Regulatory Impact Statement: Improving accountability and transparency for standard setting and approval functions for initial teacher education

Coversheet

Purpose of Document	
Decision sought:	Final Cabinet Decisions
Advising agencies:	Ministry of Education
Proposing Ministers:	Hon Erica Stanford, Minister for Education
Date finalised:	21 November 2024

Problem Definition

Standard setting and quality assurance of initial teacher education (ITE) provides assurance that all teachers are gaining the knowledge and skills that they need to be effective, with downstream benefits for learners. Where beginning teachers lack competence and confidence, learners suffer, and additional support from other teachers, school systems and government provision of professional learning and development is required to bring them to the expected standard.

Evidence from a range of different sources shows there is inconsistency in the quality of graduate outcomes and does not set them up to be confident and competent in classroom and early learning service practice, pedagogy and content. This variability indicates that ITE providers are not equipping many new teachers with the skills they need, and that standard setting and quality assurance of ITE is not achieving its objective of producing graduate teachers that are well prepared to operate effectively in classrooms and early learning services as new teachers (with appropriate support).

Currently, government's visibility of quality assurance of ITE practice is mediated through the Teaching Council. While this is deliberate and by design, it means the government has no single point of oversight of the whole system from pre-service training through to ongoing professional development. The government has limited levers to provide guidance to tertiary providers in determining what new teachers should learn in their ITE studies to meet government expectations for the skills and knowledge of a new teacher.

This means expectations in ITE are not able to be aligned by the Minister with expectations for delivering in the workplace (schools and early learning settings). The Minister may issue a Statement of Government Policy to set their expectations, about the

Teaching Council's performance of their functions, but cannot direct the Council on standard setting, quality assurance and approvals of ITE.

Executive Summary

Background

To become a registered and certificated teacher in New Zealand, students must enrol in and complete an approved initial teacher education (ITE) programme. The Teaching Council of Aotearoa New Zealand (the Council) is an independent professional and regulatory body for teachers in New Zealand. It is primarily funded through fees and levies and is responsible for a range of functions related to the teaching profession, including setting the standards for and approving ITE programmes leading to teacher registration.[1] The New Zealand Qualifications Authority (NZQA) and, for universities, the New Zealand Vice Chancellors Committee (NZVCC - also known as Universities New Zealand) have responsibilities for qualification listing, programme approvals, and accreditation and quality assurance of university ITE providers.

The Teaching Council is an independent statutory body and the Minister of Education is unable to direct the actions of the Council.

Objectives and options considered

The ultimate objective is to develop consistently high-quality ITE graduates who are well prepared to teach. To support ITE graduate preparedness, the Minister is seeking to align ITE settings with Government education policy direction and targets. This needs to be balanced with maintaining a functioning and effective teacher regulatory system and upholding the status of the teaching profession.

Four options are considered:
- Option one: The counterfactual *(no changes are made)*
- Option two: Issuing a Statement of Government Policy (SoGP) *(non-legislative change)*
- Option three: The Secretary for Education takes over responsibility for standard setting and quality assurance of ITE *(legislative change)*
- Option four: Strengthening transparency and accountability over the Teaching Council's ITE functions *(legislative change)*

9(2)(g)(i)

Our preferred option is option 4 – to strengthen accountability and transparency over the Teaching Council's ITE functions through:

---

[1] Note that this RIS does not consider the Teaching Council and NZQA process in assessing overseas trained teachers for certification and registration.

- giving the Secretary for Education a legislated advisory role in ITE standard setting, reviews and approvals,
- broadening the Council's consultation requirements under the Education and Training Act 2020 (the Act) to include consulting the Minister before making changes to standards for ongoing practice and criteria for the issuing of practicing certificates, and
- requiring the Council to report on SoGPs through their annual report.

Option 4 best meets the objectives of ensuring consistent, competent, high-quality graduates, and aligns ITE settings with government education policy direction and targets, while using existing system processes and capacity. It also maintains the Council's independence.

Risks

The risks with this option include:

- Impact of increased accountability on the Council's independence. The Teaching Council is an independent statutory body, and increased accountability will increase government and Ministerial influence. Implementation will consider how we ensure there are clear roles and responsibilties for the Secretary and the Council.
- Potential sector opposition. Evidence shows change is most successful when parties buy-in to the change process. Consideration will be given to how we reassure the sector that Government involvement will not inappropriately affect the standard setting process or compromise the profession's expertise.

Limitations and Constraints on Analysis

There were three constraints on our analysis:

Scope

The Minister limited consultation to shifting responsibilities for ITE standard setting and approvals from the Teaching Council to the Secretary for Education.

Following targeted consultation, the Minister of Education directed work on a legislative option that strengthens accountability and transparency in the standard setting and approval functions of ITE, 9(2)(f)(iv)

Limited public consultation

The initial commissioning and tight timeframes limited consultation and we prioritised engaging with the ITE sector due to the direct impacts. This may have skewed feedback. ITE graduates, new teachers, learners, parents and whānau were not consulted. While we invited Māori and iwi representatives to provide written feedback

on the proposal, most did not respond. This may have been in part due to the limited timeframes and does not indicate either concern or support.

While this timing meant we were unable to consult on the option to strengthen transparency and accountability, elements of this approach were raised as alternatives by some stakeholders.

Limited evidence

ITE standard setting approval functions for ITE will impact on all sectors and settings, including early learning settings, Kaupapa Māori and Māori medium settings, Pacific immersion and bilingual language settings, and English medium. However, the evidence on the preparedness of ITE graduates is focused on English medium settings, and the schooling sector. To mitigate risks, we intend to consult with representatives from all education settings to identify the impacts across learning environments as this approach is implemented.

The Council updated their ITE Programme Approval, Monitoring and Review Requirements in 2019, and all programmes were approved under these new requirements by 2022.[2] There has not, therefore, been enough time to see the impact of these updated requirements on the next cohort of student teachers. Most of the available evidence, including the 2024 Education Review Office (ERO) report, *Ready, set, teach: How prepared are our new teachers?,* includes new teachers who graduated under the previous ITE programme requirements. Despite this, we have been able to identify useful evidence and insights into the preparedness of ITE graduates in New Zealand that has informed this analysis.

Responsible Manager(s) (completed by relevant manager)

Alanna Sullivan-Vaughan

Acting General Manager, Schools Policy

Te Pou Kaupapahere

Ministry of Education

21 November 2024

---

[2] https://teachingcouncil.nz/assets/Files/ITE/ITE-Programme-Approval-Monitoring-and-Review-Requirements.pdf

Quality Assurance	
Reviewing Agency:	Ministry of Education
Panel Assessment & Comment:	The Ministry of Education's Quality Assurance Panel has reviewed the Regulatory Impact Statement produced by the Ministry of Education and dated 21 November 2024. The panel considers that it meets the Quality Assurance criteria and provides analysis to support effective decision making on the proposals.

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

Current pathways to becoming a teacher

1. We know that teachers have a strong influence on the educational success of all learners, including ākonga Māori.[3] ITE therefore has an important role in preparing and supporting all teachers to work in a way that uses effective teaching practices, has high expectations for all learners' achievement, and supports all learners to thrive in culturally responsive ways.[4]

2. To become a registered and certificated teacher in New Zealand, students must enrol in and complete an approved initial teacher education (ITE) programme. To qualify as an early childhood education (ECE) or primary teacher, it usually takes three years' full-time study through a Bachelor's degree. Graduate and postgraduate qualifications are the main pathways for secondary teachers or career changers.[5] Graduate Diploma, Postgraduate Diploma and Master's degree programmes are typically, depending on prior study, one- or two-years full-time study and are for people who have already completed an undergraduate degree.

---

[3] Quality Teaching for Diverse Students in Schooling: Best Evidence Synthesis Iteration (2003); Mana Mokopuna | Children & Young People's Commission, "Without racism Aotearoa would be better: Mokopuna share their experiences of racism and solutions to end it" (March 2024) Mana Mokopuna Without_racism_Aotearoa_would_be_better_Digital.pdf
[4] Hana Turner-Adams, Christine M Rubie-Davies, Melinda Webber, *High achieving Māori students' perceptions of their best and worst teachers,* Mai Journal: A New Zealand Journal of Indigenous Scholarship (December 2023): Turner-Adams_FNL-webready.pdf (mai.ac.nz); Quality Teaching for Diverse Students in Schooling: Best Evidence Synthesis Iteration (2003)
[5] Education Counts, Initial teacher education statistics (August 2024), 11 - Initial teacher education statistics | Education Counts

3. Ministry data shows most ITE students in primary and secondary teaching are studying at universities.[6] In contrast, in the ECE sector, private training establishments (PTEs) had the largest proportion of first-time students in 2023 (65 percent), followed by Te Pūkenga (18 percent) and universities (16 percent). Not all teaching staff in early learning settings are required to be certificated teachers.[7]

4. In 2024, there are 25 approved ITE providers, and a total of 87 approved ITE programmes that lead to a teaching qualification.[8] Providers deliver multiple programmes across sectors and levels resulting in significantly more programmes than providers. ITE providers consist of:
    a. 7 Universities
    b. 8 Institutes of Technology and Polytechnics (ITP) (currently part of Te Pūkenga);
    c. 3 Wānanga;
    d. 7 Private Training Establishments (PTEs)

5. The ITE programmes listed on the Ministry' programme finder tool are split between the following sectors:
    a. 33 Early Childhood Education (ECE);
    b. 39 Primary;
    c. 23 Secondary.

