Te Tāhuhu o te Mātauranga
Ministry of Education

Regulatory Analysis Summary: Shift to clearly defined national curriculum

Decision sought	Ministerial decisions about national curriculum statements
Agency responsible	Ministry of Education
Portfolio Minister(s)	Minister Stanford
Date finalised	12 October 2026
Ministry for Regulation tracking number	

Brief description of the Minister's regulatory proposal (preferred option)

The Minister has commissioned a knowledge-rich curriculum, which is a clearly defined national curriculum (option 4), that specifies year-by-year content, sequencing, progression, and teaching approaches, and assessment and aromatawai. Aromatawai is the term for assessment in Te Marautanga o Aotearoa.

The Minister sets teaching, learning, and assessment and aromatawai requirements through national curriculum statements, a type of secondary legislation made under section 90 of the Education and Training Act 2020. The proposed change supports students to gain important knowledge and skills no matter where they go to school or kura.

Summary of the problem definition

Some students miss out on important knowledge and skills because the National Curriculum is too high level and not clear enough about what students should be taught and learn when. Schools and kura need to decide what to teach when, which increases workload and leaves learning to chance.

Summary of options considered for addressing the problem

We considered the following mix of regulatory, deregulatory, and non-regulatory options:

- Option 1: Flexible curriculum framework (status quo – loose regulation).
- Option 2: Locally led curriculum (deregulatory option).
- Option 3: Moderately defined national curriculum.
- Option 4: Clearly defined national curriculum – preferred option.
- Option 5: National syllabus (tightly prescribed regulation).

Is the Minister's preferred option the same as the preferred option in the RAS?

Yes.

Summary of the main benefits of the Minister's preferred option

We don't know the monetised benefits. Employment has measurable economic benefits, but we cannot isolate the curriculum's contribution well enough to monetise those benefits. Non-monetised benefits include:

- students will be more likely to develop important knowledge and skills no matter where they go to school or kura so they will be better positioned to achieve in further study and employment
- schools and kura will no longer bear as much responsibility for detailed curriculum design: rather than spending time planning what to teach, teachers will be better able to focus on meeting their students' needs
- the use of assessment and aromatawai supports early identification of learning gaps and evidence-informed teaching decisions
- better targeting of implementation supports, including resources and professional learning and development.

Schools and kura still have some flexibility to implement teaching and learning programmes that are engaging and meaningful, and can draw on global, national, and local contexts.

Summary of the main costs of the Minister's preferred option

We don't know the monetised or non-monetised costs for the shift to a clearly defined curriculum. For all curriculum types, curriculum costs fall into two broad categories: implementation costs and administration costs, including capability costs (developing educator knowledge and skills), and compliance costs (meeting, monitoring, and demonstrating curriculum requirements). The scale of these costs will vary depending on the extent of change required and how closely current practice aligns with the revised curriculum.

Curriculum design involves a trade-off between national direction (consistency) and local flexibility. More detailed curriculum requirements increase central development and implementation costs but reduces the workload for schools and kura to decide what should be taught and learnt when. Less detailed requirements provide greater flexibility for schools and kura but require them to invest more time, expertise, and resources in curriculum design and implementation.

In the short term, we expect curriculum changes will take time, effort and investment. The Ministry is investing in implementation supports, including curriculum resources and professional learning and development so principals, teachers, and other staff have the capabilities needed. Schools and kura will no longer need to spend funding or teacher time on detailed curriculum design. Some schools and kura may have higher costs if the gap between the national curriculum expectations and their current delivery is large. Alongside Government funding, schools and kura can use their operational funding to support National Curriculum implementation and day-to-day running costs.

Does the RAS indicate that the benefits of the Minister's preferred option are likely to outweigh the costs?

Yes.

Have any potential inconsistencies with the principles of responsible regulation in the Regulatory Standards Act been identified in relation to the Minister's preferred option?

No.

Limitations and constraints on analysis			
Condensed timeframes	**No**	Constrained option set	**No**
Legislative constraints	**No**	Data and evidence gaps	**Yes**

Ministerial direction	**Yes**	Other	**No**
Limited public consultation	**No**		

Summary of limitations and constraints on analysis

Ministerial and Government direction has limited the curriculum design choices. The Government's focus is on lifting educational achievement so that 80% of Year 8 students are at or above the expected curriculum level for their age in reading, writing and maths by December 2030. The Government's priorities include: a clearer curriculum (establishing a knowledge-rich curriculum grounded in the science of learning), a better approach to literacy and numeracy, and smarter assessment and reporting. The Government's priorities have shaped the criteria to analyse the options, alongside options proposed by the Ministry for Regulation. The Minister has also commissioned a knowledge-rich curriculum.

Another limitation is that we have data and evidence gaps. We lack information about the costs of different curriculum types: curriculum costs are borne by the government, schools and kura (boards, leaders, teachers, and other staff), and/or students, for example, if they do not gain important knowledge and skills. There is clear evidence that a knowledge-rich curriculum can support student achievement, including equitable outcomes, better than other curriculum types.[1] However, it will not be possible to isolate the impact of the curriculum alone, given its link with teacher capability, change processes to support implementation of the new curriculum, and other system reforms. While curriculum is one consideration, educational achievement is impacted by a range of factors, including: the quality of teaching, qualifications, and learning support; attendance; socio-economic barriers, such as housing insecurity, financial hardship, and transience arising from frequent home and/or school changes; and employment, health, and wellbeing.

These data and evidence limitations will be mitigated because a regular cycle of curriculum area reviews will help the National Curriculum to support educational achievement, including equitable outcomes, over time. Socio-economic barriers are being addressed through other Government work.

I am satisfied that, given the available evidence, this RAS represents a reasonable view of the likely costs, benefits and impact of the preferred option.

Responsible Manager(s) signature: 9(2)(a)

9(2)(a)
Senior Policy Manager
12 October 2026

Quality Assurance Statement	
Reviewing [Agency/Agencies]: Ministry of Education	**QA rating:** Partially meets

[1] Learning First (2025) *Knowledge-rich curriculum: a review of the literature. Final report.* See: NZC - A knowledge-rich curriculum

Panel Comment:
The Ministry of Education's Quality Assurance Panel has reviewed the Regulatory Analysis Summary prepared by the Ministry of Education (dated 23 July 2026). The panel considers that it *partially meets* the Quality Assurance criteria. The panel acknowledges that there was related extensive consultation on a knowledge-rich curriculum as well as continual feedback on specific curriculum learning areas. However, given there has not been specific consultation on this regulatory proposal, this means the consulted criteria cannot be fully met. There were also limitations around analysis on the comparative differences between some of the proposals. Despite this, the analysis provides clear, concise and complete information about the problem definition and the case for change and provides sufficient analysis of the options and proposals to support broader decision making.

Section 1: Diagnosing the policy problem

What is the policy problem?

