

Regulatory Impact Statement: 100-day plan - Mandating teaching times for maths, reading, and writing

Coversheet

Purpose of Document	
Decision sought:	Cabinet endorsement of the approach to mandating teaching times for maths, reading, and writing This is a 100-day plan proposal.
Advising agencies:	Ministry of Education
Proposing Ministers:	Hon Erica Stanford, Minister of Education
Date finalised:	6 December 2023
Problem Definition	
<p>Reading, writing, and maths are fundamental skills that unlock the rest of the curriculum. Not all students are getting the time they need for these fundamental basics, and this could be a driver for some students' low achievement. There is an opportunity to mandate teaching of reading, writing, and maths so that students get a consistent amount of time.</p>	
Executive Summary	
<p>As part of its 100-day plan, the Government is proposing mandating teaching times for reading, writing, and maths, which are key skills for students. These skills are critical for student learning across the curriculum, and without these basics, students may be less able to experience success in further education and the labour market. Evidence shows that:</p> <ul style="list-style-type: none"> • some students do not have the maths, reading and writing skills needed • some students may not have enough opportunities to gain these skills. <p>To impact positively on progress and achievement, students need consistent instruction in these areas. Not all students are receiving focused, consistent instruction.</p> <p>It is not just the length of teaching time that is important – the quality of teaching and the curriculum are also important for improving student outcomes. Work is underway to refresh and redesign New Zealand's curriculum settings towards stronger national direction. The aim is to better provide for consistency and equity, while still maintaining local flexibility for teaching and learning to be responsive to students and local communities. This work considers whether there should be more guidance for schools and teachers about what and how to teach.</p> <p>Three options are explored:</p> <ul style="list-style-type: none"> • option one: the counterfactual, that is no specification of minimum teaching times 	

- **option two: regulatory approach** – mandate teaching times for reading, writing, and maths through curriculum statements
- **option three: provide guidance** recommending teaching times for reading, writing, and maths.

On balance, option two is preferred because it best meets the objective of ensuring regular teaching to students and may support students to achieve better outcomes. It provides a clear and unambiguous direction on the amount of time that must be spent on maths, reading, and writing.

Many schools are already teaching around an hour a day for each area, though for some it will require a shift in practice. The limited time for them to prepare to implement the change may mean that for some schools, there is a delay between the curriculum statements coming into force and them complying. The Ministry and Education Review Office will work with schools to raise awareness about the requirements and support implementation. This includes releasing timetabling to support the new arrangements.

There may also be concerns about how the mandated teaching times will impact on other curriculum areas and education outside the classroom, but the design does provide a balance between flexibility for schools while ensuring consistency.

After the requirements come into force, monitoring and, if needed, intervention will take place.

Limitations and Constraints on Analysis

There were the following limitations and constraints on the analysis:

- Tight timeframes have limited the opportunity for detailed analysis and consultation – including with other agencies, Tiriti partners and stakeholders. This may mean areas in the analysis that could be further developed, including potential risks, impacts on specific population groups or costs.
- We have not been able to assess definitively how many schools currently meet the one hour requirement, so we cannot be as precise about the costs and benefits.
- There is limited evidence available that looks at the effectiveness of mandating teaching hours and what the optimal teaching time should be. There is no agreed 'best practice', and other countries use a range of approaches.

Responsible Manager

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6/12/23

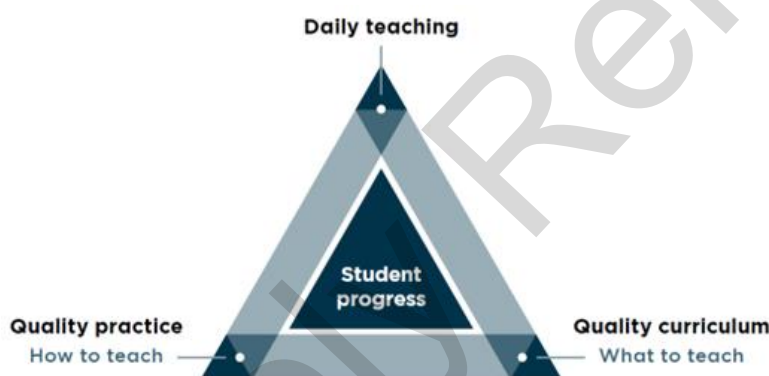
Section 1: Diagnosing the policy problem

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

Reading, writing, and maths are foundation skills for students...