6. There are 76 English medium and 19 Māori medium programmes that lead to teacher registration.[9]

7. In 2023 of the approximately 7,505 people enrolled in ITE qualifications,[10] there were 3,330 domestic students completing an ITE qualification for the first time.[11] For context, in 2023 there were approximately 74,000 teachers in the workforce.[12]

8. Upon graduating, graduates apply for a Tōmua | Provisional Practising Certificate through Teaching Council of Aotearoa New Zealand (the Council) and apply for teaching roles. New teachers are required to meet the same professional standards as experienced teachers, but with an expectation that they have support until fully certificated.[13] A Provisional Practicing Certificate is valid for five years and it is expected that beginning

---

[6] In 2023, 76 percent of primary sector students and 82 percent of secondary sector students were studying at universities.

[7] The 2023 ECE Census showed that the proportion of ECE teaching staff that were qualified was 69 percent. To be qualified, teaching staff must hold a recognised ECE or Primary teaching qualification that leads to registration with the Teaching Council. This figure includes ECE teachers and home-based coordinators only. See: https://www.educationcounts.govt.nz/__data/assets/pdf_file/0006/243780/ECE-Census-2023-Teaching-Staff-Fact-Sheet.pdf.

[8] Teaching Council data. This number is slightly lower than the 95 programmes listed on the Ministry of Education programme finder tool as it only includes approved programmes currently taking intake in 2024. Some programmes also have multiple streams e.g. Early Learning, Primary and Secondary but are approved as one single programme by the Council.

[9] Ministry of Education programme finder tool, Microsoft Power BI

[10] In 2021 there were around 10,000 people enrolled in ITE qualifications dropping to approximately 8,500 in 2022 (these are similar to levels between 2016-2020).

[11] A decrease from 3,435 in 2022 (a decrease of 3.1 percent or 105 graduates).

[12] Education Counts, *Teacher numbers* (June 2024), Teacher numbers | Education Counts

[13] Overseas trained teachers working in New Zealand for the first time are also issued with a provisional teaching certificate but are expected to undergo induction and mentoring for one year only before becoming fully certificated.

teachers will undergo a period of induction and mentoring for two years before moving to full certification.[14]

The Teaching Council sets standards for and provides quality assurance for ITE programmes in conjunction with NZQA and Universities New Zealand

9. The Council is an independent professional and regulatory body for teachers in New Zealand, established by and regulated under the Education and Training Act 2020.[15] It is primarily funded through fees and levies (see Annex 1 for details).

10. A core function of the Council is to set the standards for, and approve, ITE programmes that lead to teacher registration.[16] These standards guide the provision of teacher education by tertiary providers, influencing the design of programmes and assessment, including minimum periods of professional experience placement (practicum) learning in a school/kura/centre environment. In 2019, the Council issued revised ITE Programme Approval Requirements, and all programmes were assessed against these new requirements in 2022. This means we currently have a mix of graduates from programmes approved under the Council's previous and new ITE programme requirements.

11. The objective of the Council's programme approval requirements is that ITE programmes are "designed and delivered to ensure that graduates can demonstrate that they meet the Standards (in a supported environment)."[17] ITE graduates are not expected to have reached the level of capability of fully registered teachers, but they should have the baseline skills and knowledge to effectively teach with appropriate support.

12. The New Zealand Qualifications Authority (NZQA) and, for universities, the New Zealand Vice Chancellors Committee (NZVCC - also known as Universities New Zealand) have responsibilities for qualification listing, programme approvals, accreditation of providers, as well as quality assuring providers. Note that the Committee on University Academic Programmes (CUAP) is set up by NZVCC to conduct university programme approval and accreditation.

The Teaching Council has enhanced their approach to monitoring ITE programmes

13. The Council has an accreditation role in approving ITE programmes against the ITE standards, and accreditation recurs every three years. The Council has, therefore, moved into an operational role of ongoing monitoring. This is in recognition of the need to have

---

[14] Applying for a Tōmua | Provisional Practising Certificate :: Teaching Council of Aotearoa New Zealand
[15] Under the Education and Training Act 2020, the Teaching Council is responsible for:
   a. 479(1)(g) to establish and maintain standards for qualifications that lead to teacher registration;
   b. 479(1)(h) to review, at any time, the standards for qualifications established under paragraph (g) and, after consulting the Minister,—
      i. vary, delete, or replace 1 or more of the standards; or
      ii. add 1 or more standards; or
      iii. delete all of the standards and substitute new standards.
   c. 479(1)(i) to conduct, in conjunction with quality assurance agencies, approvals of teacher education programmes.
[16] As of 1 January 2022, all programmes meet the requirements of the new 2019 ITE Programme Approval Monitoring and review Requirements.
[17] Teaching Council of Aotearoa New Zealand ITE Programme Approval, Monitoring and Review Requirements (April 2019) ITE-Programme-Requirements-Policy.pdf (teachingcouncil.nz)

greater oversight of ITE outcomes beyond initial programme approval, despite programme monitoring not being a specific and separate legislated function of the Council.

14.	The Teaching Council recently introduced a new policy for the review and monitoring of ITE providers, to ensure their programmes are continuing to meet the standards. The Council sees this as part of their statutory role for programme approval, regarding approval as an ongoing process of ensuring effectiveness, rather than a one-off event. ITE providers must undertake self-reviews of their programmes and participate and co-operate in programme reviews (similar to NZQA's ongoing self-assessment processes). Providers must also participate and co-operate in external monitoring. The first national moderation event occurred in 2024.

15.	Providers must provide relevant information, when reasonably requested by the Council, though the Council is attempting to align information requirements with that of NZQA and CUAP to minimise the administrative burden for providers.[18] In August this year, the Council consulted on introducing a fee structure to ITE to recover costs in carrying out its functions of ITE programme approval, monitoring, reviews (see **Annex 1** for details).[19]

Ministerial powers with respect to the Teaching Council

16.	The Teaching Council is an independent statutory body (Section 474 of the Act). It represents the profession and is designed to recognise the profession's expertise to govern its own affairs. There are clear limits on the Minister of Education's powers to direct it to take specific actions.[20] The Minister can:

　　a.	commission an independent audit of the conduct of the Council's functions,

　　b.	require any financial, statistical, or other information, including information relating to the performance of the functions of the Council or any of its committees, and,

　　c.	issue Statements of Government Policy (SoGP) related to the Council's functions. The Teaching Council must have regard to these statements when performing its functions but is not required to give effect to them. Government must first consult with the Council before issuing one.

17.	The Council is required to consult the Minister on ITE standards and registration criteria, but not on the Teaching Standards, which describe the expectations for ongoing teaching practice.[21] The Teaching Standards underpin some of the key elements of the regulatory system enabling quality teaching outcomes and influence how ITE programmes prepare ITE students.

18.	The Minister intends issuing an SoGP regarding the Council's standard setting, certification and registration functions in late 2024. This will formally communicate the Government's position on three main areas of the Council's functions 9(2)(f)(iv)

---

[18] Teaching Council of Aotearoa New Zealand, ITE Programme Approval, Monitoring and Review Requirements (April 2019) ITE-Programme-Requirements-Policy.pdf (teachingcouncil.nz)
[19] Teaching Council of Aotearoa New Zealand, Consultation on proposed new Teaching Council fees for programme monitoring, review, audit and special review services to Initial Teacher Education providers (August 2024)
[20] Section 481 and Section 482 of the Education and Training Act
[21] Our Code, Our Standards :: Teaching Council of Aotearoa New Zealand

9(2)(f)(iv)

The level of central government oversight in other professional bodies and jurisdictions varies

19. There is a spectrum of relationships that can exist between government and a professional regulatory body. An arm's-length approach to regulatory bodies establishes independence, credibility and trust and devolves professional regulation to experts. Establishing professional bodies in this way means they can focus on the needs of the profession in standard setting and can be more flexible. In contrast, a closer relationship to government means educational priorities and policies creates stronger alignment, which can help to promote broader educational goals.

