



Consultation on:

- **draft year 0-10 learning areas of the New Zealand Curriculum and framework**
- **draft year 0-10 wāhanga ako of Te Marautanga o Aotearoa and framework**

To: The Ministry of Education

Introduction

1. NZEI Te Riu Roa is the professional organisation and union that represents the interests and issues of its nearly 49,000 members. Our members are employed as teachers and leaders in the early childhood education (ECE) and primary sectors (including Kura Kaupapa Māori and Wharekura), support staff in the early childhood, primary, intermediate, and secondary education sectors, school advisers employed by universities, and Learning Support staff employed by the Ministry of Education.
2. The main objective of NZEI Te Riu Roa is to advance the cause of quality public education generally while upholding and maintaining the just claims of its members individually and collectively. NZEI Te Riu Roa is a values-led, Te Tiriti o Waitangi-based organisation. This means that in all areas of work mokopuna Māori are considered first. We call this Mōku te Ao.
3. NZEI Te Riu Roa is one of the largest unions and professional bodies in Aotearoa and has a long history of playing a positive role in the education sector and on wider social issues affecting our members and the tamariki and whānau they serve.

NZEI Te Riu Roa calls for the withdrawal of the current drafts and for a genuine co-design process to be established with the education sector

4. NZEI Te Riu Roa does not support Te Mātaiaho framework, Te Anga o Te Marautanga o Aotearoa, nor the year 0-10 draft learning areas for The New Zealand curriculum (NZC) or the draft wāhanga ako year 0-10 for Te Marautanga o Aotearoa (TMOA) as they currently stand.

5. While we accept that the newly mandated English, Mathematics and Statistics learning areas and Te Reo Rangatira and Pāngarau wāhanga ako are now gazetted, we contend that the drafts of the other learning areas and wāhanga ako currently under consideration are fundamentally flawed and that halting their implementation and embarking on a truly Tiriti led engagement process with the education sector, will prevent further damage to kaiako, tamariki and our public education system.
6. The drafts represent a profound narrowing of curriculum scope, while their content load has increased to unworkable levels. We are deeply concerned at the number of basic errors throughout the learning areas and wāhanga ako as identified by subject matter experts and subject associations, demonstrating a rushed process which they have been excluded from.
7. We are alarmed that much of TMOA content is a translation of NZC, amounting to recolonisation. The privileging of western knowledge in both documents, manifest in the concepts of the science of learning and a 'knowledge-rich curriculum' is nothing short of epistemic violence.
8. We assert that the drafts are so far removed from the needs of ākongā and the values of our education system that they are not fit for purpose. We believe any continued work on them in their current form would be a misuse of our members' time and expertise.
9. NZEI Te Riu Roa is, however, committed to supporting the development of te Tiriti o Waitangi based, professionally led, child centric curricula for Aotearoa New Zealand. We are ready and willing to work together with our sector and the Ministry of Education to complete our two curricula that comprise the National Curriculum.
10. This submission does not attempt to provide detailed suggestions to correct the structure or content of the curricula as they currently stand. Rather, it presents our position on curriculum, our deep concerns for te Tiriti o Waitangi, some illustrative criticisms of the drafts and the writing and engagement processes, as well as our suggested remedies.