1. Reading, writing, and maths are fundamental skills that unlock the rest of the curriculum. Without the ability to read, students cannot be expected to understand history or social studies. Without mathematics, students will not be able to grasp other curriculum areas such as science. In the longer term, poor achievement in these areas can have an impact on access to further education and employment opportunities.
2. To impact positively on progress and achievement, students need consistency and stability through regular instruction (typically every day) by teachers using a high-quality curriculum and evidence informed teaching practices, as depicted in Figure 1 below.

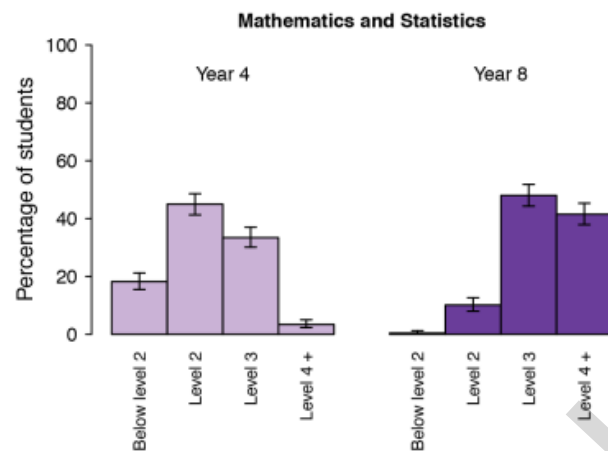
Figure 1: Maximising student progress



... but in New Zealand, student achievement is too low for reading, writing and mathematics

3. Achievement rates are too low for reading and writing. The latest estimates, from NMSSA 2019, show that, at year 4, 63% of students are achieving at least Level 2 of the writing and reading curriculum expectations. At year 8, 35% of students are writing at Level 4 or above of the curriculum; 56% of students are reading at Level 4 or above of the curriculum.
4. This disproportionately impacts on some population groups, as at both years 4 and 8:
 - a. Māori students scored lower, on average than non-Māori students in all English modes
 - b. Pacific students scored lower, on average than non-Pacific students in all English modes - but the difference for year 4 Pacific students in English writing was not statistically significant
 - c. students from high-decile schools scored higher, on average, across all English language modes than those from mid-decile schools, who, in turn, scored higher, on average, than those from low decile schools (NMSSA 2019).

5. Similarly, by year 8, students' overall achievement rates are too low for mathematics. At year 4, an estimated 82% of students are achieving at or above the curriculum expectations. But in year 8, this drops to 42% of students (see figure below – note year 4 students should ideally have achieved at least level 2, and year 8 students should have achieved at least level 4):¹



6. This disproportionately impacts on some population groups, as at both years 4 and 8:
- Māori students scored lower than non-Māori students
 - Pacific students scored lower, on average, than Pacific students
 - Students attending high decile schools scored higher, on average, than those attending mid or low decile schools.
7. The Government is concerned that school leavers may not have always mastered the basics of reading, writing, and maths. A recent NCEA pilot in June 2023 found that 64.4% of students achieved the reading co-requisite, 56.3% achieved the writing co-requisite, and only 55.9% achieved the numeracy co-requisite.

Students may not always get enough opportunities to build their maths, reading, and writing skills

8. Most students regularly get the opportunity to learn mathematics, though not daily. Surveys estimate that mathematics is taught:
- for around 51 minutes per day (for year 5 students from the Trends in International Mathematics and Science Study (TIMSS) 2019 survey) – this was very close to the international average of 52 minutes
 - between 4 and 5 times a week, with sessions most commonly reported to be either 45 to 50 minutes or 60 minutes long (from the NMSSA 2022 survey)
9. Based on the Progress in International Reading Literacy Study (PIRLS) 2021 (which focuses on year 5 students), New Zealand had higher than average teaching times for reading than the international average (around 23% of New Zealand teaching time was estimated to be on reading, compared to an international average of 16%).² This

¹ National Monitoring Study of Student Achievement Report 30: Mathematics and Statistics 2022 – Achievement Findings. https://www.educationcounts.govt.nz/_data/assets/pdf_file/0008/221759/NMSSA_2022_Mathematics_Achievement_Report_FINAL_UPDATED_MoE.pdf

² Purposes for and processes of reading: New Zealand's participation in PIRLS 2021. https://www.educationcounts.govt.nz/_data/assets/pdf_file/0020/223382/PIRLS-2021-Purposes-for-and-Processes-of-Reading.pdf

is approximately equivalent to 5 and half hours per week on average for New Zealand students. It is less clear how much time is spent on writing. Based on the PIRLS 2021, an additional 10% of teaching time was spent on language-related instruction (other than reading). This is equivalent to just under 3 hours a week and is in line with the international average.