20. The Teaching Council's functions are similar to other jurisdictions with independent statutory professional regulators for teachers (for example Ireland, Scotland, and Ontario Canada - **see Annex 3**). However, in jurisdictions with more central government policy direction of the education sector, core functions held by the New Zealand Teaching Council sit within government departments (for example, England and Singapore).

21. Some other professional bodies in New Zealand also have standard setting functions for qualifications as part of their remit including:

    a. **The Nursing Council** accredits and monitors the performance of nursing education providers and their programme in collaboration with New Zealand Qualifications Authority and/or the Committee of University Academic Programmes.[22]

    b. **The Social Workers Registration Board** requires tertiary education programmes to meet the Social Workers Registration Board Education Standards to maintain their status as a prescribed social work qualification to ensure social work education enables graduates meet professional standards for entry into the social work.[23]

    c. **New Zealand Council of Legal Education** is an independent statutory body responsible for the quality and provision of education and practical legal training that is required to become a lawyer.[24]

What is the policy problem or opportunity?

Standard setting and quality assurance in initial teacher education are not delivering desired results in teacher preparedness and competency, and impact on learner outcomes

22. While there is much good practice and achievement in the New Zealand education system, educational achievement data shows significant gaps and variability in

---

[22] Accreditation lasts for a maximum of five years but will be shorter if the Council has underlying concerns about a programme. The Nursing Council requires all graduates from nursing programmes to also sit and pass the Council's national State Final Examination, which tests competence across all elements of nursing practice, before gaining registration: About Us (nursingcouncil.org.nz)
[23] Education Standards Review 2021-24 | Social Workers Registration Board (swrb.govt.nz); About us | Social Workers Registration Board (swrb.govt.nz)
[24] New Zealand Council of Legal Education (nzcle.org.nz)

educational achievement of New Zealand students. The 2022 results of the OECD's Programme for International Student Assessment (PISA) examinations continue the trend of worsening overall performance of New Zealand students and large equity gaps.[25] Achievement and equity challenges need to be addressed to ensure that our education system sets all learners up to succeed and thrive, regardless of what school or early learning service they attend.

23. We know that there are many important factors that contribute to quality teaching. One is standard setting and quality assurance which provides assurance all teachers are gaining the knowledge and skills needed to be effective, with downstream benefits for learners.

The pathway from training in ITE to teaching is not well-aligned

24. The quality of teaching is the most important in-school factor influencing educational outcomes.[26] We expect that the teacher pathway, which includes ITE, through to ongoing professional development as a teacher are well aligned. The current teacher training system is not, however, set up to support a smooth journey from ITE, to ongoing professional development for teachers, through to educational leadership roles. For example, while new 2019 ITE Programme Approval Requirements increased the length of professional experience placement, stakeholders report that placement is often highly disconnected from the theory taught in ITE programmes. Variability in teacher competence and confidence can have a very large impact on learners.[27] These impacts on a learner's learning journey extend beyond their interaction with an individual teacher.[28]

Evidence shows that not all ITE graduates are prepared to teach in core subject areas

25. There is an expectation in New Zealand that provisionally certificated teachers are supported to meet the Council's Teaching Standards. However, evidence shows that the way we train teachers is not setting them up to be confident and competent in classroom practice, pedagogy and content, and beginning teachers are often given the same full teaching responsibilities as their fully-certificated colleagues. Recent research from ERO highlights the variability in new teachers' confidence in classroom practice, pedagogy and content knowledge. This variability indicates that ITE providers are not equipping many new teachers with the skills they need. ERO also found that 60 per cent of school principals report teachers are not prepared when they start teaching and despite being passionate, nearly half of the new teachers surveyed reported feeling underprepared.[29]

26. Other research points to a lack of confidence of primary teachers teaching maths and science. The New Zealand Institute for Economic Research (NZIER) found that many primary school teachers enter ITE with a poor understanding of maths and science from

---

[25] PISA 2022 Results (Volume I and II) – Country Notes: New Zealand (December 2023), PISA 2022 Results (Volume I and II) - Country Notes: New Zealand | OECD

[26] Quality Teaching for Diverse Students in Schooling: Best Evidence Synthesis Iteration (2003)

[27] Evidence shows that up to 59% of variance in student performance is attributable to differences between teachers and classes: Quality Teaching for Diverse Students in Schooling: Best Evidence Synthesis Iteration (2003).

[28] Quality Teaching for Diverse Students in Schooling: Best Evidence Synthesis Iteration (2003).

[29] Education Review Office, Ready, Set, Teach: How Prepared are our New Teachers? (April 2024): Ready, set, teach: How prepared and supported are new teachers? (ero.govt.nz)

their own secondary learning.[30] The Royal Society reports that nearly half of Year 4 teachers were only moderately confident in teaching maths.[31] ERO also found graduates from universities report being less prepared than graduates from non-university providers.[32]

27. There is also some evidence about the preparedness of ITE graduates who work in early learning settings. We have heard through consultation that some ECE stakeholders think that ITE graduates are not prepared to teach in early learning settings. ERO found in 2021 that many teachers could make better use of assessment to describe and understand children's learning in science, and to inform next steps for their learning, from early childhood up to Year 4.[33] A 2022 study on a small number of beginning teachers showed that ECE students often did not get opportunities to learn specific skills or lead a class or group of learners while on placement.[34] A 2017 survey by ERO reported new ECE graduates who did not feel prepared or confident to teach felt they understood the theory, but not how to implement this into practice, that they had limited knowledge in using formative assessment information to plan, and planning a curriculum that is responsive to children's language, culture and identity.[35]

28. Together, these findings are a cause for concern. While the proportion of ITE graduates joining the teaching profession makes up a small percentage of the teacher workforce every year, if new teachers do not feel confident in their preparedness to teach areas of the curriculum, it is likely their learners will struggle to learn in these curriculum areas. Gaps in teacher knowledge and skills from ITE will need to be addressed through ongoing professional learning and development (PLD). While ongoing development and in-service training is important, we need ITE programmes to equip their graduates with key core content to support graduates to start their careers as effective beginning teachers.

29. These findings indicate that standard setting and quality assurance of ITE is not achieving its objective of producing student teachers that are adequately prepared to operate effectively in the classroom and early learning service as new teachers with appropriate support.

---

[30] NZIER, Fit for purpose: Teachers' own learning experiences and lessons about standardisation from the health sector (2024): Fit for purpose: Teachers' own learning experiences and lessons about standardisation from the health sector - NZIER Insight 112
[31] Royal Society Pāngarau Mathematics and Tauanga Statistics in Aotearoa New Zealand: Advice on refreshing English-medium Mathematics and Statistics learning area of the New Zealand Curriculum (2021) Note - Drawing on TIMSS data from 2019, Pāngarau Mathematics and Tauanga Statistics in Aotearoa New Zealand (royalsociety.org.nz)
[32] Education Review Office, Ready, Set, Teach: How Prepared are our New Teachers? (April 20204): Ready, set, teach: How prepared and supported are new teachers? (ero.govt.nz)
[33] Education Review Office, Science in the early years: Early Childhood and Years 1 – 4 (April, 2021), Science in the Early Years: Early Childhood and Years 1-4 (ero.govt.nz)
[34] For example, the study noted that ECE beginning teachers were unable to be taught how to change nappies while on placement due to safety restrictions. See: Sophie Watson, Sally Boyd and Teresa Maguire, Supporting early career teachers and kaiako: Experiences of mentoring, induction and PLD, New Zealand Council for Educational Research (2022), Supporting early career teachers and kaiako: Experiences of mentoring, induction, and PLD | Education Counts
[35] Education Review Office, Newly Graduated Teachers: Preparation and confidence to teach (December 2017), Newly Graduated Teachers: Preparation and Confidence to Teach | Education Review Office (ero.govt.nz)

eoll2elr4 2024-12-04 10:44:13

The current regulatory environment has been intentionally set to be at arm's-length from Government influence, which makes it challenging to align Government educational policy priorities across the career pathway

30. Government's visibility of quality assurance of ITE practice is mediated through the Teaching Council. While this is by design, it means government has no single point of oversight of the whole system from pre-service training through to ongoing professional development. The government has limited levers to guide tertiary providers in determining what beginning teachers should learn as part of their ITE studies to meet government expectations of the skills and knowledge of a registered teacher.

31. While the Minister can influence educational policy in schools and early learning settings, including through powers under the Act to issue foundational curriculum policy statements and national curriculum statements (curriculum statements), and make changes to PLD to support in-service teachers, the Minister cannot change or align the ITE standards with other educational policy changes to ensure student teachers are effectively prepared as part of their pre-service teacher training for in-service teaching. This means expectations in training (ITE) are not able to be aligned by the Government with expectations for delivering in the workplace (schools and early learning settings).

32. Beyond issuing a SoGP, the Minister can influence the Council through the legislation and appointment processes, including:

    a. appointing the Chair of the Governing Council and six of the 13 Councillors,

    b. requiring the Council to consult the Minister on key regulatory settings, including when the Council proposes any changes to ITE programme requirements.

