



**Te Tāhuhu o
te Mātauranga**
Ministry of Education

Independent Workplace Review

Te Poutāhū | The Curriculum Centre

Summary and Response Report



New Zealand Government
Te Kāwanatanga o Aotearoa

Foreword – Secretary for Education

Kia ora koutou katoa

As part of our Strengthening Education work, we're taking steps to improve our culture across the Ministry by embedding ngā mātāpono (our organisational principles) and my leadership expectations into the way we work together every day. This means listening to our people, acting on what we hear, and taking accountability for creating the culture we want to see.

So, when concerns were raised about the culture in Te Poutāhū | The Curriculum Centre, we listened and took action. I commissioned an independent reviewer to talk to you about your experiences and views of the working environment of this group and provide recommendations for how we can do better. I did this because I take these concerns seriously, and I am committed to a workplace that is respectful, safe, and professional for everyone.

What we've heard

More than 100 people took the opportunity to share their perspectives through this process (many current staff and some former staff), and I am grateful for the insights contributed. The Reviewer observed that the experiences people described of working in the group varied a lot, but there were also some common themes.

One of the themes that came through strongly for the Reviewer was the passion that all of you have for the work of Te Poutāhū | The Curriculum Centre. That is absolutely my experience, and what I see every day. We are incredibly fortunate to have so many talented and committed people doing the important work that you do.

What also came through clearly, however, is the sustained delivery pressure that Te Poutāhū | The Curriculum Centre has been under for several years now. As participants noted, this goes back to the COVID-19 pandemic when the group worked at significant pace and scale to provide support for students to continue their learning.

As COVID pressures eased, our efforts were redirected to the ambitious programmes of work that were underway to refresh the entire school curriculum and deliver large-scale changes to NCEA. When a new Government was formed at the end of 2023, we had to quickly respond to delivery expectations that were no less ambitious.

It's clear that this ongoing pressure has taken a toll on the group. I acknowledge that we should have done more to make sure that alongside our delivery, we also remained consistently focused on providing the support and positive working environment you should be able to expect.

Something that also came through clearly in this Review is that many people don't feel that they can speak up when they have concerns in the workplace. This is really concerning to me. It's critical that you feel safe and supported to speak up, and that you understand and trust the channels that you can do this through. While this was really concerning to hear, I am pleased that so many of you chose to participate and share your feedback through this Review. This provides a strong foundation and opportunity for us to build your trust in these processes – by ensuring that your confidentiality is fully respected, demonstrating that no one is in any way

disadvantaged by participating, and by showing you that we listen and take action when things need addressing.

What we're sharing

As you know, we have been clear throughout this process about the importance of respecting confidentiality, and that I would consider whether the Review Report or a summary of it could be shared. I thought carefully about how to share the feedback and recommendations of the review with you. Two factors have informed my decision to share a detailed, fulsome summary of the final report: the need to be open and transparent about what the Reviewer heard, while at the same time respecting and protecting confidentiality.

While the Reviewer took care not to include identifying details in their report, I was still concerned that people may identify – or think they identify – themselves or others in examples that were included. Accordingly, this summary has been developed to exclude specific details or situations that may be identifiable.

This is important not only to protect the confidentiality of the people who contributed, but also because the people who may have been the subject of feedback have not had an opportunity to respond to what was said about them. As the Reviewer was careful to emphasise, this was not a fact-finding review or investigation. It shares people's perspectives, thoughts and opinions, but has not been tested in accordance with natural justice. While it was open to participants to refer the matters they raised for formal investigation or review, no one agreed to do so – which again goes to the importance of creating an environment where people feel safe and supported to speak up.

To balance the need to maintain confidentiality with the need for transparency, the summary remains significantly detailed, retains the structure of the Report, and takes care to preserve the language used by the Reviewer, including indications of scale. We shared our summary back with the Reviewer to make sure that this remained true to what they had heard, and that no matters of significance were omitted.

What we're doing

Our attention is now on the steps we need to take to improve the culture and working environment of Te Poutāhū | The Curriculum Centre.

I have tasked your Hautū | Deputy Secretary, Pauline Cleaver and Julia Wootton (Hautū | Deputy Secretary, Te Pou Rangatōpū | Corporate Services) with developing and implementing an action plan to achieve this, and to report against this plan so that we can see that improvements are being made. I am clear in my expectations that this is to be a core focus.

An external expert is supporting them to develop this plan, and they will also want and need your input into this. The Reviewer has provided a wide range of recommendations for our consideration, which have been included in full in this document. All of these will be considered as the plan is developed, but we will need your feedback on which actions will make the biggest difference and how they can best be implemented.

At the same time, I am setting clear expectations on particular areas and actions that need to be focused on in this plan. I have provided my reflections and expectations alongside the feedback summary – so that you can see not only what we have heard, but what we are going to do about it. These are included in text boxes at the end of each section.

Thank you

Finally, and importantly, I want to acknowledge and thank everyone who participated in the Review. I acknowledge this may not have always been easy. Your input has provided insights and helped shape recommendations that I am confident will help us do better.

Ngā mihi nui



Ellen MacGregor-Reid

Te Tumu Whakarae mō te Mātauranga | Secretary for Education

Independent Workplace Review – Summary of Report

1. Executive Summary

The Ministry commissioned the Review into the working environment and culture of Te Poutāhū | The Curriculum Centre (the Group) in response to concerns raised through confidential channels. The Review was conducted on an 'opt in' basis, with a total of 92 submissions (relating to 107 participants) received from current employees or contractors working in Te Poutāhū, as well as some who had left.

The anonymity of participants was assured. The feedback received has not been tested in accordance with natural justice, nor have any factual findings been made.

Participants described a variety of experiences, although on certain matters there were strong themes – including passion for the work that Te Poutāhū | The Curriculum Centre delivers. However, the breadth of experiences means that not all participants will agree with all the themes or observations, but are encouraged by the Reviewer to reflect on the fact that colleagues may be experiencing the Group differently.

The strongest concerns of almost all participants relate to workload and wellbeing. Feedback consistently described workloads as unsustainable, characterised by constant urgency and short deadlines. It was considered that more could be done to manage workloads and timeframes.

While some people found Te Poutāhū | The Curriculum Centre to be a safe, respectful and professional working environment, many did not and/or expressed a range of concerns about leadership practices, including:

- Widespread concern about favouritism by senior leaders, especially in relation to the many temporary appointments in Te Poutāhū | Curriculum Centre
- Widespread concern regarding the application of public sector values and principles including fair and transparent appointment processes, conflict of interest management and concerns about the obligation to give free and frank advice to the Minister not being met
- Unreasonable or unprofessional workplace behaviours exhibited or tolerated by leaders
- Strategy, work planning and commissioning
- Organisational design and resourcing, particularly the extensive use of contractors or other temporary arrangements
- Deeply held concerns about speaking up. This included fear of negative career consequences, which it was considered others had experienced, and because of perceptions of favouritism
- A small number of other examples of concerns relating to diversity, inclusion or equity, and sexual harassment.

The Terms of Reference allowed for a referral process for specific concerns that warrant further investigation. While this was discussed with many participants, none of the participants consented to this, often citing the concerns about speaking up.

There was both optimism that the commissioning of the Review signalled a willingness by the Ministry to consider and address concerns, and doubts that anything would change.

The Report identifies opportunities for improvement, reflecting both the feedback of participants and the Reviewer's analysis of Ministry policies, processes and practices.

Participants and Ministry representatives supporting the Review were open and co-operative, which was appreciated and acknowledged by the Reviewer.

2. The Review

On 5 May 2026, the Ministry instructed an external, independent reviewer to undertake the Review. The purpose of the Review was to provide a high-level analysis of the culture and working environment of Te Poutāhū | The Curriculum Centre and identify opportunities for improvement.

3. Process

3.1 Participants

Participants were able to opt in from across Te Poutāhū | The Curriculum Centre, including former employees and contractors who had left but had feedback relating to the last 12 months. 105 queries were received regarding the Review, followed by 92 feedback submissions, including one submission on behalf of 15 people, giving a total of 107 participants.

The majority of submissions were done by way of a meeting with the Reviewer, but some written submissions were also considered (including some submitted by way of an anonymous form set up during the Review in response to concerns regarding identification).

Feedback was received from a variety of people currently or previously working in each part of Te Poutāhū | The Curriculum Centre and at all levels, including employees, contractors, managers, and senior leaders. Most feedback (approximately 83%-90%) was from current employees or contractors. There was a broad range in terms of length of service and professional backgrounds.

Some participants currently working at the Ministry noted that certain areas had shifted in the last few months, and this shift was also reflected in the feedback. This was evidenced by a variation in focus, with participants who had left the Ministry having very strong feedback on themes or events that occurred before they left. Those who still work in the Group had a slightly different focus to their concerns. As this Review is a snapshot in time, strong feedback on past time-specific matters or related to people that no longer work in the Group is included in the Report but the Reviewer did not emphasise it as much as feedback relating to current staff or ongoing concerns.

The Reviewer also spoke with other Ministry staff and senior leaders to obtain information about processes and practices in the Group and the wider Ministry, and reviewed Ministry policies, processes and certain data from Ministry systems.

3.2 Anonymity

Anonymity was a significant feature of the Review. Many people spoke of a fear of consequences if they were to be identified as participating or if feedback could be attributed to them. The Reviewer therefore took a cautious approach to protecting identities and reducing identifying detail, and strongly recommends that the Ministry make clear that there will be no repercussions for having participated in the Review. Leaders should not speculate about where feedback may have come from, and should take care that their actions are not perceived as reacting to any negative feedback in this Report.

3.3 Nature of the Review

The Reviewer notes that it is important to bear in mind that the Review reports feedback and perceptions of individuals on the working environment and culture of the Group, which have not been tested in accordance with natural justice, and the Report does not include factual findings. No individuals are named in the Report. The terms 'manager' and 'senior leader' have been used to distinguish between different levels of the Group where it was important to do so, with the term 'leader' used to encompass both groups where feedback was more general. The need for anonymity means some aspects of the Report are necessarily high level.

3.4 Referral process

Although the Terms of Reference included the possibility of referrals for specific matters, no participant consented to formal referral of an individual concern, which participants often described as being due to a fear of speaking up or of being identifiable.

The Reviewer has made a general referral to the Integrity Champion (Hautū | Deputy Secretary – Te Pou Rangatōpū | Corporate) regarding potential ongoing conflicts of interest, in light of the number of concerns received about these.

3.5 Draft Report

On 7 July 2026, a draft Workplace Review Report was provided to the Secretary for Education to allow the Ministry to confirm that the Terms of Reference had been complied with. A small amount of feedback was received from the Ministry. The Reviewer made some minor changes to clarify their analysis, these did not change the substantive nature of the feedback themes or the opportunities for improvement set out in the Report..

