

30 September 2025

[REDACTED]

Tēnā koe [REDACTED]

### Official Information Act Request

Thank you for your request of 3 September 2025, under the Official Information Act 1982, for the following information:

*I wish to request, under the Official Information Act, any official briefings, documents and advice prepared by NZQA around the proposed changes to NCEA in 2025 to Education Minister Erica Stanford*

On 4 September you provided further clarification on your request:

*Timeframe: within the past 12 months leading up to the NCEA changes being announced on August 4, 2025*

*Purpose: any briefings or advice NZQA have provided to Minister Stanford within the specified 12 month time frame.*

We have interpreted the scope of your request to include:

- advice requested by and provided to the Minister to inform the proposal to replace NCEA with new national qualifications; and
- meetings between either NZQA staff or members of the NZQA Board, and the Minister, on the above.

We have understood your request to exclude advice on changes to the curriculum and to the current NCEA system, where the advice was not informing the consultation/proposal to replace NCEA with new national qualifications (i.e. changes to the current settings).

Your request has been considered under the Official Information Act 1982.

Ten documents fall in the scope of your request, of which:

- four documents are being partially released, and
- five documents are being withheld in full.

For the remaining document, to support readability, and given the substantial amount of content that falls outside the scope of this document, we are providing an extract of the communications between NZQA and the Minister of Education.

A full breakdown of the documents and decisions on release is included in Appendix 1.

As indicated in Appendix 1, we have withheld some information in the documents under the following sections of the OIA:

- section 9(2)(f)(iv); advice that is under active consideration by the Minister in relation to the proposed changes to NCEA, has been withheld at this time to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials.


Information that is out of scope of this request has also been redacted, as noted in Appendix 1.

Our response to your request may be published on our website after five working days. Your name and contact details will be removed before publication.

If you require further assistance or believe we have misinterpreted your request, please contact Elizabeth Templeton in the Office of the Chief Executive, email [elizabeth.templeton@nzqa.govt.nz](mailto:elizabeth.templeton@nzqa.govt.nz) or telephone (04) 463 3339.

You have the right to seek an investigation or review by the Ombudsman of this decision under section 28(3) of the Official Information Act 1982. Details of how to make a complaint can be found at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz). You can also telephone 0800 802 502 or write to the Ombudsman at PO Box 10152, Wellington, 6143.

Nāku nā



Dr Grant Klinkum  
Pouwhakahaere/Chief Executive

Appendix 1 – Document Index  
Four attachments

## Appendix 1: Document index

Number	Date	Type	Document title	Decision on release
1.	8 May 2025	Meeting Agenda	8 May 2025 - OC01690 Agenda NZQA Board Chair Minister Stanford.pdf	Partial release: <ul style="list-style-type: none"> <li>out of scope content redacted</li> </ul>
2.	8 May 2025	Preparatory notes for Board Chair	8 May 2025 - Chair Deputy Chair Minister meeting 8 May 2025	Withheld in full: <ul style="list-style-type: none"> <li>out of scope content redacted</li> <li>Information withheld under s 9(2)(f)(iv)</li> </ul>
3.	28 May 2025	Fortnightly Update	28 May 2025 - OC01725 NZQA Fortnightly Report to Minister Stanford 28 May 2025.pdf  Extract: <i>Future approach to moderation</i> Throughout 2024 and 2025, NZQA have taken a series of steps to strengthen the internal quality assurance system, however we consider there are further opportunities in the short term to strengthen arrangements. s9(2)(f)(iv)	Extract provided <ul style="list-style-type: none"> <li>Some information withheld under s 9(2)(f)(iv)</li> </ul>
4.	12 June 2025	Report	12 June 2025 - OC01769 NZQA response 20250612 (2).pdf	Partial release: <ul style="list-style-type: none"> <li>Some information withheld under s 9(2)(f)(iv)</li> </ul>
5.	23 July 2025	Meeting Agenda	23 July 2025 - OC01856 Agenda NZQA Board Chair Minister Stanford Wed 23 July 11.30 am.pdf	Partial release: <ul style="list-style-type: none"> <li>out of scope content redacted</li> </ul>
6.	23 July 2025	Preparatory notes for Board Chair	23 July 2025 - Chair Deputy Chair Minister meeting 23 July 2025.pdf	Withheld in full: <ul style="list-style-type: none"> <li>out of scope content redacted</li> <li>Information withheld under s 9(2)(f)(iv)</li> </ul>
7.	24 July 2025	Report	24 July 2025 - OC01873 RR Unit Standards and NCEA 20250723 (3).pdf	Withheld in full <ul style="list-style-type: none"> <li>Information withheld under s 9(2)(f)(iv)</li> </ul>
8.	30 July 2025	Report	30 July 2025 - OC01897 NZQA IU Special Assessment Conditions - Equity Approach 20250730.pdf	Partial release: <ul style="list-style-type: none"> <li>Some information withheld under s 9(2)(f)(iv)</li> </ul>
9.	1 August 2025	Report	1 August 2025 - OC01871 NZQA Supporting a credible qualification - Actions to strengthen NCEA 20250801 (1).pdf	Withheld in full <ul style="list-style-type: none"> <li>Information withheld under s 9(2)(f)(iv)</li> </ul>