33. Additionally, the Minister can commission an independent audit of the conduct of the Teaching Council's functions or request, by written notice, any financial, statistical, or other information, including information in relation to performance of its functions. While the Minister does therefore have influence with the Council and can set expectations, the Minister cannot enforce these or mandate certain actions.

We have an opportunity to ensure the whole teacher pathway is aligned by improving accountability and transparency of the standard settings and approval functions for ITE

34. The Government aims to achieve greater quality and consistency of the skills, knowledge and competencies of ITE graduates. This goal could be furthered through greater government oversight and central control of ITE practice. However, this aim needs to be balanced with the value of professional body independence and autonomy, recognising the impact that this has on the status of the teaching profession, and the strong support among the teaching profession for an independent professional body, which appropriately recognises the expertise of the profession to govern standards for entry to the profession and the skills and knowledge required to practice successfully.

35. There is an opportunity to improve the consistency and quality of ITE graduates so they are better prepared for teaching, by strengthening government's influence over the ITE Standards and quality assurance. This should improve coherence in the ITE to teacher pathway and create alignment with other areas of educational policy. Improving the quality

of ITE will slowly improve the quality and capability of teachers coming into the schooling system. The impact will likely be small initially, as beginning teachers make up a small percentage of the teaching profession. Therefore, the ability to make judgements about how successful changes are in this space in isolation and in the short term is limited.[36] Likewise, changes to standards and quality assurance will affect, but not determine, decisions by tertiary providers about the content of ITE programmes. However, with time and alongside other reforms, greater accountability and transparency for standard setting and approval functions for ITE should improve the quality of teaching, and learner outcomes.

36. Alongside changes to improve the quality and consistency of teaching, other factors in the school environment affect learner outcomes. Student outcomes are also achieved when:

    a. learners have access to targeted learning support when needed,

    b. schools implement high-quality assessment and reporting practices,

    c. teachers use data to inform teaching and monitor learner progress and achievement.

What objectives are sought in relation to the policy problem?

37. The ultimate objective we seek is consistently high outcomes for all learners, which is supported by consistently high quality ITE graduates who are well prepared to teach in the learning environment.

38. To support ITE graduate preparedness, the government seeks to effectively align ITE settings with government education policy direction and targets. These objectives need to be balanced against the importance of maintaining a functioning and effective teacher regulatory system, which is required to ensure we have an adequate supply of teachers and kaiako, and to support the Council's purpose of ensuring safe and high-quality leadership, teaching and learning for all learners. The objectives also need to be balanced against the importance of upholding the status of the teaching profession, to continue workforce attractiveness and retention, and to acknowledge that teachers have the expertise to manage their own profession.

Section 2: Deciding upon an option to address the policy problem

What criteria will be used to compare options to the status quo?

39. The options will be assessed against the following criteria:

---

[36] For example, we have not been able to find clear evidence of the effects of changes made by England, who shifted their ITE standard setting from an independent body to within government in 2012.

Criteria	Considerations
Improved consistency, quality and preparedness of ITE graduates	Does the approach: • Support ITE graduates and ITE providers to have clear expectations in the skills, competencies and knowledge required to teach? • Support improved quality and consistency of ITE graduates? • Support ITE standards to be consistent and in alignment with government education priorities and targets?
Uphold our obligations under Te Tiriti o Waitangi	Will the approach uphold our obligations under Te Tiriti of Waitangi, including: • Agency and authority for Māori medium and kaupapa Māori educational pathways? • Achieving equity for ākonga Māori?
Effective functioning ITE system	Does the approach: • Provide clear direction to ITE providers so they operate effectively and efficiently, while accounting for academic freedom? • Provide transparency and ensures accountability that appropriate standards for teaching quality are met? • Align with the full regulatory system of the teaching profession?
Implementation	Is the approach: • Easy to implement? • Cost effective for all parties?
Upholds the status of the profession	Does the approach: • Include the voice of the profession? • Support teachers to contribute to the future of the teaching profession? • Balance the alignment of ITE standards with government education priorities and targets against maintaining the profession's role in governing its own affairs?

What scope will options be considered within?

40. Officials were initially instructed to consult on a proposal that would remove the ITE standard setting and approval functions from the Teaching Council and give these

responsibilities to the Secretary for Education (option 3, outlined below). Given the speed at which the proposal was being developed, this meant we were only able to undertake limited consultation on the proposed shifting of ITE responsibilities with a select number of stakeholders. We prioritised engaging with the ITE sector due to the direct impacts of the proposal on them. We used feedback from this limited consultation to inform our analysis and development of the options.

41. Following consultation, officials provided advice to the Minister on options to proceed with shifting responsibilities for ITE standard setting and approvals to the Secretary for Education, alongside other options for the Minister to consider. Based on the feedback from consultation and our analysis, we outlined several risks, including:

   a. Significant sector disruption,

   b. Additional resource, time, fiscal cost to Government to set up a new function in Ministry of Education,

   c. The Ministry's ability to quickly establish, and effectively carry out these functions,

   d. Lack of regulatory coherence as the Council and Ministry's roles become blurred, and

   e. Potential to limit the Minister's ability to consider broader, longer term regulatory reform.

42. The Minister agreed to proceed with initial steps to ensure greater transparency and accountability of the Council's ITE functions, 9(2)(f)(iv)

What options are being considered?

43. This analysis looks at four potential options:
   i. Option 1: The counterfactual,
   ii. Option 2: Issuing a Statement of Government Policy *(non-legislative change)*,
   iii. Option 3: The Secretary for Education takes over responsibility for standard setting and quality assurance of ITE *(legislative change)*, and
   iv. Option 4: Strengthening transparency and accountability in ITE *(legislative change)*.

44. 9(2)(f)(iv), 9(2)(g)(i)

Option	Description	Comment
Option One: Counterfactual/Status Quo	Current settings would remain in place, and the Minister would not have a strong influence on ITE standards setting. ITE programmes would continue to be monitored and approved by the Teaching Council, alongside NZQA and NZVCC through CUAP. There are a few ways the Minister could influence change, as outlined in the options above, but the primary lever would be to issue a SoGP (Option 2).	ITE delivery may continue to not be aligned with Government priorities, which may mean some ITE graduates are underprepared and lack the necessary skills and knowledge in core subject areas to teach effectively once they graduate. The introduction of the Council's 2019 new programme approval requirements may result in a lift of the quality of ITE.[37] The Council are also proposing to: • amend entry standards, • update programme requirements to make curriculum expectations explicit, and • develop Key Teaching Tasks for assessment. Other initiatives for in-service teaching will also influence ITE provision, for example curriculum changes.
Option Two: Statement of Government Policy (SoGP) *(non-legislative change)*	The Minister issues a SoGP to set out Government policy on how the Council could align ITE standards, monitoring and approvals processes with Government expectations and overall system priorities. The Minister is required to consult with the Council first before issuing a SoGP.	Provides an opportunity for the Council to receive notification of and, respond to Government education priorities. Could be an initial step before considering legislative changes. The Minister is intending to issue an SoGP to the Council in late 2024 regarding the Council's standard setting,

---

[37] The Council produced a report last year on the interim monitoring of nine ITE providers in 2021/2022 that were approved under its revised 2019 ITE approval requirements. Overall, the nine providers appear to be meeting the intent and vision of the requirements, however there were some ongoing challenges.

		certification and registration functions. It does not include ITE. While a SoGP is a strong influencing mechanism, which we would expect the Council would give regard to, the Minister does not have the levers to control how the Council gives regard to it.
Option Three: **Secretary for** **Education takes over** **responsibility for** **standard setting and** **quality assurance of** **ITE** *(legislative change)*	This option would remove the powers of the Teaching Council for standard setting and approval functions for ITE and extend the power of the Secretary for Education to undertake these functions. The monitoring and approval of ITE programmes would become the responsibility of the Secretary for Education, but we would still need to work alongside NZQA and CUAP for quality assurance of ITE programmes. The Minister would be able to direct the Secretary to review ITE standards, quality assurance and approval processes to ensure they align with other educational policy changes. The specific areas of the Act that would be removed from the Teaching Council's responsibility and shift to Secretary for Education are: a. Section 479(1)(g): Establish and maintain standards for qualifications that lead to teacher registration, b. Section 479(1)(h): To review, at any time, the standards for qualifications, and c. Section 479(1)(i): Conduct, in conjunction with quality assurance agencies, approvals of teacher education programmes.	If this option were supported, the Government is proposing to make these changes as part of a future Education and Training Act Amendment Bill, with implementation from the beginning of 2026.

