

Regulatory Impact Statement: Changes to the teacher workforce regulation model

Decision sought	This analysis is produced for the purpose of informing final Cabinet decisions on education workforce regulation
Agency responsible	Ministry of Education
Proposing Ministers	Hon Erica Stanford, Minister of Education
Date finalised	5/06/2025

Key Proposal

Proposed changes to the workforce regulation model include:

- 1.) Moving all standard setting functions from the Teaching Council to Ministry of Education, with appropriate consultation requirements to ensure continued sector voice (including Teaching Standards, Code of Conduct, requirements for registration and certification and Teacher Education Programme Standards)
- 2.) Retaining the Teaching Council to deliver certification, registration, conduct and competence, and teacher education approvals and monitoring functions with a smaller, fit-for-purpose governance and stronger legislated powers for approvals and monitoring.

Summary: Problem definition and options

What is the policy problem?

There is high variability, inequity and unacceptable levels of achievement within and between schools in New Zealand. Many students leave school without the skills or qualifications needed for further education, training or employment, limiting their future opportunities and reinforcing wider social inequalities.

We know that differences between teachers and classes are a significant driver of the variance in student performance. There is a high risk of harm to student outcomes through poor quality teaching. Therefore, there is high public interest, and a proportionate role for government, in teaching quality and teaching workforce regulation.

Through the Teaching Council, we currently operate a mixed model of regulation. However, the current regulatory model is ineffective, and the public interest is not being met. Teacher training outcomes have been a long-standing area of concern for schools employing new teachers who believe that many new teachers enter the workforce underprepared and lacking confidence in critical areas. We have limited visibility of the quality of teaching delivered by already practicing teachers, and few levers for government to regulate teaching practice.

Under our current regulatory model, there is a risk of perverse incentives and unhealthy tensions, including the profession failing to exit non-performers who are part of their membership, especially where this would amplify teaching shortages.

Key problems with functions currently held by the Teaching Council include:

- a. High-level and unaligned standard setting.
- b. Quality assurance regulatory powers lack teeth.
- c. Duplication of functions.

Some non-regulatory options have already been explored to address issues with the current workforce regulation model. This includes:

- a. Issuing the Teaching Council with a Statement of Government Policy (SoGP), which outlined the Government's policy positions with regard to the Teaching Standards.
- b. Working with the Teaching Council to strengthen teacher education provision by raising entry requirements and progressing changes to the teacher education programme approval and monitoring requirements to better reflect curriculum priorities.

However, this alone will likely not be enough to improve outcomes. Since teaching quality has a significant impact on student achievement, the regulations governing the education workforce must be robust.

What is the policy objective?

The objectives sought are:

- a. assuring teacher quality and competence to raise student achievement, protect students from harm and maintain public trust and confidence in the teaching profession.
- b. improving quality and consistency in teacher education to ensure all teachers are adequately prepared to teach the curriculum in the relevant school or early childhood education setting.
- c. supporting alignment between teaching workforce regulation and broader government education policies and priorities, particularly curriculum goals and workforce requirements to support quality teaching.

What policy options have been considered, including any alternatives to regulation?

Status quo - All functions that currently sit with the Teaching Council stay with the Teaching Council.

Option One – The Teaching Council retains responsibility for registration and certification and competence and conduct functions and approvals and monitoring of teacher education provision. The Ministry of Education takes responsibility for standard setting functions.

Option Two – The Teaching Council retains responsibility for registration and certification and competence and conduct functions. The Ministry of Education takes responsibility for standard setting functions. The Education Review Office takes responsibility for approvals and monitoring of teacher education.

Option Three – Remove independent Teaching Council and replace with a Crown Agent, which has responsibility for all current Teaching Council functions.

The preferred option is Option One.

Two additional options were discounted:

- The option to move all regulatory functions to the Ministry was rejected as it doesn't align with the current roles of existing entities and could create tension between the Ministry's regulatory and support functions.
- Creating a separate qualifications regulator was also ruled out because it diminishes coherence between the standards for teaching practice and teaching education standards, which are designed to require that teacher education graduates can meet the standards for the teaching profession, with support. This lack of coherence could lead to more complexity and duplication of effort for teacher education providers.

What consultation has been undertaken?

No consultation has been undertaken because the Minister has directed that these decisions are a priority 9(2)(f)(iv)

This Bill must be ready for introduction by 31 October 2025 which means policy decisions are required in June 2025. People will have an opportunity to submit 9(2)(f)(iv) through the Select Committee process.

We take note of feedback received through a previous targeted consultation held in August 2024 on a proposed 'lift and shift' of teacher education standard setting and approval functions from the Teaching Council to the Secretary for Education. There was strong opposition to the proposal in consultation, and most stakeholders strongly supported the value of the independence of the Teaching Council. Stakeholders said there were risks related to government control of standards, such as frequent disruption and the potential for (real or perceived) politicisation of the standard setting process, and a risk of loss of professional autonomy and esteem from limiting profession-led regulation.

On balance, we believe that issues with professional regulation, and the public interest in New Zealand's teachers having the attributes, skills and knowledge to deliver excellent student outcomes outweighs the negative feedback from consultation, and change is still desirable.

The sector, and wider public, will have opportunity to input into the consideration of these policy proposals through the Select Committee stage 9(2)(f)(iv)

Is the preferred option in the Cabinet paper the same as preferred option in the RIS?

Yes, the preferred option in the Cabinet paper is the same as in the RIS.

Summary: Minister's preferred option in the Cabinet paper

Costs (Core information)

Outline the key monetised and non-monetised costs, where those costs fall (e.g. what people or organisations, or environments), and the nature of those impacts (e.g. direct or indirect)

There will be both one-off and ongoing costs from shifting functions away from the Teaching Council to the Ministry of Education. We estimate that the one-off transitional costs will amount to approximately \$0.3m for set-up of new staff, structure, operating models and support systems at the Ministry. We estimate that ongoing costs will sit within the \$1.5-2.5m range per annum. This figure is based off cost estimates from the Council for the operation of its standard setting and teacher education quality assurance functions, plus additional costs to deliver a strengthened quality assurance function.

Non-monetised costs will largely fall to the sector (teacher education providers, teachers, and education leaders) in needing to adapt to changed standards and assurance processes. The profession may consider the loss of an independent Teaching Council as a cost to professional

esteem. Raised standards for teacher education may create barriers that exclude some candidates.

Benefits (Core information)

We anticipate some savings from efficiencies created by reducing the Teaching Council's functions, however most benefits are non-monetised. Benefits will be experienced by regulators, the regulated parties, and others in the education system such as students.

Students and their families will benefit from improved quality and consistency of teaching across New Zealand. By ensuring that all educators have the attributes, skills, and knowledge needed to deliver excellent outcomes and keep students safe, the preferred option supports a stronger, more effective education workforce. These improvements will enhance student learning, contributing to a more resilient and prosperous New Zealand society and economy in the longer term.

The Teaching Council will be able to focus on a narrower set of functions and do these functions well. Increased function clarity and expanded powers will support the Council to strengthen their quality assurance of teacher education. The Ministry will have increased influence in workforce regulation, resulting in increased system alignment. The Government will have more ability to set and enforce expectations regarding the quality of teaching and the standards expected of teacher education and ongoing teacher practice.

Balance of benefits and costs (Core information)

Option One best meets our decision-making criteria and comes with the least trade-offs. It clarifies agency roles and aligns standards across the education system. The greatest cost of the preferred option is the funding required for it to work properly, however some of this cost is a one-off.