1. Some students miss out on important knowledge and skills because the National Curriculum is too high level and not clear enough about what students should be taught and learn when or how the curriculum should be taught, learnt, and assessed. Consultation found that the 2007/2009 National Curriculum has set high level expectations and has limited information about the knowledge and skills students should be taught and develop at each stage of schooling. There are concerns that the balance between curriculum flexibility and consistency is not appropriate. Many submitters supported a clearer, more explicit curriculum that specifies what students should learn and when. Submitters also want teachers to use professional judgement to meet the needs of diverse students.
2. Under the 2007/2009 National Curriculum, schools and kura need to decide what to teach when, which increases workload and leaves learning to chance. They invest substantial time and resources in designing curriculum-related content, sequencing, progression, teaching, and assessment and aromatawai approaches.[2,3] Teachers and leaders frequently raise issues about workload, resourcing, time, and professional learning requirements.
3. The National Curriculum's focus on outcomes contributes to uneven student achievement, including in literacy and mathematics. School, qualification, and university entrance achievement vary significantly by ethnicity, socio-economic background, disability status, location, and provision type (for example, immersion settings). Persistent disparities remain for Māori, Pacific, disabled learners, and learners from lower socio-economic communities (see Annex 1 for an overview of educational achievement rates).[4] New Zealand's curriculum approach is quite different to other jurisdictions, which usually have more detailed curriculum expectations.[5]

The Minister sets curriculum requirements, which inform school and kura teaching and learning programmes

4. The Minister of Education makes national curriculum statements under section 90 of the Education and Training Act 2020 ("the Act"), which set out teaching, learning, and assessment and aromatawai requirements for schools and kura.[6] Before amending a national curriculum

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[2] *Strengthening curriculum, progress and achievement in a system that learns: a report by the Curriculum, Progress and Achievement Ministerial Advisory Group*. 2019. https://ndhadeliver.natlib.govt.nz/delivery/DeliveryManagerServlet?dps_pid=IE52084486

[3] *Ministerial Advisory Group: redesigning the English and Mathematics and Statistics learning areas in the refreshed New Zealand Curriculum for primary, intermediate and early secondary school students: Years 0-10. Initial report.* 2024. Report-from-the-Ministerial-Advisory-Group-March-2024.pdf

[4] See:

- Student Achievement | Education Counts
- Factsheet - Target 7 - More students at expected curriculum levels - March 2026
- 2025 Annual Report on NCEA, UE and NZ Scholarship Data and Statistics
- Key insights into disabled people in education | Whaikaha - Ministry of Disabled People

[5] For example, Singapore has a highly detailed curriculum with specific syllabi containing the content, pedagogy, and assessment expected for each subject.

[6] Section 90 national curriculum statements are a type of secondary legislation.

statement, the Minister must have regard to the listed minimum considerations[7] in section 90(1).[8]

5. The National Curriculum has two pathways:
    a. Te Marautanga o Aotearoa
    b. The New Zealand Curriculum.

6. Te Marautanga o Aotearoa is written in te reo Māori and focused on revitalisation of te reo Māori through teaching and learning programmes that are culturally grounded in te ao Māori and tikanga Māori. This pathway is designed to develop literacy (te reo matatini) in te reo Māori first, and English later.

7. The New Zealand Curriculum is primarily written in English and focused on delivery in a range of settings, in ways that reflect each school's community. This pathway is designed to develop literacy in English, but schools and kura may choose to also develop literacy in other languages.

8. The New Zealand Curriculum has learning areas and subjects, which use strands to group related knowledge, skills, and concepts into broad themes so that teaching and learning are structured and coherent. Equivalent arrangements apply to Te Marautanga, which has wāhanga ako (learning areas) and subjects. These use whenu (strands) to group related knowledge, skills, and concepts. Under section 164 of the Act, schools and kura must develop and implement teaching and learning programmes based on the National Curriculum (see Annex 2 for a system map of how the National Curriculum is regulated).

Section 2: Assessing options to address the policy problem

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

9. The following criteria will be used:
    a. **Effectiveness:** Is the option effective in supporting educational achievement? Does the option take account of relevant evidence and international practices for setting national curricula? Does the option achieve consistency of practice, while still allowing a level of flexibility to respond to individual needs?
    b. **Equitable outcomes**: Does the option support equitable outcomes for students, including Māori, Pacific, and those with learning support needs?
    c. **Efficiency**: Is the option efficient, that is, practical to implement for school boards, leaders, and teachers within current funding? Is it the best use of resources?

10. Effectiveness (educational achievement) is the most important criterion: this is the paramount objective of school boards[9] and in line with the Government's goals and priorities.

What scope will options be considered within?

11. We have considered options that are in line with:

[7] This requirement came into force on 6 July 2026. Before this, there were no minimum considerations.
[8] These are the Secretary's report about the curriculum statement review (if any), information about the educational achievement of students in the reviewed learning areas, subjects, and wāhanga ako, relevant evidence, and international practice relating to the setting of curricula.
[9] See section 127(1).

a. Government priorities, including a clearer curriculum (the shift to a knowledge-rich curriculum), a better approach to literacy and numeracy, and smarter assessment and reporting

b. recent changes to the Education and Training Act 2020, including to school board objectives and curriculum-related settings, including curriculum reviews

c. the Māori Education Action Plan[10] and the Action Plan for Pacific Education 2020–2030[11]

d. findings from consultation with students, the sector, communities, employers, tertiary education providers, expert groups, and others.

12. The Kōrero Mātauranga | Education Conversations work highlighted the need for stronger connections between curriculum, teaching, assessment, and progress information. More than 43,000 people shared their views about the future of education. Participants valued both equity and excellence, emphasising that all learners should have access to important knowledge and skills while also developing broader competencies and capabilities. Participants wanted a system that supports learning progress and provides clear information about achievement without creating unnecessary compliance.

13. The 2018/19 Ministerial Advisory Group found broad support for a clearer and more detailed curriculum that provides greater consistency in what students learn.[12] However, some people emphasised the importance of retaining sufficient flexibility for schools and kura to respond to local contexts, learner needs, and special character. Key concerns related to implementation workload, professional learning requirements, and ensuring the curriculum supports equitable outcomes for diverse learners. Overall, feedback highlighted the need to strike an appropriate balance between national consistency and local flexibility.

14. The 2024 Ministerial Advisory Group advised that the curriculum should be more knowledge-rich, clearly sequenced, and grounded in the science of learning.

15. This RAS also takes account of consultation feedback on draft learning areas and wāhanga ako. While there has not been specific consultation about a knowledge-rich curriculum, people have been able to comment on draft learning areas. Through consultation on learning areas and wāhanga ako, we have had extensive feedback about the knowledge-rich curriculum and its components. The exception is the adoption of mandated teaching times for reading, writing, and mathematics, which was part of the Government's 100-day manifesto.[13]

16. We included a deregulatory option, in line with the Ministry for Regulation's expectations for regulatory analysis summaries. The national curriculum statements have been informed by evidence, international practices, engagement, and consultation.