Number	Date	Type	Document title	Decision on release
10.	7 August 2025	Report	7 August 2025 - OC01831 Joint NZQA MoE Report Future options for managing the quality and consistency of internal assessment. 20250807pdf (1).pdf	Withheld in full Information withheld under s 9(2)(f)(iv)

## Hon Erica Stanford Minister of Education

### NZQA Meeting- Board Chair and Deputy Chair

#### Agenda

Meeting location	Venue: EW5.3
Date and time	Thursday 8 May – 10.45 am to 11.30 am

	Discussion Items
1.	Out of Scope
2.	Out of Scope
3.	Strengthening NCEA
4.	Out of Scope

**Hon Erica Stanford Minister of Education**

**NZQA Meeting- Board Chair and Deputy Chair**

**Agenda**

Meeting location	Venue: EW5.3
Date and time	Wednesday 23 July – 11.30 am to 12.15 pm

	Discussion Items
1.	Out of Scope [Redacted]
2.	Out of Scope [Redacted]
3.	Out of Scope [Redacted]
4.	NCEA reform (your expectations of NZQA in 2025/26).

**Rapid Response:** **NZQA advice on proposed changes to NCEA**

<b>To:</b>	Hon Erica Stanford, Minister of Education		
<b>Cc:</b>			
<b>Date:</b>	12 June 2025	<b>Priority:</b>	High
<b>Security Level:</b>	In-Confidence	<b>OC No:</b>	OC01769
<b>Key Contact:</b>	Grant Klinkum	<b>DDI:</b>	027 5270870
<b>Deputy Chief Executive:</b>	Jann Marshall	<b>DDI:</b>	027 246 0768

### Request

1. The purpose of this paper is to summarise what student NCEA participation and achievement data tells us about the performance of the three senior secondary school qualifications. Drawing on these insights, we provide commentary on the proposed new qualification settings currently under consideration. We also outline several future considerations that will need to be worked through to ensure that any replacement qualification is robust and credible.

### Proactive Release

2. We recommend that this report is not proactively released as part of the next publication of documents, until Cabinet decisions regarding NCEA changes are made public. Any information that needs to be withheld should be managed in line with the provisions of the Official Information Act 1982.

### NZQA Response

#### NCEA participation and attainment

3. In 2024, 64% of Year 11 students, 84% of Year 12 students, and 80% of Year 13 students were participating in NCEA at the typical year levels of Year 11 Level 1, Year 12 Level 2 and Year 13 Level 3.
4. NCEA Level 2 and Level 3 and University Entrance attainment has been relatively stable over the past 10 years, although there has been an increase in attainment of NCEA Level 3.
5. In 2015, 76% of Year 12 students achieved NCEA Level 2 and this has decreased slightly to 74% in 2024.
6. NCEA Level 3 attainment has increased over the same period from 63% in 2015 to 69% in 2024.
7. University Entrance attainment has increased slightly from 48% in 2015 to 51% in 2024.