NZEI Te Riu Roa position statement on curriculum

11. NZEI Te Riu Roa hold that under te Tiriti o Waitangi we have an obligation and responsibility to operationalise a system that recognises and uplifts Māori people and their identity. A system based on rangatiratanga centres children with rights to control their own aspirations and destiny and would work for all children through values of mutual benefit to society. We hold that National curricula are an essential means through which our education system gives effect to te Tiriti o Waitangi.
12. Curriculum should enable all tamariki to access the knowledge, skills and experiences that are important to their whānau, iwi, hapū, local communities and Aotearoa New Zealand as a whole. Curriculum should be inclusive from the outset and provide tamariki with access to a broad range of ways of thinking, understanding, and experiencing the world. They should therefore provide for learning about social issues, subjects, and events, which expand on the experiences tamariki have in their homes and communities.
13. While set at a national level, kaiako, school leaders and the community must be enabled and encouraged to localise the curriculum to meet the specific needs of the tamariki at each school, and indeed the aspirations they and their whānau hold for themselves.
14. Curriculum development and consultation must be grounded in transparency of process and decision-making, collaboration and engagement with the teaching professions, subject experts, iwi, hāpū and whānau, and must be built on a foundation of Tiriti partnership, trust and respect for professional knowledge and evidence-based practice.¹
15. NZEI Te Riu Roa strongly feel that the above values are not reflected in the current national curriculum re-writes resulting in curricula that do not give effect to te Tiriti o Waitangi, disadvantage tamariki, ākongā Māori in particular, ignore the rich cultural tapestry and mātauranga of Aotearoa New Zealand, and create unreasonable and unworkable conditions for NZEI Te Riu Roa members and ultimately all workers in the education sector.

¹ This point is inspired by the statement of He Rau Ringa <https://www.bayscience.nz/post/he-rau-ringa-open-letter-joint-subject-associations>

Pace of curriculum change – Impact on NZEI Te Riu Roa members

16. There are significant risk factors that come with hastily implemented curriculum change. First, changes add significant pressure on top of already overloaded teacher workloads² this risks teacher burnout³, which has flow on effects to teacher recruitment and retention⁴.
17. It is well-documented that during term time, most full-time primary teachers work around 50 hours per week, which has been evidenced consistently for more than 20 years. Research also indicates they work approximately 20 hours per week during term breaks. The Primary Teachers Collective Agreement says teachers shouldn't regularly work more than 40 hours per week but should do what is required. This curriculum change programme asks even more of our members without adequate support or remuneration that reflects the additional workload.
18. Research into why education reforms fail shows that the expectation for schools and school systems to change rapidly, often due to strong political imperatives, is a key reason why school reform policies are ineffective. NZEI Te Riu Roa believes that this current curriculum reform programme is expecting rapid change for immediate gain and that this has resulted in timeframes that are far shorter than necessary for deep sustainable change.
19. We believe if the current demands on teachers are not halted or slowed down, and recognised and supported at whatever pace, we risk driving people away from the profession and, ultimately, we risk an ineffectual, partially implemented programme of curriculum reform.

² Addison, R., & Brundrett, M. (2008). Motivation and demotivation of teachers in primary schools: The challenge of change. *Education 3-13, 36*, 79–94.

³ Byrne, B. M. (1991). Burnout: Investigating the impact of background variables for elementary, intermediate, secondary and university educators. *Teaching and Teacher Education, 7*, 197–209.

⁴ Barmby, P. (2006). Improving teacher recruitment and retention: The importance of workload and pupil behaviour. *Educational Research, 48*(3), 247–265.

Upholding Te Tiriti o Waitangi

20. NZEI Te Riu Roa believes the drafts under consultation breach te Tiriti o Waitangi in both the process of their development and their resulting form.
21. The Ministry of Education must take positive steps to achieve equitable educational outcomes for tamariki Māori. We believe these curriculum documents risk reversing decades of evidence, understood by our members through daily practice, which have established that ākonga Māori are most engaged and achieve better outcomes when they see themselves reflected in their learning environment.
22. Active protection - At the curriculum level, the active protection obligation requires the Ministry of Education to enable Te Marautanga o Aotearoa (TMoA) to be genuinely indigenous in its architecture and for the NZC to be a bicultural curriculum. NZEI Te Riu Roa is alarmed at the fundamental changes made to Te Mātaiaho and the removal of the Tīrewa model as the structural basis for TMoA.
23. The curricula now standardise knowledge in ways that exclude iwi-specific mātauranga at the planning level and create a structural impossibility for kaiako to integrate te reo and tikanga within the prescribed timetable, working against equitable outcomes for ākonga Māori. This can be exemplified by the 60-minute daily mandate for mathematics and English in the NZC which requires any teaching and learning session that borrows time from those subjects to integrate explicit literacy or numeracy within the same lesson, making it structurally impossible to also integrate te reo and tikanga effectively at the same time. Furthermore, tikanga appears in the NZC as isolated facts (for example, tapu mentioned within Health) rather than as a cohesive, integrated worldview.
24. Partnership – The Ministry of Education is obligated to act reasonably, honourably and in good faith toward Māori as Treaty partners. We emphasise that these curricula have been developed with reduced Māori collaboration, engagement and consultation which has been acknowledged by the Ministry of Education⁵. This means that in TMoA, Māori knowledge is now organised within western structures rather than Māori knowledge organising the