17. The work has considered diverse student needs and different state and state-integrated school and kura interests. This includes:

18. Kura Kaupapa Māori and designated character schools, including Ngā Kura ā-Iwi, kaupapa Māori kura and Montessori schools, which need to operate in accordance with their special

[10] See Māori Education Action Plan - Ministry of Education

[11] Ministry of Education (2023) *Action Plan for Pacific Education.* See Refresh of the Action Plan for Pacific Education 2023 - Ministry of Education

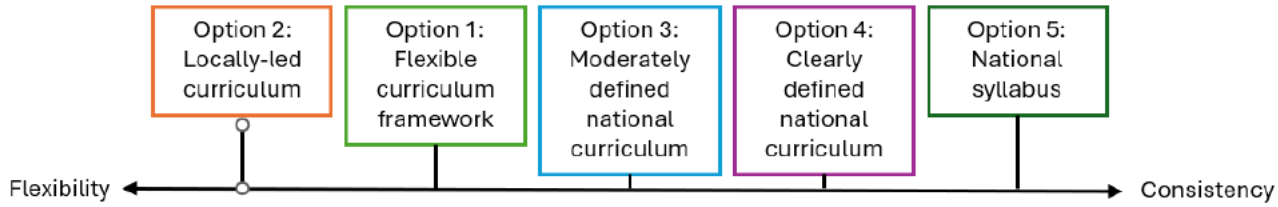
[12] The first round of engagement had 2,053 responses; the second phase had 193 written responses with feedback from 745 people. As well, 4,120 people attended 67 events about the proposed changes.

[13] See: Regulatory Impact Statement: 100-day plan - Mandating teaching times for maths, reading, and writing | Ministry for Regulation.

characteristics and provide education that differs significantly from education in an ordinary State school[14]

a. State-integrated schools, which need to reflect their special character.[15]

What options are being considered?



19. Five options[16] have been analysed in detail.

Option 1: Flexible curriculum framework (status quo – loose regulation): The National Curriculum sets out a high level vision, principles, and learning expectations. Schools and kura have high flexibility about how they interpret curriculum expectations, including what content they cover when, assessment or aromatawai practices and judgements, sequencing, progression, and pedagogy. The Ministry issues guidance but some schools and kura will not follow the guidance.

For Years 0–10, most learning areas or wāhanga ako must be taught, except learning languages and Ngā Reo, which are optional.[17] For Years 11 and above, schools and kura choose the subjects they offer; assessment drives teaching practices more than curriculum.

Option 2: Locally led curriculum (deregulatory option): Each school decides their own curriculum content, assessment and aromatawai, sequencing, progression, and pedagogy. The Minister revokes national curriculum statements and there are no nationally specified requirements, but guidance may be issued.

Option 3: Moderately defined national curriculum: The National Curriculum has moderately defined teaching, learning, and assessment and aromatawai. Components include:

- sequencing of learning and links between knowledge, skills, and capabilities
- progress outcomes in 2–3-year phases (one end-of-phase progress outcome for each learning area or wāhanga ako, with more granular progress markers for early literacy and mathematics)
- some direction on how to assess progress towards the outcome, but not specific requirements

[14] Sections 201 and 204.
[15] Section 211/212, schedule 6 clause 28.
[16] Option 2 gives the most flexibility to schools. Options 1, 3, 4, 5 have increasing levels of consistency.
[17] The previous curriculum documents signalled that learning languages was mandatory for years 7–10 students, but this was never gazetted. When schools teach languages, there is required learning content.

- some direction about the design of school teaching and learning programmes: schools and kura retain flexibility to meet their students' needs and interests.

For Years 0–10: most learning areas or wāhanga ako must be taught, except learning languages and Ngā Reo, which remain optional. For Years 11 and above, schools and kura choose the subjects they offer; assessment drives teaching practices more than the National Curriculum.

Option 4: Clearly defined national curriculum: The National Curriculum sets out clear year-by-year content, assessment and aromatawai, sequencing, progression, and pedagogy. Components include:

- sequencing of teaching and learning
- specified assessment and aromatawai tools[18]
- progress markers and progress descriptors, which support consistent judgements about student learning progress over time
- mandated teaching times
- direction about school teaching and learning programmes to better support student pathways: schools and kura have some flexibility to meet their students' needs and interests.

For Years 0–10, most learning areas or wāhanga ako must be taught, except learning languages and Ngā Reo, which remain optional. For Year 11, there is some subject choice: mandatory subjects are English, mathematics and statistics, and science (for those using the New Zealand Curriculum); and Te Reo Rangatira, Pāngarau, and Pūtaiao (for those using Te Marautanga).

For Years 12 and above, students must generally do five subjects; schools and kura choose the subjects they offer students to select from; assessment and aromatawai are based on the National Curriculum.

Option 5: National syllabus (tight regulation): A tightly prescribed National Curriculum that defines content, assessment and aromatawai, sequencing, progression, and teaching approaches at each year level with minimal local variation. Schools and kura have mandated teaching and learning times and requirements with limited flexibility to design their own teaching and learning programmes.

[18] Currently, specified assessment and aromatawai tools include the Phonics Check, Hihira Weteoro, the SMART Tool, and Progressive Achievement Tests (PATs).

Multicriteria analysis

	Option One Flexible curriculum framework – status quo	Option Two – Each school decides what is taught, learnt, and assessed [deregulatory option]	Option Three – Moderately defined national curriculum	Option Four – Clearly defined national curriculum	Option Five – National syllabus
Effectiveness	**0** Some students miss out on important knowledge and skills.	**--** Quality teaching and learning is left to chance, and some students will miss out on key knowledge and skills.	**+** Provides more direction than the status quo but, as schools and kura can decide specific content, student access to knowledge and skills and educational achievement will vary.	++ Evidence signals that this approach provides more consistency in the content that students are taught and can learn, supporting educational achievement.[19] Schools and kura will be better able to focus on what matters most and have some flexibility to tailor teaching and learning programmes to global, national, and local contexts.	- Provides consistent detailed content but does not allow teachers to respond to different learner needs, which will impact educational achievement.
Equitable outcomes	0 Some students miss out on quality teaching and learning, which impacts equitable outcomes.	-- Increases risk of students missing out on important knowledge and skills, including for Māori, Pacific, disabled learners, and those with learning support needs.	+ Schools and kura can respond to the specific needs and context of their students, but students can be taught different content and may miss out on important learning.	+ Evidence shows knowledge-rich approaches can reduce inequality and improve outcomes[20], which may positively impact Māori and Pacific students, and those with learning support needs.	- Ensures uniform teaching across the country but increases risk of students not gaining necessary skills because teachers cannot respond to diverse student needs, including for Māori, Pacific, and students requiring tailored learning support.
Efficiency	**0** Schools and kura are responsible for detailed curriculum design and implementation and access a wide range of bespoke supports.	**--** Increases school workload and costs. There would be more variable teaching and assessment practices. Schools and kura would need to access implementation support (for example, resources and professional learning and development), which would need to meet wide-ranging needs and approaches.	**+** Easy transition for most schools and kura. Schools and kura still carry the workload of determining what to teach. Enables a coherent focus for implementation supports, which would need to cover content selection and design as well as practice shifts.	**+** Some schools and kura are already using some curriculum features, for example, structured literacy, but some schools and kura are not. Schools and kura retain some flexibility to meet their students' needs but will no longer need to decide what is to be taught or when it should be taught. There is more certainty about key assessment and aromatawai. Schools and kura that have a special character and/or use multi-level classes may have more complex implementation challenges. Greater national consistency makes it easier to provide implementation supports and promote effective practice.	0 This approach reduces teacher planning workload and supports national consistency, allowing implementation supports to align directly with the curriculum. Schools and kura will have very limited ability to give effect to their special character and may choose to omit content, which reduces consistency. Providing for special cases could mitigate this risk but would increase complexity and require additional implementation support.
Overall assessment	**0** Variable educational achievement, equitable outcomes, and high workload for schools and kura.	**--** Highly variable educational achievement, poor equitable outcomes, and increased school workload and costs.	+ Supports educational achievement and equitable outcomes. Better efficiency, while preserving flexibility.	**++** Strongly supports educational achievement and equitable outcomes. Over time, this would become more efficient than the status quo. Teachers make informed judgements about diverse student needs.	- May not support educational achievement. Does not support equitable outcomes or allow schools and kura to respond to diverse student needs.