4. Scope

4.1 Scope of the Review

The Terms of Reference required a review into the working environment and culture of Te Poutāhū, rather than the work itself. The Reviewer emphasised this scope to participants. However, participants often spoke about the work itself, either to give context to the culture or because it was apparent many of their concerns were about the work itself.

For a small number of participants, concerns about the work itself were the majority of what they spoke about, and for them it was clear it has affected their experience of working in Te Poutāhū (often significantly). Some feedback related to specific pieces of work or instructions and others the general direction. It is, however, outside the scope of this Review to comment on the work itself, and so the Reviewer did not reflect that feedback in this Report. For those participants, that may mean the observations in this Report are frustrating, because the things most impacting their experience at Te Poutāhū are not addressed in detail. That said, a number of the opportunities for improvement set out in this Report around communications and work commissioning may indirectly address some of those concerns.

To the extent that the Report comments on any work as part of the context, the Reviewer emphasises this is reporting the perceptions of the people giving the feedback. Those matters were not tested and the Reviewer does not make any findings in relation to those matters. Finally, the Reviewer notes that people often spoke about the work with great passion for the work of Te Poutāhū, even when outlining their frustrations.

4.2 Breadth of experiences

Participants had a range of different experiences, both positive and negative. Some shared only or mainly positive experiences of their work, while others provided feedback that was primarily, and sometimes strongly, negative – for example by describing the culture as toxic. There were also many people in the middle, with both positive experiences and feedback on current difficulties or scope for improvement. Many people's motivation for participating was a strong desire for significant change, often because they believe passionately in the work and see the potential for an improved working environment. Many others felt that such significant change seemed impossible, but they still wished to give their feedback, while some were motivated by wanting better for their colleagues. Some were hopeful that the Ministry's commissioning of the Review showed that it was open to feedback, while others were doubtful that anything would change.

The range of feedback demonstrates that experiences may depend on which team participants work in, which managers and senior leaders they work with, and the specific work being performed.

A particular component of diversity of perspectives was the varying professional backgrounds of the participants. Many participants referred to the fact that Te Poutāhū | The Curriculum Centre is largely composed of staff from three distinct groups: education sector background, public service background, and programme or delivery background (the latter often being contractors).

The Reviewer spoke to people from all three groups and notes that their passion for the work was equally strong. However, the distinction is mentioned in the Report because some themes arose particularly from one group or another, or centred specifically on the distinction itself as a source of tension or misunderstanding. In particular, there appeared to be some lack of understanding or valuing of programme delivery expertise; The Reviewer noted that there could be an opportunity for education within the Group about how a programme of work operates and the roles that programme specialists can perform. Previous underinvestment in delivery expertise was noted as context by some for the recent increase in such roles.

4.3 Public sector values and principles

A number of participants spoke about the values and principles from the Code of Conduct for the Public Sector (Code of Conduct), particularly political neutrality and the obligation to give free and frank advice. Some raised these themes proactively (either with reference to the Code of Conduct or indirectly by describing the matters set out of the Code of Conduct) and in some cases the Reviewer asked broad questions about these topics given the overlap with the scope of the focus areas in the Terms of Reference. Some are addressed as standalone themes in section 5 below, for example in respect of recruitment and conflicts of interest. However, two areas came up with sufficient regularity to address up front so that they can be borne in mind when reviewing the Report.

Political Neutrality

A number of participants referred to the principle of political neutrality and the obligation as public servants to serve the government of the day.

Some participants commented that this may have been difficult for some former employees and that was understood to be a reason some people had left because they did not agree with the direction of the government of the day.

However, a large number of participants spoke regularly and proactively about their obligation to serve the government of the day. This came from people across all three groups within the workforce, including those from education, public service, and programme backgrounds. Therefore, the reason the Reviewer wanted to mention this is to ensure that feedback in this Report should not be attributed to a lack of awareness of this principle or perceived unwillingness to serve in this way, given the number of people spoke very openly about this obligation being front of mind for them.

That said, some participants did comment on their view of others' knowledge or application of this principle. For example, a number suggested that those joining Te Poutāhū or the Ministry directly from the sector should perhaps be required to go through more training than simply the online module, in order to be educated about public sector principles and this obligation specifically. The Reviewer also can not rule out that there are people that have not or may not apply this principle (given this Report reflects what people who opt in choose to share) and that the Ministry may need to address any such situations.

From the people spoken to directly, which the Reviewer acknowledges is not a full representation of the Group, it appeared that the leadership perception of this being an issue may be different to the reality of what people were thinking. Some people spoken to were extremely passionate about their work, and the Reviewer could see how this could give rise to an interpretation that they may not be willing to serve the government of the day if they disagreed with the decisions. However, in many cases participants described a desire for further explanation of the context or rationale of an instruction they received, or clarity about where certain instructions were coming from. Many referred to the opaqueness of instructions, in that they were not always sure whether an instruction was coming from the Minister's office or whether it was a decision of senior leadership. Any steps to increase the transparency of decision-making and commissioning of work may help address some of these concerns.

Free and Frank Advice

The second Code of Conduct principle the Reviewer highlights upfront is the obligation to give free and frank advice to the Minister. Many people expressed a concern that this may not always be being done by senior leaders, which they perceived as being out of a desire to follow the direction of the Minister and build trust. In other words, participants felt that the leadership emphasis was on delivery of the work as directed and without free and frank advice to the Minister.

A specific example given by many was a concern the Ministry was not giving free and frank advice on what timelines for implementation were realistic (which is addressed below regarding workloads). Many people also spoke of their concerns about requests for advice to be changed as not being reflective of this obligation. Some people went into significant detail about specific instructions.

When providing this feedback some acknowledged that they were not directly privy to the advice being provided and that was limited to small group of senior leaders or senior employees. However, it was their perception based on what they were observing of the information or requests being cascaded to them (especially the requests for amendments to advice).

Others appeared to interpret this principle as being “free and frank advice” more generally (ie within Te Poutāhū rather than to the Minister) – this type of feedback is addressed within ‘speaking up’ below, given it relates to the nature of the working environment.

As the scope of the Review did not extend to commenting on the nature of the work of the Group, including advice to the Minister or specific instructions, this topic is not addressed further in this Report. However, since such a significant number of participants raised this concern, the Reviewer noted it so the Ministry is aware it is a key concern and can reflect on that feedback.

Secretary for Education - Public Sector values and principles

Providing free and frank advice is a core principle of our public service, and one that I expect us to adhere to in all our work with Ministers as a bottom-line. While participants raised concerns about whether this obligation was being met, they also acknowledged that they did not necessarily have visibility of the advice being provided. In both my current and former roles I have been closely involved in the provision of advice on curriculum matters across a number of years and administrations, and I am absolutely clear that we have consistently provided robust, free and frank advice to Ministers to help inform their decision-making.

What the feedback in this review has made clear to me however is that we could do more to make this appropriately visible to our teams – to help you better understand the decisions being made and the advice that is being given. To improve this we will:

- Te Poutāhū | The Curriculum Centre – Review and strengthen Group’s communications and commissioning processes, so that staff directly undertaking work have greater context and understanding of decisions and advice **(3-6 months)**

Some people also noted that it would be helpful for new staff, particularly those joining the public service from the education sector, to have training on public service principles. While

Te Pou Rangatōpū | Corporate currently provide training on this, this could be expanded and better systematised.

- Te Pou Rangatōpū | Corporate to develop and implement a more structured public service principles and machinery of government training programme, including induction training for new staff alongside regular opt-in learning sessions **(6 months)**.

Structure of the Report

The Reviewer chose not to structure the report around the Terms of Reference, as this could give prominence to topics that were not frequently raised, and instead sets out the feedback themes as they were presented by participants.

5. Feedback themes

5.1 Working environment

Concerns raised around the working environment in Te Poutāhū | The Curriculum Centre centred most significantly on workload and timeframes, which were described as unmanageable and unsustainable by nearly all participants, regardless of seniority or team. Contributing factors identified included:

- High work volumes over a long period of time, from standing up new programmes during COVID-19, through curriculum refreshes, and into the current programme
- Previous restructures and government savings programmes impacting resourcing, which was said to mean the Group is expected to do more with less
- High expectations from the Minister, which participants understood, but considered need better planning internally to manage in a sustainable way.

The need for improved work programme planning was specifically cited in the context of short turnarounds (e.g. less than an hour, or over the weekend), unclear commissioning or instructions, duplication of effort and poor overall project management. Participants observed that a culture of urgency has become ingrained ('everything is urgent all of the time') leading to a general culture of 'organised chaos'. There now appears to be an expectation that staff will routinely work late or over the weekend, with some providing examples of where they had worked high or extremely high hours (e.g. hours that were more than double a standard work week), for a month or months at a time.

Many participants felt that more could be done by Te Poutāhū | The Curriculum Centre leaders to manage expectations of realistic timelines given existing workloads, and to manage work programme implementation and commissioning more effectively – including by spreading the workload more evenly across their team (which people linked to the theme of favouritism, discussed below). Failure to do so is seen as impacting not just wellbeing, but also the quality of the work produced.

Concerns about wellbeing were specifically raised by a significant number of participants, with particular reference to burnout, stress and overwhelm, both in themselves and their colleagues (including colleagues they considered very resilient and experienced). This was considered to be a reason some colleagues had left, and it was noted that people are consistently worked to this level and then granted discretionary leave. This in turn put additional pressure on others to manage the additional workload, and people reported feeling guilty about taking leave for their own wellbeing because of this. Significant physical and mental wellbeing impacts reported include lack of sleep, fatigue, cognitive impairment and a range of other mental health challenges. Crying at work was described by some as commonplace.

Contributing factors identified here included:

- Workload, work design and leadership behaviours, as referenced elsewhere in the Report
- Hostile or difficult interactions that team members had faced with external parties, with limited or only reactive support offered to navigate these

- Cumulative pressure over several years since COVID, as noted above, with no end or improvement in sight
- Many participants acknowledged senior leaders are often significantly or most impacted by these pressures, given their delivery responsibilities. However, the overriding preference is for work to be resourced and managed in a sustainable way, which people considered senior leaders could improve.

Many felt that the 'wellbeing support' offered by the Ministry was inadequate or performative, does not address the cause of wellbeing issues, and that acknowledgement by senior leaders of workloads and overtime is ineffectual. Use of Time Off in Lieu (TOIL) was described as providing some assistance, but being offered inconsistently, and there is reluctance to take advantage of it due to feeling judged. Similarly, the Employee Assistance Programme is seen as retroactive and placing additional burden on the employee to manage access alongside their workload.

Secretary for Education - Working Environment

As I acknowledged in my Foreword, Te Poutāhū | The Curriculum Centre has been managing significant work pressures over a number of years now. This has included needing to respond to changing scope, timeframes and the rephasing of major programmes by successive governments. The planning, processes and supports that we have had in place to manage our work programmes have not always effectively kept pace with this. We need to do better to manage our work in a sustainable way and maintain our focus on the wellbeing of our staff.

