and through the school's overall approach to career guidance and mentoring of students.

In terms of increasing the use of pedagogies that develop the Key Competencies, there is a glaring need for comprehensive PLD on this. At the time of the curriculum alignment project, PPTA offered Teacher Only Days across the country at which teachers could access resources demonstrating how to do this in their subject. However, a one day session is not enough to change teacher practice, and much more resource needs to be put into this.

SPC would also like to see a lot more resource going into schools to support whole school approaches to careers information, advice, guidance and education (CIAGE). The resourcing available for Careers Advisers is minimal, and a whole school approach requires a lot more than a single Careers Adviser with a small amount of time to work with students in groups or individually. The Careers Development Benchmarks: Secondary⁹ provides a good model of the ideal provision, but schools are simply not adequately resourced for this.

SPC also has doubts about the value and workability of the current Vocational Pathways. Too many students are gaining pathways almost by accident, especially in the case of the Creative Industries pathway. ERO showed in their 2016 review of the pathways¹⁰ that they were still not having a major impact on curriculum planning in schools, and it is SPC's view that this will not have changed significantly since then. Rather than blaming schools for not adopting the Pathways as policy-makers envisaged they would, there should have been an investigation into why schools were not doing so.

SPC views the Pathways as too narrow, too dependent on the availability of industry standards, and somewhat stigmatised because of the "vocational" tag. They have also become largely a Level 2 option, because the Ministry has never resolved the issues around how to recognise them at Level 3. SPC would like to see work done on expanding the concept of "pathways" from an industry-focused model into a model that

⁹ <https://www.careers.govt.nz/resources/planning/career-development-benchmarks/secondary/>

¹⁰ ERO (2016). *Vocational pathways: Authentic and relevant learning*. Wellington: Education Review Office. Downloaded from <http://www.ero.govt.nz/publications/vocational-pathways-authentic-and-relevant-learning/>

is relevant to all students, because all students are on pathways of one kind or another. Only some of these can be recognised in the current Vocational Pathways.

Principals are also very aware that there are aspects of the funding regime for schools that act as disincentives to placing students part-time in employment or tertiary study, and until these are fixed it will always be problematic for schools. These include quarterly funding, the “bulk funding” of students who are on these pathways, and the paucity of provision for the co-ordination of these programmes. The result of these mechanisms is unpredictability of school funding and staffing and a significant drain on the school’s already stretched resources.

Another area where schools need far more support than they are currently receiving is in timetabling so that students on mixed school-tertiary pathways do not miss out on school learning when they are outside the school. The Ministry of Education has provided very little in the way of guidance to schools on ways to do this, despite it being something they have asked for over a long period.

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

SPC’s view is that teachers, schools and kura will never be able to really refocus on learning until there is a really significant reduction in the amount of assessment that happens in the senior school. With every standard assessed or reassessed, the quality assurance load on teachers and school administrators increases.

SPC accepts that the Qualifications Framework requires results submitted from internal assessment to be underpinned by a quality assurance process, however this process has become excessively burdensome on schools. Principals at the SPC seminar on the Review commented that the current system is a low-trust model, and yet the evidence from the external moderation system shows an astonishingly high overall level of agreement between teachers and moderators: in 2017 this agreement rate was 92.1% at the credit/no credit boundary, and 83.2% at the grade margins. This agreement rate has been steadily improving since 2013 when it was first published in the NCEA Annual Report¹¹ and suggests that there is no justification for persisting with such a low-trust approach to moderation.

¹¹ NZQA (2018). *Annual report on NCEA and New Zealand Scholarship: Data and statistics*. Wellington: NZQA. Downloaded from <https://www.nzqa.govt.nz/assets/About-us/Publications/stats-reports/ncea-annual-report-2017.pdf>

To enable teachers to refocus on learning, there are only really two approaches available:

- Reduce the quality assurance requirements, and/or
- Reduce the quantum of assessment.

We don't see either of these alternatives in evidence in this Big Opportunity, but we think both of them need to happen.

In response to the specific suggestions in the proposal (the bullet points on p.30):

- There have been calls since before the NCEA began for there to be better resources for designing coherent courses and school course construction. SPC doesn't see these two parts of the proposal as likely to make any appreciable difference to teacher and school workload, but they certainly need to be provided.
- The proposal to develop a course approval process simply sounds like an extra burden on schools.
- "Streamlining moderation" might help, but SPC and PPTA have been calling for this for years to little avail.
- Requiring every school and kura to have a pathways strategy sounds like more work for schools unless it is accompanied by significant extra resourcing.

The only part of the MAG's proposals that seems to us to have potential, is the suggestion that achievement standards be reviewed to support coherent courses by making each worth more credits.

However, experience shows that making a standard larger, while adhering to the principle established in the Standards Review that no standard should have more than one Achievement Criterion, has the effect of making the assessment judgement more difficult. The achievement criteria become very generic and need to be supported by extensive explanation and exemplification, otherwise teachers will find it very hard to make decisions at the grade boundaries. Larger standards have also tended to raise the difficulty level, because more content is covered. Nevertheless, SPC supports work being done in this area, but carefully modelled and piloted to determine the impacts.