The curriculum refresh and redesign is expected to set clearer expectations about quality teaching practices

10. Work is underway to refresh and redesign New Zealand's curriculum settings towards stronger national direction. The aim is to better provide for consistency and equity, while still maintaining local flexibility for teaching and learning to be responsive to students and local communities. This work considers whether there should be more guidance for schools and teachers about what and how to teach.

What is the policy problem or opportunity?

11. The Government's goal is to make sure every child has the opportunity to master the basics – reading, writing and maths. While there are many drivers for achievement, it is possible that one driver for some students' low achievement in these areas is that they are not getting enough teaching time. The Government wants every child to have sufficiently focussed classroom teaching time, with explicit and direct teaching in reading, writing and maths, so students get at least a year of progress for a year of learning.
12. Many schools across New Zealand routinely schedule minimum class time each day for the basics. But this is not consistent – which means each student over time and all students across the system are not getting the same opportunities to learn the basics. There is an opportunity to ensure students get access to regular and quality teaching about key matters, such as reading, writing, and maths, as this could help lift student achievement.
13. Due to time constraints, we have not been able to consult to find out how teaching times might be affecting different groups of students, or what stakeholders might think about the problem. The key stakeholders for this problem include:
 - a. school boards, principals, and teachers – who design and deliver teaching and learning programmes
 - b. learners and their whānau – learners' progress may be impacted by the amount of teaching
 - c. iwi, hapū and Māori – as Te Tiriti o Waitangi partners, as well as in some instances as leaders of kaupapa Māori education settings.

What objectives are sought in relation to the policy problem?

14. The ultimate objective of this work is to ensure all students are achieving in reading, writing, and maths. To help achieve this, the following objectives are sought:
 - a. all learners get regular, quality teaching for maths, reading, and writing
 - b. there is consistency in teaching times across schools
 - c. we uphold our obligations under Te Tiriti o Waitangi.

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

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

15. The following criteria will be used:

Criteria	Considerations
Ensure students get consistent, daily instruction of at least an hour each for maths, reading, and writing	Does the approach meet the policy objective of ensuring that all students year 0 – 8 will get on average spend an hour a day on mathematics, and two hours on reading and writing?
Uphold our obligations under Te Tiriti o Waitangi	Will the approach to teaching times uphold our obligations under Te Tiriti o Waitangi, including: <ul style="list-style-type: none"> • rangatiratanga over kaupapa Māori and Māori medium educational pathways • achieving equity for ākonga Māori
Practical for schools to implement	Does the approach: <ul style="list-style-type: none"> • provide flexibility to take account of the realities of school life? • minimise the amount of time/effort needed to comply with any change?
The requirement is clear and unambiguous	<ul style="list-style-type: none"> • Does the requirement provide clear direction to schools, so there is minimal ambiguity? • Would it be easy to determine whether a school was complying?
Support all ākonga to achieve across the full curricula	Does the approach: <ul style="list-style-type: none"> • Support ākonga to be skilled in reading, writing and in mathematics? • Meet the needs of diverse learners and encourage inclusion? • Support learning across the full curriculum?

16. While all criteria are important, we consider that the following criteria are the most important as these will support and enhance the achievement of all learners:

- a. Ensure students get **consistent, daily instruction** of at least an hour each for maths, reading, and writing
- b. **Practical** for schools to implement
- c. Support **all ākonga to achieve** across the full curricula.

What scope will options be considered within?

17. This option is part of the Government’s 100-day plan. The scope of options has been limited by the Minister’s commissioning, the timeframe, and available information and evidence. For example, we have not analysed options for other periods of time (for example, 30 minutes a day).