Key	--	-	0	+	++

[19] Learning First (2025) *Knowledge-rich curriculum: a review of the literature.* NZC - A knowledge-rich curriculum and Latest Curriculum Insights study results released
[20] Learning First (2025) *Knowledge-rich curriculum: a review of the literature.* NZC - A knowledge-rich curriculum

	Much worse than the status quo	Worse than the status quo	No change from the status quo	Better than the status quo	Much better than the status quo

Section 3: Cost-benefit analysis

What are the additional costs and benefits of the preferred option?

Benefits

20. We don't know the monetised benefits from moving from a broad and enabling National Curriculum to a clearly defined national curriculum, as curriculum settings are only one factor influencing student outcomes and the benefits cannot be isolated over time. Employment has measurable economic benefits, but we cannot isolate the curriculum's contribution well enough to monetise those benefits. Non-monetised benefits include greater access to the knowledge, skills, and capabilities valued by employers, tertiary education providers, and communities. This is expected to improve young people's readiness for further education, employment, and participation in society. There may also be wider benefits for wellbeing and social outcomes.

21. We expect that the benefits will build over the students' educational journey and will better support students who change school two or more times a year[21], through a focus on foundational knowledge of reading, writing, and mathematics, and carefully sequenced steps. Schools and kura (boards, principals and other school leaders, teachers, and other staff) will have more clarity about and support for effective teaching, learning, and assessment and aromatawai. Schools and kura will no longer bear as much responsibility for detailed curriculum design: they will spend less time deciding what to teach and more time on teaching. The use of assessment and aromatawai supports early identification of learning gaps and evidence-informed teaching decisions. Teachers will continue to make professional judgements about how to support diverse students to access and succeed in the required content.

22. The changes will better support earlier identification of needs through the use of consistent assessment and aromatawai. Over time, we expect to see more effective responses that should reduce the demand for intensive targeted support. Employers, tertiary education providers, and communities benefit when school leavers are better prepared for employment and study.

Costs

23. We don't know the monetised costs for a shift to a clearly defined national curriculum relative to other curriculum options. There will always be costs for any form of curriculum.

24. Change costs arise from transitioning to the new curriculum, including curriculum development, updating resources and assessment tools, staff time to redesign teaching and learning programmes, and the implementation support provided by the Ministry. Capability costs arise from building and maintaining the knowledge and skills needed to implement the curriculum effectively, including professional learning and development, leadership support, curriculum expertise, and ongoing guidance for teachers and school leaders. Together, these costs are likely to be highest during the transition period and for schools and kura whose current practice differs most from the new curriculum.

25. A more detailed national curriculum will have higher costs than a looser curriculum. There are costs for developing a clearly defined Te Marautanga o Aotearoa given that the resources and

[21] Research suggests that students who move home and/or school frequently are more likely to underachieve in formal education when compared with students who have a more stable school life. See: Transient students 2024

workforce are within New Zealand. Compliance costs arise from the need to understand, implement, monitor, and demonstrate alignment with curriculum requirements. These may include time spent on planning, documenting teaching and learning programmes, participating in monitoring and review processes, and using any required assessment and aromatawai. Baseline funding supports National Curriculum design, implementation, and administration, including teacher capability. Recent Budgets have also included significant investments in the National Curriculum and assessment. These investments are not specific to a clearly defined national curriculum, but reflect the funding required to refresh, maintain, and deliver the National Curriculum and associated supports.

26. Recent curriculum-related investments include: $67 million in operating funding in Budget 2024 for structured literacy approaches, covering professional learning and development, resources, online supports, administration and evaluation; $287 million operating and $10.7 million capital funding in Budget 2025 for curriculum and assessment initiatives that support the system-wide approach to raising achievement, including the SMART tool, Science and Pūtaiao Kits, accelerative programmes, and other curriculum and assessment supports; and, in Budget 2026, $136 million in operating funding for 12 components to further strengthen mathematics and literacy teaching and learning (including resources, professional development, and additional supports) and $257 million in operating and $7 million in capital funding in support of the new secondary curriculum (including professional learning and development, and resources) and to strengthen vocational education and training.
27. This includes development of both The New Zealand Curriculum and Te Marautanga o Aotearoa, costs for Phase 5 subject development and operational spend. The Ministry does not hold a breakdown of the total expenditure paid to all external parties, including consultant fees, contractor rates, and associated departmental costs. The Ministry is developing guidance and implementation supports, including professional learning and development, using baseline and Budget funding.
28. The revised National Curriculum includes assessment and aromatawai requirements. There is no cost to schools and kura for using the Phonics Check, Hihira Weteoro, or the SMART Tool.[22] Given that schools and kura can use a free tool, we have not quantified the costs of schools and kura choosing to use Progressive Achievement Tests (PATs) as an alternative to the SMART Tool.
29. Some schools and kura may face higher costs than others during the transition, depending on how much they need to adjust their current delivery approaches (for example, to balance special or designated character with national curriculum or change how they deliver teaching within multi-level classrooms). Some schools and kura may face costs if they shift from using multi-year classes. High equity index schools and kura may need to do more work to address the effects of student disadvantage, including lower prior achievement, attendance challenges, and additional learning needs. With a nationally consistent curriculum, it will be clear what students are entitled to be taught and learn, creating pressure on schools and kura, and the system as a whole, for those needs to be met. These risks are reduced because schools

[22] Schools and kura pay a per-student fee for Progressive Achievement Tests (PATs). The PATs have a $300 annual subscription per school and kura, $30 per subject, and the assessments cost $2.50–$3.50 per student. If PATs are used for twice-yearly assessments of reading, writing, and mathematics, schools and kura cover the estimated $15–$25 cost per student through operating funding. In some cases, the school and kura can use other assessments agreed in the student's support plan: we do not have cost information for these assessments.

and kura can prioritise use of their operational funding but this may limit their ability to absorb other cost-pressures or undertake improvement in other areas.