However, at the same time as reviewing the standards to avoid fragmentation, there needs to be work done on credit values. There are two issues in this area:

- Whether the credit values of the current achievement standards genuinely reflect the 10 hours of learning, private study and assessment that each credit is meant to represent. There were always too many credits per subject, even in the initial years of NCEA where each level of a subject had a “set menu” of 24 credits, and certainly since the Standards Review when there was a decision to allow subjects to move to a larger “smorgasbord” of credits. If the 10 hours per credit were well understood and adhered to in developing courses, no subject would offer more than 20 credits, on the basis of a 34 week school year up to the exams, with 6 hours of in-class and study time each week totalling 204 hours = 20 credits.
- The credit values of unit standards, some of which seem to schools to be ludicrously out of kilter with the 10 hours per credit rule. This works in a very negative way in schools, with students, for example, coming back from a week-long practical Agriculture course with 20 credits up their sleeves when a week-long course of 40 hours should not be able to deliver more than 4 credits (applying the 10 hours per credit rule). Students look at how much work, in contrast, is involved to get three credits in a Drama assessment that might take most of the term, and decide it’s not worth the effort. NZQA must bite the bullet on this issue and review all of the standards. That was supposed to be the last phase of the Standards Review, but it never happened.

SPC would like to see NZQA exploring ways to reduce the quality assurance requirements by using a triage approach, where schools or subject areas with a strong record of making accurate judgements have a much lighter touch moderation system than schools or subject areas where there is evidence that teachers are struggling. Where the judgements are below standard, there should be readily available help for those concerned.

Principals would also like to see the number of credits required to achieve NCEA Levels 2 and 3 reduced to 60 at the level or higher. Separating the attestation of literacy and numeracy from the certificates would help with this. But in addition, SPC would like to see an end to the ability to carry over and re-use 20 credits from a lower level. This is not well understood and doesn’t make a lot of sense to teachers, students or families.

Instead, our proposal is that students who are working at a range of levels would achieve the relevant level certificate when they had 60 credits at that level or higher, but that credits at a lower level would not count. Any higher level credits used for a

lower certificate could then be re-used the following year to achieve the higher certificate. To illustrate:

- Student A is in Year 11, but during that year, they achieve 20 credits at Level 2. In Year 12, they can add those 20 Level 2 credits to the 40 Level 2 credits they achieve, to make a 60 credit Level 2 certificate.
- Student B is in Year 13. They achieve 50 Level 3 credits that year, but they also achieved 20 Level 3 credits the year before, so they easily qualify for a 60 credit Level 3 certificate in Year 13.

This is not much different from the current situation, except that currently, the 80 credits for a certificate can include up to 20 **lower** level credits. SPC would like to see that rule end. Reducing the credit requirement to 60 at the level or higher would in fact make no real difference, as that is in fact the minimum for Levels 2 and 3 now, given that students can currently carry over 20 credits from a lower level to gain certificates requiring 80 credits. It would just make the requirements easier for students and families to understand.

An alternative approach that has been suggested by some principals is to abandon the annual granting of level certificates altogether, and simply award students with a leaving certificate which shows the highest level that they achieved, e.g. if they had obtained 60 credits at Level 3, they would leave with that certificate. If they had not reached that requirement, but had 60 credits at Level 2, they would leave with that certificate.

However, that would still leave the question of why a certain number of credits is given so much importance. Professor Paul Black of King's College, London, in a Ministry-commissioned evaluation of the initial design of NCEA, asked why the design gave such cachet to a particular number 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.¹²

SPC has not developed this idea of a leaving certificate fully, and some members are not clear how this would be an advance on abandoning the certificates altogether and students simply presenting their Record of Achievement. It is, however, worth some consideration, because of the benefits of putting the emphasis on what a student

¹² 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=l>

leaves with, and their subsequent outcomes, and the likelihood that it would reduce the media's interest in developing league tables.

Principals have been discussing the question of how schools are to be measured in future. It is our view that NCEA data on its own is an inadequate reflection of the success of a school. School leaver data, student wellbeing data, evidence of the richness of the school's curriculum and pedagogy, engagement with the community, families and whanau, and other evidence are all very important measures of the success of a school which need to be placed alongside NCEA data. The publication of league tables of NCEA results alone can have a disastrous impact on schools that are in fact highly successful for their communities. SPC would like to see further investigation of how the publication of league tables can be stopped.

Another suggestion, even more radical, is for teachers to simply stop assessing NCEA altogether, and use the time released to refocus on learning and on enabling students to put together portfolios to demonstrate their learning across the curriculum. These portfolios would be sent away, as with the Technology and Art portfolios, for a national panel to assess. SPC would like to see this idea at least considered as an option for the future.