The new leadership structure that is now being established for Te Poutāhū | The Curriculum Centre has been designed to provide greater stability and enable a more strategic focus for the Group. As the new leadership team comes onboard there is a critical opportunity to prioritise the development of a strategy and work plan for the Group, making sure this is communicated and kept visible to staff. This will include getting better planning and processes around the Group's work so that workloads can be managed sustainably.

Consideration also needs to be given to whether the supports we provide for staff wellbeing are appropriate and are being consistently and proactively promoted, and work is needed to shift attitudes to dispel any negativity around people looking after their wellbeing.

I also want to address the concerns some people expressed about possible impacts on work quality. Our people are deeply passionate about their work, and it's right that we hold ourselves to very high standards – the teachers and students of New Zealand deserve nothing less. Our Curriculum work goes through a number of processes and checks to assure its quality, including internal reviews as well as public consultation. I am incredibly proud of the work that Te Poutāhū delivers, and our people absolutely deserve to be proud of the contribution that they make to this.

Our actions to improve workload and wellbeing will include:

- Te Poutāhū to develop a Strategy and Work Plan, including communicating this with staff (3-6 months)
- Te Pou Rangatōpū to work with Te Poutāhū to review the supports that are being provided for staff wellbeing, including ensuring that they are being consistently and proactively promoted, and that steps are taken to shift attitudes toward wellbeing (3-6 months)

5.2 Leadership practices

There was a range of different feedback on leaders (managers and senior leaders) and leadership practices, so the Report focuses on recurring themes rather than individual perceptions. The themes were not unanimous – for each leader that some criticised, others may have praised different aspects of their leadership. Therefore the caveats of this Report – particularly that it is reporting different people’s perceptions, which have not been tested – should be borne in mind.

Many participants recognised that Te Poutāhū leaders have delivered a significant volume of work under exceptional time pressures. Some complimented their ability to grasp a wide range of details quickly and to manage a heavy work programme. Others also noted that leaders had not been set up for success, due to resourcing constraints during a period of heavy demand.

However, the following themes were highlighted in the Report.

5.2.1 Favouritism

The overarching concern regarding leadership practices was a widespread perception of favouritism. A majority of participants described an in-group and an out-group, with senior leaders maintaining a small, trusted group of people at different levels, who receive preference in work allocation, better opportunities for progression and development as a result, and better access to information and influence over decisions. Mixed perceptions (positive and negative) were reported around the idea that these individuals were placed in such positions to keep leaders ‘safe’.

Favouritism was often said to show up particularly through recruitment and appointment processes, which are discussed further below. The Report notes that the high proportion of acting roles with Te Poutāhū significantly contributed to the perception that roles or opportunities were being created for ‘favourites’.

Participants also described the following:

- Practices feeling relational rather than based on systems, processes and communication
- Protection from consequences of negative behaviour, and even favourable outcomes (e.g. promotion) for those who had displayed these behaviours
- Uneven recognition of achievements, e. g. ‘favourites’ being given credit during Group updates rather than others who also contributed to the same work
- Impacts on wider teams of leaders being in or out of favour, including in work prioritisation or distribution
- Favouritism affecting ability to provide feedback or challenge decisions, with people who speak out being seen as out of favour.

5.2.2 Psychological safety and fear of speaking up

A majority of participants said they did not feel that they could speak up within the Group, for multiple recurring reasons. Many referred to ongoing organisational uncertainty and that they felt that during previous restructures they had seen people who voiced concerns as those who may not have been successful in securing ongoing roles. The fear of further change being on the horizon significantly impacts people’s willingness to voice any concerns.

The Reviewer considered it important to emphasise this isn't limited to speaking up about serious concerns or the type of feedback set out in the Report, but also what they consider to be reasonable work related feedback or questions. Some phrased this as feeling threats to their job security when they simply provided evidence or advice. For those who had worked in other public sector agencies, the types of discussions they said they would commonly have in other settings, such as around risks or reporting or advice on whether timeframes were achievable, were the kinds of concerns being referred to when they talked about their reluctance to raise that type of matter within Te Poutāhū. Some referred to the fact that senior leaders did not appear to want them to add matters to risk registers, which in turn had a chilling effect. Others did acknowledge the projects they were on regularly reported risks through project mechanisms, but their frustrations were more that nothing come of reporting such risks.

Specific examples were given to the Reviewer of when people have chosen not to speak up including seeking reviews of appointments they consider have not followed fair processes; decisions on restructuring outcomes; and/or why they would not use formal channels to report any concerns regarding behaviours in the workplace. A small number of people referred to being aware of people raising formal complaints and not being satisfied with the process followed (including confidentiality) or outcome, which in turn made others reluctant to use formal channels.

Some participants also attributed parts of this culture to the practice of rewarding 'yes people' that they had seen evolve. They feel that senior leaders expect people to do what they're told and not to question anything – examples given where they had seen people raising genuine and what they considered reasonable concerns, only to receive defensive responses from senior leaders, be called 'passive aggressive', or being told they will be replaced by a contractor if they don't follow the instruction.

For many, this culture is significantly different to previous experiences across the public sector, where they feel that healthy debate is often encouraged by leaders and that leads to improved work. In contrast, people felt that at Te Poutāhū, managers and leaders were more focused on trying to please those above them, than the quality of the work.

A number of people also spoke of a 'blame culture' where any problems were identified, and that defensive behaviours by leaders were common rather than taking accountability (especially where there was unclear commissioning). On the other hand they also observed leaders taking credit for work that had been done by others. A very regular cause of fear was what people considered they had seen happen to others. Many people referred to people who had voiced concerns either being taken off work, had limited career progression, were made redundant or, if they were contractors, terminated immediately. The movement of projects between different parts of the Group and individuals are regularly taken on and off projects, also impacted people's willingness to raise concerns where they didn't want to be taken off the work.

Many observed uncertainty because of the high number of people hired as contractors or on fixed term employment agreements (but seeking permanent roles) contributed to this culture, as the uncertainty led to people being less willing to voice any concerns or what might be perceived as criticism. In particular many contractor participants told the Reviewer they wouldn't share the feedback they shared in this Review, out of the need to keep their head down.

A small number of participants did say they trusted their immediate line manager, and in some cases their GM, but even then many of those said they would ask their line manager not to raise concerns any further on their behalf, often voicing they have little to no trust in the wider

leadership group and/or senior leaders. The Reviewer also wanted to acknowledge that certain individuals said they did feel comfortable, and had raised concerns, with senior leaders in Te Poutāhū, but these were the exception rather than the norm and appeared to come back to individual relationships that person had with that leader.

Some reported leaders warning people about consequences if they continued to raise concerns. This may have included discouragement from participating in this Review. Despite assurances of confidentiality, these concerns also reportedly led to reluctance from some to participate in the Review.

The Report notes that the degree to which this fear is embedded is significant, and recommends careful consideration of how to rebuild trust and a psychologically safe workplace while assuring staff that they will not be penalised for raising concerns.

5.2.3 Leadership styles and behaviours

Many described Te Poutāhū as quite hierarchical, with outdated, authoritarian leadership styles and top-down communication practices.

Examples given concerned:

- Unreasonable and intimidating behaviours, such as raising voices, insulting language, or belittling or swearing at people. These behaviours were not necessarily widespread and weren't attributed to all leaders, but when they did occur they significantly impacted the people who experienced them
- A general prevalence of swearing (not at people) by leaders was commented on
- Rudeness, dismissiveness and lack of courtesy, including people not being welcomed to or farewelled from the group, and leaders not knowing people's names
- Comments on, ridicule or criticism of individuals behind their backs, sometimes in front of others.

The Report notes that some participants gave positive feedback regarding the leadership style of the same leaders others had concerns with – they appreciated that there remained a level of banter even during high stress periods of delivery. However, the volume of that feedback was significantly outweighed by the prevalence of the above concerns. The Reviewer noted that they received feedback and have included examples about leaders who have since left, as well as some who remain in the Group.

5.2.4 Leadership development and capability, and performance management

Many participants noted that promotion to management or leadership positions is based on subject matter expertise or technical capability rather than experience in people leadership or management, and that training or support is not provided to those appointed to act in these positions. Of particular concern to some participants was a lack of financial capability and knowledge (including a manager's obligations under the Public Finance Act). This was described as having a negative impact on staff due to managers' lack of awareness of performance management or other people leadership processes and practice, Ministry systems, or their role in ensuring professional behaviours in the workplace. Examples were given where participants considered that leaders did not seem willing or able to manage poor performance from staff.

Secretary for Education - Leadership Practices

I am making my expectations around the perceptions of favouritism very clear to the Group's leadership, and will be holding them to account to make sure appropriate processes and practices are put in place to address these perceptions.

I want to acknowledge the fact that the last couple of years have been challenging for Te Poutāhū | The Curriculum Centre in terms of the number of acting arrangements in place across the Group's leadership. I know that some of this uncertainty was created when I was asked at the end of 2024 to step out of the role of Hautū | Deputy Secretary for Te Poutāhū | The Curriculum Centre, to act in the role of Secretary. This was only expected to be a short-term arrangement, but was extended a number of times until I was appointed to the role in late 2025.

I know that this had flow on effects for the Group, with many people subsequently needing to step up into acting roles without any certainty about how long such arrangements might be in place. I greatly appreciate the flexibility and commitment that people showed during this time, but am really pleased that we are now in a position to recruit a permanent leadership team to bring greater stability for the Group.

Speaking Up

As I said in my Foreword, it's really concerning to hear that people don't feel able to speak up, and that some of you were concerned about taking part in this review because of this. The high level of participation (around a third of the Group) that we achieved through this process is really pleasing, as this provides an important foundation for us to build trust and demonstrate that we take concerns seriously and respond appropriately.

Behaviours and practices

While the Reviewer noted that the examples provided to them of some very inappropriate leadership behaviours were not necessarily widespread, I want to be very clear that these are not acceptable in our workplace. I acknowledge that these types of behaviours would have a significant impact on the people involved.

I have been clear about the expectations that I have for Ministry leaders, including that they value and respect our people. This connects with our Ngā Mātāpono, in particular:

Manaakitanga – We empower people to do their best by being respectful, inclusive and generous.

Setting clear expectations for our leaders and providing opportunities and supports for them to strengthen their leadership has been a high priority for me as Secretary, because I understand how important good leadership is both for our work and for our culture. This has included investing in new programmes to support the development of our leaders and aspiring leaders, including for those transitioning into people leadership. I will continue to prioritise this, and I know that this will be a focus for Pauline as she sets up her new Leadership Team.

Actions will include:

- Te Pou Rangatōpū to support Te Poutāhū to make sure an appropriate Leadership Development Plan is in place, identifying and matching individuals with opportunities to develop their leadership capabilities **(3-12 months)**
- Te Pou Rangatōpū to incorporate the findings from this Review into the review of Speak Up, and provide an opportunity for Te Poutāhū members (alongside other Ministry staff) to provide feedback on planned improvements before finalising and implementing this. **(3-8 months)**

5.3 Culture and workplace behaviours

Participants' views of the current culture of Te Poutāhū varied greatly, with some speaking positively regarding the culture among their own colleagues or team, and others describing the overall culture as toxic or dysfunctional. Many described a deterioration over the past 12 to 18 months, while some reported recent signs of a positive shift.