There are risks to proceeding with option one, especially

- Sector and stakeholder pushback
We have previously heard strong support from the sector for the independence of the Teaching Council. There will be a high level of sector interest, and potentially opposition, to some Teaching Council functions moving to a government agency.
- Capability and capacity
The Ministry of Education will need to be supported to expand its way of working to take on the new functions delegated to it. This will require careful implementation planning and transitional processes to ensure that the change of authority occurs effectively.

However, on balance, we consider that there are significant opportunity costs from not proceeding, including the ongoing impact on student learning from inconsistent teaching and leadership practice and that change is preferable to the status quo.

Implementation

Standard setting is a high priority and will shift to the Ministry upon commencement of the Bill, expected to be in June-July 2026. To ensure there is no adverse impact on current or future teachers, the legislation will state that all current standards and criteria set by the Teaching Council will remain in effect until such time that they are amended by the Secretary for Education. We expect that a rapid consultation process will be held to inform new standards that can be in place by the end of 2026, in preparation for the 2027 academic year. Standards will be reviewed on a regular cycle.

The Council will take on new monitoring and approvals functions and powers 9(2)(f)(iv) and will incorporate these into their operational processes.

Changes to the Teaching Council's governance will require a new Council to be reappointed to reflect the reduced size and new composition. The Council appointed in July 2025 will continue to serve until a new Council is appointed. The new appointments process is expected to take approximately 6 months.

We acknowledge that these implementation timeframes are compressed and present risks. Capacity building and the Ministry will need to ensure that the knowledge, systems and personnel required for new structures are proactively identified and acquired.

The impact of these regulatory changes on student achievement is not likely to be observable in the near term. Student outcomes will continue to be measured through existing domestic and international measures, which will provide, over time, the ability to assess the impact of these changes in causing improvements in teaching quality, as the most significant in-school driver of student achievement.

Limitations and Constraints on Analysis

9(2)(f)(iv) which workforce regulation decisions are a priority, must be ready for introduction by 31 October 2025 which means policy decisions are required in June 2025. This has limited:

- a. The scope of options we've been able to consider
 - We have developed options for regulatory change in response to the Minister's preferences for reform to consider how we could create greater alignment between government expectations of teacher quality and the current regulatory framework. Because we are focusing on good regulatory practice, we have not considered softer options such as providing the Teaching Council with additional funding as this would not address system alignment or duplication issues.
- b. Our ability to consult on the policy problem and set of options
 - We are relying on previous consultation on a smaller but related matter. People can still submit through the Select Committee process.

Additionally, we have not talked to the Teaching Council about this proposal and therefore we do not have detailed costing information. We are instead relying on estimates. Following policy approval, we will undertake more detailed work with the Council, which will help inform the potential future budget proposal.

I have read the Regulatory Impact Statement and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the preferred option.

Responsible Manager(s) signature:



Paul Aitken
Senior Policy Manager
Quality Teaching and Learning
5 June 2025

Quality Assurance Statement <i>[Note this isn't included in the four-page limit]</i>	
Reviewing Agency:	QA rating: [Meets, partially meets, does not meet]
Panel Comment: The Ministry of Education's Quality Assurance Panel has reviewed the Regulatory Impact Statement produced by the Ministry of Education. The panel considers that, because of the impact of the time constraints imposed on consultation and analysis, this RIS can only be assessed as partially meeting the Quality Assurance criteria. It provides useful and clear analysis of the options for strengthening the regulatory system to better support high quality teacher training. The potential impacts, risks, and limitations of the proposed approach are well illustrated.	

Section 1: Diagnosing the policy problem

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

There is high variability, inequity and unacceptable levels of student achievement between and within schools in New Zealand

1. The New Zealand education system faces many challenges. Delivering variable and inequitable outcomes for learners is one of them. Achievement varies widely across the country and the most significant differences in educational outcomes occur within schools rather than between them. Inequity remains a persistent issue, particularly for students from Māori, Pacific,¹ and low socioeconomic backgrounds,² and these students continue to face systemic barriers that limit their opportunities. Unacceptably high numbers of New Zealand students leave school without the skills or qualifications needed for further education, training or employment, limiting their future opportunities and reinforcing wider social inequalities.³
2. Declining attendance is both a symptom and cause of declining achievement. While external factors play a role, what happens in classrooms (i.e., how engaging, relevant, and supportive learning is) directly affects whether students choose to come to school.⁴ Alongside this, national and international evidence points to a long-term decline in core areas of student achievement like literacy⁵ and numeracy⁶ particularly during the teenage years. A lack of both basic literacy and numeracy will inhibit the next generation's ability to actively participate in the world around them. This includes their ability to earn a good income which in turn diminishes their quality of life and their contribution to New Zealand's economy. Without meaningful changes to the factors shaping students' experiences of learning, these patterns are unlikely to improve.

Teaching quality drives student success and workforce regulation (currently held by the Teaching Council) is a key lever for that

3. We know that differences between teachers and classes are a significant driver of the variance in student performance.⁷ There is strong public interest in regulating the education workforce so that teachers have the attributes, skills and knowledge required to deliver

¹ [NCEA-Annual-Report-2022.pdf \(nzqa.govt.nz\)](#)

² [PISA 2022 Results: Factsheets New Zealand | OECD](#)

³ [School leavers with NCEA Level 2 or above | Education Counts](#)

⁴ [Attendance: Getting Back to School | ERO 2023](#)

⁵ [Reading literacy achievement: senior secondary school | Education Counts.](#)

⁶ One out of every five 15 year olds did not have the numeracy capability required to enable them to participate actively in life situations that require mathematical skills. [Mathematics literacy achievement: senior secondary schooling | Education Counts](#)

⁷ 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 \(BES\) | Education Counts](#)

excellent student outcomes and keep students safe from harm. Educational workforce quality supports a strong New Zealand society and economy.⁸

4. Teacher workforce regulation has been a contentious area for the best part of a century.⁹ Through the Teaching Council, we currently operate a mixed model of regulation. The Council is profession-led, with some levers for Government influence to reflect the substantial government and public interest in education workforce regulation. Teacher workforce regulation in New Zealand is mostly profession-led because it was hoped that more teacher voice in the professional body would lead to improved teaching practice and teaching status.¹⁰
5. When workforce regulation is done right, it acts as a powerful lever to assure quality workforce outcomes, by setting clear expectations for who can enter the profession and how they must continue to meet standards over time. It ensures that only individuals who meet specific standards are allowed to begin and continue practicing.
6. This begins with standards for teacher education, which ensure that all entrants to the profession meet a baseline of knowledge and capability and are able to meet the Standards for the Teaching Profession, with appropriate support. Once certificated, professionals must maintain their practising certificates, which may involve ongoing professional development or compliance checks, and being certified by their school professional leader as continuing to meet the Teaching Standards. Regulation also includes a code of conduct, which defines expected professional behaviour, and a disciplinary process that can be triggered when those standards are not met, as well as processes for dealing with concerns related to a teacher's ongoing competence.¹¹
7. The Government sets the legislative framework that establishes the Teaching Council as an Independent Statutory Entity, and its purpose "to ensure safe and high-quality leadership, teaching and learning in early childhood education and schooling through raising the status of the profession."¹² To achieve this purpose, the Teaching Council's functions have grown from its original mandate of teacher registration to also include:
 - a. Setting standards for the profession (including professional development requirements).
 - b. Setting standards for qualifications (ITE standards).
 - c. Approving ITE qualifications.

⁸ Office circular (99) 6: Policy Framework for Occupational Regulation

www.dpmc.govt.nz/publications/co-99-6-policy-framework-occupational-regulation.

⁹ Alcorn. N (2019). Between the profession and the state: A history of the Education Council of Aotearoa New Zealand.