⁵ Cleaver, Pauline, Brief of Evidence, WAI 3553, March 2026.

curriculum itself. And for the NZC, Māori knowledge is not represented in partnership with western knowledge in either its structure or content, rather it is positioned as an add on.

25. Tino rangatiratanga - The Ministry of Education must recognise and give effect to the right of iwi to exercise authority over the education of their tamariki. Our members work every day in schools and kura that carry the responsibility of educating uri whakatupu of those iwi. Their professional obligations, including under the Teaching Council's Code of Professional Responsibility, require them to demonstrate a commitment to tangata whenua and te Tiriti partnership in the learning environment.
26. The knowledge-rich curriculum re-writes, developed without meaningful Māori partnership, removes the ability of kaiako to give effect to tino rangatiratanga in their classrooms: it prescribes content that is not grounded in te ao Māori, makes te reo Māori optional, and reduces tikanga to isolated facts rather than an integrated worldview. The curriculum is the primary tool through which kaiako give effect to rangatiratanga in practice. When that tool is designed without iwi, it cannot serve iwi.

Sector engagement, writing and consultation processes and implementation

27. The current process taken for curriculum development has not met the expectations of the sector in terms of engagement, consultation and co-design. Therefore, it has ignored the fulsome wisdom and input of young people, education experts including teachers, principals and subject specialists and iwi, hapū and whānau. We contend these processes have been driven by the narrow ideological interests of a small group.
28. We have identified the following specific issues with the process to date:
 - a) There has been no dedicated engagement with subject associations regarding each learning area or wāhanga ako or with many of the subject matter experts, as expected by the sector.
 - b) The government has operated outside of its own processes as with the appointment of Professor Elizabeth Rata to the English learning area writing group and enabling her to select other members of the group.
 - c) No specific engagement or consultation with Māori, as outlined above.

- d) The lack of transparency throughout the process exemplified by using non-disclosure agreements which have prevented contributing individuals from representing their professional groups and providing the best feedback and advice possible.
- e) The apparent absence of consultation with young people.

29. Over the course of the refresh of the NZC and the redesign of TMoA under the previous government and the curriculum rewrites under the current government, we have submitted in good faith on several rounds of consultation as an organisation. We have also encouraged and supported our members to submit individually and in representing their various professional groups. We share in the growing frustration across the education sector that our feedback is being ignored. We remain committed to contributing to the National Curriculum, but for our participation to be worthwhile, we need confidence that the processes will change.

30. The Ministry of Education has acknowledged that the consultation period for TMoA is shorter than that for the NZC. TMoA is not a subsidiary document. Together the NZC and TMoA form the National Curriculum. TMoA is the curriculum through which Māori-medium tamariki encounter national education: in te reo Māori, through te ao Māori, reflecting the mana of the iwi those tamariki belong to. Giving its communities half the time to engage with proposed changes to it does not reflect active protection of te Tiriti o Waitangi and greatly disadvantage both the educators using TMoA and the tamariki who learn through it.

31. The last-minute release of the final wāhanga ako, Pūmanawa Tangata, on April 2, 2026, which contains Te Mātai Whakamuri, leaves only 2 months for feedback where Social Science in the NZC had 6 months. We are greatly concerned that those submitting may not be aware it is now available for consultation or may have already submitted their feedback. Given the importance of histories to Aotearoa New Zealand and the significance of introducing mandatory teaching of histories in 2022, this timeframe is completely unacceptable to NZEI Te Riu Roa.