Particular concerns raised were as follows.

5.3.1 Bullying and harassment

Some participants noted examples of bullying, harassment, and what they considered to be unacceptable workplace behaviour. The examples included both direct and indirect behaviours: raised voices in public settings, public criticism or humiliation, thumping desks, exclusion, swearing at people or using insulting language, and threats about job security.

. For those that had raised concerns of this nature, they felt it was reflecting of a wider pattern and culture. Many participants described this behaviour as being rewarded, or at least tolerated, by current leaders.

A number of other participants did not consider that they had seen bullying, harassment or other unreasonable behaviours, but instead gave feedback on the leadership practices that were not ideal. Many in this category also focused on the absence of a positive culture, or a shift away from the positive culture Te Poutāhū used to have a number of years ago. Others described the culture as fragmented and dependent on the team.

Often when asked this question, participants referred to the fact they had not seen examples of 'direct' bullying behaviours. However, in the course of other parts of their interviews they would describe behaviours that may amount to 'indirect' examples of unreasonable behaviours (such as exclusion from work, gaslighting, threats about job security, and retaliation for voicing work related concerns). Many of the 'indirect' examples given by participants related to task-related matters – such as being isolated or told not to speak to others, excluded from meetings or decisions and being dropped from email chains (note that some of these matters related to how they were instructed to deal or not deal with external stakeholders).

A very small number referred to examples of alleged sexual harassment (experienced by themselves or by others) and/or consensual relationships that may be inappropriate in the workplace. These were of a nature that related to specific individuals rather than widespread patterns of behaviour, and connected to other themes such as the fear of speaking up.

5.3.2 Rumours and gossip

A small number of participants expressed concerns about how information is shared across Te Poutāhū, and expressed a desire for communication channels to be clearer.

More often, participants described widespread practices of gossip, rumour-mongering and/or talking about people behind their back. The Report links this in part to the unclear communication channels referred to above, but also notes examples of discussion or speculation on personal matters.

The Reviewer encourages all members of Te Poutāhū to reflect on the contribution they may be making to the workplace environment if they are discussing gossip.

5.3.3 Raising concerns

The Report identifies a widespread reluctance to raise concerns through formal channels, including via the referral mechanism under the Review, and cites the following reasons for this:

- Mixed experiences with the process and outcome of previous referrals
- A perception that referral would not receive a meaningful response
- Fear of negative consequences from leaders, such as being removed from work, not appointed to roles or roles being disestablished
- Distrust regarding confidentiality among leaders
- While there appeared to be misunderstandings about the use of the Speak Up tool some described it as ineffective and risky.

The Reviewer reviewed Speak Up data and considered that there was a noticeable gap between the low usage of the Speak Up tool and the widespread concerns raised through the Review.

The Report also notes that concerns of a similar nature to many of the above themes have previously been disclosed to the Ministry by way of exit interview surveys, but it is unclear what actions were taken in response to that feedback, if any.

5.3.4 Union involvement

Some individuals identified the Public Service Association (PSA) as the main mechanism through which they felt safe in raising concerns, but there were mixed perceptions of the effectiveness of this approach.

The PSA confirmed an increase in enquiries from Te Poutāhū, and views this as reflective of the number of matters of concern to members, rather than a culture shift towards escalation.

It did not appear that Te Poutāhū had regular engagement with the unions outside of formal processes.

Secretary for Education – Culture and workplace behaviours

While there were a range of different perspectives shared about the culture of Te Poutāhū | The Curriculum Centre, it's clear that we need to do more to provide a consistently positive working environment for our people. The negative behaviours that have been described are not acceptable in our workplace, and people should feel safe and supported to speak up about them if they occur.

I particularly want to address the concerns that were raised about alleged sexual harassment. Sexual harassment of any kind is absolutely unacceptable and will not be tolerated in our workplace. I urge anyone who has experienced this to report it so appropriate action can be taken. You are welcome to contact me about this directly, with my assurance that this will be managed sensitively and confidentially. The same applies for any other matters that are of concern to you.

Actions will include:

- Te Poutāhū | Curriculum Centre leadership to engage with the feedback received, and identify actions they will undertake as leaders so that staff have a more consistently positive workplace experience in Te Poutāhū. These will help inform the action plan. (0-3 months)
- Te Pou Rangatōpū | Corporate to systematise the collection and sharing of exit survey themes with senior leaders (3-6 months)
- Te Pou Rangatōpū | Corporate to progress Speak Up review as above (3-8 months)

5.4 Integrity

5.4.1 Recruitment and appointment process

There was a very strong theme of significant concerns regarding recruitment and appointment processes within Te Poutāhū, underpinned by the number of acting or temporary arrangements.

The primary concern is that Te Poutāhū is not acting in accordance with public sector obligations to notify vacancies, and instead prefers to 'shoulder-tap' or to engage contractors for key roles. The Reviewer tested this perception through HRIS data and noted that, over the past 12 months, 81 permanent vacancies had been formally advertised, but only three secondments. It also

appeared that retrospective approval had been sought not to advertise some temporary opportunities.

Data showed 99 temporary employment (acting or secondment) arrangements over the same period, a number of which have now been in place for more than 12 months. The Reviewer also noted anecdotal evidence of additional arrangements (where someone is working in another role) being put in place 'outside the system', and that this data does not include unadvertised contractor engagements.

There was related concern about the impact of these arrangements on 'affected status' and the ability or willingness of those individuals to apply for permanent positions under Ministry restructures. Many participants also felt that those who were shoulder-tapped into temporary roles then had a distinct advantage when permanent roles were later recruited to, with a perception that roles were created for, and assurances provided to, 'favourites (with others told not to apply).

Perceived conflicts of interest in the composition of appointment panels for advertised positions were also raised, and are covered below.

The Ministry confirmed there were no appointment reviews in Te Poutāhū in the previous 12 months, but the Report notes that unwillingness to instigate these is related to the matters raised above regarding culture and leadership practices.

5.4.2 Conflicts of interest

A significant proportion of participants had concerns regarding conflict of interest practices. The Reviewer examined the register for the past two years (with some personal information redacted) along with Ministry policy, processes and intranet content, and spoke to some individuals about how conflicts are managed in practice. Most of the perceived conflicts specifically discussed with the Reviewer were not disclosed in the register, or were disclosed more recently than expected based on the perceived concern. The Reviewer noted that conflicts of interest are inherently a fact specific situation that makes them more difficult to report on thematically (rather than by a fact finding investigation). That was the case with many examples shared with them, where an individual with concerns would be identifiable from the example.

Therefore, when concerns were raised with the Reviewer, they explored whether the person wished to use the referral process outlined in the Terms of Reference. However, no individual took up that offer, with the reasons given often being linked to the fears of speaking up or being identified as a participant in this Review. Therefore, the Reviewer took a two pronged approach to this with the Report setting out the general themes and nature of concerns without identifying individuals; and the Reviewer also making a general referral to the Integrity Champion, with general matters that the Ministry may want to consider auditing or investigating.

The majority of examples related to family or close personal relationships, primarily around recruitment decisions and, in some cases, procurement processes.

Areas of concern raised by participants included:

- Favourable treatment of 'friends' for employment opportunities, during restructures, or in relation to leave

- More junior employees being expected to disclose or manage conflicts, rather than the senior leader involved, and leaders needing to be asked to declare conflicts rather than doing so of their own accord
- Referral of favoured candidates to other hiring managers, where there may have been implicit pressure to hire the person related to, known to, or endorsed by the senior leader.

The procurement examples referred to were often only discussed with the Reviewer in terms of general practices rather than specific contracts. A perception was that senior leaders often wanted to engage a 'friend' rather than go through a contestable process, often due to urgency. Others described these types of situations as being about the nature of the sector meaning people are often known to each other, including because there is only a very small pool of people who might be qualified for certain parts of the Group's work – and therefore conflicts being expected but needing appropriate management.

The Report notes guidance from the Office of the Auditor-General that acquaintance is inevitable in a small and interconnected society like New Zealand, so judgment is required as to the closeness of the relationship and the need to disclose and manage actual or perceived conflicts of interest. The Reviewer noted that some participants were unclear about when a friendship between colleagues should be disclosed, and the Ministry's Policy and training did not appear to provide guidance on this. While the Review was not intended to make factual findings, the Reviewer recommends reflecting on the prevalence in the feedback of a perception of favouritism or bias.

Where conflicts had been disclosed, participants' feedback instead related to how they are managed in practice, specifically:

- Where a management plan is in place but does not appear to be followed
- Where it is not evident that a management plan is in place at all.

The Reviewer also noted a lack of central Ministry oversight of the content of or compliance with management plans.

Secretary for Education – Integrity

As a public service department, the integrity of our processes for recruitment and for identifying and managing conflicts of interest are fundamental to upholding trust and confidence in our organisation. The perceptions that people in Te Poutāhū | The Curriculum Centre have about how these processes may be operating are concerning, and need to be addressed.

Actions will include:

Recruitment

- Te Poutāhū | The Curriculum Centre – appropriate actions will be identified to improve transparency and perceptions around appointment processes within the group. In the first instance, this will focus on upcoming leadership appointments, with external members included on the panels for these **(0-3 months)**

- Te Pou Rangatōpū | Corporate – to review policies and processes around acting up and secondments, including confirming whether "acting up" roles should require notification consistent with other secondment processes (**6-9 months**)

Conflicts of Interest

- Te Pou Rangatōpū | Corporate to update Conflict of Interest guidance to ensure this provides appropriate guidance around declaration and management of personal relationships/friendships (**0-3 months**)
- Te Poutāhū | The Curriculum Centre staff to review and update their Col declarations and management plans (**3-4 months**)
- Te Pou Rangatōpū | Corporate – to commission Internal Audit review of Col identification and management within Te Poutāhū (**4-6 months**)

5.5 Work structure

5.5.1 Strategy and planning

A number of participants emphasised the highly reactive nature of Te Poutāhū | the Curriculum Centre and the absence of any overarching strategy or work planning. While the work programme demands and focus on delivery were acknowledged as a factor, many felt there was scope for more strategic leadership and planning despite these constraints, with consideration of longer-term issues or implications as well as the immediate.

Some feedback also identified that a clearer common purpose for Te Poutāhū and a more strategic approach would not only address some of the themes in the Report, including workloads, wellbeing and work quality, but also create efficiencies.

Leaders noted that there is work underway to improve work planning, but this did not appear to have been clearly communicated to other participants.