¹⁰ Winter, Baker, Aitken and Morris (2012). *Review of the New Zealand Teachers Council. A Teaching profession for the 21st Century*.

¹¹ The Teaching Council has responsibility for setting

- a. Standards for ongoing practice - s 479(j)(i) [Currently Ngā Paerewa | Standards for the Teaching Profession]
- b. Code of conduct for teachers – s 479(k) [Currently Ngā Tikanga Matatika | Code of Professional Responsibility]
- c. Standards for qualifications that lead to teacher registration – s 479(g) [Currently the ITE Programme Requirements Policy]
- d. Criteria for teacher registration – s 479(e) and criteria for issuing practising certificates s 479(j)(ii) [Currently the Registration and Certification Policy]

¹² Section 478 of the Education and Training Act 2020

- d. Quality assurance and ongoing monitoring of ITE.¹³
 - e. Setting conduct and competence requirements (code of conduct or ethics).
 - f. Discipline, conduct, competence.
 - g. Professional leadership, advocacy, developing best practice and research.
 - h. Supporting development of education leaders.¹⁴
8. Each of these functions are important in our education system. When these functions are performed well, teaching practices are of consistent high quality, we have confidence that all teachers have the expected skills, knowledge and attributes to practice effectively and deliver good outcomes for learners, robust teacher education quality assurance tells us when programmes are adequately preparing graduates for the classroom and when they are not, and appropriate action is taken where needed based off this monitoring. When these functions are not performed well the opposite becomes true.
9. The Teaching Council is comprised of 13 members, 7 of which are elected by the profession and 6 of which are appointed by the Minister of Education. The Minister also appoints the Chair and Deputy Chair. Voter turnout has been low in recent elections (8% in 2022 and 9% in 2025).
10. Although the Teaching Council has previously been funded by the profession through registration and certification fees, the government has paid teacher fees as part of the 2022 collective agreement, and has recently committed further funding to cover fees through to 2028.¹⁵
11. The work of the Teaching Council's board is shaped by consultation with teachers and the education sector more broadly. Consultation with the Minister of Education is required before any changes are made to ITE standards and registration criteria. The Education and Training Amendment Bill (No. 2), currently before Select Committee, will add a requirement for the Minister to be consulted before any changes are made to the Standards for the Teaching profession, or before the issuing of any practicing certificates of different kinds.
12. The Minister can request independent reports of Teaching Council functions, require a financial statement or other information related to the performance of its functions, and issue Statements of Government Policy (SoGPs) that the Teaching Council must have regard to.

There is already work underway to strengthen the impact of the Teaching Council within the government's wider education system work programme to improve student outcomes

13. There is already non-regulatory work underway to address some of the challenges arising from the current workforce regulation model. This includes:

¹³ The Council has responsibility for creating standards for teacher education programmes and a function under s 479 (i) "to conduct, in conjunction with quality assurance agencies, approvals of teacher education programmes." NZQA and the University Vice-Chancellor's Committee (delegated to the Community on University Academic Preparation) are the quality assurance agencies, with cross-tertiary responsibility for assuring that qualifications meet expected domestic and international academic standards. The Teaching Council's quality assurance process instead assures that teacher education programmes meet the standards for teacher education, which prepare a trainee to be able to meet the teaching standards, with support.

¹⁴ Note that a complete and more detailed list of powers and functions can be found in Section 479 of the Education and Training Act 2020.

¹⁵ [Backing teachers: Teacher registrations funded | Beehive.govt.nz](https://www.beehive.govt.nz/backing-teachers-teacher-registrations-funded)

- a. Issuing the Teaching Council with a SoGP, which outlined the Government's policy positions with regard to the Teaching Standards.
 - b. Working with the Teaching Council to strengthen ITE by raising entry requirements and progressing changes to the ITE programme approval and monitoring requirements to better reflect curriculum priorities.
14. These changes will improve alignment between the standards that shape teacher education programmes and ongoing teacher practice and Government priorities to improve consistency and quality of teaching. However, while the Council is required to have regard to Government priorities and statements of Government policy, there is no guarantee how they will respond and take into account priorities.
15. Large changes have also recently been made to the New Zealand curriculum by:
- a. Implementing a full curriculum refresh so that the curriculum is clear, knowledge rich and sets specific expectations about what students need to have learned and when.
 - b. Introducing standardised tools and processes for assessment and reporting of student learning.
 - c. Providing support for teachers and education leaders to enable them to deliver the new curriculum effectively.
16. Curriculum changes will affect teaching practice, as teachers aim to be responsive to the new demands that curriculum makes on them. They will also impact on the teaching standards and standards for teacher education (and their associated quality assurance processes), which require trainees to be equipped to deliver the curriculum.
17. However, this alone will likely not be enough to improve outcomes. Since teaching quality has a significant impact on student achievement, the regulations governing the education workforce must be robust. This includes making sure that our settings are strong so that we can be confident that the different processes to assess and assure teacher quality are well aligned with each other, despite the interaction between the Teaching Council and government roles.

What is the policy problem or opportunity?

Our system leaves too much to chance in relation to quality teaching

18. We value a system that creates excellent and equitable student outcomes, where high quality learning will enable students to fully participate in New Zealand's society and economy. There is a high risk of harm to student outcomes through poor quality teaching. Therefore, there is high public interest, and a proportionate role for government, in teaching quality and teaching workforce regulation.
19. The current regulatory model is ineffective, and the public interest is not being met. Teacher training outcomes have been a long-standing area of concern for schools employing new teachers who believe that many new teachers enter the workforce underprepared and

lacking confidence in critical areas.¹⁶ We have limited visibility of the quality of teaching delivered by already practicing teachers, and few levers for government to regulate teaching practice.

20. The appropriateness of a profession-led regulatory model operates on the underlying assumption that the profession can set appropriate standards and hold themselves to account for quality. This assumes the profession is sufficiently esteemed to recruit high quality new teachers (including through levels of remuneration and working conditions), deliver high quality training and preparation for new and beginning teachers, maintains universally high levels of teaching and leadership capability, and is fully committed to exiting non-performers.
21. Unfortunately, these assumptions are not being met. Teaching and leadership capabilities are variable. Under our current regulatory model, there is a risk of perverse incentives and unhealthy tensions, including the profession failing to exit non-performers who are part of their membership, especially where this would amplify teaching shortages.
22. Key problems with functions currently held by the Teaching Council include:
 - a. High-level and unaligned standard setting: teaching education standards and the professional code and standards set by the Teaching Council are comparatively less clear than other jurisdictions about the appropriate skills, knowledge, and attributes required of teachers and do not describe specific acts of teaching that can be directly observed. The standards have limited alignment to broader education priorities and policies which largely sit with the Ministry for Education. The Minister's ability to require alignment is limited because the Teaching Council is an independent statutory entity. The lack of detail in standards undermines the quality of monitoring and assurance processes, as regulatory actors have less certainty in measuring and assessing whether teachers or teacher education programmes meet expectations of quality.
 - b. Quality assurance regulatory powers lack teeth: Quality assurance tools available to the Teaching Council to address issues in teacher education provision are limited as they have no legislated quality assurance role separate to programme approval. They do not have an explicit power permitting them to require information or undertake site visits to perform the on-the-ground monitoring of teacher education programmes in the way that NZQA has powers to do across tertiary provision. With regard to ongoing workforce quality, Teaching Council has no process to assess the ongoing quality of a teacher's practice and relies solely on assessments by professional leaders to justify ongoing certification.