18. We have not engaged widely with stakeholders on the changes, and there has not been an opportunity for consultation. While there has been comment in the media about the proposal, there has been limited specific stakeholder feedback about the proposal.
19. We have considered one non-regulatory option, that is, the provision of guidance to schools, and the counterfactual, that is, no specification of minimum teaching times. There has not been time to consider other options.
20. We have considered the practices in other countries (see **Annex A** for information about practices in other jurisdictions). Of the countries we looked at, there were only two who specify time per day, and this was only for mathematics.
21. As part of the detailed design on the preferred option, we have considered a range of ways to make sure it meets the criteria as much as possible. For example, providing schools with flexibility around how to plan the time. **Annex B** provides an overview of these, as well as our options analysis for how to describe the time part of the requirement. The options analysis for the regulatory option reflects the proposed design.

What options are being considered?

22. For this analysis, we are looking at options within the current legislative framework. The alternative would be to make a change to the Education and Training Act to mandate teaching hours for specific subjects. This approach has not been progressed because of the ability to use curriculum statements to make the change (which fits with how we currently regulate curriculum more generally), the nature of the change, and the time needed to progress an amendment to the Act.
23. We have identified three options:
 - a. **option one: the counterfactual**, that is no specification of minimum teaching times
 - b. **option two: regulatory approach** – mandate teaching times for reading, writing, and maths through curriculum statements
 - c. **option three: provide guidance** recommending teaching times for reading, writing, and maths.

Option One – *Counterfactual*

24. Under this option school boards, principals, and teachers can determine how much time to spend on maths, reading, and writing. Each school identifies its own priorities and responds to individual learners needs and interests. Some students may continue to not get enough time on the basics.
25. School boards will continue to ensure that the principal and staff develop and implement teaching and learning programmes that give effect to foundation curriculum policy statements and national curriculum statements. This includes mathematics, reading, and writing, so all students should get regular teaching for these learning areas – but not necessarily daily of an hour on average.
26. Work has begun to move New Zealand’s curriculum and assessment settings towards stronger national direction – this may include specifying daily teaching for these skills, but at this stage it would not provide further detail about teaching times.

Monitoring and enforcement

27. Other than TIMSS and PIRLS survey data, there will be no monitoring or enforcement for teaching times less than an hour a day for each area.

Option Two – regulatory approach to mandate teaching times for reading, writing, and maths

28. This option provides State and State-integrated school students (in years zero to year eight³) with the equivalent of at least two hours on reading and writing, and one hour on maths each day. This would start in term one of 2024 for most schools, and term one of 2025 for specified kura and specialist schools.
29. To make minimum teaching times a mandatory requirement, the Minister of Education has the ability, under section 90 of the Education and Training Act, to issue foundation curriculum policy statements, and amend existing national curriculum statements. These are statements of policy concerning teaching, learning, and assessment that can be made for the purposes of giving direction to the way in which curriculum responsibilities are to be managed in state schools.
30. This approach achieves the goal of making minimum teaching times mandatory and aligns with how the curriculum is regulated so there is less risk of creating inconsistencies. The statement is easier to adjust than primary legislation if required, for example, if there is new evidence about effective practices. The statement is subject to Regulations Review Committee scrutiny and there is a risk that the statement may be perceived as easier to challenge by the sector.
31. Data suggests that many schools may be spending, on average, at least an hour a day on reading.⁴ For writing⁵ and mathematics,⁶ however, setting a minimum time of an hour is likely to be an increase for many schools. An overview of our initial Te Tiriti o Waitangi analysis for this option is set out in **Annex C**.

Monitoring and enforcement

32. Under this option, there will be monitoring and reporting of teaching times in schools. there will be monitoring and reporting of teaching times in schools – through ERO and the school reporting requirements under regulations. Boards and school managers will assure ERO of their compliance through an Assurance Statement (see Section 3 for more detail).
33. When the requirements are fully in place, if issues are identified, statutory interventions⁷ available under the Act for state schools could be used where there are concerns about a school's operations or the welfare or educational performance of its students. These are restricted to what is reasonable to deal with the risk without

³ Note there are students in these years outside of primary and intermediate schools – for example middle schools cover years 7 to 10.

⁴ Based on the PIRLS 2021 (which focuses on year 5 students), around 23% of teaching time was estimated to be on reading for New Zealand (approximately equivalent to 5 and half hours per week), much higher than the international average of 16%.

⁵ Based on the PIRLS 2021, 10% of teaching time was spent on language-related instruction other than reading (approximately equivalent to just under 3 hours a week) and was in line with the international average. This estimate will also include non-writing literacy activities.