5.5.2 Scoping

A related concern was that work within Te Poutāhū is not properly scoped, even when it is within a programme of work. This was often identified as relating to the lack of negotiation around realistic timeframes, or consideration of the resourcing required. Participants also noted the knock-on impact of reactive work on the ability to achieve other work priorities, because those deadlines do not shift to accommodate the new commissioning.

Lack of significant leadership experience in delivering large-scale work programmes was noted as a factor, while the expertise of programme specialists did not always appear to be valued.

5.5.3 Commissioning and decision-making

Several participants raised concerns regarding the commissioning of work and the impact on their working environment and culture. Many of these concerns related to the lack of strategic

planning outlined above, whereby work is commissioned reactively, with no clear purpose, rationale or context, and no explicit delegation of responsibility, leading to workload issues, inefficiency and duplication.

A primary concern for some was the tendency to commission work verbally, and often indirectly through an intermediary, leading to unclear instructions, confusion and delays, lack of transparency and tracking, and misunderstanding of context. Participants understood this practice to have come about after recent leaks, but observed that this reflects a low-trust environment.

There was some discussion about whether systems like JIRA that are used in other parts of the Ministry could be made better use of in commissioning or tracking, though leader participants noted that these may not be as suitable for complex work.

Some participants also expressed concern about key-person risks due to centralised decision-making in Te Poutāhū among a small group of individuals.

Secretary for Education – Work structure

As noted earlier, the establishment of a new leadership team for Te Poutāhū | The Curriculum Centre provides an important opportunity to establish an enduring strategy and a comprehensive work plan for the Group (ref. *Secretary for Education - Working Environment*). I expect that this action, and the review of commissioning processes (ref. *Secretary for Education - Public Service principles and values*) will address the feedback in this section.

5.6 Organisational design

5.6.1 Operating model

Some participants felt that the current operating model of Te Poutāhū was no longer fit for purpose, and would benefit from a longer-term design focused on Ministry need and strategy, rather than current delivery needs. Others noted that the design of the leadership team does not support a strategic approach, given its size and the number of delivery roles.

5.6.2 Impact of temporary arrangements

Almost all participants referred to the cumulative impact of having so many people in acting or temporary roles, especially managers and senior leaders. This is reflected in the recruitment and appointment process section above, but participants also noted that it contributes to the fear of speaking up and unwillingness to engage in healthy debate covered elsewhere in the Report, and links to the concerns about favouritism and about leadership capability and development. Many felt that it also affects decision-making and openness to change.

The reviewer noted that the number of secondment or acting events over the past 12 months (99) was sizable in the context of the number of employees within Te Poutāhū (189 fixed term or permanent as at 11 May 2026). The number of contractors (114 at the same date) adds to this.

Many participants identified the need to formalise appointments to the structure as a priority they hoped the Ministry would progress as soon possible.

5.6.3 Use of contractors

Many acknowledged that some of the programmatic work structure of Te Poutāhū requires a greater use of contractors than elsewhere (36.9% of workforce, compared to 7.3% Ministry-wide). Leaders also linked the need for contractors to the urgent delivery expectations for the work.

However, a large proportion of participants were frustrated by restrictions on recruitment of employees, which they feel lead to under-resourcing of some areas while significant numbers of contractors are added in others. Many referred to contractors being used for work outside the programmes, that they felt could or should be resourced by permanent or fixed-term employees.

The proportion of contingent workers has several perceived impacts on working environment and culture, as follows:

- Awareness of higher hourly rates for contractors giving rise to feelings of resentment and inequity, including around overtime and work allocation
- Fear for job security due to the prospect of being replaced by contractors
- Concerns regarding contractors' degree of influence and/or sidelining of employees.

The Report notes that some of these perceptions may arise from the varying professional backgrounds of the participants, as discussed above, and again notes that the value of programme expertise was not always recognised.

5.6.4 Turnover

Many participants referred to the high rate of turnover, particularly among contractors, and noted the significant impact that this has on institutional knowledge, workload, wellbeing and culture. There was also frustration that turnover tends to be attributed to the individual, rather than being recognised as a symptom of the themes discussed in this Report.

5.6.5 Restructuring and 'soft changes'

Previous restructures (especially in 2024) continue to impact participants and their perception of senior leaders. However, over the past 12 months, the primary concern related to 'soft changes', defined in the Collective Agreement as including changes to reporting lines, minor changes to job descriptions (less than 20%) and changes to work practices.

The soft change process does not follow a formal change process, but does require notification to the PSA and consultation for a minimum of five days. This is intended to enable movement of resource to urgent work as needed.

However, concerns with the practice were as follows:

- Duties and work allocations changing overnight and on a regular basis
- Changes occurring 'outside the system'
- Moving staff around to suit leaders' preferences rather than for genuine need
- Short notification or consultation periods impacting working environments and productivity

- Employees reporting to contractors who had not been engaged as people leaders and/or had no knowledge of Ministry systems or processes for employees
- Cumulative effects such as exhaustion, disruption, inefficiency and instability
- Loss of institutional knowledge or expertise as noted in relation to turnover above.

5.6.6 Affected status

As discussed above, several participants raised concerns about staff with 'affected status' being disadvantaged when applying for vacancies. While it is incumbent on the employee to apply, and 'priority' status is taken into account during recruitment, feedback indicated that enquiries about vacancies or created roles often receive no/delayed response, and roles are not always shared internally or proactively.

5.6.7 Silos

Many participants spoke of the fact that Te Poutāhū is disconnected and works in silos along functional lines, leading to:

- Duplication and impact on workload
- Issues with information-sharing, including deliberate control/withholding (particularly among senior leaders)
- Lack of visibility of other teams' work
- Lack of consultation, collaboration and engagement with other teams.

Others observed that Te Poutāhū was quite disconnected from the other parts of the Ministry that they should work with more closely, such as Policy.

Secretary for Education – Organisational Design

Again, I acknowledge the challenges for Te Poutāhū | The Curriculum Centre due to the many acting arrangements, and uncertainty around these, over the last couple of years. I am confident the appointment of a permanent Hautū | Deputy Secretary and leadership team in Te Poutāhū will help provide stability, a more strategic lens across the Group's work, and a more cohesive way of working together.

Engagement of Contractors

I want to specifically address the feedback received about the engagement of contractors in Te Poutāhū | The Curriculum Centre, which I acknowledge has been an ongoing point of tension for the Group. As mentioned elsewhere, for several years now Te Poutāhū | The Curriculum Centre's work has been significantly focused on and shaped by the delivery of major programmes to reform curriculum and assessment. The delivery of large work programmes that are time-limited in nature (which includes having time-limited funding) requires a different workforce approach to "Business As Usual" delivery. Flexibility is critical because as a programme moves through its different phases, it requires different levels of capacity and a different mix of skillsets.

When we initially started the NCEA Change and Curriculum Refresh programmes we were running these out of our BAU teams rather than setting up dedicated programme structures. Independent review and quality assurance processes found that the lack of distinction between BAU work and time-limited programme delivery, and gaps in specialist programme-delivery skills, were creating significant delivery risks. We took these findings onboard, developing programme structures and contracting in the skills and capacity we needed on a time-limited basis as we worked through each phase of the programme.

While the timeframes for delivering these programmes have been extended and rephased by successive Governments over the years, we are now reaching a point where we are able to start transitioning out of programme delivery. As you know, as part of our Strengthening Education work, we recently consulted with you on a new organisational structure for Te Poutāhū | The Curriculum Centre. The confirmed structure, which incorporates your feedback, marks the beginning of a shift away from the major programmes Te Poutāhū | The Curriculum Centre has been delivering, to aligning teams with the Group's core role of supporting a coherent, high-quality curriculum that is embedded, maintained, and improved over time.

Previous Restructures

Finally, I want to acknowledge that the Ministry restructuring during 2024 were very challenging for our people. The impacts for Te Poutāhū | The Curriculum Centre were felt widely as we needed to respond both to the Ministry-wide requirement to deliver savings, and to the Government's decision to defer work on the NCEA change programme while the curriculum changes were progressed. Because we had initially brought in a number of employees to the NCEA programme, this deferral meant that many staff (alongside contractors) no longer had work, or funding, aligned to their roles.

When I stepped into the role of Acting Secretary, I heard clearly from our people – both through our Public Service Census results and feedback that I invited from you directly – that you don't feel we've been managing change well as an organisation. This feedback has informed how I have set up and run our Strengthening Education work – making sure that we prioritise transparency, early and constructive engagement with staff and unions, and being clear about the rationale for proposed changes to avoid "change for the sake of change".

5.7 Diversity, equity and inclusion

Some participants noted they found Te Poutāhū to be a very inclusive workplace, particularly for migrant workers. Only a small number of concerns were raised about discrimination, diversity, equity and inclusion, but these were strongly held.

Participants from across Te Poutāhū were concerned that:

- The Māori medium workstream was resourced significantly lower compared to the English medium workstream, and the English medium seems to be prioritised
- Some considered that staff from the Māori medium workstream seemed to be asked to undertake any work relating to Māori, even outside their area of expertise.

A small number of participants feel that there is systemic or institutional racism within Te Poutāhū, with concerns that:

- Māori employees are allocated to the Māori medium workstream (through restructuring) even if their expertise lies and would be better deployed elsewhere
- The Perspectives team appear to be grouped with the Māori medium workstream despite their scope being much wider
- Māori staff are expected to lead karakia, while leaders make no apparent effort to learn correct pronunciation.

Individuals did speak passionately about managing the challenges of being Māori while working for the Crown, and the support they receive from individual colleagues or leaders to do so. However, many felt that more could be done to acknowledge this given the impact on wellbeing.

Other concerns raised regarding discrimination or inclusion were as follows:

- Inconsistent treatment during and after parental leave, such as in change processes or when considering development opportunities
- The role of gender rather than merit/qualifications in recruitment decisions
- Non-inclusive language, such as comments or jokes that unnecessarily bring in race or gender
- A desire for the Ministry to take a more inclusive approach to neurodiversity.

Secretary for Education – Diversity, equity and inclusion

The Ministry is committed to supporting and strengthening diversity, equity and inclusion within our organisation. Our [2026/27 Workforce Diversity Action Plan](#) is focused on:

- Valuing diversity of thought and experience
- Attracting and retaining the widest pool of capable talent
- Applying the merit principle comprehensively
- Using workforce data and employee voice

I am aware that the demands and needs across English and Māori medium can require different approaches at times, but we are committed to providing equitable support for ākonga in both pathways, and this is an expectation for the full Te Poutāhū leadership team. Under the newly confirmed structure, the Group General Manager Curriculum Learning and

Qualifications, alongside the General Managers responsible for curriculum, Māori-medium education, and the Manager Qualifications alongside the Manager, Pathways and Transitions will share responsibility for ensuring Māori education and learner outcomes remain a priority. The General Manager Progress and Achievement will also have accountabilities for delivering for Māori in both pathways. This expectation will be reinforced through leadership letters of expectation.