¹⁶ Winter et al (2012). *Review of the New Zealand Teachers Council. A Teaching profession for the 21st Century*
The NZ Initiative (2023). [Who Teaches the Teachers?](#)
Post Primary Teachers Association (2022). Initial Teacher Education: Is it fit for Purpose? AC paper - NCEA
Change Package update
NZEI, [Initial Teacher Education 2040](#) (2022).
Ready, set, teach: How prepared and supported are new teachers? Education Review Office (2024).
Teaching and Learning International Survey of New Zealand, Ministry of Education (2018)
Fit for purpose: Teachers' own learning experiences and lessons about standardisation from the health
sector. NZIER (2024)
Royal Society, Pāngarau Mathematics and Tauanga Statistics in Aotearoa New Zealand (2021) - Drawing on
TIMSS data from 2019

- c. Duplication of functions: Professional leadership, including education research, developing best practice and general advocacy for the profession has been identified in reviews as a crowded field and one where too few opportunities are taken for collective effort. It is also the area where the Teaching Council has historically been criticised for not having a distinctive brand or effective public voice.

There is an opportunity to improve effectiveness of workforce regulation by centralising standard-setting and removing duplicated functions

- 23. Previous decisions that placed workforce standard setting functions with the Teaching Council as an Independent Statutory Entity were linked to reviews that suggested that teaching practice and status in New Zealand would benefit from teachers' participation in an organisation that is the voice and face of the profession with independence from government.¹⁷
- 24. However, we have not seen high buy-in from the teaching profession to the Teaching Council model of regulation, as reflected by low voter turnout in Teaching Council elections. We believe that teacher buy-in and participation could be supported by mechanisms other than Teacher Council ownership of standard setting.
- 25. For good regulatory practice to be taking place, standard setting functions ought to be grouped together to enable more seamless alignment. Standard setting functions should be responsive to government priorities to improve student outcomes, as well as to changing evidence and best practice. This will serve the public interest in improved teaching practice.
- 26. Similarly, approvals and quality assurance functions should also be grouped together to support coherence. Minimising duplication of functions could cause healthier tensions to form within the regulatory system as opposed to confusing and counterproductive ones.

Workforce regulation monitoring functions also need strengthening

- 27. Alongside centralisation, there is an opportunity to strengthen regulatory powers to enable more effective quality assurance of workforce regulatory functions.
- 28. Variability in teacher education provision undermines the quality of teaching and outcomes of children in New Zealand. ERO's Education Evaluation Centre recently published report *'Ready, set, teach: How prepared and supported are new teachers'* (13 May 2024) found variability in the quality of ITE. Twenty-eight percent of new teachers found their ITE ineffective. New teachers' preparedness to teach was dependent on where they studied. Around fifteen percent of new teachers are educated in non-university ITE courses, and these new teachers are twice as likely to report being prepared to teach.
- 29. We consider that an effective teacher training system should set clear and specific standards and have a robust system of programme approval and monitoring, including of graduate outcomes. This could more effectively promote alignment at a national level between training, curriculum and workforce requirements. Powers such as requiring information or undertaking site visits should be held by the monitoring agency in the system.
- 30. Standards need to be more closely linked to expectations of teachers in the workplace, including employers' needs, and to government priorities, particularly in curriculum and

¹⁷ Winter, Baker, Aitken and Morris (2012). Review of the New Zealand Teachers Council. A Teaching profession for the 21st Century.

assessment. Assessment against these standards should be consistently and appropriately applied.

What objectives are sought in relation to the policy problem?

31. The objectives sought are:

- a. **assuring teacher quality and competence** to raise student achievement, protect students from harm and maintain public trust and confidence in the teaching profession.
- b. **improving quality and consistency in teacher education** to ensure all teachers are adequately prepared to teach the curriculum in the relevant school or early childhood education setting.
- c. **supporting alignment** between teaching workforce regulation and broader government education policies and priorities, particularly curriculum goals and workforce requirements to support quality teaching.

32. Workforce regulation needs to balance these objectives against the impact that regulatory barriers can have on teaching supply.

What consultation has been undertaken?

33. In August 2024, we consulted selected targeted stakeholders on Minister Stanford's proposed 'lift and shift' of ITE standard setting and approval functions¹⁸ from the Teaching Council to the Secretary for Education's powers.¹⁹ This proposal would have moved functions related to teacher education standard setting and quality assurance from the Teaching Council to the Ministry of Education. There was strong opposition to the proposal in consultation, and most stakeholders strongly supported the value of the independence of the Teaching Council. Stakeholders said there were risks related to government control of standards, such as frequent disruption and the potential for (real or perceived) politicisation of the standard setting process, and a risk of loss of professional autonomy and esteem from limiting profession-led regulation.

34. On balance, we believe that issues with professional regulation, and the public interest in New Zealand's teachers having the attributes, skills and knowledge to deliver excellent student outcomes outweighs the negative feedback from that consultation, and change is still desirable.

35. The proposal is different to the 'lift and shift' consultation in that it proposes to transfer all standard setting functions to the Ministry, instead of only those related to teacher education.

36. Stakeholders such as the PPTA have long held the view that the Teaching Council should have a narrow set of functions focused on registering and de-registering teachers and investigating misconduct. The proposal aligns to this previous feedback; however these stakeholders have not been consulted on the proposal.

37. There will not be public or targeted pre-consultation on the proposal^{9(2)(f)(iv)}

■ 1) (g-i) of the Education and Training Act 2020

¹⁹ [11-Consultation-on-Initial-Teacher-Education-standard-setting-and-approvals-Aug-2024-v3.pdf](#)

9(2)(f)(iv) which means policy decisions are required in June 2025. People will have an opportunity to submit 9(2)(f)(iv) rough the Select Committee process.

38. We expect that the sector will continue to oppose any proposal that shifts control away from the Teaching Council as a professional body.

Section 2: Assessing options to address the policy problem

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

39. The Ministry has assessed the options based on the following criteria and compared them against the status quo. These criteria have been developed to assess whether the policy solutions will achieve the overall objectives. These objectives include improving the quality of ITE and the teachers it trains and aligning teaching standards with broader government education policies and priorities, whilst minimizing impact to teacher supply.

Criteria	Description
Regulatory best practice	The extent to which the option clarifies roles, strengthens agencies' ability to meet government expectations, aligns with broader roles and responsibilities in the education system, introduces constructive tension between standard-setting and assessment/ quality assurance, and ensures robust oversight across functions.
Effectiveness/ Supports quality of teaching	Enables the system to assure teaching quality, and leads to improved outcomes for students
Implementation	The extent to which the option minimises cost, capability building, and complexity, can be implemented by current operational processes, is durable.
Te Tiriti	Extent to which the option gives effect to Te Tiriti o Waitangi / The Treaty of Waitangi (Te Tiriti) ²⁰

What scope will options be considered within?

Timeframe

9(2)(f)(iv) within which workforce regulation decisions are a priority, must be ready for introduction by 31 October 2025 which means policy decisions are required in June 2025. This has limited the scope of options we have been able to consider.

41. Because we are having to use previous consultation on a smaller but related matter to inform the likely reaction to the outlined policy problem and our options to address it, it is likely that some perspectives within the sector have not been captured. Relying on previous consultation is less robust than consultation on the current proposals, and creates

²⁰ Criterion reflects the Ministry's obligations under section 4(d) of the Education and Training Act 2020.

perception and relationship risks with the sector. However, sector stakeholders, and the public will have an opportunity to submit 9(2)(f)(iv) through the Select Committee process.