	The Council would remain responsible for all other functions in Section 479 of the Act.	
Option Four: Strengthening transparency and accountability in ITE *(legislative change)*	This option would involve a package of legislative changes to strengthen transparency and accountability in the delivery of the Teaching Council's functions for ITE. Legislative changes would amend: a. Section 479(1)(h) and Section 479(h)(i) to give the Secretary for Education a legislative role in ITE standard setting, review and approval, b. Section 479(1)(j) so that it includes the requirement for the Teaching Council to consult with the Minister of Education before making changes to standards for ongoing practice and criteria for the issuing of practicing certificates, and c. Section 483 so that it requires the Teaching Council to include how the Council has considered any relevant SoGPs issued as part of their annual reporting. ITE programmes would continue to be monitored and approved by the Council, alongside NZQA and CUAP. The Secretary would also have an advisory role in ITE standard setting, approvals and review. If the Minister wants to influence change for monitoring, there are a few ways she could do this as outlined above, but the primary lever would be to issue a SoGP.	Proposal A: The Secretary will have a role in the decision-making for ITE approval and review panels. This gives greater visibility over the quality of ITE programmes and the extent to which they are adapting to meet government priorities. Note that the Council must have regard to the views of the Secretary, but the advice provided by the Secretary would not be binding. Proposal B: The Act already requires consultation with the Minister of Education on two main areas of the Council's functions: a. section 479(1)(f) before making changes to the criteria for teacher registration, and b. section 479(1)(h) before changing the standards for qualifications that lead to teacher registration (ITE standards). This would align consultation requirements across all three of the main standards and criteria setting functions of the Council and address a current anomaly in the legislation. We note that the Council already consults with the Minister before making changes to the Teaching Standards and criteria for the issuing of practicing certificates, so this would formalise into law what already happens in practice. Proposal C requires reporting on response to an SoGP. If this option were supported, the Government is proposing to make these changes as part of an Education and Training Act Amendment Bill, with implementation from the beginning of 2026.

Criteria	Option 1: The counterfactual	Option 2: Issue a Statement of Government Policy on ITE	Option 3: Shifting responsibility of ITE standard setting and quality assurance to the Secretary	Option 4: Strengthening transparency and accountability in ITE
Improved consistency, quality and preparedness of ITE graduates	**0**	**+**	**++**	**+**
	There may be some improvements to ITE with the Teaching Council's proposed amendments to entry standards, updated programme requirements to expect preparation to teach the curriculum explicit and developing core Key Teaching Tasks. However, the quality and consistency of ITE graduates will likely continue to be variable if ITE providers continue to adhere to the current high level ITE standards. Current settings mean there is weak ability for the Government to align ITE standards with educational priorities and targets, as the Council is independent from the government by design. While the Minister could require an audit and/or request for information on performance of functions, there are no implications for the Council if the Minister is not satisfied with the findings.	Issuing a SoGP provides an opportunity for the Government to clearly set out their set out policy views on the importance of consistent, competent, high-quality ITE, and the need for it to align with government education policy direction and targets. The Council will have regard to the SoGP and implement it at their own discretion, but the Government cannot influence what that implementation would look like. It also needs to be worded carefully so as not to encroach on the Council's independence. Issuing a SoGP on its own is a weak lever to align government educational priorities as it is not binding. However, regardless of how the Council gives effect to an SoGP, issuing one sends a clear signal to ITE providers on the Government's expectations of standard settings. Some providers may choose to adapt their programmes based on the SoGP, but we do not know how many ITE providers would initiate this. Therefore, it is likely that we will still see variability of ITE programmes and graduates.	Shifting the responsibility of ITE standard setting and quality assurance to the Secretary for Education would mean government has greater influence to set clear expectations about the skills competencies and knowledge to support ITE graduates in being prepared to teach. This should help influence improved quality and consistency of all ITE graduates, regardless of what programme they undertake. However, any changes to ITE programmes will be at the discretion of tertiary providers, in response to the standards and quality assurance processes. Provides a clear and direct lever for the Government to influence ITE standards so that they are consistent and in alignment with government educational priorities, including specifying what ITE standards should look like and what assurance processes should be undertaken. Note however, if there are frequent changes applied to the standards, this could be disruptive to ITE students and providers.	Giving the Secretary a legislated role in ITE, broadening consultation requirements, and strengthening reporting on SoGPs partially achieves the Government's objectives for aligning educational priorities and targets with ITE standards, but this option is not as direct as option 3. The advisory roles provide the Secretary and Minister greater opportunities to set clear expectations of the skills, competencies and knowledge required to support ITE graduates in being prepared to teach. However, this option does not give the Secretary or Minister any additional powers and they cannot direct change.
Uphold our obligations under Te Tiriti o Waitangi	**0**	**0**	**-**	**0**
	The Teaching Council has an explicit focus on meeting the needs of ākonga Māori, through a framework specifically designed for Māori medium ITE programme approval and through the Standards for the Teaching Profession where a commitment to tangata whenuatanga and Te Tiriti o Waitangi partnership is required. There is a high level of discretion for the Council in assessment of providers given the high-level nature of requirement specifications. This allows the Council to be responsive to the needs of different types of providers and programmes that meet different needs. However, the Council set the standards for all ITE programmes, working	As per the counterfactual, because the Council has frameworks to ensure they are meeting their Te Tiriti obligations. Note however that if the focus of an SoGP is on building a more consistent approach to teacher training, this could impact on the Council's ability to be responsive to the different types of providers, particularly those that have a kaupapa Māori and te ao Māori focus.	The purpose of shifting the Council's ITE functions to the Secretary would be to improve the quality of ITE delivery and the quality of graduates, which should have positive impacts for all learners, including ākonga Māori, regardless of what setting they are in. To ensure we are delivering equitable outcomes for all learners, we would need to work with hāpu, iwi and Māori communities to ensure ākonga are supported in all learning settings, and support iwi and Māori communities who want to build their own local workforce and develop approaches that support success and equity of outcomes as Māori define them. If the focus is on building a more consistent	The purpose of increasing accountability and transparency of standard setting and approval functions for ITE is to improve the consistency and quality of graduates, which should have positive impacts for all learners, including ākonga Māori, particularly in English medium settings. As per the counterfactual, both the Council and Ministry currently have frameworks to support good governance in relation to Te Tiriti. The Secretary can currently utilise of the Ka Hikitia - Ka Hāpaitia and Tau Mai Te Reo strategy to ensure good governance in relation to Te Tiriti obligations. It also provides an opportunity for the

alongside NZQA and CUAP for programme approval and quality assurance, which Māori must operate under. While we know that ākonga Māori achieve better wellbeing and learning outcomes in Kaupapa Māori and Māori Medium settings, there are persistent inequities in educational outcomes for ākonga Māori in English medium settings. Inconsistency in preparedness of ITE graduates will therefore likely have a disproportionate impact on ākonga Māori in English medium settings.		approach to teacher training, this could impact on the Council's ability to be responsive to the different types of providers, particularly those that have a kaupapa Māori and te ao Māori focus. Shifting the functions away from the Council also diminishes kaiako ability to influence the ITE standards. Consultation with Māori, including iwi, hapū, Te Rūnanga nui o ngā Kura Kaupapa Māori o Aotearoa, Ngā Kura ā Iwi o Aotearoa and the teaching sector would need to be robust to ensure that if the Secretary makes changes on ITE standards and quality assurance in a way that recognises the needs and aspirations of Māori across English medium, Māori medium and Kaupapa Māori ITE providers and the teaching sector.	Secretary and Council to work together in consistently carrying out Te Tiriti obligations. If the focus of advice from the Minister and Secretary is on building a more consistent approach to teacher training, this could impact on the Council's ability to be responsive to the different types of providers, particularly those that have a kaupapa Māori and te ao Māori focus.
Effective functioning ITE system	**0**	**+**	**- -**	**+**
	The counter factual gives clear roles to the government and the sector. These are well understood and supported. The current settings create a separation between oversight of ITE and broader education system priorities. This has potentially negative effects as the Minister has minimal ability to influence their education priorities across the whole teacher pathway. The current settings ensure coherence in the overall regulation of the teaching workforce from pre- to in-service teaching, with the Council having oversight of the regulation of the teaching workforce from pre-service to in-service teaching. Some assurance and transparency levers are built into the legislation but there is no single point of oversight for the whole education training system and there is limited ability for government to respond.	As per the counter factual, this option uses existing system processes and roles and utilises the Council's experience and capacity. However, quality assurance processes would still be dispersed between agencies and somewhat at arm's-length so full transparency and accountability is not achieved. The power to issue SoGP to the Council has not yet been used. Rather than changing roles and responsibilities, this option would be using powers that already exists, and provides the Government an opportunity to set clearly set out their policy intentions. It therefore better aligns existing elements of the system relative to the counterfactual.	Under this option there would be a clear process for the Minister to shape teaching standards, quality assurance for ITE and ITE approval processes. However, ITE standard setting could become politicised with direct government influence and may face strong sector opposition. Providers may feel the need to continually adapt their programmes with a change of government, which may make ITE provision unattractive for providers. Alternatively, they may be less responsiveness to the Teaching Standards if there is less certainty of or respect for the status of the Standards. Small ITE providers, including kaupapa Māori and Māori Medium ITE providers may be disproportionately burdened by continual changes, and could also lead to some providers to stop offering ITE. The full regulatory system from pre- to in-service teaching would be spread across the Secretary and the Council, which could lead to incoherence in the teacher regulatory pathway.	The Council would maintain oversight of the regulation of the teaching workforce from pre-service to in-service teaching. Requiring the Council to consult with the Minister before making changes to the Teaching Standards and criteria for issuing of practicing certificates supports alignment across the teacher pathway, ensuring the Minister has an opportunity to express their expectations for the full teacher pathway. The requirement for the Council to report on how they are responding to any SoGPs issued to them increases transparency and accountability by providing a consistent method of reporting if any are issued to the Council. However, there are no implications if the Minister is not satisfied with how the Council is having regard to any issued SoGPs.