5.8 People and culture experience

Some more general concerns were raised by participants around 'employment hygiene' or 'getting the basics right'. These relate more to the Ministry's centralised systems and processes than Te Poutāhū specifically, and were not as strong as other themes, so are summarised more briefly below.

5.8.1 Development and progression

- Lack of opportunities for progression or on-the-job development, and limitations on pay progression for high performers, other than through appointment to a new role
- No capacity to undertake professional development due to 'busyness'

5.8.2 Employment and contracting documentation

- Delays or poor communication regarding employment or contracting documentation, particularly for temporary arrangements or those with affected status
- Delays in generating employment offers, meaning that good candidates are lost.

5.8.3 Ministry support functions

- Limited, slow or inconsistent support from centralised functions such as People Services, Finance, and Procurement, particularly in the recruitment process
- Advisory model as opposed to business partnership meaning that support must be actively sought, rather than through regular engagement
- Turnover in support functions impacting the ability to build relationships
- Leaders ultimately having the option to disregard the advice provided
- People Services support being skewed towards people leaders rather than accessible to all staff, including via guidance available on the intranet.

5.8.4 Onboarding and induction

- Minimal induction outside of mandatory online training modules, leading to process knowledge-gaps and misunderstanding of how individual teams operate
- Poor team communication or introductions when new people come on board
- A need for more comprehensive induction for staff who are new to the core public sector, such as around the Code of Conduct and machinery of government.

5.8.5 Office space and flexible working

- Insufficient desks and temporary office arrangements meaning teams are separated, impacting collaboration and culture
- Open-plan environment making some of the concerns set out in this Report more visible.

5.8.6 Communication

- Lack of centralised communication or information-sharing at a group level, including for significant announcements such as organisational restructuring or policy updates
- Some were positive about recent initiatives like the Kōrero and newsletters, and valued the team or 'all in' group events, while others thought they were "tokenistic" or missed opportunities to undertake key engagement with the group (rather than one-way presentations)
- Lack of communication about who is joining or leaving the group means people are unclear who is working on what.

5.8.7 Values

- Lack of ongoing focus on Mātāpono despite the effort to develop them initially
- Need to strengthen alignment between organisational values and leadership practices.

Secretary for Education – People and culture experience

The feedback provided in this section will be helpful for informing both the Action Plan responding to this Review, as well as our wider Strengthening Education work to improve how we do things as a Ministry.

6. Policies, processes and systems

The Reviewer was tasked with considering any gaps in the Ministry's systems, processes, policies or practices that may have contributed to the concerns raised during the Review, noting that those concerns are unlikely to be addressed through policy or guidance alone. Because this section of the Report is primarily based on the Reviewer's review of policy documents, rather than feedback from staff, this has been extracted and attached in full (with one redaction as noted) as **Annex 1** to this Summary.

Secretary for Education – Policies, processes and systems

The Reviewer has provided helpful analysis and feedback in our policies and processes, which will be used to help strengthen these.

Actions will include:

- Te Pou Rangatōpū | Corporate Services to develop a sequenced, prioritised plan for reviewing and updating these documents (6-12 months)

7. Terms of Reference – focus areas

The Terms of Reference for the Review required the Reviewer to comment on six specific focus areas. As noted, they chose not to structure the Report around these areas, to avoid giving prominence to topics that were infrequently raised, but noted in relation to these:

Whether the working environment of Te Poutāhū is respectful, safe, and professional

The Reviewer noted the range of views about the working environment set out in the Feedback section, including in relation to Leadership Practices, Culture and Workplace Behaviours and concerns about speaking up

Whether there are any concerns regarding discriminatory behaviour (particularly on the basis of gender, race, or other protected grounds) or inappropriate conduct such as bullying, harassment, sexual harassment, sexual misconduct, or aggressive or intimidating language or behaviour

The Reviewer noted that many participants did not raise any concerns about diversity, equity and inclusion, but some were raised as described in section 5.7. In relation to concerns about inappropriate conduct, as set out in section 5.3.1, the Reviewer noted that some participants considered they had seen or experienced behaviours that may be bullying, while many did not consider they had seen these but did describe unprofessional practices.

Whether there are any concerns about leadership and management practices including:

- **Whether leadership practices within Te Poutāhū reflect Ministry standards**

The Reviewer noted that the Review is not of a fact-finding nature, but that if the information shared was substantiated it appears to suggest a number of areas where the Group has not met Ministry Standards.

- **Whether the recruitment and appointment processes within Te Poutāhū have been conducted in accordance with the Ministry's policies and procedures and in a fair, transparent, and merit-based manner**

The Reviewer noted that significant concerns were raised (set out in section 5.4.1) regarding recruitment and appointment processes. If these concerns were substantiated they may be in breach of Ministry policy and, regardless, the perception that processes are relationship-based is significantly impacting the Group.

- **Whether Te Poutāhū staff/personnel have experienced or observed conduct suggesting any undisclosed or incomplete disclosure of conflicts of interest, including in relation to personal relationships between (a) Ministry personnel who may be in positions of relative authority and (b) those whom they manage or influence**

The Reviewer noted that as set out in section 5.4.2, significant concerns were raised about potentially undisclosed or inappropriately managed conflicts of interest, and a general referral was made to the Ministry about this.

Whether there are any workplace health and safety concerns in relation to psychosocial risks or hazards

The Reviewer noted that a number of concerns were raised relating to health, safety and wellbeing, in particular relating to workload and wellbeing. These are set out under Working Environment, Work Design, Leadership Practices, Workplace Behaviour and Psychological Safety.

Where Group staff have had concerns regarding the above matters, have those concerns been addressed in accordance with Ministry Standards?

The Reviewer noted that a very small number of participants referred to raising matters through formal channels, and there was a mixed response as to whether their concerns had been addressed. The majority of participants did not feel comfortable raising concerns.

8. Opportunities for improvement

Note: As this section of the Reviewer's Report is not considered to give rise to any potential concerns around confidentiality, it has been reproduced in full rather than summarised.

The Terms of Reference also specified that the Reviewer should outline any opportunities for improvement. I have collated these into this section, given that some of them address multiple themes addressed throughout this Report. I also asked participants for any views they had on opportunities for improvement, and so this section incorporates those identified by participants, along with my own analysis of the feedback and applicable policies and processes.

It is an ambitious list, especially given the delivery demands on Te Poutāhū. Many may take time and resource to do, and it will be for the Ministry to determine which if any of these steps it may take or prioritise (acknowledging the Ministry may also have other context and information which I may not be privy to) and to reflect on how it will communicate with Te Poutāhū about any actions it will implement.

Some opportunities relate to Ministry wide systems and processes, others are focused on Te Poutāhū as a Group, and some are for leaders to reflect on personally.

In many cases, leaders – especially senior leaders - will need to rebuild trust on their leadership, and that will take time and action (i.e. words alone will not address employees' concerns, they will need to see leaders mean what they say).

Workloads

- *The strongest feedback regarding opportunities for improvement was to ensure a work programme was fully scoped with realistic timeframes for delivery and implementation (and specifically for the Ministry to consider providing free and frank advice on timeframes that are realistic where applicable).*

Organisational Structure and Appointments

- *Confirm the organisational structure within Te Poutāhū and make permanent appointments to positions. For many participants this is the most important priority for the Ministry to address the wide ranging concerns.*
- *In confirming the structure, review or take into account:*
 - *The desire for it to reflect an overarching strategy for the Group (not just immediate delivery needs or replicating existing structures based around individuals).*
 - *The Group structure should account for the need for leadership accountability and capacity for strategy and work planning (in particular at the leadership team level).*
 - *Ensure the structure provides role clarity, especially where there has previously been duplication of work and encourage collaboration where applicable.*
 - *Appropriate use of resourcing options (e.g. balance between permanent employees, fixed term employees and contractors). While this may need to take into account any other factors or guidance, the Ministry may want to consider explanations for use of contractors (where applicable).*
 - *Reviewing the appropriateness of contractors as people leaders of employees (noting there may be a distinction between contractors that are deliberately engaged as people leaders and those engaged in other roles).*
 - *Longer term workforce planning to reduce reliance on 'urgent' temporary engagements.*
 - *Acknowledge there is significant and ongoing loss of trust and concerns caused by previous restructuring and soft change process, and that communication and consultation should take this into account.*
- *Ensure all appointments are made through fair, transparent processes based on merit (including ensuring that any potential conflicts of interest on appointment panels are managed appropriately). While this opportunity reflects public sector obligations, it will be important for these steps to be visible to Te Poutāhū to rebuild trust in appointment processes.*
- *Consider inclusion of representatives from outside Te Poutāhū on appointment panels.*
- *Ensure people leader training includes capability building on undertaking fair and transparent appointment processes, including management of conflicts of interest.*
- *Undertake regular reporting and monitoring on appointment processes within Te Poutāhū (in particular the advertising of vacancies compared to number of permanent or temporary vacancies).*

Leadership capability

- *Ensure appointment criteria for people leadership positions includes a focus on people leadership skills and experience (not solely simply subject matter expertise).*
- *Provide general people leader training and development for those in people leadership positions (potential topics include people management and leadership, the role of a manager in the Ministry, Ministry policies, systems, financial delegations and obligations, appointment processes, development processes, and leading positive, inclusive and collaborative workplaces).*
- *Ensure regular performance and development process for people leaders that take into account performance as a people leader and consider seeking regular feedback from employees.*

Strategy & Planning

- *Consider formulation and articulation of the strategy for Te Poutāhū.*
- *Ensure robust and long term work planning across Te Poutāhū (including work scoping and realistic timeframes) in a consistent way and that is communicated to the Group (acknowledging that leaders told me this was underway, but participants did not appear to be aware of it).*
- *Encourage the Leadership Team allocates capacity for such regular strategy and planning discussions.*
- *Review and implement written work commissioning protocols to ensure transparency, accountability, consistency and minimising duplication.*

Workplace behaviours

- *The primary opportunity for improvement is for all leaders across Te Poutāhū to reflect on, and take accountability for, how their behaviours set the tone for the culture of the Group. In the short term, this includes reflecting on how they react to this Report, including whether they are willing to take accountability and/or action to address any of the feedback in it. On an ongoing basis, this may also include taking accountability of their own actions, role modelling positive behaviours; calling out behaviours that fall below the expected standards; and ensuring there is no retaliation for any employee who voices concerns.*
- *Update policies, guidelines and processes to reflect analysis set out in section 6, in particular to include examples and ensure workers have channels to seek information or raise concerns outside their people leader and that reassurances are given regarding retaliation.*
- *Provide all workers with general education on how to prevent and respond to bullying, harassment, and discrimination in the workplace (including a focus on inclusive behaviours) and the options for seeking support or raising concerns.*
- *Prioritise enhanced training for leaders, covering their role in developing workplace culture, role modelling behaviours and how to respond to concerns (including an obligation to ensure*

no retaliation for those raising concerns).