Scope of options

42. We have developed options for regulatory change in response to the Minister's preferences for reform to consider how we could create greater alignment between government expectations of teacher quality and the current regulatory framework.
43. As outlined in Section One, non-regulatory changes have already been made to try and address challenges arising from the current workforce regulation model. We define the ability to continue to use these non-regulatory levers as part of the status quo. For these reasons, we have not developed any further non-regulatory options.
44. We have not considered providing the Teaching Council with more funding as an option. While this could address some aspects of the policy problem, e.g. strengthening Teaching Council teacher education quality assurance, it would not address the full scope of the problem including the unaligned standard setting or duplication of functions.
45. We discounted two of our initial options:

Discounted Option A	Discounted Option B
All regulatory functions are moved to the Ministry of Education	A separate ITE qualifications regulator is created
This option was discounted because it wouldn't be aligned with the existing strengths and functions of entities within the system. It also risks tensions between the occupational regulation objectives of the Ministry and the Ministry's wider supportive functions for the sector.	This option was discounted because it diminishes coherence between the standards for teaching practice and teaching education standards, which are designed to require that teacher education graduates can meet the standards for the teaching profession, with support. This lack of coherence could lead to more complexity and potential duplication of work for providers, with associated pushback from the sector.

What options are being considered?

46. In addition to the status quo, we have considered three options. All options separate professional enhancement functions from core regulation functions. Our options are:

Status Quo	All functions that currently sit with the Teaching Council stay with the Teaching Council.
Option One	The Teaching Council retains responsibility for registration and certification and competence and conduct functions and approvals and monitoring of teacher education provision. The Ministry of Education takes responsibility for standard setting functions.
Option Two	The Teaching Council retains responsibility for registration and certification and competence and conduct functions. The Ministry of Education takes responsibility for standard setting functions. The Education Review Office takes responsibility for approvals and monitoring of teacher education.
Option Three	Remove independent Teaching Council and replace with a Crown Agent, which has responsibility for all current Teaching Council functions.

Status Quo: All functions that currently sit with the Teaching Council stay with the Teaching Council

47. Under the status quo, the Teaching Council will continue to hold a broad regulatory mandate by retaining all of its current functions and powers outlined in Section 479 of the Act. This includes standard setting, assurance, and support functions. It will continue to be a mixed model of workforce regulation that is more profession-led than not.

48. The governance arrangements of the Teaching Council will remain the same under the status quo.²¹

Probable level of stakeholder support

49. Previous consultation on lifting and shifting functions away from the Teaching Council was met with a very negative reaction from the sector, including teacher education providers. Because the status quo doesn't shift anything away from the Teaching Council, we anticipate that stakeholders would take a neutral or positive stance towards the status quo option.

50. However, we also anticipate that dissatisfaction towards teaching quality in New Zealand will continue to grow and that current workforce regulation settings will be scrutinised if they are not changed.

²¹ Currently, the Teaching Council comprises of 13 members, 7 of which are elected by the profession and 6 of which are appointed by the Minister of Education. The Minister also appoints the Chair and Deputy Chair.

Option One – Functions are split between a retained Teaching Council and the Ministry of Education

The Ministry of Education takes standard setting and professional enhancement functions

51. Option one shifts the standard settings functions (for the profession and for qualifications) to the Secretary for Education, who will be required to hold targeted consultation on any changes to the standards.
52. Professional enhancement functions will also be moved to the Ministry under option two. This includes professional leadership, professional advocacy, and developing best practice and research, in addition to supporting the development of education leaders.
53. In practice, advocacy for the profession will continue to sit across teacher representative groups. However, the Ministry will play a role in providing direction and enhancing the status of teachers through its role in setting standards and supporting teachers to meet them.

The Teaching Council is retained and keeps all assurance functions

54. Under option one, the Teaching Council will be retained as an independent professional body, although it will be streamlined with fit-for-purpose governance where the Minister of Education will have the majority of board appointments. Instead of 13 members, the board will have 7-9 members, which still allows for three sector representatives.
55. The Teaching Council will continue to hold registration and certification functions. In doing so, it will need to determine the future of the Professional Growth Cycle process versus appraisal. The Teaching Council will continue to have the administrative task of keeping the register of registered teachers and LAT holders.
56. It will also continue to approve teacher education programme qualifications and quality assure and monitor the programmes themselves. This means being responsible for defining the teacher education programme approval and reapproval process, providing tools and guidance to support it, maintaining records of approved programmes and providers, and operationally monitoring the programmes through its established policy, even though this is not a legislated function.
57. Under this option, the Teaching Council's current teacher education programme approval function, set out in s 479 of the Education and Training Act 2020 would be amended to include the following functions:
 - a. the ability to place conditions on new or existing programme approvals and remove approvals;
 - b. monitoring and review of teacher education providers' delivery of approved programmes.
58. Option one would also strengthen the Teaching Council's powers to deliver its existing and expanded approval and monitoring functions by enabling the Teaching Council to require, by written notice, and for the purpose of performing its functions, a teacher education programme provider to provide specified information by a specified date.
59. As part of option one, legislation will state that the revocation of any education institution's programme approval does not affect the registration of a teacher who qualified to practice

on the basis of having a qualification from that institution. This replicates the health practitioners act and avoids any unnecessary angst about the impact of revocations.

60. These changes do not replace the current New Zealand Qualifications Authority (NZQA) or Committee on University Academic Programmes (CUAP) role. NZQA/CUAP will still accredit providers at a general level. The Council will approve programmes and review providers' delivery of those programmes in relation to teacher education specifically. The two functions will operate in a complementary way, as they do now.
61. This option makes no changes to the Teaching Council's current competence and conduct functions.

Probable level of stakeholder support

62. Stakeholders such as the PPTA have long held the view that the Council should have a narrow set of functions focused on registering and de-registering teachers and investigating misconduct. Professional leadership and advocacy is a crowded field and including it in a Council without standard setting would result in a confused identity, taking away its focus on its core functions.
63. However, stakeholders are unlikely to react favourably to the transfer of standard setting functions to the Ministry. Although teachers have shown a variable commitment to their professional body to date, including through elections, there was strong support for the independence of the Teaching Council's teacher education functions expressed in Minister Stanford's 2024 consultation on the Ministry taking responsibility for these functions.
64. We have had to assume that this will be the likely reaction from the sector as we have been unable to consult on this option. However, these assumptions have been informed by 2024 consultation on a smaller but related proposal to shift responsibilities away from the Teaching Council.

Option Two – Functions are split between a retained Teaching Council, the Ministry of Education, and the Education Review Office

The Ministry of Education takes standard setting and professional enhancement functions

65. In option two, the Ministry takes the same functions from the Teaching Council as it does as part of option one. This means the Secretary for Education will take the standard settings functions (for the profession and for qualifications) and will be required to hold targeted consultation on any changes to the standards.
66. As with option one, in option two, the focus of professional standard setting will be on strengthening certification requirements, such as consistent performance metrics and clearer requirements for moving from provisional to full certification, with possible direct support for teachers. For qualification standards, the emphasis will be on alignment with curriculum, assessments, and entry and exit criteria, with the Ministry potentially supporting or funding teacher education providers to meet these standards or providing funding through the TEC for significant shifts.
67. Professional enhancement functions will also move to the Ministry. The Ministry will focus on professional leadership, advocacy, best practice, research, and supporting education leaders. While teacher representative groups will continue to play significant roles in

advocacy, the Ministry will enhance the profession's status by setting standards and helping teachers achieve them.