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

SPC is overwhelmingly **opposed** to the idea of having NZQA's official results document, the Record of Achievement, being somehow expanded to include reporting or a summary of other experiences students have had and evidence of their dispositions. We don't believe that NZQA could actually put its name to such a document, because they could not show that everything on it had been quality assured to their requirements.

Instead, SPC would like to see students, on graduating from school, having two documents as of right:

- The NZQA Record of Achievement showing standards they have achieved to date;
- A document co-constructed by the school and the student, using a standard template provided online by the Ministry of Education or Careers Services, whichever agency has the capacity to do so. The content of this document

would include students' evidence of their in-school and out-of-school achievements, commentary by relevant adults such as employers, teachers, coaches and others, students' self-evaluations against the Key Competencies and/or Employability Skills, etc. As an online document, it could provide links to other evidence, including to the Record of Achievement.

Both of these documents would be able to be carried on by a student through their adult working life and tertiary study, and there would be no costs associated with continuing to make use of the tool used to initially produce the document. The tool would need to be continually refined by whichever agency provided it, and must have high standards of privacy including being safe from hacking.

3.6 Big Opportunity 6 – Dismantling barriers to NCEA

SPC supports the goal of dismantling barriers to NCEA, but we see the issues as broader than envisaged here.

Removing fees for NCEA is strongly supported by SPC, who can see advantages for students in enabling access for all, but also advantages for schools in removing what can be a significant administrative task, collecting fees.

The matter of special assessment conditions has been the focus of a lot of work in recent years, but it is still a major resourcing and cost issue for schools. There is a clear bias in the system towards high decile schools where families are more likely to have the resources to be able to access professional assessments that entitle their children to Special Assessment Conditions. These professional assessments come with clear advice and guidance for teachers about ways to make the classroom more inclusive for these students. Less advantaged schools struggle to get the assessments done by using their own teachers, and these don't include the level of "next steps" guidance that most professional assessments include. RTLBs have been given a role in low decile schools to do these assessments, but their capacity to do this is patchy.

Higher decile schools are also more likely to have the resources available to provide the conditions to which the student is entitled, such as quiet rooms, writer-readers, ICT support, volunteers to help, and so on. There are also significant costs associated with supporting identified students throughout the year in all of their internal assessments as well as for the externals, and yet there is no extra support provided to schools for this.

Other equity issues identified by SPC were:

- A lack of PLD and resourcing to support the teaching of numeracy and literacy across the curriculum. If the requirements are to increase, there will be an even greater need for this lack of provision to be addressed.
- NZQA is pushing towards its goal of digital assessment for the external assessments, but availability of hardware and high quality infrastructure is an equity issue. There is also a significant digital divide with some students still having no access to computers or internet access at home.
- The absence of a coherent system for PLD that enables teachers to learn from other schools is a major equity issue because schools end up constantly reinventing the wheel and some schools are better able to afford to buy in external expertise than others. The Ministry of Education needs to take a central role in identifying and sharing good practice across the system, and providing high quality resources and guidelines and PLD programmes. A return to a team of subject advisers that are readily available to support a department or an individual teacher would make a huge difference for schools.
- SPC would also like to see the end of the publication of league tables and competition between schools, because these stand in the way of collegiality, sharing ideas for innovation, and sharing quality resources.

4. CONCLUSIONS

SPC is concerned that the current review of NCEA is too broad in scope and looks more like a review of the NZ Curriculum than a technical review of the qualification as required by NZQA rules. The responses received will no doubt be as diverse as the contributors to the review.

In the next phase, there needs to be much closer attention paid to the empirical data about how the NCEA is working (and not working) for students and for schools, and a focus on the technical requirements of the NCEA and how they need to be revised in order to accord with the key principles set for the review, i.e. wellbeing, equity, coherence, pathways and credibility. While the Big Opportunities do make links to these principles, we do not see them as providing a coherent package that would address all the principles. In fact some of the Big Opportunities actually conflict with one or more principles, for example Big Opportunities 1 and 3 fail to address teacher or student wellbeing because they involve additional assessment and administrative burdens on teachers rather than reducing them.

Identifying a coherent package of refinements to the NCEA that accord with these key principles must be the goal of the next phase. That will require a much greater focus on listening to the experiences and understandings of the teaching profession, both principals and teachers. While the views of the wider audience that have been collected in this first phase are of interest, it is the principals and teachers who have the technical knowledge and experience to be able to see which proposals for change will work and which won't.

While members of SPC did not sign the full-page advertisements in the national dailies that preceded the establishment of the third consultative group, the Professional Advisory Group, we have some sympathy with the view that the profession's voice had been, up till then, somewhat under-represented in the Ministerial Advisory Group and in the Reference Group. We are glad to see the Professional Advisory Group established, and believe it will be critical to the next phase of work, by accessing the knowledge gained from experience of the teaching profession. Along with that knowledge, there must be robust data analysis and comprehensive modelling and testing of proposals for change.