Position on the NZC and TMoA frameworks, structure and content

The New Zealand Curriculum framework

32. The education sector widely accepted Te Mātaiaho 2023 because it was developed with the sector. It was co-designed with educators, Māori and communities to honour te Tiriti o Waitangi and to centre the well-being and identities of all ākonga. We believe the retention of the same name with the current framework to be misleading as it has been rewritten without the sector and without explicit consultation with Māori. The original Te Mātaiaho sought to broaden our view of what educational success looks in a bicultural nation whereas the 2025 draft prioritises western, euro-centric structures, concepts, and epistemologies as well as instructional uniformity and compliance. This is an entirely unacceptable regression of the years of progress the sector had made towards a bicultural National New Zealand Curriculum.
33. We believe this Te Mātaiaho to be so fundamentally changed, and that without assurance that the changes were approved by Dr Ngata and in the absence of any clear collaboration and consultation with the sector and Māori, that the framework cannot legitimately continue to carry the name. We note with great disappointment that the curriculum title has changed from 'Te Mātaiaho: The New Zealand Curriculum' to 'The New Zealand Curriculum: Te Mātaiaho' which is entirely unnecessary.

Te Anga o Te Marautanga o Aotearoa

34. NZEI Te Riu Roa acknowledges TMoA's significance as a national Māori-medium curriculum and its decades-long structural constraint of having to mirror the English-medium NZC. We were supportive of the distinctly indigenous Tīrewa model and Te Tamaiti Hei Raukura framework, developed after structured consultation with hundreds of Māori through multiple avenues over the course of several years.
35. We are now distressed at the near wholesale removal of the Tīrewa model. It is outrageous, and we believe a breach of te Tiriti o Waitangi, that the design of TMoA once again, simply mirrors that of the NZC. While conceptual elements of the Tīrewa model are found throughout the new draft TMoA framework, through the use of particular kupu, the structure

is the same as NZC. The draft TMoA is no longer a distinctly indigenous curriculum from within te ao Māori for tamariki Māori.

36. The decision to develop and adopt Te Tīrewa was based on years of research by academics, educators and Māori curriculum experts, and informed by the views of thousands of members of the public, including iwi, hapū and whānau. Whereas no publicly released information explains the why and how of the decision to remove Te Tīrewa.
37. The decision to apply the Minister's design principles from the NZC to TMoA appears to have come only from the Minister of Education and the Ministerial Advisory Group appointed by her. We have not seen any evidence that applying these design principles to TMoA and dropping Te Tīrewa as the framework and model, and indeed the name of the curriculum, was consulted on at all, or that this radical shift in direction has the support of those who were initially consulted, prior to and during the initial redesign work.

Structure, content and pedagogy of NZC and TMoA

38. We reiterate our position on the science of learning as an underpinning principle of these curriculum rewrites, as set out in our previous submissions on the Mathematics and Statistics learning area and the English learning area of the NZC.
39. We noted our concern at the inclusion of the science of learning as the prescribed pedagogical approach into the body of the learning areas, as well as details of how to spend approximately 1hr a day on reading, writing and Mathematics and Statistics. We stand by our contention that this approach will limit, not deepen, teaching and learning.
40. We repeat that 'the science of learning' is not a clearly defined field, despite it being presented in a matter of fact and seemingly straightforward way in these documents and in communications with the sector. In a 2023 review, Privitera et al. found 43 unique definitions of 'the science of learning', within which considerable definitional and academic differences existed.⁶

⁶ A.J. Privitera, S.H.S. Ng, S.H.A. Chen, 'Defining the Science of Learning: A scoping review', *Trends in Neuroscience and Education*, Volume 32, 2023.