⁶ Based on the TIMSS survey (year 5 students), around 51 minutes per day – this was very close to the international average of 52 minutes. The NMSSA 2022 survey found students in year 4 and 8 most commonly had sessions between 4 and 5 times a week.

⁷ These range from requiring the board to provide information through to the dissolution of the board.

intervening more than necessary in the affairs of the school. They apply to the board (as the employer and governing body for the school) rather than teachers.

34. These interventions could potentially be used if there were reasonable grounds for concerns with curriculum implementation in a school – for example issuing a performance notice could be one approach. If a school continued to not comply with the teaching times rules, we could look at interventions like issuing a performance notice. But interventions would need to be proportionate – our strongest enforcement levers (like dissolving a board) are not appropriate for responding to minor non-compliance.

Stakeholders have a range of views

35. School boards, principals, and teachers support effective teaching and learning and improving learner outcomes. In initial conversations with a small number of schools about the proposed changes, we heard that:
- a. some are already providing for teaching reading, writing, and numeracy for three hours per day
 - b. some felt there should be flexibility so they can decide the amount and nature of teaching required.
36. Learners, parents, and whānau may be concerned about a whether the needs of diverse learners, including those with high learning support needs, will be met. As outlined in **Annex B**, the design does take into account needs for diverse learners and provides mechanisms to vary the teaching times if required for specific students.

Risks and mitigations

37. Setting minimum teaching times for maths, reading, and writing does create risks – the table below outlines the key ones we have identified along with the available mitigations:

Risk description	Potential mitigations
<p>Quality of teaching</p>	<p>Teachers may need to spend additional time on a subject just to meet the time requirements, even if this does not fit with the specific needs of their students.</p> <p>The easier ways to meet the time requirement may not necessarily be the most effective teaching for these subjects or for all students.</p> <p>Timetabling and other guidance is being developed to support quality teaching. Enabling schools to adapt the rule for specific students, who have individual education plans, where required with agreement from the whānau.</p> <p>Flexibility with how to plan to meet the requirements across the week – so it can be in smaller, more frequent sessions for example.</p>
<p>Narrowing the curriculum</p>	<p>Progress in other learning areas could be negatively impacted, if there is only an hour or two¹⁰ for other learning areas (e.g., technology, science)</p> <p>The design of the requirement can help to reduce this risk as does enable integration with other subjects where appropriate.</p> <p>As part of the curriculum refresh, making it clearer that schools should offer students opportunities to learn across all areas of the curriculum.</p>

Student engagement	<p>We have heard that some initial feedback from schools who were concerned about the potential impact on student attendance, as well as their ability to offer rich learning experiences like Education Outside the Classroom (EOTC).</p>	<p>Flexibility within a school week around when to provide the teaching, so that schools may vary to accommodate different types of learning experiences.</p> <p>For attendance, schools have a legal responsibility to manage attendance and should be monitoring changes in the pattern of attendance and take action to address any impacts.</p>
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Option Three - Provide guidance recommending teaching times for reading, writing, and maths

- 38. This option would provide guidance recommending to schools that they teach around an hour a day for each of reading, writing, and maths for students in years 0 - 8. School boards, principals, and teachers could then decide how, if at all, they would follow these guidelines.
- 39. This option would provide more direction than Option One but guidelines may not influence schools who are already resistant to the idea of spending a lot of time on the basics at the expense of other parts of the curriculum. This option may increase teaching times at some schools, but we do not know what the overall impact on teaching practices would be.

Monitoring and enforcement

- 40. Other than TIMSS and PIRLS survey data, there will be no monitoring or enforcement for teaching times less than an hour a day for each area.