- *Include a specific section in Sexual Harassment Policy or Guidelines to clarify the Ministry's position on consensual relationships in the workplace (i.e., they may not amount to sexual harassment but may still be inappropriate where there is a power imbalance and/or require disclosure as a conflict of interest).*

Conflicts of Interest

- *Prioritise guidance to Te Poutāhū and ensure the conflict of interest register contains all actual, potential or perceived conflicts (with appropriate management plans) to ensure they can be managed appropriately through any appointment or procurement processes.*
- *Consider further investigation or audit of potential, actual or perceived conflicts of interest of senior leaders in Te Poutāhū to ensure they are being appropriately disclosed and managed.*
- *Update policies, guidelines and training to provide guidance on when a personal relationship or friendship should be disclosed and other recommendations set out in section 6 above.*
- *Provide additional training on conflicts of interest for people leaders, given their responsibilities to manage conflicts of interest.*
- *Review the role of the Integrity team to ensure there is appropriate proactive monitoring and evaluation of the disclosure and management of conflicts of interest in practice, and ability to take action in the event of apparent non-compliance.*
- *Investigate connecting the conflict of interest disclosure form to the HR and procurement systems so that management plans (for example, alternative decision-makers) are reflected in relevant processes such as leave approvals and appointment decisions.*

Channels for Raising Concerns

- *Update policies, guidelines and processes to reflect analysis set out in section 6, in particular to ensure workers are aware they have channels to seek information or raise concerns outside their people leader.*
- *Consider how to raise awareness in the workforce of the channels to raise concerns confidentially (including by clarifying intranet content, explaining what happens with the external or confidential Speak Up channel, and also through training and development on options for addressing concerns).*
- *Undertake wider training and education with people leaders, and People Services team, on the triaging of any complaints (e.g. in particular on support and options if people do not want to be identified and how to provide reassurances regarding confidentiality and retaliation).*
- *Ensure leaders understand that an increase in concerns following these steps should be expected (and so is not necessarily a reflection of more issues, but rather a willingness to address them).*

- *Consider more regular engagement between Te Poutāhū and unions - given people's reluctance to speak up directly, this may provide an opportunity for the unions to indirectly raise matters of concern to their members.*

Communication

- *Develop an action plan outlining what will be done as a result of this Review, and communicate any actions, plans and progress regularly to people currently working in Te Poutāhū.*
- *Continue regular and structured information and communication flows across Te Poutāhū including newsletters and Group meetings, ensuring information is cascaded appropriately rather than by accident or relationship.*
- *Identify opportunities to communicate or upskill Te Poutāhū workforce in understanding programme delivery and the role of programmes expertise.*

People & Culture experience

- *Identify and implement opportunities for connection across Te Poutāhū (acknowledging these do not need to be costly or time consuming).*
- *Consider providing employees and people leaders with guidance on conducting regular performance development discussions.*
- *Identify and communicate career pathways within Te Poutāhū.*
- *People Capability to follow up with Te Poutāhū leaders to ensure consistent application of TOIL, including recording and monitoring, and a genuine ability for employees to take it (without explicit or implicit criticism).*
- *People Capability to review all upcoming expiry of fixed term agreements or redundancies and schedule proactive updates to those individuals.*
- *Identify opportunities for better supporting neurodiversity within the Ministry (for example, peer networks, education and upskilling of leaders).*

Professional Wellbeing and Cultural Supervision

- *Consider structured group supervision for workers required to engage in difficult or challenging situations with external stakeholders (i.e. building this into the operating model).*
- *Consider internal cultural group supervision to support Māori staff as part of the operating model.*
- *Undertake regular reporting and monitoring of TOIL/hours worked, sick leave and discretionary leave to identify any individuals or team that may require active wellbeing support.*
- *Consider the appointment and training of relevant representatives to act as health, safety and wellbeing on concerns that may also impact mental health (including bullying and harassment).*

Central Support

- *Consider enhancing the role of the centralised Ministry functions (in particular Integrity and People Capability) above an advisory only function to proactively support leaders and monitor compliance of Te Poutāhū with core Ministry Standards, and take action in the event of potential non-compliance (in particular in relation to appointment processes, conflicts of interest and professional behaviours).*
- *Consider central support functions offering regular 'drop in' sessions to support and upskill managers and leaders on core Ministry processes or for questions.*
- *Consider regular reporting and accountability on the status of any outstanding recruitment processes (given this was regularly identified as significantly delayed and impacting workloads).*
- *Review exit interview process to ensure feedback is addressed (subject to privacy considerations).*

Accountability and monitoring

- *Consider what support can be provided to ensure transparency and accountability of any next steps following this Review. This could include: The presence of a person from outside Te Poutāhū to have regular engagement with the Te Poutāhū leadership team to monitor progress on any action plan or culture shifts more generally; and*
- *Regular updates to staff on any next steps identified by the Ministry.*

Secretary for Education – Opportunities for Improvement

As noted in my Foreword, the Hautū | Deputy Secretary for Te Poutāhū | The Curriculum Centre supported by the Hautū | Deputy Secretary, Te Pou Rangatōpū | Corporate Services will be developing, implementing and reporting on an Action Plan to respond to the feedback received through this Review. The Reviewer's recommendations will all be considered as the plan is developed. As the Reviewer notes, we will need to prioritise the actions that will make the biggest difference – and getting your feedback on this will be important.

9. Next Steps

The Reviewer noted that they had explained to participants that decisions on next steps sat with the Secretary, and that the Terms of Reference stated that the report would be confidential, but that the Secretary may share it, or parts of it, at her discretion or in accordance with official information obligations.

The Reviewer recommended that the Secretary consider what update could be given to Te Poutāhū regarding next steps, and that any changes following the Review should be kept visible

for staff, especially in light of some of the doubts that had been raised about whether meaningful changes would follow.

The Reviewer acknowledged that some of the observations and improvement opportunities in the report are relevant to the broader Ministry, and/or may be significantly complex and take time to work through. Regular updates to Te Poutāhū staff are recommended for this reason.

The Reviewer concluded by thanking everyone who participated, commissioned or supported the review, especially where there were doubts or concerns about it. The care and passion for the work of Te Poutāhū came through strongly, which the Reviewer hoped would guide everyone in shaping the desired working environment.

Annex 1 – Policies, processes and systems

Section 3.2 of the Terms of Reference also requires me to consider and comment on any gaps in the Ministry's systems, processes, policies or practices that may have contributed to the concerns raised.

Therefore, I requested and reviewed Ministry policies that were relevant to the themes emerging in this Review. I also spoke with people in certain roles (in both the Ministry and Te Poutāhū) to understand how some of these policies are implemented in practice. This section summaries key points of these policies, together with my analysis on how they may be relevant to the feedback themes and/or opportunities for improvement.

While it is important to get the foundational documents right, it should be noted that the concerns that emerged through this Review are unlikely to be able to be addressed through policy or guidance alone. A strong focus would need to be in increasing awareness of some of the matters in the policies, and most significantly, leadership actions in role modelling and applying any such policies.

Bullying and Harassment Policies, Guidelines & Training

The Ministry has in place a Bullying & Harassment Policy as well as a Complaints Resolution Process and Guidelines. I was also provided with separate Sexual Harassment Guidelines.

- The Bullying & Harassment Policy itself is very short, with most information sitting in the Guidelines. While those Guidelines state what bullying or harassment 'isn't' they do not include any examples of what constitutes bullying (for example an acknowledgement there can be both direct and indirect examples of unreasonable behaviour). Including such examples (including the indirect or task based bullying examples set out in WorkSafe Guidelines) may be important given the nature of concerns highlighted in this Report, many of which relate to indirect examples.
- There are two limbs to a sexual harassment definition under the applicable legislation: where there is a promise or threat in connection with sexual activity (often called quid pro quo) and the broader category of behaviour that is of a sexual nature and unwelcome or offensive. The Bullying & Harassment Guidelines only contain the latter category, although 'quid pro quo', is set out in the Sexual Harassment Guidelines there is not any cross-referencing between these two documents.
- None of the Policy or Guideline documents refer to consensual relationships between workers within Ministry. The Ministry could consider including such a section that clarifies that while consensual relationships may not amount to sexual harassment there may be situations that they could still be inappropriate (e.g. if there is a power imbalance) and/or need to be disclosed and managed as a conflict of interest.
- There is limited information regarding how workers may seek help if they are concerned about bullying and harassment (especially if their concern is about their people leader). The "getting help with this policy" refers employees to their people leader, with no alternative avenues such as People Capability, a worker representative or confidential channel for advice and support.
- Similarly, informal resolution process relies heavily on the people leader, with no alternative pathway (e.g. People Capability) available for where a people leader may be part of the concern (or at a more senior level than their people leader). Given the

concerns regarding the perceived friendships between certain leaders, developing the options for alternative information or reporting channels, and emphasising this across all policy documents should be considered.

- The Bullying & Harassment Complaints Resolution process does set out both informal and formal resolution options. However, the options heavily refer to the application of natural justice and the respondent being informed (which many participants identified as being a concern), other than a reference to making a protected disclosure. The Ministry could consider whether there are any channels where a worker could at least speak to someone in confidence to explore all options and/or the possibility of addressing concerns confidentially (noting that if an employee is not willing to be identified options may be limited to support or general training).
- The Policy states it covers different types of workers (contractors, subcontractors, consultants) consistent with health and safety legislation. However, there is otherwise limited reference to such non-employee workers (e.g. in the Principles/Expectations section, in the complaints resolution processes, or how to get help).
- Both the Public Services Commission and WorkSafe recommend training for people leaders and employees. It did not appear the Ministry has in place any training for Ministry employees, leaders or contractors on the prevention or response to bullying and harassment at work. This is a significant gap, especially in respect of leaders in Te Poutāhū given the concerns in this Report. The Ministry should consider how to strengthen its training in this space, and I recommend it consider using the 'Continuum of Behaviours' (a tool used in other public sector agencies and reviews) given it focuses on discussing a number of the examples given in this Review.
- WorkSafe's Guidelines recognise Health and Safety Representatives (**HSRs**) as having a mitigation role in respect of workplace behaviours — including staff support, training obligations, and health and safety accountability. While bullying and harassment are considered health and safety issues, from what I understand of it the HSRs within Te Poutāhū are more focused on physical health (e.g. concerns regarding the office). Therefore, the Ministry should consider whether its framework can identify trained individuals (whether HSRs or others) as specific contact points for information and support regarding concerns about bullying and harassment at work.
- Overall these documents are guidelines are primary focused on *responding* to concerns rather than *prevention*. If there were to be training on behaviours at work, and management training more generally, this could also focus on a leader's role in leading positive and inclusive workplace cultures.

Code of Conduct & Training

- I was advised that in March 2026, the Ministry moved to applying the Code of Conduct for the Public Sector rather than their own standalone Code. Therefore, the applicable Code of Conduct sets out all the core public sector values and principles.
- In accordance with the value of Whakarangatira | Respectful, the Code of Conduct has a brief section on contributing to a positive and safe workplace culture. This acknowledges that all have a role to play in creating a positive workplace culture, and that this is particularly important for those in leadership roles. However, as set out above the Ministry policy framework generally (including policies and training) could include more examples of the examples of what is and is not expected).