Table 1: Cost-Benefit Analysis

Nature of the benefit/cost to New Zealand	Dollar value of impact (or quantified impact)	Scale of unquantifiable impact	Nature of impact – one-off or ongoing	Source of evidence
Additional benefits of the preferred option compared with taking no action				
Clarity and consistency about what students should be taught and learn	No known monetised value	Medium: More students will get access to a consistent, clearly defined national curriculum, which can contribute to better educational achievement. Easier to identify students whose needs aren't being met and respond earlier and more effectively.	Ongoing	NZC - A knowledge-rich curriculum
More effective and nationally consistent teaching practices	No known monetised value	Medium: Reduced variation in teaching, learning, and assessment practices.	Ongoing	NZC - A knowledge-rich curriculum
Better preparation for further study and employment	No known monetised value	Medium: When students have relevant knowledge and skills, they are more likely to succeed in qualifications and post-school.	Ongoing	
Supports more effective monitoring and accountability	No known monetised value	Medium: Makes it easier for the Education Review Office (ERO) and the Ministry to monitor school performance and intervene if needed.	Ongoing	
Total annual benefits	N/A	Medium	Not known	
Total one-off benefits	N/A	Medium	Not known	
Additional costs of the preferred option compared with taking no action				
Implementation	No known monetised costs	Medium: Development of both The New Zealand Curriculum and Te Marautanga o Aotearoa. Indirect costs include school planning, professional learning and development, and implementation to support the revised National Curriculum.	One-off	*Māori education - Ministry of Education* *FINAL B25 Factsheet - Curriculum and Assessment.pdf*
Administration	No known monetised costs	Medium: Schools and kura can use free assessment and aromatawai tools, for example, the Phonics Check, Hihira Weteoro, or the SMART tool. Instead of the SMART tool, schools and kura can use PATs for twice-yearly reading, writing, and mathematics assessments, at an estimated cost of $15–$25 per student.	Ongoing	
Ongoing monitoring and, if needed, interventions	No additional monetised costs: within ERO and Ministry baselines.	Medium	Ongoing	
Total annual costs	Not known	Medium	Not known	
Total one-off costs	Not known	Medium	Not known	
Net impacts compared with taking no action				
Total annual benefits minus costs	Not known	Medium	Not known	
Total one-off benefits minus costs	Not known	Medium	Not known	

Are the benefits of the preferred option expected to exceed the costs?

30. On balance, the benefits are expected to exceed the costs. Student educational outcomes are supported when there is a clearly defined national curriculum. Higher educational achievement is correlated with better work and social outcomes, resulting in lower costs for the government over time.

What are the impacts on different groups of the preferred option compared with taking no action?

31. There is demand for a clear and coherent National Curriculum[23], so teaching and learning is not left to chance but, given the diversity of views across the system, it is not possible to get consensus about curriculum settings. For example, there are different views about what effective indigenous education looks like. The National Curriculum changes will impact State and State-integrated school students, as there is more clarity on what will be taught, when, and how. When students have relevant knowledge, skills, and qualifications, they will be better positioned to achieve in further study and employment. Given experiences in other jurisdictions, this change is likely to support educational achievement and equitable outcomes.

32. The precise impact on groups experiencing inequitable outcomes, including Māori, cannot be determined in advance. Curriculum is one of a range of interacting factors that influence learner outcomes, and its effects cannot readily be isolated from teaching quality, implementation, other system changes, and learners' wider circumstances. The assessment is therefore necessarily predictive. The impact of the new curriculum on inequitable outcomes will be monitored through the regular rolling cycle of curriculum area review, enabling emerging impacts to be assessed as evidence and experience develop and adjustments to be considered where needed.

33. We expect some schools and kura will be concerned about the National Curriculum changes, a loss of flexibility, their workload, teacher capability to implement the National Curriculum, and compliance costs. In the longer term, teacher workload is likely to decrease, as the National Curriculum will do more of the heavy lifting, reducing the need for schools and kura to design, interpret, and sequence the curriculum. If the curriculum is high quality and sets reasonable expectations, we expect more effective implementation of the changes. There is a risk that the curriculum may be too detailed, which could impact how schools and kura implement the revised curriculum. To mitigate this risk, the Ministry is developing implementation supports, including resources and professional learning and development.

34. Research indicates that when a system introduces a knowledge-rich curriculum, performance improves across the system, and when a knowledge-rich system curriculum is removed, performance declines.[24] With the shift to a more detailed National Curriculum, evidence signals some recent improvements. Following the recent updates to English and Mathematics Learning Areas, evidence shows statistically significant improvements in mathematics and writing at Year 6. These shifts interrupt the longstanding pattern of declining achievement between Year 4 and Year 8 and indicate early signs of progress within the system.[25]

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[23] *Strengthening curriculum, progress and achievement in a system that learns: a report by the Curriculum, Progress and Achievement Ministerial Advisory Group*. 2019.

[24] Learning First (2025) *Knowledge-rich curriculum: a review of the literature. Final report.* See: NZC - A knowledge-rich curriculum

[25] Latest Curriculum Insights study results released

Te Tiriti o Waitangi/the Treaty of Waitangi

35. The changes retain distinct schooling and curriculum pathways for Māori learners. The use of a knowledge-rich curriculum has been shown to have a positive impact on bridging the knowledge gap and promoting greater educational equity. Schools and kura can continue to use the New Zealand Curriculum and/or Te Marautanga o Aotearoa, and both pathways provide for te reo Māori, tikanga Māori and mātauranga Māori. The reforms also expand curriculum provision through te reo Māori. These settings provide for important Māori interests, but retaining distinct pathways and local flexibility does not by itself determine the extent of Māori authority over curriculum design and delivery. The Tiriti analysis identifies more limited effect in relation to rangatiratanga, particularly where national curriculum requirements affect Māori knowledge and distinctive Māori-medium and kaupapa Māori approaches.

36. Greater national specification reduces the scope for schools and kura to determine what is taught, when it is taught and, in some cases, how it is taught. While schools and kura will continue to be able to contextualise teaching and learning, greater specification reduces some of the space available for local mātauranga, histories, whānau, hapū and iwi aspirations, and distinctive kaupapa Māori approaches. For Māori-medium and kaupapa Māori education, the issue goes beyond the amount of flexibility available to schools and kura and extends to who appropriately exercises authority over Māori knowledge and distinctive Māori educational approaches. This has particular significance for Māori-created educational pathways where Māori authority, philosophy or special character shapes curriculum content, sequencing and pedagogy. 9(2)(f)(iv)

37. There has been engagement and consultation on curriculum reform since 2018, although the approach and the extent of Māori influence have varied over time. Māori perspectives have influenced aspects of the design, including Māori curriculum content, provision for bilingual and immersion settings, space for local mātauranga, and differentiated arrangements for kaupapa Māori education. However, some policy directions were set before Māori engagement occurred, including mandated teaching times for reading, writing and mathematics, limiting the opportunity for Māori to influence those decisions. Consultation feedback was also not collected in a way that allows Māori responses to be systematically identified separately from wider feedback, which limits what can be concluded about Māori views of the reforms. WAI 3553 Stage Two[26] also identified shortcomings in meaningful engagement and consensus-building with Māori in developing the draft curriculum and in consideration of whānau, hapū and iwi aspirations for Māori-medium and kaupapa Māori education. Implementation of some Years 0 to 10 requirements was deferred for specified kura boards to allow further engagement before those requirements take effect.