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

Criteria	Option One – Counterfactual	Option Two – regulatory approach to mandate teaching times for reading, writing, and maths	Option Three - Provide guidance recommending teaching times for reading, writing, and maths
Ensure students get consistent, daily instruction of at least an hour each for maths, reading, and writing	0 Based on current data, most schools are not providing an hour a day for mathematics or two hours for reading and writing.	++ Students would generally receive on average, an hour a day for mathematics and two hours for reading and writing.	+ Guidance would be voluntary, so compared to the current state, it is possible that more students may receive closer to this amount of teaching time.
Uphold our obligations under Te Tiriti o Waitangi	0 Māori medium and kaupapa Māori educational pathways have autonomy over how much time to spend on these subjects. Achievement of ākonga Māori in Māori medium and kaupapa Māori education is higher than ākonga Māori in English medium education - but not all ākonga Māori are achieving at equitable rates.	0 (if implementation delayed) This approach may be seen as a restriction of mana motuhake within Māori medium and kaupapa Māori education pathways. Initial conversations with the two main representatives of this sector suggested that many kura may already be doing this, but there was a desire for mana motuhake over kura to be maintained. Further targeted consultation is required to confirm whether this would be worse than the counterfactual. Unclear whether the changes would have any impact on equity of outcomes for ākonga Māori.	0 As for current state.
Practical for schools to implement	0 N/A	x While many schools will already be doing this, some schools will need to plan for how to meet the requirements with relatively little time to prepare. So, while in the long-term it will be practical for schools to implement, in the short-term there may be challenges.	++ Schools would continue to have flexibility and can choose to what extent to implement the recommendation based on what works for them.
The requirement is clear and unambiguous	0	++ The mandate is clear and unambiguous	+ Clearer direction than the counterfactual, but we are unlikely to know whether schools are complying
Support all students to achieve across the full curricula.	0 Data suggests that achievement rates are low for mathematics, reading, and writing.	0 This option may have a positive impact on student achievement for reading, writing and maths, though this is dependent on the quality of teaching. Given the design, it will also provide some flexibility for diverse learners. But it may limit how much students access the full curriculum, which could affect progress in other areas. Overall, the impact on achievement across the curriculum could be both positive and negative.	0 As guidance would be voluntary, it is unclear to what extent it would influence students' achievement compared to the current state.
Overall assessment	0 Teaching times would continue to be inconsistent, so some students may not get enough time on the basics	+ Will ensure that all students get regular, consistent time on the basics.	+ Clearer direction on teaching times but its voluntary nature may mean consistency is not achieved.

Key				
++ Much better than the counterfactual	+ Better than the counterfactual	0 Neutral/no change compared to the counterfactual	x Worse than the counterfactual	xx Much worse than the counterfactual

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

41. While both options two and three are improvements, our preferred option is option two - to mandate teaching times for reading, writing, and maths. This is because it better meets the policy objectives to ensure that students should receive consistent, regulation instruction for maths, reading, and writing. Along with guidance on quality teaching practices, this is likely to have a positive impact on student achievement in these areas. We note that this is subject to there being delayed implementation for the kaupapa Māori education sector, to enable further consultation with our Te Tiriti partners.

What are the marginal costs and benefits of the option?

Affected groups	Comment.	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
School boards	Ongoing resourcing impact, as boards will need to make sure the school complies with the new requirements.	Low	Low
Principals, teachers, and other staff	Ongoing, though higher during transition. Staff time will be needed to update timetables and otherwise prepare to comply with the new requirement. Additional teaching resources and training may also be needed in some cases.	Medium	Medium
Regulator: Ministry of Education	Ongoing, but higher in the short-term. The Ministry will develop guidance (including example timetables) to support school implementation. The Ministry may need to provide support and/or intervene if a school needs help to comply. This change will be delivered within baseline.	Low-medium	High
Regulator: Education Review Office	ERO will monitor schools' compliance. ERO can provide system performance information.	Low-medium	High
Students, parents, whānau, and communities	No additional costs for most. Some students may be less engaged with school.	Low	Medium
Iwi, hapū, and Māori	May be a cost if autonomy is restricted.	Low-medium	Low
Total monetised costs	N/A	Unknown	Unknown
Non-monetised costs		Low-medium	Low-medium

Additional benefits of the preferred option compared to taking no action			
School boards	N/A	N/A	N/A
Principals, teachers, and other staff	Clarity about expectations	Low	Low
Regulators: <ul style="list-style-type: none"> Ministry of Education Education Review Office 	N/A	N/A	N/A
Students, parents, whānau, and communities	<p>More students will get regular and consistent teaching time for the basics – which may improve achievement, though the available evidence is limited.</p> <p>The information will enable whānau and communities to hold their school to account and better understand student progress.</p>	Medium	Low
Iwi, hapū, and Māori	It is unknown whether there would be any additional benefits specific to Māori, iwi and hapū, though the change could benefit some Māori students.	Low	Low
Total monetised benefits	N/A	Unknown	Unknown
Non-monetised benefits		Low-medium	Medium

Section 3: Delivering an option

How will the new arrangements be implemented?