	Option 1	Option 2	Option 3	Option 4
Implementation	**0**	**0**	**-**	**0**
	NZQA, CUAP and the Council continue in their roles of ITE approval and quality assurance. The Council will continue to undertake cost recovery through charging fees and levies for registration and certification, and will look to charge fees for ITE approval, reviews and monitoring. No added costs with this option.	NZQA, CUAP and the Council continue in their roles of ITE approval and quality assurance. This option would be low cost. It may take time to implement by drafting and issuing an SoGP, but it is much faster than options 3 and 4 because it does not require regulatory change and is currently available to the Minister, making it easy to implement. While the SoGP could set clear Government policy intentions, the successful implementation and delivery of objectives will depend on how the Council gives regard to the SoGP. Effective implementation may depend on how consultative the Minister is with the Council in developing the SoGP.	The Ministry would need to source ongoing funding, either from reprioritisation or Budget. We could consider undertaking some cost recovery as the Council does through fees, but this may be unpopular with the sector given they haven't agreed to pay fees to the Ministry. Legislative change is required for this option, which will take time to implement. The Ministry would need time to design and establish this function within the Ministry and would need to ensure we have the capability to deliver these new functions effectively. The Ministry would also need to manage potential conflicts, as the funder of some ITE programmes (for example employment-based ITE programmes (EBITEs)).	This option would cost less than option 3 but would require a very small resource requirement for the Ministry, which could be met within existing resources. The Ministry would need to manage potential conflicts, as the funder of some ITE programmes (e.g. EBITEs) and a new role in review/approvals. Legislative change is required for this option, which will take time to implement, but does not require as much implementation time as option 3.
Upholds the status of the profession	**0**	**0**	**-**	**0**
	Under the counterfactual, the voice of the profession is mediated through the Council, who have teacher representatives on their board and are consultative in their approach, ensuring that teachers can contribute to the future of the teaching profession.	As per the counterfactual, ensures that the voice of the profession is heard and can contribute to the future of the teaching profession.	This option erodes the Council's independence, which would likely be negatively received by the sector. This option would limit the profession's ability to contribute to the future of the teaching profession. Conducting consultation with the sector should help to mitigate this.	As per the counterfactual, maintains the independence of the Council and its ability to operate as a professional body and ensures that the voice of the profession is heard and can contribute to the future of the teaching profession.
Overall assessment	**0**	**+**	**-**	**+**
	This option does not meet the objectives of ensuring consistent, competent, high quality ITE graduates, and does not effectively align ITE settings with government education policy direction and targets.	This option would be low cost and would take less time than options three and four. An SoGP could also set out clear Government policy views on the importance of consistent, competent, high-quality ITE, and the need for it to align with government education policy direction and targets. However, successful translation of the SoGP into action does depend on the actions of the Teaching Council, which is a limitation.	Meets the objectives of ensuring consistent, competent, high-quality graduates, and supports the government to align ITE settings with government education policy direction and targets. However, this option has impacts for the status of the profession, and there are risks with maintaining an effectively functioning ITE system. This option would take the longest time to implement. There would be new, ongoing costs for the Ministry, and we would need to ensure we have the capability to deliver these new functions effectively to achieve the government's objectives.	This option goes some way to meeting the objectives of ensuring consistent, competent, high-quality graduates, and supports the government to align ITE settings with government education policy direction and targets, while also using existing system processes and capacity. Gives government a stronger role in influencing ITE standard setting and approval functions, balanced against maintaining independence of the Council.

Key for qualitative judgements:

++   much better than doing nothing/the status quo/counterfactual

+   better than doing nothing/the status quo/counterfactual

0   about the same as doing nothing/the status quo/counterfactual

-     worse than doing nothing/the status quo/counterfactual

- -   much worse than doing nothing/the status quo/counterfactual

eoll2elr4 2024-12-04 10:44:13

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

45. Our preferred option is option 4 – to strengthen accountability and transparency in ITE because it best meets the objectives of ensuring consistent, competent, high-quality graduates, supports the government to align ITE settings with government education policy direction and targets, while using existing system processes and capacity. It also maintains the Council's independence.

46. While option 3 is the strongest in meeting the Government's ultimate objective, this requires significant change and stakeholder feedback was clear that the independence of the Council is valued by the sector, that politicisation would risk instability in regulation and a loss of sector voice in critical decisions.

47. Option 2 is rated the same overall rating as option 4. It did not, however, rate highly in our assessment on its own to achieve the Government's objectives. It is a strong influencing mechanism that is available to the Minister under existing settings and combining option 2 and option 4 would make for a stronger approach overall. As already signalled, the Minister intends issuing a SoGP to the Council. The current SoGP does not include ITE.

48. For these reasons, we recommend option 4.

Te Tiriti o Waitangi Analysis

49. As a partner to Te Tiriti o Waitangi, the Crown has a duty to actively promote and protect Tiriti rights and interests. This duty is recognised in Section 4(d) of the Act, which outlines that one of the education system's purposes is "to establish and regulate an education system that honours Te Tiriti o Waitangi and supports Māori-Crown relationships".

What we have heard before about ITE provision

50. As we were unable to consult on the preferred option, our Te Tiriti analysis was informed by what we have heard through previous engagements, and what the Waitangi Tribunal has said on similar matters.[38] We have heard from previous engagements that:

    a. Tangata whenua would like to have more agency in supporting Māori into ITE.

    b. Te Rūnanga Nui o Ngā Kura Kaupapa Māori o Aotearoa would like to have input on teacher assessment and conveying Mātauranga Māori, and that they wish for a distinct and bespoke policy framework for Kaupapa Māori education.

    c. Māori want tino rangatiratanga – agency and authority – over the education of Māori learners, and that Māori would like to have more agency over their taonga including mātauranga Māori, te reo and tikanga in the delivery of ITE.[39]

---

[38] Relevant claims heard at the Waitangi Tribunal include; Matua Rautia: The Report on the Kōhanga Reo Claim (Wai 2336), The Report on the Aotearoa Institute claim concerning Te Wānanga o Aotearoa (Wai 1298), and Kei ahotea te aho matua (Wai 1718)

[39] Education Conversation: Kōrero Mātauranga - What you told us (2018)

d. representation amongst teacher and school leaders is important so learners can see themselves reflected in these roles,[40] and that racism and bias continue to impact Māori learner confidence, achievement, and outcomes.[41]

Summary of Te Tiriti analysis of the preferred option

51. Overall, the preferred option (option 4) has limited alignment with considerations that are relevant to Te Tiriti o Waitangi. The option is intended to improve transparency and accountability of the Council's functions, which should help to support quality ITE graduates, which in turn should have positive impacts for all learners, including ākonga Māori, regardless of what setting they are in. We know that ākonga Māori have better educational outcomes in Kaupapa Māori and Māori Medium settings, compared to English medium settings.[42] Improving the consistency and quality of ITE graduates will improve their effectiveness for students' learning. This will likely have particularly positive impacts for ākonga Māori in English medium settings, who are often underserved and achieve at lower rates.

52. The preferred option focuses on improving accountability and transparency in ITE, but does not explicitly include how we could implement this in partnership with Māori, and does not enhance tino rangatiratanga. As outlined in the options analysis, both the Ministry and the Council have frameworks to support good governance in meeting Te Tiriti obligations, which supports us to work in partnership with Māori. Both the Secretary and the Minister could also choose to consult with Māori when providing their advice and making decision on ITE and standard setting. We know iwi are focused on ākonga achievement in schools and kura through to ITE, and will have a view on changes to ITE, in alignment with their strategic priorities.