38. Overall, the changes provide a stronger basis for more consistent and equitable access to important knowledge, skills and pathways for Māori learners, while retaining distinct Māori educational pathways and provision for te reo Māori, tikanga Māori and mātauranga Māori. However, more consistent access cannot be assumed to result in equitable outcomes. A key Tiriti consideration is that greater national prescription also reduces some of the space available for local mātauranga, whānau, hapū and iwi aspirations, and distinctive Māori-medium and kaupapa Māori approaches, and does not substantially increase Māori authority

[26] Waitangi Tribunal (2026) *Hūtia te Rito o te Harakeke, Kei Hea te Kōmako e Kō? interim Stage Two, Part 1.* WAI 3553.

over curriculum design and delivery. Overall, the assessment is that the changes give reasonable effect to Article 1 (kāwanatanga) and Article 3 (ōritetanga), but more limited effect to Article 2 (rangatiratanga). The extent to which the curriculum gives effect to Māori rights and interests will also depend on implementation, ongoing partnership and differentiated arrangements for Māori-medium and kaupapa Māori education.

Table 2: Distributional Analysis

Affected groups	How they are affected	Description of level of impact(s)	Source of evidence
Students, including Māori, Pacific, and those with learning support needs	Students receive clear and sequenced content, which improves understanding and retention, so they achieve to the best of their ability. When students have relevant knowledge, skills, and qualifications, they will be better positioned to achieve in further study and employment.	Medium-high • Students will be taught and learn based on evidence about what works best. Alongside other changes, a clear and coherent National Curriculum will support student learning and better educational outcomes. • Evidence shows knowledge-rich approaches can reduce inequality and improve outcomes.[27] • More consistent assessment and aromatawai informs adaptive teaching and timely identification of learning support needs. • Curriculum design stops students being streamed into groups or classes that restrict their access to be taught and learn some content and then being cut out of pathways.[28] • Structured literacy benefits all learners, especially those needing additional support. • The National Curriculum provides for diverse student needs, for example, some students will not have the skills to use specific assessment tools and alternative arrangements are available.	The move to a structured literacy approach (which includes the curriculum, professional learning and development (PLD), assessment, and other supports) is showing positive impacts: MLfWzu
Teachers, school leaders, principals, and school boards	Clarity and national consistency in teaching, learning and assessment and aromatawai	Medium-high • Improved teaching and learning based on evidence relating to teaching practices and knowledge development. • A detailed National Curriculum reduces the need for teachers to construct teaching and learning programmes from scratch. • With any curriculum change, in the short term, there will be higher workloads, more planning, and a need for more professional learning and development. • Teachers will no longer have to decide what to teach and will have access to curriculum supports and professional learning and development that are directly aligned with the National Curriculum. • Teachers of multi-year classes, including in rural and isolated areas, may face implementation challenges if the National Curriculum is too detailed. • Teachers will continue to exercise their professional judgement about how to best meet student needs and will have more clarity about what to look for from private professional learning and resource providers to support implementation. • Some will be concerned about the time available for considering global, national, and local contexts. • There will be mixed support for the changes to senior secondary school subjects, including mandatory Year 11 subjects: some subjects were removed; others were added. • Designated and special character schools and kura may be concerned about whether they have sufficient time to give effect to their special character.	AERO – A knowledge-rich approach to curriculum design
Employers and tertiary education providers	Students will be better prepared for the labour market and tertiary education	Medium-high • Clearly defined national curricula emphasise explicit teaching of important knowledge and skills, for example, literacy, numeracy, and subject knowledge, which is intended to improve workforce capability. • OECD evidence shows higher literacy, numeracy and digital skills are strongly associated with higher earnings and employment outcomes.[29]	

[27] Learning First (2025) *Knowledge-rich curriculum: a review of the literature. Final report.* See: NZC - A knowledge-rich curriculum
[28] See Kōkirihia | The Plan For Removing Streaming From Our Schools
[29] New Zealand (EN). Data from recent domestic studies show that moderate to large differences in average scale scores were observed between Māori and non-Māori students, and between Pacific and non-Pacific students at each year level. This aligns with data that shows that Māori and Pacific students were more likely than non-Māori or Pacific students to attend higher equity index schools, that is, with students facing socio-economic barriers to achievement at school.

Affected groups	How they are affected	Description of level of impact(s)	Source of evidence
		• More nationally consistent and knowledge-rich curriculum will enable students to enter the labour market and further study with the knowledge and skills necessary to succeed.	
Parents, whānau, and communities	Clarity and national consistency	Medium • Many will support better educational achievement and equitable outcomes. • Supports more consistency and certainty in what will be taught, and that their child won't miss out on things because of the school they go to. • Parents will get more consistent and reliable information about how their child is doing (linked to reporting to parents' changes). • For those impacted by inequities, including parents of disabled children, there will be more visibility of how the system is performing for kids and better support for students to access and succeed in the curriculum. • Some may be concerned about a reduction in flexibility and limited availability of classroom time for local content.	
Ministry and ERO	Clearer roles and accountabilities	Medium • Supports monitoring and, if needed, interventions.	
Māori, iwi, hapū, and whānau	Māori-Crown relationship is supported	Medium • Supports educational achievement and equitable outcomes. • Provides for consistency in what students will be taught, so streaming does not restrict their access to curriculum content or pathways, including STEM. • Enables access to senior secondary subjects in te reo Māori as part of TMOA, instead of having to access them in English as part of NZC. • Better data to see how the system is working for Māori (particularly the high proportion in English medium education) and to create system pressure for improvement towards equity. • Likely reduces the ability of all schools and kura to significantly incorporate iwi and hapū knowledge in teaching and learning programmes. • Limits the ability of kaupapa Māori schools and kura to prioritise their philosophy and the aspirations of whānau, hapū and iwi for their children. • Limited or time pressure affecting ability to include more local context.	
Professional learning and development and resource providers	Better targeting of funding	Medium • Supports educational achievement and equitable outcomes. • Have better information about what matters and can more confidently align their services to the expectations in the national curriculum. • For provision paid for by schools and kura, there is an opportunity to focus on gaps in the market that contribute to driving improved impact of teaching and learning rather than simply providing more choice. • If not aligned with National Curriculum priorities, some providers may not be funded by the Ministry or will have to adjust their services.	