42. The proposal is for the Minister to both issue foundation curriculum policy statements and amend the national curriculum statements (used for learning areas). These are both legislative instruments under section 90 of the Education and Training Act 2020 (the Act). The two forms of statements work together to set curriculum requirements. The actual time requirements will sit in the national curriculum statements. The foundational curriculum policy statements will underpin how schools implement the time requirements, including setting out the nature of local flexibility and the need for transparency to each school's community on the implementation approach.
43. School boards will be required to ensure that the principal and staff develop and implement teaching and learning programmes that give effect to the requirements. It is expected to come into force for most schools on 1 January 2024, so that all teaching and learning programmes must include the required teaching times from term one 2024.
44. It is proposed to come into force for specialist schools in term one of 2025. This recognizes that it will be more complex to implement for them, as specialist schools take a much more personalised approach to their programmes, including responding in the moment to what a learner needs on any given day (which may mean deviating from what had been planned).
45. Given the Te Tiriti o Waitangi implications, it is proposed that kaupapa Māori education providers be consulted before any requirements are finalised. As a result, the teaching time requirements are set for term one in 2025 for specified kura (see Annex B).
46. Most schools will have already finalised their programmes for 2024. We expect that a lot of schools will already be allocating enough time to the basics. Though for other schools, there will be a need to transition to the new requirements and it may be a challenge in the short-term for some schools due to the tight frames (particularly those with more rigid timetables).
47. The Ministry will provide examples of timetabling and programme design to support schools to meet minimum teaching time requirements. We will communicate with schools as soon as possible once the new requirements are confirmed. Through Te Mahau, the Ministry also has staff available who can provide assistance to principals and schools. This includes the Leadership Advisors, who have been consulted on this change. ERO will also help to raise awareness of the teaching requirement, including through:
 - a. its communications to Boards and school managers about how ERO will monitor compliance
 - b. its requirement for Boards and school managers to attest their school's compliance through an Assurance Statement.

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

48. The Education Review Office (ERO) and Ministry of Education will monitor the new arrangements (as described in the previous section). At an aggregate level, ERO's Assurance data will provide a system level picture of compliance. ERO can undertake other system-level evaluation to provide insights into school practices and

experiences with the policy change. This proposal will likely be subject to a post-implementation assessment, one year after the regulatory change takes effect.

Proactively Released

Annex A: Practices in other jurisdictions

1. Participating countries in PIRLS and TIMSS were asked about whether they mandated teaching time for language/reading⁸ and mathematics respectively. They were also asked what percentage of total teaching time was mandated for these subjects. The table below outlines this information.

	PIRLS	TIMSS	
	Year 4	Year 4	Year 8
Participating countries	57	58	39
Countries that mandate teaching time for that subject.	32	48	35
% of countries that mandate teaching time for that subject.	56%	83%	90%
Countries that supplied data on the number of hours mandated for that subject.	31	44	27
Average teaching hours mandated for that subject as a percentage of total teaching time.	27%	18%	14%
Range of teaching hours mandated for that subject as a percentage of total teaching time.	15%-42%	10%-22%	10%-22%

2. The *Education at a Glance 2023* publication also collected data on the percentage of total teaching time devoted to each of the seven key learning areas (first language⁹, mathematics, arts, physical education and health, natural sciences, social sciences and second and other languages). The table below outlines the OECD average total teaching time devoted to first language and mathematics in the primary and lower secondary levels.

	Primary	Lower Secondary
First Language	25%	15%
Mathematics	16%	13%

How different countries mandate teaching hours

3. Different countries had different approaches for mandating teaching hours for certain subjects. The table below outlines the different ways that different countries mandated teaching hours using information provided in the PIRLS and TIMSS.

⁸ Some countries also include other subjects/learning areas involving language/reading in their language/reading time allotment. For example, mandated language/reading time in Croatia includes time for 'media and culture' studies.

⁹ 'First language' instruction refers to reading, writing and literature in the primary language in that jurisdiction.