41. We also reiterate our comments regarding the shift from teaching in levels to teaching by year groups. Our members have explained the success of teaching in the current curriculum levels and were generally positive about the initial shift to teaching in phases set out in the Te Mātaiaho 2023. This would have acknowledged and accommodated for the varying rates of learning and the breadth of diversity in child development.
42. Importantly, teaching in curriculum levels or phases allows for diverse organisation of children in and across classrooms. The rationale for the placement of children into classrooms or learning spaces is unique to every school and kura and reflects the nature of their community and the make-up of the school roll at any given time. Arrangements include junior, middle, and senior groupings, composite classes of two-to-four-year groups, single classroom area schools, vertical year groupings, and developmental and cultural groupings as found in special character schools or kura kaupapa Māori.
43. These arrangements mean that a teacher can be managing the learning of students whose skill and abilities range up from 1 to 8 academic years. Members have raised pressing concerns about how rural teachers are expected to teach this curriculum in cases of small one or two staff schools, where all ākonga are in one classroom.
44. NZEI Te Riu Roa members are very concerned about how they are going to manage the shift to teaching according to year groups across the curriculum. They are concerned there won't be room for flexibility to adapt the teaching programme and the timing to cater for ākonga who need longer on certain concepts or extension of ākonga who already understand concepts. Some teachers are already reporting increased workload and stress levels for both themselves and ākonga due to year-by-year teaching demands and classroom arrangements.
45. A one-size fits 'knowledge-rich' curriculum 'grounded in the science of learning' ignores the diversity of Aotearoa New Zealand and does not include the excellent research and practices found developed here.
46. For decades teachers have successfully delivered responsive, evidence-informed teaching and learning programmes and the draft curriculum suggest that kaiako will retain this flexibility and will be able to apply professional judgement to the delivery of these curricula. However, these drafts do the opposite in narrowing teaching to prescribed content and removing the discretionary space required for meaningful local curriculum. This undermines school and kura ability to design learning that upholds te Tiriti and reflects their communities and

weakens the collective work of collaboration and professional networks that drive innovation, coherence and equity across Aotearoa New Zealand.

47. NZEI Te Riu Roa does not support the ill-defined concept of 'knowledge-rich' curricula, which we see to be an imported ideological framing of a very narrow conception of western-knowledge over all other forms of knowledge, of which mātauranga Māori should be foremost in Tiriti consistent curriculum for Aotearoa New Zealand.
48. We contend that the imposition of strictly prescribed content, set out year-by-year for each learning area and wāhanga ako, amounting to thousands of discrete learning expectations is a knowledge-impooverishment of our national curricula and will result in surface level teaching and learning at the expense of developing critical thinkers who understand how to inquire and question in their learning.
49. We are worried about the pedagogical regression involved in shifting to 'Know and Do' at the expense of 'Understand' in both the NZC and TMOA. This is a pedagogical regression. The removal of 'understand' will encourage poor practice as knowledge is only as valuable as once ability to use it. The societal need for deep understanding and the necessary critical thinking and analytical skills, increases by the day, just as knowledge available on the internet grows and the use of AI changes the landscape of teaching and learning.

Remedies to address the disadvantage caused by the curriculum redesign

The Ministry of Education must:

- a. Immediately halt the finalisation and rollout of The New Zealand Curriculum and Te Marautanga o Aotearoa.
- b. Commit to genuine Treaty-compliant consultation and engagement with Māori, including kaiako Māori, whānau, iwi, and hapū, and curriculum co-design with the wider education sector.
- c. Commission an independent review of the curriculum documents released for consultation, specifically examining the extent to which they give effect to Te Tiriti o Waitangi and reflect mātauranga Māori, with that review to be conducted by experts nominated by Māori education bodies.

50. NZEI Te Riu Roa supports the submissions of Te Wehengarua PPTA, The New Zealand Principals Federation, Te Akatea and the many subject associations of Aotearoa New Zealand.

Thank you for taking the time to consider our submission. We would be happy to meet with you to discuss it further.

Stephanie Mills

Korimako Tangiata | National Secretary