Which option is the most effective, efficient, and proportionate response to the problem?

39. On balance, a clearly defined national curriculum (option 4) is the most effective, equitable, efficient, and proportionate response to the problem. In line with consultation feedback, the clearly defined national curriculum provides greater certainty about the essential knowledge and skills all students should learn while retaining sufficient flexibility for schools and kura to design engaging programmes, use professional judgement, and incorporate locally important contexts, histories, and knowledge.

40. This option:

    a. is likely to be effective in supporting educational achievement: evidence suggests educational achievement is higher with a knowledge-rich curriculum

    b. supports more equitable outcomes by reducing the likelihood that students miss important knowledge and skills because of school-level curriculum decisions, mobility between schools and kura, or differential access to learning pathways

    c. is likely to be efficient to implement for school and kura boards, leaders, teachers, and government agencies as there will be a clear and consistent National Curriculum, more efficient targeting and use of resources, and a greater ability to drive improvement in a timely manner

    d. is proportionate with an appropriate balance between national consistency and local flexibility, ensuring that learning is not left to chance while preserving space for professional judgement and local curriculum design.

41. Curriculum design involves balancing national consistency with local flexibility (curricular autonomy). The key policy question is not whether flexibility or consistency is preferable, but how much variation in student learning outcomes is acceptable. Greater flexibility increases local autonomy and school workload (teachers, school leaders, and boards need to do more work to design and implement curriculum expectations); and the likelihood that students receive different learning opportunities depending on the decisions made by schools and kura. When there are highly variable teacher practices, there is a stronger case for nationally consistent curriculum expectations.[30] Within any curriculum arrangements, teacher professional judgement remains important.

42. Some submitters note that highly prescribed requirements may create implementation challenges for kura, designated character schools, and schools using integrated or multi-level teaching approaches. Greater consistency reduces variation but can limit schools' and kura abilities to adapt learning to local needs and contexts and make it harder for schools to reflect their special character and communities, including Kura Kaupapa Māori, kaupapa Māori education, and State-integrated schools, including Montessori and Steiner schools. Some of these schools and kura use a more integrated approach to teaching and learning. If curriculum requirements do not provide sufficient flexibility for designated and special character schools and kura, there is a risk that these schools and kura will make different decisions about what and how content is taught, reducing national consistency in curriculum implementation.

43. Curriculum design is only one driver of student achievement. A more clearly defined curriculum will not eliminate differences in teaching quality or implementation, but it can

[30] See Sinnema, Claire (2015) 'The Ebb and Flow of Curricular Autonomy' in *The Sage Handbook of Curriculum, Pedagogy and Assessment.*

reduce differences in what students are expected to learn. This provides a stronger foundation for effective teaching, assessment, and system-wide improvement.

44. The status quo (option 1) provides significant flexibility for schools and kura. However, this flexibility comes at the cost of consistency. There is substantial variation in what students are taught and when, meaning some students miss important knowledge and skills depending on the decisions made by schools and kura. The current curriculum contributes to this variation because it provides limited direction about what students should learn. It also places a significant curriculum design burden on schools and kura, creates workload pressures, and makes it more difficult to develop consistent resources, assessment, and professional learning. As a result, this option does not adequately address concerns about achievement, equity, or curriculum consistency.
45. The deregulatory option (option 2) increases school and kura flexibility and autonomy. However, it is likely to increase variation in what students learn, make outcomes more dependent on local capability and resourcing, and widen inequities between schools, kura, and learner groups. While it reduces central government costs and responsibilities, it shifts these to schools and kura. This option places too much weight on flexibility and insufficient weight on ensuring all students have access to important knowledge and skills.
46. A nationally coherent curriculum (option 3) provides greater direction than the status quo but retains significant flexibility. While this supports local design, it is likely to result in continued variation in what students learn and the knowledge and skills they acquire. This option reduces, but does not eliminate, the risk that learning is left to chance and therefore does not achieve the same level of certainty, equity, or consistency as option 4.
47. A national syllabus (option 5) places greater emphasis on consistency and would provide the strongest assurance that all students are taught the same content. However, it risks becoming overly detailed and prescriptive, reducing flexibility, constraining professional judgement, and increasing implementation costs and workload. It may also create challenges for kura, designated character schools, and schools using integrated or multi-level approaches. While it may further reduce variation in curriculum delivery, any gains are unlikely to justify the additional costs and loss of flexibility. This option places too much weight on consistency and insufficient weight on flexibility.
48. Option 4 sits between these two extremes of flexibility and consistency. Unlike options 1–3, it reduces the risk that students miss important knowledge and skills because of variation in curriculum decisions. Unlike option 5, it retains sufficient flexibility for schools and kura to respond to their learners, communities, and character. It therefore provides the most appropriate balance between national consistency and local autonomy.
49. The Minister and Ministry of Education have the same preferred option.

Section 4: Delivering an option

What are the next steps for implementing the legislation?

50. Using section 90 of the Act, the Minister will use national curriculum statements to set curriculum requirements. Publication of the national curriculum statements will be notified in the New Zealand Gazette and on the Ministry website.

51. The curriculum will be implemented in a staged way:

Date	Year levels	Learning areas, wāhanga ako, and subjects
2025	Years 0–6	English and Te Reo Rangatira
	Years 0–8	Mathematics and Statistics and Pāngarau[31]
2026	Years 0–10	English and Mathematics and Statistics for Years 0-10, and Te Reo Rangatira and Pāngarau
2027	Years 0–8	Science, Social Sciences, Pūtaiao, and Pūmanawa Tangata
	Years 9–10	All learning areas and wāhanga ako
2028	Year 11	New curriculum
2029	Years 0–8	Years 0-8 – all remaining learning areas and wāhanga ako (Health and Physical Education, The Arts, Technology, Learning Languages, Waiora, Toi Ihiihi, Hangarau, Te Reo Pākehā, and Ngā Reo).
	Year 12	New curriculum
2030	Year 13	New curriculum

52. When the new requirements come into effect, school boards will be responsible for implementing the new requirements. School boards must ensure that the principal and other staff develop and implement teaching and learning programmes that give effect to the requirements. The Ministry will use a proportionate approach. Initially, the Ministry will provide a range of resources and professional development opportunities to support the changes. At a regional level, this includes the Curriculum Advisory Service, which can provide in-person support. This approach will involve supporting and extending capability through: professional learning and development; curriculum resources; guidance and tools for teachers and leaders; and frontline support. There will be guidance for multi-level classes and schools and kura of special character.

53. Over time, the Ministry will provide more targeted supports that respond to more specific needs and the progress people are making in the change journey. Tertiary education providers will update initial teacher education to reflect the National Curriculum changes. The Standards for the Teaching Profession are also being updated. These standards describe what effective teaching looks like. They set out the expectations that teachers are expected to meet throughout their careers and are used to support teacher registration, certification, professional growth, and the quality of teaching across the education system. School qualifications are being reformed to take account of the revised National Curriculum, including the Phase 5 subjects.