The Education Review Office takes quality assurance functions

68. Under option two, quality assurance functions are moved from the Teaching Council to ERO and become more clearly defined.
69. Strengthened teacher education programme standards from the Ministry will support ERO's teacher education programme approval function. ERO will develop its own teacher education programme approval, monitoring, and review policy to be clear on its framework and requirements for providers. Powers to remove programme approval will be made clearer, supported by clear operational guidance on interventions and steps that will lead to programme approval revocation.
70. The quality assurance and ongoing monitoring of programmes will become a legislated function and ERO will be given appropriate powers to perform this effectively. ERO's powers will be in line with similar agencies with monitoring and review functions, e.g., access to information and entering premises.
71. In order to support necessary collaboration in the system, ERO will have a function that requires it to share information with the Secretary for Education, to support their system stewardship and management and administration of funding role.

The Teaching Council is retained and keeps registration, certification, and competence and conduct functions

72. The Teaching Council will be retained as part of option two but will have a smaller set of functions than the status quo and option one.
73. The Teaching Council will continue to undertake registration and certification. In doing so, it will need to determine the future of the Professional Growth Cycle process versus appraisal. The Teaching Council will continue to have responsibility for keeping the register of registered teachers and LAT holders.
74. Option two would make no changes to the Teaching Council's current competence and conduct functions. The Council will continue to establish all legislative rules, guidelines, and information for its discipline, compliance, and competence functions, and oversee the operation of the Competency Authority Panel, Complaints Assessment Committee, and Disciplinary Tribunal.

Teaching Council governance will look different

75. Option two changes the Teaching Council's board to a small fit-for-purpose one where the Minister of Education will have the majority of board appointments. Instead of 13 members, the board will have 7-9 members, which still allows for three sector representatives.

Probable level of stakeholder support

76. Stakeholders such as the PPTA have long held the view that the Council should have a narrower set of functions focused on registering and de-registering teachers and investigating misconduct.

77. However, as noted for option one, there is likely to be a reasonable level of sector opposition to the transfer of standard setting functions to the Ministry. The removal of teacher education approval and monitoring functions and transfer of these functions to ERO will likely be seen as further undercutting the status of the Council. Additionally, we expect pushback on shrinking the Teaching Council board because it reduces sector voice and buy-in compared to the status quo.
78. ERO currently has no role in the tertiary sector. We expect that there would be a reasonable degree of concern from some in the sector about ERO taking on assurance roles, given the differences between schooling and tertiary provider roles and expectations. There would likely be a strong view that ERO would need significant capability building, and to develop a deep understanding of the needs and expectations of the sector before taking on any assurance function.
79. We have had to assume that this will be the likely reaction from the sector as we have been unable to consult on this option. However, these assumptions have been informed by 2024 consultation on a smaller but related proposal to shift responsibilities away from the Teaching Council.

Option Three – Remove independent Teaching Council and replace with a Crown Agent

The Teaching Council is streamlined and brought closer to government

80. Option three would change the Teaching Council from its current status as an independent body corporate to being a Crown agent. Doing so means increased accountability to government, as the Teaching Council's performance would then be monitored by the Ministry of Education. The Teaching Council would also be required to give effect to government policy, rather than have regard for it.
81. Under this option, the Teaching Council would keep its standard setting functions and its assurance functions, including registration and certification of teacher practicing certificates, approval and monitoring of teacher education programmes, and maintaining processes for assuring teacher competence and conduct. However, it would still lose its professional enhancement functions to the Ministry.
82. The board's size would be reduced to seven members. The Minister of Education would appoint the board and do away with elected sector representation on the board, but would retain sector representatives received through nomination.

Probable level of stakeholder support

83. There would likely be strong sector pushback to the Teaching Council being moved closer to government and losing its status as an independent professional body. We have had to assume that this will be the likely reaction from the sector as we have been unable to consult on this option. However, these assumptions have been informed by 2024 consultation on a smaller but related proposal to shift responsibilities away from the Teaching Council.

How do the options compare to the status quo/counterfactual?

	Status Quo	Option One – Functions are split between a retained Teaching Council and the Ministry of Education	Option Two - Functions are split between a retained Teaching Council, the Ministry of Education, and the Education Review Office	Option Three - Remove independent Teaching Council and replace with a Crown Agent
Reflects regulatory best practice	0	++ Increases role clarity and healthy tension between functions through separating standard setting and professional enhancement functions from quality assurance functions. Greater government oversight of standards improves coherence between policy objectives and levers for intervention. Shifting standard setting functions to the Ministry will streamline the Teaching Council and means that it will likely be more effective and efficient at delivering its core regulatory functions than it currently can be.²² Updated legislation to strengthen the Teaching Council's functions	++ Increases role clarity and healthy tension through separating standard setting and professional enhancement functions from quality assurance functions. Greater government oversight of standards improves coherence between policy objectives and levers for intervention. Monitoring and approvals processes align with ERO's role for monitoring and assurance in the wider education sector. Monitoring functions are supplemented with explicitly enabled legislative powers to improve assurance delivery. An additional player is introduced into the tertiary quality assurance	+ Increases role clarity through streamlining functions of the occupational regulator and establishing a new structure with a coherent and consistent relationship to government. However, doesn't introduce tension any more than status quo. Does not provide any alignment between teaching quality standards and assurance functions, and the work of other entities in the education system. Teaching quality functions are performed independently of other change that may be happening in the sector, such as curriculum changes, though will act with

²² The Teaching Council's Strategic Plan 2024-2029 is not focused on its core regulatory functions of registration/certification, ITE approval or discipline and compliance.

		and powers will better reflect what it already does operationally. No additional player is introduced into the tertiary quality assurance system, avoiding confusion and duplication.	system, which risks confusion and/or duplication.	awareness of government priorities
Supports quality of teaching	0	++ Substantially improves system ability to meet government's expectations through direct ownership of standard setting. This will lead to standards for teaching practice which align with government understandings of the skills, knowledge and attributes required for quality teaching and teacher education standards which lead trainees towards these expectations. Improved student outcomes should result from teaching standards which are more explicit about what is expected and valued as quality teaching, and from improved consistency of practice to these expectations Improved monitoring and approvals of teacher education will ensure quality and consistency	++ Substantially improves system ability to meet government's expectations through direct ownership of standard setting. This will lead to standards for teaching practice which align with government understandings of the skills, knowledge and attributes required for quality teaching, and teacher education standards which lead trainees towards meeting these expectations. Improved student outcomes should result from teaching standards which are more explicit about what is expected and valued as quality teaching, and from improved consistency of practice to these expectations Improved monitoring and approvals of teacher education will ensure quality and consistency	0 Improves system ability to meet government's expectations, though government does not have direct ownership of standard setting. Government priorities in standard setting and quality assurance may be implemented, with associated benefits for teaching quality, and therefore student outcomes. However, monitoring and quality assurance of ITE lacks robustness due to lack of distinct legal powers; leading to inconsistency in the quality of ITE provision.

		of beginning teachers, improving student outcomes.	of beginning teachers, improving student outcomes.	
Implementation	0	- Splitting functions is costly and complex. Requires significant collaboration between the Teaching Council and the Ministry of Education for effective transition. Capability building will be required in the Ministry to take on standard setting functions. New operating processes will need to be developed to ensure that standard setting is valued within the Ministry and contributes to other Ministry work appropriately. The Teaching Council already holds pre-existing relationships with teacher education providers.	-- Splitting functions is costly and complex. Operationally requires significantly improved information sharing and collaboration to work effectively. Capability building will be required in the Ministry to take on standard setting functions. New operating processes will need to be developed to ensure that standard setting is valued within the Ministry and contributes to other Ministry work appropriately. There is greater capability building and adaptation needed within ERO to take on teacher education approvals and monitoring. There will be a high level of disruption, capability building, and cost associated with transferring functions to ERO. The Teaching Council already holds pre-existing relationships with teacher education providers. These cannot be replicated quickly by ERO.	-- Significant transition required. A Crown entity would need to be enabled legislatively, and then designed and operationalised. It is likely some staff carryover and use of existing processes could support implementation.