8. The number of students leaving school with an international qualification such as Cambridge International or International Baccalaureate is small (approximately 1,900 students in 2024) but increased by 400 from 2023 [source Ministry of Education School Leavers data].
9. Retention in school to age 17 has declined since the peak rate in 2015 [source Ministry of Education School Leavers data], which signals a potential weakening in student engagement and sustained participation in senior secondary education.

### **Concerns with current NCEA qualification settings**

10. NCEA was deliberately designed to be highly flexible, to be supportive of 'academic' and 'vocational' pathways. However, over time, the inherent flexibility in NCEA has been overused to that extent that it may be observed that the current settings:

- **encourage a focus on small components of learning, rather than core learning areas or deep subject knowledge.**

There is no core learning required to achieve subjects within the qualification, other than the co-requisite. At Levels 2 and 3, with at least 24 credits available across 6-8 standards (of which at most, 2 or 3 standards are externally assessed) for each subject, there is little consistency in the learning and assessment undertaken in each subject.

Usage rates of available standards within a subject area vary as do achievement rates. Practically, this makes it difficult to compare students' subject achievement or qualifications because there is no consistency between what schools offer as part of subjects.

This design feature of NCEA can influence how programmes of learning are constructed, with some being structured around combinations of standards that are perceived to be 'easier', to maximise credits accumulation and help students achieve the minimum 60-credit threshold.

Concerningly, this problem could be seen even with the new Level 1 standards which were designed to have four assessments for each subject. In 2024, two-third of schools did not enrol their students in assessment for all four standards.

- **encourage the accumulation of credits (credit counting behaviours) from across a wide range of standards and subjects**, sometimes at the expense of coherent course design and clear pathway outcomes.

Illustratively, only 54% of year 12 students who achieved NCEA Level 2 in 2024 did so by completing three or more achievement standard based subjects, with each subject defined as having 14 credits. This suggests that nearly half of the students achieved the qualification without engaging in a full programme of coherent subject-based learning.

Credit accumulation in disparate learning areas may also be seen in the programmes of study of students. Just over 30% of Year 12 and Year 13 students who achieved NCEA Level 2 or Level 3 relied on unit standard credits to meet the minimum credit requirements for NCEA. These unit standards were often drawn from disparate areas and did not form part of a coherent package.



This pattern reflects a systemic issue where the flexibility of the qualification is being used to prioritise credit accumulation over meaningful learning and clear educational or vocational pathways.

- **allow for an increasingly problematic imbalance of internal and external assessment.**

Only 22% of 2024 results were achieved through external assessment. In an age of AI, issues around the authenticity of internal assessment work have become even more challenging.

- **enable students to avoid external assessment** which can mean that critical learning in a subject may not occur, undermining the qualifications' credibility. Students can also decide on the day of the examination whether they will complete all standards or just one or two (or none).

Year 12 and Year 13 students participating in NCEA do an average of five (5) externally assessed standards each year worth 4-6 credits each (i.e. contributing only between 20-30 credits towards an NCEA).

On average, students do not attempt 25% of the external assessments they are entered in for by their school. In 2024, there were more than 250,000 instances where students did not sit external exams, largely because students determined they already had sufficient credits to meet qualification requirements before the end of year examinations commenced.

Engagement in external assessment has reduced over the last ten years with schools entering students for fewer than the 2 or 3 standards available in an examination session, and not attempting all the standards they are entered for. For example, for the Level 3 core science subjects (Chemistry, Biology and Physics) the proportion of students entered for all three (3) standards in the 3-hour examination session in 2015 was 77%. By 2024, it was 49%.

This trend raises concerns about the depth and consistency of subject learning, and the long-term credibility of the qualification.

- **lead to significant differences in internal and external assessment results.**

Despite existing moderation systems, the disparity between internal and external assessment results is concerning. Students are more likely to achieve better in internal assessment, which drives into students making choices about which standards to enter.

In 2024, 84% of students "achieved" the internals they attempted and 25% achieved with "excellence". On the other hand, only 77% of students "achieved" the externals they attempted and 12% achieved with excellence.

- **do not encourage coherent vocational education pathways.**

When looking at the use of unit standards (outside of structured arrangements such as Trades Academy), too many senior secondary students are drawing on a seemingly incoherent range of unit standards, rather than meaningfully progressing toward a VET pathway.