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

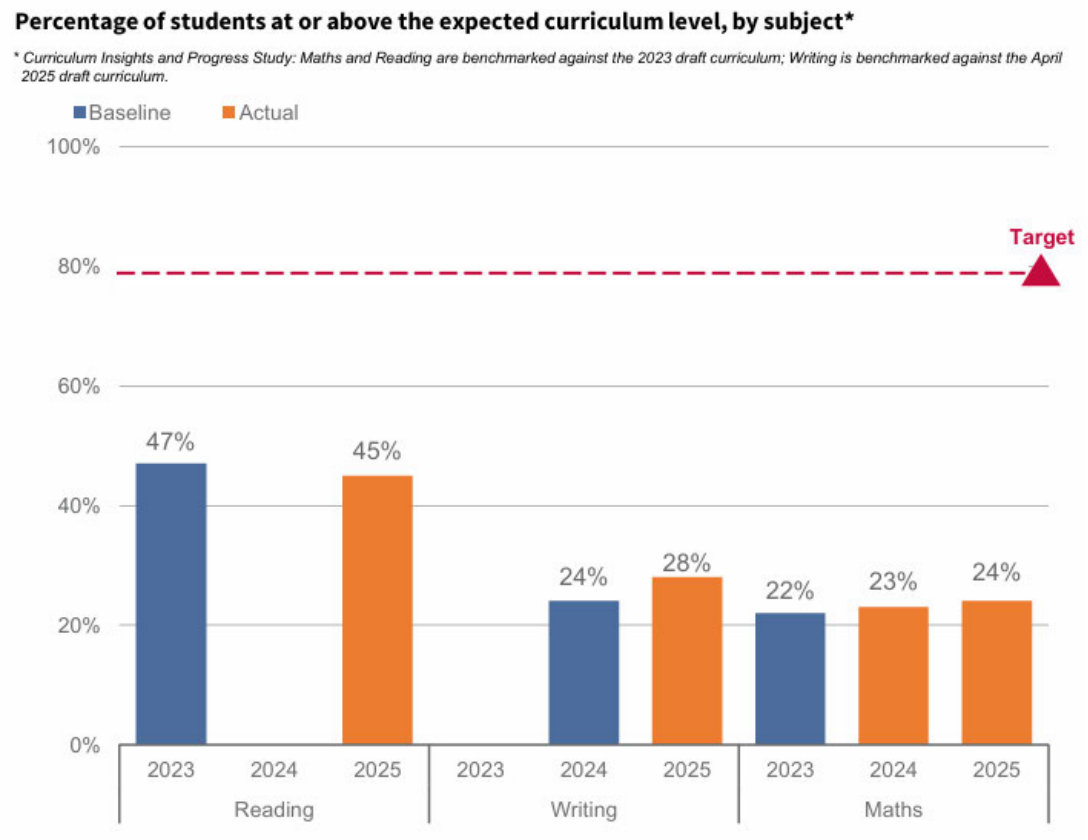
54. The Government is monitoring its target for lifting educational achievement. ERO will independently review and publicly report on how individual schools and kura are implementing the curriculum and supporting student achievement. The Ministry will monitor curriculum implementation and student outcomes at the system level, with regional offices maintaining direct relationships with schools and kura, and identify emerging issues at the local level. This will enable the Ministry to evaluate progress towards educational objectives and take proportionate action where needed, including professional learning and development, additional resources, targeted support, and guidance. The changes will support improved reporting to parents about their child's progress and achievement. The Ministry

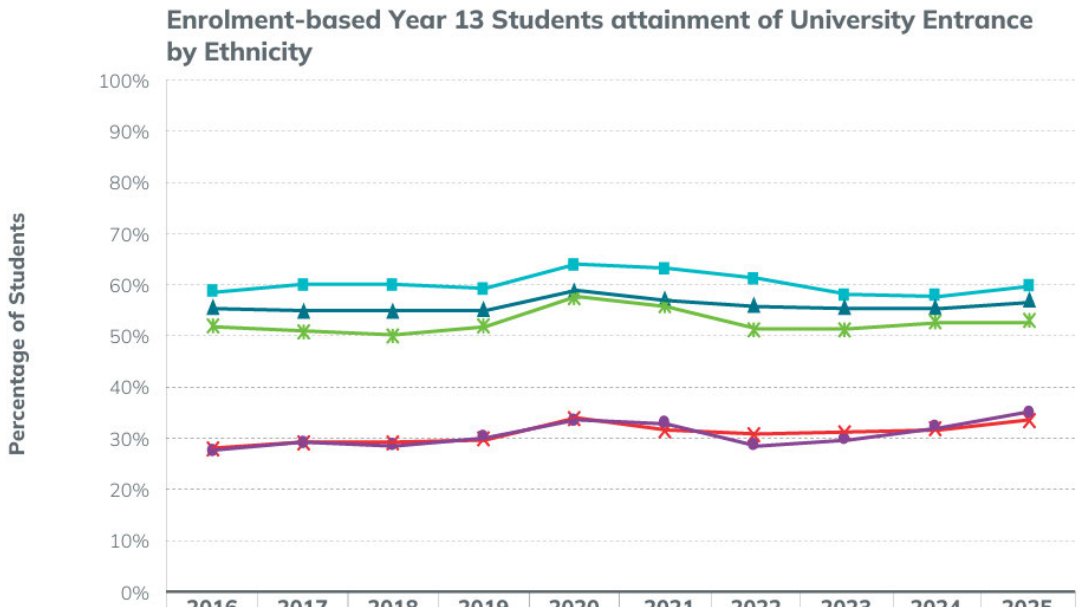
[31] For specified kura boards, the national curriculum statements and foundation curriculum policy statements take effect in 2027.

and/or Minister can use statutory intervention powers set out in the Act. The Minister can also amend the National Curriculum over time.

55. The Ministry will monitor the impact of the National Curriculum changes as part of the five-yearly rolling cycle of reviews of learning areas, subjects, and wāhanga ako (included in the Education and Training (System Reform) Amendment Act). The reviews will consider the curriculum's contribution to student outcomes, consistency in teaching and learning, teacher capability, effective use of resources, and the identification and response to student needs.

Annex 1: Overview of educational achievement rates





	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Asian	58.8%	60.1%	60.1%	59.3%	64.1%	63.4%	61.3%	58.1%	57.9%	59.8%
European	55.6%	55.0%	55.0%	55.1%	59.0%	57.2%	56.0%	55.5%	55.6%	56.6%
Māori	28.1%	29.3%	29.3%	29.9%	34.1%	31.7%	30.9%	31.2%	31.9%	33.7%
MELAA	52.0%	51.0%	50.2%	52.0%	57.7%	56.0%	51.4%	51.4%	52.9%	52.6%
Pacific Peoples	27.7%	29.3%	28.6%	30.3%	33.7%	33.0%	28.7%	29.8%	32.2%	35.3%

Annex 2: System map of how the National Curriculum is regulated