- The Ministry has an online training module for the Code of Conduct, which some participants acknowledged was useful. As outlined in section 4.3, some participants thought additional training should be offered to those joining the public service or the first time (covering both the principles and values in the Code of Conduct, but also other practical matters relating to the machinery of government).

Conflict of Interest Policies, Procedures & Training

- The Ministry has a Conflict of Interest Policy, Guidelines, a register (operated through JIRA) and an online training module that is mandatory when someone joins the Ministry. I understand at the Ministry new joiners are required to complete a conflict of interest disclosure at the time of starting, annually and if an actual or perceived conflict arises. I have analysed these documents and practices against the PSC's Model Standards for the public sector (the **Col Model Standards**).
- The Col Model Standards emphasise strong foundations, regular training and ongoing awareness for both staff and managers (including induction, updates following policy changes, and continued reminders), and monitoring and evaluation.
- While the Conflict of Interest Policy and Guidelines provide a robust foundation, there seems little follow up on this in practice at the Ministry. This is especially the case for the category that as of the most concern to participants in this Review – namely where there is a personal relationship (including family, friendship or other close personal relationship). There was no guidance given as to when a personal relationship would need to be declared, and this did not appear to be an example in the online training. Given the perception of widespread personal relationships affecting matters across Te Poutāhū the Ministry should consider incorporating into its policy and training the guidance provided by the Auditor General and PSC ('a close and reasonably long-standing relationship with demonstrable intimacy', and recency or financial interests may also be a factor).
- Alongside the consideration of providing additional guidance to leaders on conflicts of interest, the Ministry could also consider asking Te Poutāhū (especially leaders) to provide any updates to the conflicts of interest register, to that it can audit and ascertain whether any such potential conflicts of interest are being managed appropriately and/or put appropriate mitigations in place. This may be crucial to be done before recruitment processes are in place for permanent roles across Te Poutāhū.
- The Col Model Standards outline the need for clear roles, escalation pathways, and documented responsibilities, including where conflicts involve senior individuals and require escalation beyond the immediate manager. In contrast, the Ministry system seems to be largely people-leader led. Once a disclosure is made that goes to the people leader for consideration and to discuss any management plan. I could see that management plans have been saved for some, but not all, of the disclosed conflicts in Te Poutāhū, this is inconsistent with the People Leader Guidelines that state an agreed management plan is required for all conflicts. There did not appear to be any follow up if a management plan was not uploaded, indicating a gap in the compliance and monitoring.
- Even where there is a management plan, there does not seem to be any centralised monitoring or support available in respect of any disclosed conflicts of interest. I have seen that some of the disclosed conflicts of interest in Te Poutāhū mean that certain

leaders will not be involved in the recruitment, employment or procurement decisions relating to certain individuals they have disclosed conflicts of interest. However, this does not appear to have any mechanism to monitor or support this approach. I heard and saw evidence that suggests that may not be the case (i.e. that such leaders may be directly or indirectly involved in decisions relating to those individuals). In particular, the HRIS does not appear to be updated to remove the conflicted leader from any employment decision making (such that employment decisions could be made by the conflicted leader without triggering any questions regarding appropriate delegations).

- Whilst the Integrity team have access to the conflicts of interest register, it does not appear that they have proactive role in monitoring whether management plans are put in place for disclosed conflicts, whether the management plans that are put in place are being complied with, and/or ensuring consistency across the Ministry (unless advice is sought on an issue or a complaint is made). In other words, most of the monitoring by either Business Operations or Integrity appears to be on whether documents have been completed in the Ministry system, rather than the contents of those documents or how they are applied in practice.
- When disclosing a conflict an individual is asked if they have undertaken training. I saw several individuals answered 'no' to this question when disclosing a conflict of interest, but it did not appear there was any follow up to this (i.e. they were not required to undertake a refresher). The only mandatory training is that at the start of employment, which may have been some years prior for some of these people that do have disclosed conflicts of interest.
- The Col Model Standards recognise it is an individual public servant's responsibility to raise interests for discussion, but that it is a shared responsibility between the individual and their organisation to assess the interests and identify and manage any actual, perceived, or potential conflicts. In Te Poutāhū this organisational responsibility appears to largely be borne by the people leader. Although there are some written People Leader Guidelines, it does not appear that people leaders receive any additional training in respect of how to manage conflicts of interest disclosed to them. It was also commonly noted that the people leaders were often the most stretched in terms of capacity (especially when managing conflicts of leaders given senior leaders were routinely identified as the most stretched). Therefore, the Ministry may want to reflect on what additional training, support, capacity and checks and balances could be put in place to assist people leaders in managing conflicts of interest.
- ***[One Paragraph has been redacted here as it relates to feedback from one participant and could potentially be identifiable]***
- Finally the Col Model Standards emphasise these are ongoing obligations. While the Ministry has in place robust foundations for the commencement of employment or engagement, many of the concerns appear to relate more to how these unfold in practice at a later stage, which was the primary concern for a number of participants.
- Based on the information I have seen, there may be a number of alleged situations where the management of conflicts of interest in practice may not at the level expected of the public service and so that warrants further investigation. This is reflected in my separate referral back to the Ministry as to certain categories of conflicts of interest it may wish to audit or investigate further to ensure they are being managed appropriately in practice. I emphasise this referral is general and does not contain identifiable details of any participant in this Review.

Recruitment and Secondment Policy & Processes

- The Recruitment Policy states “*All permanent positions, secondments, and fixed term positions must be advertised for a minimum of 5 working days. All vacancies must be advertised using 1 or more means.*”
- The Secondment Policy notes there is an exemption from advertising for ‘acting up’ arrangements, but this is not defined. I was told the People Capability advice is that if the arrangement is for more than 3 months it should be notified (but this is advice only and up to the leaders as to whether to accept it). It was not clear to me how an acting up arrangement was different to a secondment.
- As set out in 5.4(a) above, only 3 secondments were advertised through the Recruitment team in the last 12 months, despite a significantly higher number of secondment or acting up arrangements starting or extending (many of which were for more than 3 months, and sometimes have ended up more than 12 months).
- This means that many secondments do not appear to have been compliant with this Policy. While for any ‘acting up’ arrangements may mean they have technically been compliant with this Ministry’s policy (that does not require advertising for acting up), the strong feedback from participants was that these practices (the volume of them, the length for which they are in place, and what appears to be a deliberate preference of leaders for not notifying at least some of these vacancies) is undermining the integrity expected of the public sector in respect of appointment processes.
- The Ministry should consider whether to provide definitions of each and incorporate guidance into its Policy as to when a temporary vacancy (whether acting up or secondment) should be notified or advertised.
- As the Ministry’s People & Capability function is characterised as being ‘advisory’ only, there does not appear to be any centralised monitoring of this Policy and therefore the Public Service Act 2020. It also appears that Te Poutāhū leaders had often disregarded the advice, and so it should be considered how accountability for compliance with these obligations should be managed (i.e. regular audits of HRIS data compared to Recruitment data and/or ability for its People Capability function to monitor and follow up in the event of apparent non-compliance).

Speak Up & Protected Disclosure Policies, Guidelines, Training (and other processes for raising concerns)

- The Ministry processes for raising concerns appears to include:
 - For concerns regarding bullying and harassment, the Bullying and Harassment Complaints Resolution Process
 - Speak Up Framework (policy, quick reference guides and processes) and which says it can apply to bullying and harassment, conflicts of interest, criminal activity, discrimination, environment health and safety, fraud, inappropriate behaviour, breach of Ministry policy.
 - Protected Disclosure Policy for suspected serious wrongdoing
 - Via People Services or JIRA (eg the Code of Conduct refers everyone to this channel for getting help with the Code of Conduct).
 - People Leader (the Bullying & Harassment and Conflicts of Interest Policies direct people to their people leader for further help).

- The Speak Up Framework is a comprehensive set out of documents that contains a lot of detail regarding how a worker may 'speak up', different channels for doing so, and what will happen if you do so. Therefore, while these foundations appear to be in place, the feedback from participants show there is low trust in using these, due to fear of retaliation from leaders.
- There is no reference in the 'Speak up' Guidelines for People Leaders about ensuring the person who has spoken up is not subject to retaliation for doing so. Given this is the primary reason giving for not speaking up during this Review, the Ministry may want to consider how to strengthen this foundation in its framework but also practice (including education of leaders, communications to staff, and monitoring of any users of the Speak Up channels to ensure they have not experienced disadvantage).
- I was informed that using the Speak Up JIRA form means this information is only submitted to two members of the ER team, to ensure appropriate confidentiality. While this was stated in other parts of the Speaking Up Guidelines, it was not apparent on the form itself or the Portal and so the Ministry may want to emphasise this information in light of the concerns regarding confidentiality.
- Given the primary concern is about leaders becoming aware an employee has raised concerns, the Ministry may want to reflect on what further information could be included in the Portal and Speak Up framework to address this concern, for example any resolution options that may not involve notification (it is in some sections but could be further emphasised, subject to limitations where confidentiality is sought).
- It does not appear that there is any onboarding or education to ensure workers are aware of the how the Speak Up framework operates and/or that people leaders understand their role in terms of receiving disclosures and ensuring there is no retaliation (while training was shown on the intranet page, the link was not operational). The Ministry should consider prioritising building awareness of these channels.
- It has been reported that several employees believe others have submitted a Speak Up disclosure, however this does not appear match the actual Speak Up disclosures on record and so participants may be mistaken for using the normal People Services JIRA form. Further awareness building may address this misunderstanding and to emphasise the different process for Speak Up (especially if confidentiality is a concern).
- The Speak Up Framework does refer to an external channel that can be used for anonymous concerns (via EAP) but immediately notes this is reported back to the Ministry. No one mentioned this process during this Review, so it does not appear to be widely used. If it is still available, the Ministry should consider whether such an external reporting line could be expanded to include support and advice on options before reporting back to the Ministry.
- I note that the relevant sections of the intranet containing other relevant policies (such as bullying, harassment, Code of Conduct, and conflicts of interest) could be updated to cross-reference the Speak Up framework (given this contains channels other than the applicable people leader). At this stage those sections all point non-manager employees back to their people leader (who may be involved in their concerns).
- The Protected Disclosure Policy largely reflects the legislative framework for protected disclosures, including what may constitute serious wrongdoing. For "non-managers" it again refers them to their people leader to get help with this policy (which does not acknowledge that the concern may be about a people leader and/or there may be a

desire for confidentiality). While the Speak Up framework is referenced elsewhere in this policy, this could also be referenced in this section.



**Te Tāhuhu o
te Mātauranga**
Ministry of Education

He mea tārai e mātou te mātauranga
kia rangatira ai, kia mana taurite ai ōna huanga.

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