53. While we were not able to consult on this option with Māori due to limited timeframes, there will be opportunity to hear from Māori as part of the Select Committee process if this option were to progress. From the Select Committee process, alongside what we have heard before in previous engagements on the aspirations Māori have for ITE and ākonga Māori, we expect we will hear views about how to actively protect Māori rights and interests. We anticipate Māori may express ambitions and priorities in line with those described above at paragraph 50.

---

[40] Mana Mokopuna | Children & Young People's Commission, "Without racism Aotearoa would be better: Mokopuna share their experiences of racism and solutions to end it" (March 2024) Mana_Mokopuna_-_Without_racism_Aotearoa_would_be_better_Digital.pdf;
[41] Education Conversation: Kōrero Mātauranga - What you told us (2018)
[42] Ministry of Education, Ngā Haeata o Aotearoa 2020 (July 2022), Ngā Haeata o Aotearoa 2020 | Education Counts; Education Review Office, Te Kura Huanui: The treasures of successful pathways (July 2021) Te Kura Huanui: The treasures of successful pathways | Education Review Office; New Zealand Qualifications Authority, Aide-Memoire: NCEA in Kaupapa Māori senior secondary settings, 27 May 2024, Reference OC00816, Information releases :: NZQA

What are the marginal costs and benefits of the option?

Affected groups (identify)	Comment nature of cost or benefit (eg, ongoing, one-off), evidence and assumption (eg, compliance rates), risks.	Impact $m present value where appropriate, for monetised impacts; high, medium or low for non-monetised impacts.	Evidence Certainty High, medium, or low, and explain reasoning in comment column.
Additional costs of the preferred option compared to taking no action			
Teaching Council	Teaching Council will continue to be responsible for the standard setting and approval function of ITE. Will need to ensure that the Secretary for Education's views are regarded as part of ITE standard setting, review and approval. Will need to ensure the Council consults with the Minister before making changes to the Teaching Standards and criteria for issuing practicing certificates. Will need to ensure that the Council includes in their annual report how they have accounted for any relevant SoGPs issued.	**Low monetised impact** Carrying out these new requirements will be relatively low cost and build on collaborative processes that already occur. **Low non-monetised impact** The stronger role for the Secretary for Education and the Minister in the Council's legislated functions could have a reputational impact on the Council, if the sector perceive that this undermines the Council's independence.	Medium
ITE providers	ITE providers will continue to hold relationships with the Council. No new monetised costs for ITE providers.	**Low**	Medium
ITE students	No changes in costs for ITE students.	**N/A**	High
Regulator: New Zealand Qualifications	NZQA and CUAP continue to hold an ongoing role in the quality	**N/A**	High

Authority (NZQA) and Committee of University Academic Programmes (CUAP) for New Zealand Vice-Chancellor's Committee (NZVCC)	assurance of ITE providers and qualifications, which will be the same as the counterfactual.		
Schools and kura, ECE settings, teachers and communities	Sector's relationship with the Council may be adversely affected if they perceive the Council as having lessened independence.	Low non-monetised	Medium
Iwi, hapū and Māori	Community relationship with the Council may be adversely affected if they perceive the Council as having lessened independence.	Low non-monetised	Medium
Total monetised costs		**Low**	
Non-monetised costs		**Low**	Medium

Additional benefits of the preferred option compared to taking no action			
Affected groups	**Comment**	**Impact**	**Evidence Certainty**
ITE providers	Providers will have greater confidence they are meeting Government expectations with regard to the skills and knowledge they are providing to ITE students, and that their programmes will set students up well for a successful teaching career.	**Medium** Increased government input in standard setting and quality assurance functions for ITE provides increased assurance that approved programmes reflect government expectations.	**Medium**
ITE students	Students will have greater confidence that their ITE learning aligns with government expectations about the skills and knowledge required to be a successful beginning teacher, and so be more confident in their practice.	**Medium** Increased government input in standard setting and quality assurance functions for ITE provides increased assurance that standards reflect government expectations.	**Medium**
Principals, teachers and other staff	Schools, kura and ECEs benefit from greater transparency and accountability, creating assurance that ITE graduates have the knowledge and skills that the Government considers are required to succeed as beginning teachers with appropriate support.	**Medium** Increased government input into standard setting and quality assurance provide opportunity for establishing clear minimum standards. Principals and teachers voices should be given high importance in engagement on the design of standards and quality assurance processes.	**Medium**
Regulators:	Provides more opportunities for	**Medium** Increased	**Medium** Benefits will be long

Ministry of Education NZQA CUAP for NZVCC	government to be clear about their expectations for ITE. Clearer accountability and transparency helps regulators to have clear understanding of what they are expected to monitor	government input supports regulators to have certainty about what they are expected to monitor	term and will take time to flow through the system.
Learners, parents, whānau and communities	Schools, kura and ECE communities benefit from greater transparency and accountability, creating greater assurance that ITE graduates have the necessary skills and knowledge to be effective beginning teachers	**Medium**	**Medium**
Iwi, hapū and Māori	Iwi, hapū and Māori benefit from greater transparency and accountability, creating assurance that ITE graduates have the necessary skills and knowledge to be effective beginning teachers.	**Medium** Māori should be engaged with early and often to ensure that standards and quality assurance processes appropriately acknowledge the skills and knowledge that are necessary to support ākonga Māori	**Medium**
Total monetised benefits			
Non-monetised benefits		**Medium**	**Medium**

Section 3: Delivering an option

How will the new arrangements be implemented?

54. As noted, the proposals require legislative change to sections 479(1)(h-j) and 483 of the Education and Training Act 2020. The Government proposes to make these changes in the upcoming Education and Training Act Amendment Bill (No. 2), with proposed implementation from the beginning of 2026.

55. We are only at the proposal stage of this work, and further work will support the implementation of the Secretary's advisory role in ITE standard setting, review and approval processes. We will need to formalise working processes between the Secretary, Council, NZQA and CUAP, noting that we already work with these partners in many areas.

56. The Council's processes for consulting the Minister before making changes to standards for ongoing practice and criteria for the issuing of practicing certificates will need no change. The Council will need to update its annual reporting to include reporting on any SoGP that is issued.

57. To support the ongoing implementation of standard setting and ITE approval functions for ITE, the Council and the Ministry of Education will each carry out their standard business processes required to deliver this function, including:
    a. Ministerial reporting (for example reports to ministers, Official Information Act queries, Parliamentary Questions),
    b. Policy development, and
    c. Budget processes.

58. The Council will continue to do cost recovery for monitoring and review of ITE programmes through teachers' practicing certificate and registration fees, as well as some cost recovery.

59. We also acknowledge that the impacts of changes to ITE standard setting and approval functions will take a long time to be realised. Annual cohorts of graduating teachers entering the profession make up only a small percentage of the overall workforce.

60. Changes to Standard setting and approval functions of ITE would need to demonstrate how they incorporate the Tapasā framework to ensure teachers are culturally aware, confident and competent when engaging with Pacific learners, parents, families and communities.[43]

Implementation risks

61. There are some risks with implementing this option. The main risk is that giving the Secretary and Minister new advisory roles in the functions of the Council introduces some complexity as to who must be involved in an advisory capacity of the Council's functions.

---

[43] Tapasā framework

The Council will need to balance advice provided by the Minister and the Secretary alongside other stakeholders.

62. The table below outlines identified risks with strengthening accountability and transparency of the Teaching Council's ITE functions, along with the potential impact and likelihood of the risk, and potential ways we could mitigate these risks.

Risk	Risk assessment [High, medium, low]	Potential mitigation
Implementation risk		
• The Ministry of Education will need to ensure we support the Secretary with the necessary expertise in advice on ITE standard setting, approvals and monitoring. • The Council and the Secretary will need to develop new ways of working as part of ITE standard setting, monitoring and approvals.	Impact: Low Likelihood: Low	• The Secretary could also consult with the sector and experts to help support their advisory role. • The Council and the Secretary define and agree to roles and responsibilities, and clarifiy expectations of how they will work together.
Stakeholder support impacts effectiveness		
• Lack of Teaching Council support diminishes impact and achievement of outcomes. Evidence shows change is most successful when parties buy-in to the change process.[44]	Impact: Medium Likelihood: Low	• Involve the sector as part of consultation when the Secretary is preparing to advise on ITE standard setting, approvals and monitoring.

How will the new arrangements be monitored, evaluated, and reviewed?

63. The monitoring and approval of ITE programmes would continue to be the responsibility of the Council, working alongside NZQA and CUAP for quality assurance of ITE programmes, with the additional advisory role for the Secretary. The monitoring and

---

[44] An implementation framework for effective change in schools (OECD) 2020

evaluation arrangements for assessing the ITE standard setting could be assessed against the policy objectives, which include:

    a. Is the new implementation ensuring consistently high quality ITE graduates who are well prepared to teach in the learning environment?

    b. How effectively are ITE settings aligned with government educational priorities?