Te Tiriti	0 The Teaching Council is not a part of the Crown, but an independent professional body, which therefore has no explicit responsibilities under Te Tiriti. However, 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.	+ The Ministry of Education has a responsibility to give effect to Te Tiriti and a commitment to <i>Ka Hikitia</i> – the Māori Education Plan and <i>Tau Mai te Reo</i> – the Māori Language Education Plan. Giving the Ministry responsibility for standards will place a legislative requirement that standard setting for the education workforce aligns with these responsibilities. The standards the Ministry sets for teacher education programmes and teachers should reflect Treaty/Tiriti responsibilities, including ensuring flexibility for Kaupapa Māori and Māori medium education to deliver for Māori as Māori.	+ The Ministry of Education has a responsibility to give effect to Te Tiriti and a commitment to <i>Ka Hikitia</i> – the Māori Education Plan and <i>Tau Mai te Reo</i> – the Māori Language Education Plan. Giving the Ministry responsibility for standards will place a legislative requirement that standard setting aligns with these responsibilities. The standards it sets for teacher education programmes and teachers will reflect this, including ensuring flexibility for Kaupapa Māori and Māori medium education to deliver for Māori as Māori. ERO is also a government department with responsibilities to Tiriti partnership. Giving ERO responsibility for teacher education monitoring and assurance will require ERO to develop its assurance policies to acknowledge the particular needs of Māori providers.	+ Transforming the Teaching Council into a Crown agency would give the Council an official Tiriti partnership responsibility. Council functions would need to reflect this, with regard to consultation and partnership with Māori on standard setting and quality assurance for the education workforce.
Overall assessment	0	++	+	0

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

Option one best meets our criteria and in doing so best addresses the high variability, inequity and unacceptable levels of student achievement in New Zealand

84. Option one is the preferred option. Under this option:

- a. the Ministry of Education takes standard setting and professional enhancement functions,
- b. the Teaching Council is retained and keeps registration, certification, competence and conduct. Its quality assurance functions are strengthened.

85. Giving the Secretary for Education standard setting functions is a substantial step that will support standards' alignment with government priorities, including in curriculum and assessment, as well as with the latest education research on what works. The sector will continue to be involved, as the Secretary for Education will be required to hold targeted consultation on any changes to professional and teacher education standards. Targeted consultation with the sector will enable standards to incorporate sector knowledge and expertise.

86. This is a good opportunity to strengthen the quality assurance of the teacher education and training system. The Teaching Council already looks beyond programme content and considers provider ability to deliver the programme. This action is taken under the Teaching Council's operational guidelines and not legislation. Expanding the Teaching Council's current teacher education programme approval function in legislation by including the ability to place conditions on new or existing programme approvals, remove approvals, and monitor and review teacher education providers' delivery of approved programmes means that it will be backed by stronger legislative power and no longer need to tread as carefully with providers. The expanded powers available to the Council will support this enhanced assurance.

87. The Council has already been making progress with teacher education providers in developing a stronger framework of programme approval and ongoing monitoring, despite not having a clearly defined legislative mandate to do so. Keeping quality assurance with the Teaching Council means that these existing relationships and capabilities won't go to waste. Additionally, existing progress that has been made will not be lost as it may have been during the legislative process if another agency had taken the function.

88. Keeping registration, certification, and competence and conduct functions with the Teaching Council is a good fit. These are functions that are important to deliver effectively and are the most suited to an arms-length body as they have an impact on individual teachers' livelihoods.

89. Teaching Council governance changes will also support improved teaching quality. It is important to ensure the professional body is well run and can support quality teaching and uphold high standards of the profession, which in turn supports safety and high educational outcomes for learners. Having the right mix of people and skills is an important factor in effective governance.²³ Having 7-9 board members instead of thirteen will allow for a mix of

²³ [Elements of effective governance — Office of the Auditor-General New Zealand](#)

skills and attributes and some flexibility whilst reducing the board's size to better align with the reduced scope of the Teaching Council itself. This number will also mean that the board retains broad sector representation.

90. Students and their families will benefit from the changes under option one because the quality and consistency of teaching will be strengthened across New Zealand. By ensuring that all teachers have the attributes, skills, and knowledge needed to deliver excellent outcomes and keep students safe, this option supports a stronger, more effective education workforce. These improvements will not only enhance student learning but also contribute to a more resilient and prosperous New Zealand society and economy in the future.
91. Although there are risks to proceeding with reform, there are significant opportunity costs from not proceeding, including the ongoing impact on student learning from inconsistent teaching practice. We consider that the following risks can be balanced against the benefits from proceeding with option one:
- a. Stakeholder push-back: Stakeholders are likely to be strongly opposed to any option that shifts control away from the profession and places responsibilities for occupational regulatory functions within government. This was the strong view in our previous consultation on the 'lift and shift.'
 - b. Capability and capacity: As functions are being moved away from the Teaching Council and into the Ministry, significant capability and capacity building will be required. We note that organisational performance, and its leadership, has as much impact on the operation of the regulatory system as where the functions sit or how strong the regulatory framework is.
 - c. Fiscal: There are costs associated with this proposal, and advancing this proposal without budget funding is a risk.
92. Without consulting with the Council, we can't be completely confident that the new functions and powers suggested are the best mix to enable them to deliver their role most effectively. However, we have put these together based on a review of other like-regulators and taking into account previous conversations with the Council about the limitations of their narrow legislative functions in relation to teacher education programmes.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

93. Option One is Minister Stanford's preferred option, as outlined in the Cabinet paper.

What are the marginal costs and benefits of the preferred option in the Cabinet paper?

Affected groups <i>(identify)</i>	Comment <i>nature of cost or benefit (eg, ongoing, one-off), evidence and assumption (eg, compliance rates), risks.</i>	Impact <i>\$m present value where appropriate, for monetised impacts; high, medium or low for non-monetised impacts.</i>	Evidence Certainty <i>High, medium, or low, and explain reasoning in comment column.</i>
Additional costs of the preferred option compared to taking no action			
Regulated groups (Teacher education providers, teachers)	Cost to teacher education providers to adapt to changed standards and approval and monitoring processes. (Monetised, Ongoing – Episodic) Cost to those who interact with teaching standards – school leaders, PLD providers. Potential that standard setting being driven by government results in more frequent change, requiring more adaption. (Monetised, Ongoing – Episodic) Unclear costs to teachers. Dependent on what the review of standards looks like. Potential loss of esteem related to profession with the loss of responsibility for Teaching Council. Potential that raised standards for teacher education will create a barrier, excluding some candidates (Non-monetised, Ongoing)	Teacher education providers: Medium-High Teachers: Medium	Medium. Dependent on what changes are made to standards and approval and monitoring processes.

Regulators (Teaching Council, the Ministry, NZQA, CUAP)	Teaching Council loses functions and funding associated with those functions. Loses standing with the sector. (Monetised and non-monetised, ongoing) Ministry gains new functions, needs to be funded to develop new processes and to deliver them. (Monetised, one-off and ongoing)	Teaching Council: Medium Ministry: \$150,000 (one-off), \$1.5-2.5m per annum (ongoing)	High for non-monetised impacts. Proposal is regulatory. Clear impact on regulators. Medium certainty of monetised impacts, as we have been unable to talk to the Teaching Council to get detailed costings.
Others (Education leaders, schools)	Unclear costs to wider sector. Dependent on what the review of standards looks like. Potential loss of esteem related to profession with the loss of responsibility for Teaching Council. (Non-monetised, Ongoing)	Likely medium.	Medium. Dependent on what changes are made to standards and approval processes.
Total monetised costs		\$0.3m (one-off) for Ministry implementation \$1-5- 2.5m per annum (ongoing) for standard setting function.²⁴	
Non-monetised costs		<i>Medium</i>	

²⁴ Currently covered by the commitment to fund teachers' Teaching Council fees. In future, the government could discontinue this commitment, but would need to continue funding standard-setting, which is now a core government function.