11. Recent changes to NCEA in relation to literacy and numeracy have improved the credibility of the qualification by introducing explicit assessment for literacy and numeracy. NZQA notes however that the literacy and numeracy achievement required for NCEA qualifications which are at curriculum levels 6-8, is set at curriculum level upper 4, lower 5. Over time, NZQA believes that the literacy and numeracy requirements for NCEA should be at the same level as the qualifications themselves.
12. One other feature of NCEA that NZQA considers is suboptimal is that the total credit requirement (outside of literacy and numeracy which is typically taken the year before NCEA Level 1 commences) is 60 credits. NZQA considers the qualification size (within the current credit paradigm) should be at least 80 credits.
13. Increasing the qualification size could also enhance the international recognition of NCEA. Additionally, it would prompt a re-evaluation of the qualification's placement within the New Zealand Qualifications and Credentials Framework (NZQCF). NZQA considers that NCEA Level 3 may be more appropriately aligned with Level 4 of the NZQCF, reflecting the complexity and learning outcomes associated with the qualification.

### **Features of a robust qualification**

14. NZQA views the following components as features of a robust secondary school level qualification:

Credibility – recognised and valued, nationally and internationally, by tertiary providers, employers and other stakeholders

Comparability – aligned with international standards, equivalence and well understood and recognised by other jurisdictions

Curriculum led – the qualification is designed around the curriculum, is teaching and learning led, and supported by rigorous assessment

Validity – aligned to the curriculum and reflects intended learning outcomes

Accessibility and Equity – access to the qualification for all groups and individuals e.g. availability of support for disabled students

Transparency and accountability – the elements of the qualification are publicly available (curriculum, assessment objectives, grading policies/marketing schedules, mechanisms to appeal results, publication of attainment data, etc)

Progression pathways and longitudinal impact – support effective transitions to tertiary education, vocational training or employment

Student wellbeing and workload balance – teaching, learning and assessment should be challenging, but manageable.

## Proposed changes to NCEA

15. s9(2)(f)(iv) [REDACTED]
- [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
16. s9(2)(f)(iv) [REDACTED]
17. s9(2)(f)(iv) [REDACTED]
18. s9(2)(f)(iv) [REDACTED] current NCEA attainment data suggests that there are high levels of 'gaming' within current participation and achievement patterns. In some cases, students and schools are calibrating their programmes of study to the current modest credit attainment requirements s9(2)(f)(iv) [REDACTED]

## Considerations as the architecture of any qualifications are developed and confirmed

19. In considering the likely proposed qualification settings covered above, NZQA, through a qualifications and assessment lens, would note that it will be important to:
- effectively manage the period where there is a new curriculum and old qualifications s9(2)(f)(iv) [REDACTED]
  - s9(2)(f)(iv) [REDACTED]
  - s9(2)(f)(iv) [REDACTED]

- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
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- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]
- s9(2)(f)(iv) [Redacted]

## Summary

20. Current NCEA qualification design features and settings are not sufficiently aspirational and allow for a level of flexibility which undermines the robustness of the qualification.
21. Based on student participation and attainment data, NZQA considers that NCEA does not incentivise schools and students, by default, to engage in coherent programmes of learning.

22. s9(2)(f)(iv)

23. s9(2)(f)(iv)

## Information Update: Special Assessment Conditions - Equity Approach

<b>To:</b>	Hon Erica Stanford, Minister of Education		
<b>Cc:</b>			
<b>Date:</b>	30 July 2025	<b>Priority:</b>	Medium
<b>Security Level:</b>	Unclassified	<b>OC No:</b>	OC01897
<b>Key Contact:</b>	Grant Klinkum	<b>DDI:</b>	027 527 0870
<b>Deputy Chief Executive:</b>	Jann Marshall	<b>DDI:</b>	(04) 463 3389

### Request

Provide an update on NZQA's approach to Special Assessment Conditions (SAC), including current usage trends, equity implications, and how SAC will be supported in the context of potential changes to the assessment system—particularly increased reliance on external assessment.