64. We will assess the effects of the changes in consideration of wider ITE reform proposals in 2025.

Annex 1: The Teaching Council of Aotearoa New Zealand's purpose and funding

The Teaching Council of Aotearoa New Zealand (the Council) is an independent professional and regulatory body for teachers in New Zealand. The Council's purpose as a professional body is to ensure safe and high-quality leadership, teaching and learning for children and young people in early childhood, primary, and secondary schooling in English-medium, settings that teach in te reo Māori and other language settings. It is governed by a Council made up of 13 Councillors, seven of which are elected by the profession and six are appointed by the Minister of Education. This structure is intended to give teachers voice and ownership of the Council.[45] The Teaching Council of Aotearoa came into effect in 2017, but it has not always been an independent professional body. A history of the Council is outlined in **Annex 2.**

Core functions of the Teaching Council

The Council is given broad legislative functions set out in the Section 479 of the Education and Training Act 2020 (the Act), including to raise the status of the profession and to identify and disseminate best practices in teaching. Their functions as set out in the Act can be grouped into four main areas:

   a. Setting standards for and approving initial teacher education programmes (ITE),
   b. Setting criteria for, and carrying out, teacher registration and practicing certificate functions,
   c. Setting and upholding the Standards for the Teaching Profession | Ngā Paerewa (the Standards) for the teaching profession, and
   d. Performing disciplinary and competence functions.

The Teaching Council is primarily funded through fees and levies

The Council is largely funded through a user-pays set up, where they set fees and the levy to be paid by registered teachers to fund the delivery of these mandatory statutory functions. By law, the Council is only allowed to recover the actual and reasonable costs of delivering those functions from teachers. This means the Council can only use its funding for functions that they are required to perform as outlined in legislation. The Council has outlined that the cost for their mandatory functions is $18.122M annually.[46] The Council has recently proposed to recover costs for staff time involved in the monitoring, reviews and audits of ITE programmes. The current proposed fees range from $360 to $12,384 each time a programme is monitored or reviewed.[47]

The Council also receives funding from the Ministry to conduct its optional leadership functions, and to provide system support of their online system Hapori Matatū, a professional space for

---

[45] Meet the Governing Council :: Teaching Council of Aotearoa New Zealand
[46] What we do:: Teaching Council of Aotearoa New Zealand
[47] Teaching Council of Aotearoa New Zealand, Consultation on proposed new Teaching Council fees for programme monitoring, review, audit and special review services to Initial Teacher Education providers (August 2024)

teachers and professional leaders to access online services, network and to apply for or renew their recertification.[48]

---

[48] The Council receives an existing annual grant of $178,000 in Vote Education that can be used to support its optional functions. In May 2022, the Minster agreed to reprioritise an additional $322,000 to provide a total of $500,000 per annum ongoing until further notice to support the Council's leadership activities [METIS 1279029]. Also see: Home (teachingcouncil.nz)

Annex 2: History of teacher regulation in Aotearoa New Zealand

Timeline of teacher regulation in New Zealand

1989 Teacher Registration Board	2002 New Zealand Teachers Council	2015 Education Council Aotearoa of New Zealand	2017 Teaching Council of Aotearoa New Zealand

Establishment of the Teacher Registration Board

In response to on-going concerns about the quality of teaching and the profession's capture by bureaucracy and teacher unions, the **Teacher Registration Board** was established in 1989 as part of the Tomorrow's Schools reforms. Its key function was teacher registration, aiming to reflect the General Teaching Council for Scotland, as well as other professional bodies in New Zealand.[49]

The New Zealand Teachers Council

In 2002, the Teacher Registration Board was disestablished, and the **New Zealand Teachers Council** was established with a broader set of powers, but as a Crown Entity, which limited its ability to speak on the behalf of the profession.[50]

Education Council of Aotearoa New Zealand

In 2015 the New Zealand Teachers Council was replaced by the **Education Council of Aotearoa New Zealand,** which was to be independent from Government. However, members of the Board were to be appointed by the Minister which led to opposition by teacher organisations.[51]

Teaching Council of Aotearoa New Zealand (the Council)

In 2017 new legislation was introduced so the Minister could only partially elect members of the Board, and the Council's name was changed to the **Teaching Council of Aotearoa New Zealand** to reflect this.[52]

---

[49] Noeline Alcorn, *Between the profession and the state – a postscript - A history of the Education Council of Aotearoa New Zealand,* Teaching Council of Aotearoa New Zealand (June 2019)

[50] Noeline Alcorn, *Between the profession and the state – a postscript - A history of the Education Council of Aotearoa New Zealand,* Teaching Council of Aotearoa New Zealand (June 2019)

[51] Noeline Alcorn, *Between the profession and the state – a postscript - A history of the Education Council of Aotearoa New Zealand,* Teaching Council of Aotearoa New Zealand (June 2019)

[52] Noeline Alcorn, *Between the profession and the state – a postscript - A history of the Education Council of Aotearoa New Zealand,* Teaching Council of Aotearoa New Zealand (June 2019)

Annex 3: Comparing other jurisdiction's ITE standard setting and quality assurance

Note: this table draws from online research.

Jurisdiction	Independent professional body?	Responsibility for ITE standard setting and quality assurance
Singapore	**No** No defined independent professional body. The Academy of Singapore Teachers is a voluntary professional body, with primary function being professional leadership.[53]	**Government** Ministry of Education vets ITE, but only one institution - The National Institute of Education (NIE)—is authorised by the Ministry of Education to prepare teachers for teaching.[54] It offers both a master's degree and a bachelor's degree route into teaching.
England	**No** The professional body for teaching in England, the General Teaching Council for England, was abolished in 2012, with some of its responsibilities transferring to the Teaching Regulation Agency (TRA), which is an executive agency of the Department for Education.[55]	**Government** The standard setting and accreditation functions for ITE in England are carried out by the Department for Education (DfE). Organisations delivering ITE that lead to Qualified Teacher Status in England must be accredited by the DfE, and courses must continually meet the requirements set out in DfE's ITT criteria.[56] Ofsted (a quasi-equivalent to ERO) also undertake reviews of ITE in a similar way that they undertake reviews within schools, where they inspect providers in accordance with the Ofsted ITE framework.[57] Ofsted then provides information to the Secretary of State for Education about the work of the providers and the extent to which an acceptable standard of training is being provided. Information from

---

[53] Our Organisation (moe.edu.sg)
[54] Singapore - NCEE
[55] About us - General Teaching Council for England - GOV.UK (www.gov.uk)
[56] Initial teacher training (ITT): criteria and supporting advice - GOV.UK (www.gov.uk)
[57] About us - Ofsted - GOV.UK (www.gov.uk); **and** Initial teacher education (ITE) inspection framework and handbook - GOV.UK (www.gov.uk)

		these reviews can inform whether the Department retains, manages, or removes accreditation status for an ITE programme.
Ireland	**Yes** In Ireland, An Chomhairle Mhúinteoireachta | The Teaching Council is an independent self-funding statutory body established in 2006 under the Teaching Council Act 2001.[58]	**Independent regulator** The Teaching Council is responsible for reviewing and accrediting programmes for ITE.[59]
Scotland	**Yes** The General Teaching Council for Scotland (GTC Scotland) is the independent regulator for teachers in Scotland.[60]	**Independent regulator** The GTC Scotland is responsible for accrediting programmes of ITE and setting minimum entry requirements for these programmes.[61]
Ontario, Canda	**Yes** The Ontario College of Teachers licenses, governs and regulates Ontario's teaching profession in the public interest.[62] It is an independent, self-regulating professional body.[63]	**Independent regulator** The Ontario College of Teachers accredits teacher education programs in Ontario.[65] It also reviews and approves hundreds of Additional Qualification courses. These help teachers stay up-to-date with their practice, expand their skills and meet the challenges of today's classrooms.[66]

---

[58] Department of Education, Periodic Critical Review of the Teaching Council (21 March 2024).
[59] An Chomhairle Mhúinteoireachta The Teaching Council, Annual Report 2022/2023 (p. 17),
https://www.teachingcouncil.ie/assets/uploads/2023/08/Teaching-Council-Annual-Report-2022-to-23-Final.pdf
[60] About GTC Scotland
[61] About GTC Scotland
[62] About the College | Ontario College of Teachers (oct.ca)
[63] Ontario College of Teachers, 2023 Annual Report 2023 Annual Report (oct.ca)
[65] What We Do | Ontario College of Teachers (oct.ca)
[66] What We Do | Ontario College of Teachers (oct.ca)

All publicly funded schoolteachers and administrators in Ontario must be certified by and be members of the College. The College is governed by a Council comprised of 12 members, half of whom are Ontario Certified Teachers and half who are members of the public appointed by the Government of Ontario.[64]	

---

[64] Ontario College of Teachers, 2023 Annual Report 2023 Annual Report (oct.ca)