Additional benefits of the preferred option compared to taking no action			
Regulated groups (Teacher education programmes, teachers)	Approved providers of teacher education will be more trusted due to increased assurance of quality. (Non-monetised, Ongoing) Teacher education trainees can expect consistently high standards between teacher education providers that will support them to have the attributes, skills, and knowledge needed to deliver excellent outcomes and keep students safe, raising the esteem of the profession. (Non-monetised, Ongoing) The sector benefits from clearer guidance on the expectations for quality teaching to guide consistent practice. Schools benefit from receiving a more consistent standard of graduate teachers, who are assured to have a consistent level of quality. This leads to less need for intensive support and mentoring for graduate teachers (Non-monetised, ongoing)	Providers: Medium Teacher trainees: High Teachers, schools and wider sector: High	Medium. Increased clarity and consistency of standards and monitoring across system will support improved quality and consistency of expectations and outcomes. However, the impact of these changes will be mediated through the acts of teachers, school leaders and teacher educators in response to the changes, and any improvements will likely take time to be observable.
Regulators (Teaching Council, the Ministry, NZQA, CUAP)	The Teaching Council will be able to better focus and strengthen its remaining core functions. The Ministry (and Minister) has increased	Ministry: Medium For the most part, regulators are taking on new functions not	Medium. True benefits to regulators will only be measurable once functions have shifted to

	influence in workforce regulation to shape a higher quality teaching profession. Holding standard setting functions increases system alignment.	to benefit themselves, but regulated parties and the public.	their new agencies.
Others (Education leaders, schools, students, whānau)	The wider community benefits from improved student outcomes from more consistent and higher quality teaching practice, with associated improved societal outcomes. Education leaders and schools will feel confident that teachers, both new and established, will have the skills, knowledge and attributes they expect them to have to do their job well. (Ongoing)	Wider community: High Education leaders and schools: High	Medium We expect that improved standards and regulatory processes will lead to improved teaching quality; however regulation will need to be paired with larger system capability building to improve the quality and consistency of teaching
Total monetised benefits	Estimated savings from reduced functions of Teaching Council.	\$2.5m (ongoing)	
Non-monetised benefits		<i>Medium-high</i>	

There will be both one-off and ongoing costs from shifting functions to the Ministry, but no costs from strengthening the Teaching Council's remaining functions

94. We know from Teaching Council estimates that the current cost of the standard setting functions, as funded by fees and levies directly, is \$2.5m per annum. This reflects the base level of capacity required to undertake continuous engagement with the sector to ensure the standards are understood and applied to the highest quality, as well as to keep abreast of issues and developing evidence to plan for reviews and changes to standards. While there could be efficiencies in the operation of this function once in the Ministry, we estimate this to be the upper cost and will further explore it with the Council. The Teaching Council also allocates \$0.75m per annum to its role in professional enhancement, however we have not

included this in the cost picked up by the Ministry because we consider it can be delivered by other mechanisms within the Ministry within baselines.

95. There will also be one-off transitional costs. We estimate that the Ministry will face around \$300,000 for one-off transition costs e.g. new-staff set-up, website changes, information releases etc. We have not built in any additional cost for other back-end functions such as IT platforms as we are assuming existing Ministry systems will be utilised.
96. We anticipate the Teaching Council will have some transition costs, most of these associated with redundancy costs. The Teaching Council's website indicates there are around 100 staff, but we do not know the likely number who could be made redundant through this process with enough certainty to provide a cost estimate at this time.
97. The assurance functions we are defining in legislation are already outlined in the Teaching Council's operational policies. The Teaching Council may increase its efforts with stronger legislative backing, or in response to stronger and clearer standards. However, the Teaching Council has an existing system of cost recovery with teacher education providers that it can draw on. There may be some flow through to increased fees and levies for teachers, but we expect these costs will be offset by other savings to the Council from a streamlined role in other areas and smaller governance. Overall, we expect the strengthening of assurance functions to be largely fiscally neutral.

There could be savings and offsets

98. The operating costs of the Teaching Council will be reduced through its reduced span of functions, reduced board size and potential reduced remuneration of the board. We estimate that the retained functions the Teaching Council will make up around 82% of the current fees and levies contribution to operating cost (\$15.7m total or up to \$3.5m in savings), though we don't yet have an indication of the board cost savings or transition costs noted above.

Section 3: Delivering an option

How will the proposal be implemented?

Standard setting is a high priority and will shift to the Ministry as soon as possible

99. The Ministry will take on standard setting functions upon commencement of the Bill, expected to be in June-July 2026.
100. To ensure there is no adverse impact on current or future teachers, the legislation will state that all current standards and criteria set by the Teaching Council will remain in effect until such time that they are amended by the Secretary for Education.
101. We are aware that standard setting is of high priority for the Minister and therefore anticipate initiating a rapid consultation process to inform new standards that can be in place by the end of 2026, in preparation for the 2027 academic year.
102. If we instead rely on the Teaching Council's current review of the Teaching Standards, we anticipate that all other standards and criteria will not need a full-scale review or any major amendments within the short-term (and could fall into any regular review cycle that the Minister opts for).

Changes will be made to the Teaching Council's assurance functions and governance model

103. The Teaching Council will continue to hold registration and certification, competence, and conduct functions. These will look the same as they currently do, although the Teaching Council will need to determine the future of the Professional Growth Cycle process to satisfy itself that a teacher meets the standards and requirements set by the Ministry.
104. The Teaching Council will also continue to hold assurance functions, but these will be strengthened through the expanded scope of the Council's monitoring and approvals functions and powers upon commencement of the Bill.
105. A new Council will need to be reappointed to reflect the reduced size and new composition of majority of ministerially appointed members and three elected members. The Council appointed in July 2025 will continue to serve until a new Council is appointed. We expect the new appointments process this to take approximately 6 months.
106. We acknowledge that these implementation timeframes are compressed and present risks. Capacity building within the Ministry will need to ensure that the knowledge, systems and personnel required for new structures are proactively identified and acquired.

How will the proposal be monitored, evaluated, and reviewed?

107. The Minister has agreed to institute a schedule of regular review for the Secretary of Education's standard setting powers. This will provide assurance that the standards for teaching practice, code of conduct, standards for teaching education and registration and certification policies are updated to meet developing evidence regarding teaching quality, adjust to changes in the sector (e.g. curriculum changes), and continue to meet expectations in measuring and assuring that teachers have the knowledge, skills and attributes to practice effectively. This review also provides a feedback mechanism to assess how the standard setting process has been influenced by the shift in standards setting responsibility from the Teaching Council to the Secretary for Education.
108. Review will be coordinated with targeted sector consultation on any proposals to add, vary or delete standards, to ensure that sector voice influences the standards review process and informs decisionmakers about the implementation implications of any change.
109. The impact of these regulatory changes on student achievement is not likely to be observable in the near term. Student outcomes will continue to be measured through existing domestic and international measures, which will provide, over a period of time, the ability to assess improvements in teaching quality, as the most significant in-school driver of student achievement.