### Information

#### Purpose of Report

1. As alternative qualifications options with a higher proportion of engagement with external assessment are considered, it is timely to consider current Special Assessment Conditions (SAC) arrangements.
2. In looking forward to the possibility of new assessment approaches aligned to new curricula and new qualifications, we need to ensure that SAC is effective in supporting students to equitably demonstrate their knowledge and skills, and that New Zealand's approach to SAC is internationally comparable and informed by good practice.
3. This paper looks at NZQA's current approach to SAC, considers the implications of proposed assessment and qualification system changes, and outlines the steps being taken to ensure equitable access to assessment for students with diverse learning needs.

#### SAC Categories and Provisions

4. SAC are designed to support a wide range of physical, emotional, sensory, medical, and learning needs. They offer flexibility in how a student can access and demonstrate their knowledge, without compromising the integrity or difficulty of the assessment.
5. NZQA has established specific categories to identify learner needs that qualify for SAC use and guide the appropriate provisions.

## **Categories**

6. Learner needs or barriers are currently categorised into:
  - Learning - Specific Learning Disorder eg. Dyslexia.
  - Medical - Attention-Deficit /Hyperactivity Disorder, Disruptive, Impulse-Control and Conduct Disorders, Autism Spectrum Disorder, Diabetes, Epilepsy, Mental Health concerns, for example, anxiety, depression and PTSD, Tourette's Syndrome.
  - Physical - Back/leg injury, chronic pain, Developmental Coordination Disorder (Dyspraxia), Hand/wrist/arm/shoulder injury (chronic pain), Head or Brain injury, Illegible handwriting, Pregnancy, early infant care, Significant physical or muscular or neurological disability, for example, paraplegia, muscular dystrophy or cerebral palsy.
  - Sensory Impaired - Deafness/hard of hearing, Blind or visual impairment.
7. Between 2020 and 2024, there has been a significant rise in students accessing learning support across key categories:
  - Attention Deficit (up 156%),
  - Autism Spectrum (up 56%),
  - Mental Health (up 35%), and
  - Illegible Handwriting (up 41%).

These trends point to improved diagnostic practices, more precise categorisation by NZQA, increased awareness, and a growing willingness among students to seek help, particularly in areas related to neurodevelopment and emotional wellbeing.

8. This shift highlights the need for responsive and inclusive support systems that are equipped to meet the evolving and diverse needs of learners.

## **Provisions**

9. Separate accommodation, both isolated and small group, remain the most used SAC provision, accounting for 42.2% of all SAC usage in 2024. This reflects its broad suitability across a wide range of learning needs. Uptake has increased by 48.1% for small group and 22.3% for isolated accommodation since 2020.
10. Many students access multiple SAC provision, underscoring the complexity of individual needs and the importance of a flexible approach.
11. While some provision, such as Braille, enlarged papers and signers, show stable but limited use, others are seeing notable growth since 2020. The top five increases from 2020 to 2024 are:
  - Candidate only to use computer: up 94.3%
  - Separate accommodation: up 70.4%
  - Rest breaks: up 74.5%
  - Reader: up 29.4%
  - Writer assistance: up 5%

These trends suggest increasing recognition of the value of certain provisions.

## **International Comparison of SAC**

12. New Zealand's SAC approach aligns broadly with international practice, with all countries recognising a wide spectrum of learning and support needs. These include learning disabilities such as dyslexia, physical and sensory impairments, mental health conditions, and chronic illnesses.
13. However, there are notable differences in how provisions are applied. Singapore and Ireland permit exemptions from specific exam components; an approach less commonly seen elsewhere. Germany places strong emphasis on legal entitlements and formal application processes, particularly for non-intellectual barriers. In contrast, Sweden and Canada require individualised education or action plans as a prerequisite for accommodations. Both New Zealand and the United Kingdom base eligibility on a student's normal way of working, reflecting a more integrated and practice-based approach.
14. Application processes also vary. In Canada, Ireland, Sweden, and Australia, school-based evidence, such as history of need or school-developed action plans, is central. Meanwhile, Singapore, Germany, and the UK typically require a formal medical diagnosis or report.
15. While comprehensive usage data is not available across all countries, Australia and Singapore report increased demand, particularly for students with cognitive (e.g. dyslexia, ADHD) and social-emotional (e.g. anxiety, depression) needs. In Germany, uptake remains low, attributed to stigma and limited awareness of available supports.

## **SAC: Growth, Equity, and Oversight**

16. SAC access has quadrupled over the past decade, from 5,700 in 2015 to 21,100 in 2024, placing increasing pressure on NZQA and schools. This growth reflects increased trust in schools to identify learning needs using school-based evidence, the removal of cost barriers such as medical diagnoses, and targeted support for lower equity schools. While uptake has increased across all demographics, persistent disparities remain, particularly for Māori, Pacific, Asian, and kura-based students.
17. NZQA maintains strong oversight of SAC through training, clear guidance, and audit processes. Even so, from August 2025, NZQA will expand its auditing of school-approved SAC notifications to further ensure alignment with approval criteria. This includes verifying accurate categorisation of learning needs, sufficient supporting evidence, and appropriate SAC provisions. A compliance target of 95% has been set in NZQA's Statement of Performance Expectations for 2025/26.

## **SAC Impact on Assessment Participation and Achievement**


18. Students receiving SAC consistently attempt fewer external assessments than their peers, likely reflecting the impact of persistent learning barriers such as cognitive load, anxiety, or processing difficulties. These lower participation rates may also be influenced by the perceived difficulty or rigidity of external assessments, which often lack the flexibility found in internal assessments.
19. Encouragingly, the participation gap has narrowed in recent years. This suggests that SAC provisions are supporting greater engagement, and that broader system-level improvements, such as inclusive teaching practices, better identification of learning needs,



and increased awareness, are contributing to improved access. This trend indicates progress toward a more equitable assessment landscape. Continued efforts are needed to ensure all students feel confident and supported in participating fully in external assessments.

20. Importantly, SAC does not appear to offer inappropriate academic advantage. Students with SAC continue to experience achievement gaps compared to their peers (on average 6% lower), reinforcing SAC's role as a compensatory equity measure rather than a performance enhancer. These students on average, attain lower grades, particularly at the Excellence level (on average 4.9% lower), which may reflect the cumulative impact of learning challenges rather than a lack of effort or potential. The disparities are even more pronounced in schools facing higher equity challenges, suggesting that SAC alone cannot overcome broader systemic disadvantages.
21. Even with SAC provisions such as a reader or writer, students often face time-related challenges, as assessments must normally still be completed within standard timeframes. This can place undue pressure on students who require more time to process information or communicate their responses effectively.

22. s9(2)(f)(iv)



### **Ensuring Equity for SAC Students in a High External Assessment Model**

23. NZQA continues to explore ways to strengthen support for students with learning challenges, ensuring the system remains equitable—particularly in the context of a potential shift toward greater reliance on external assessment. This includes:
- Technology is playing an increasing role in supporting equitable assessment. Polly, a text-to-speech tool, enables all students to have content read aloud via headphones—reducing reliance on traditional SAC and supporting learners with reading or processing challenges. This aligns with Universal Design for Learning principles. While currently used for Literacy Writing and Numeracy co-requisite digital assessments, NZQA's Digital Programme is exploring its feasibility across other external assessments.
  - The SAC Notifications Gateway is enhancing accessibility and reducing administrative burden by transitioning from a centralised approvals model to a streamlined, non-approvals approach. Currently available for Year 11 students, early evaluation shows strong uptake, positive feedback from schools, and no evidence of misuse. Following a successful trial in 2024/25, the Gateway will be extended to support Level 2 and 3 students. To ensure system integrity, strengthened audit and assurance practices will be implemented.
  - Over time, NZQA will further explore international comparisons with comparable education systems to ensure our approach remains fit-for-purpose and aligned with global best practice. This includes staying current with developments in learning support and inclusive assessment.

- NZQA will further its engagement with the Ministry of Disabled People to ensure the assessment system remains equitable and responsive, particularly for students with health and disability-related needs.
- NZQA will work closely with the Ministry of Education's Learning Support team to strengthen system coordination and alignment. With the focus on shared responsibilities and ensuring SAC is integrated with broader learning support systems—enabling a more cohesive and responsive approach to meeting the needs of diverse learners.