Approach to mandating teaching hours	Number of countries surveyed using this approach		Example
	Reading (PIRLS Year 4)	Maths (TIMSS Year 4)	
Setting a weekly requirement	14	15	France- 8 hours out of 24 teaching hours are set aside for French language in Year 4.
Setting an annual requirement	3	8	Bulgaria- 128 hours out of 736 teaching hours set aside for mathematics in Year 4.
Setting a percentage requirement	2	7	South Korea- 13.5% of classroom unit hours are set aside for mathematics in Year 4.
Setting a daily requirement	0	2	Philippines- 50 minutes per day are allotted for mathematics in Year 4.

4. Fewer countries provided details around the regulatory levers and guidance which countries used to mandate teaching time by subject in the PIRLS and TIMSS. The countries which did include this level of detail are outlined in the table below.

Country	Regulatory Levers and Guidance for Mandating Teaching Time for Subject
Ireland	Minimum weekly teaching time (4 hours and 10 minutes per week for mathematics and 8 hours 30 minutes per week for language ¹⁰) is prescribed in a curricular letter (Curricular 0056/2011 ¹¹) issued by the Department of Education and Skills. It serves as the initial steps in implementing the National Literacy and Numeracy Strategy 2011-2020.
The Philippines	Minimum daily teaching time (50 minutes per day) in mathematics is prescribed in an order (DepEd Order No 31, s. 2012 ¹²) by the Department of Education. It outlines the policy guidelines for the implementation of the K to 12 Basic Education Curriculum, effective for the school year 2012-2013.
Slovakia	A minimum weekly number of lessons (4 x 45-minute lessons) in mathematics is prescribed in the National Mathematics Curriculum Framework in the State Education Program
Uzbekistan	Prescribed weekly teaching time for 'native language' and reading (with 4 hours and 3 hours a week respectively) are set out in an order by the Ministry of Public Education, dated December 9, 2020 (No. 297 ¹³).

¹⁰ Includes both English and Irish

¹¹ See https://www.into.ie/app/uploads/2019/07/cl0056_2011.pdf

¹² See https://www.deped.gov.ph/wp-content/uploads/2012/04/DO_s2012_31.pdf

¹³ Order of the Ministry of Public Education of the Republic of Uzbekistan. (2020). On approval of the basic curriculum for general secondary schools for the 2021–2022 academic year, No. 297, December 9, 2020.

How effective is mandating teaching hours?

5. Both PIRLS and TIMSS also measured student achievement using a standardised score. When comparing the total teaching hours with student achievement in different countries, both the PIRLS and TIMSS found that as teaching time increased, student achievement declined for reading and mathematics respectively (though the relationship was not statistically significant).¹⁴ It is important to note that this reflects the relationship between length of teaching time and achievement, not whether these teaching hours are mandated.
6. After searching on Google and Google Scholar, we found few studies or reports about the effectiveness of mandating teaching hours for specific subjects. There was more literature about the length of teaching time, both in general and in relation to specific subjects.¹⁵
7. We found one study from Southern Italy which investigated the effects of introducing mandated teaching hours on student achievement in language and mathematics.¹⁶ This study used a sample of 6th grade students from 'low achieving' schools in Southern Italy. Some classes within these schools were selected for the intervention, where there was a requirement to teach at least 9 hours of language and 6 hours of mathematics per week¹⁷. The other classes in the study formed the control group.
8. The study found a positive effect for the intervention group (with mandated teaching hours) in achievement for mathematics but not language. In the highest performing schools, mandating time spent on language led to lower achievement in mathematics. This could be as a result of less time being available to be spent on mathematics if more time is required for language.

Summary

9. According to PIRLS and TIMSS, many countries mandate teaching hours for reading and mathematics. On average, a greater percentage of teaching time is allocated for reading (27%) compared to mathematics (18%) for Year 4 students. However, only two of the countries in these surveys mandate teaching hours as a daily requirement. The countries which did provide information about the regulatory levers and guidance they used to mandate teaching time, mostly did so through orders and letter issued by their Ministry of Education or equivalent.
10. There is mixed evidence regarding the effectiveness of mandating teaching hours for specific subjects on student achievement. Data from PIRLS and TIMSS shows that as teaching time increases, student achievement declines for both reading and mathematics. There are few studies investigating the effect of mandating teaching hours on student achievement. The one study which we found investigating this found a positive effect for mathematics but not for reading.

¹⁴ Paper by Te Poutāhū 'Optimal Instruction Time for Literacy and Maths' provides a detailed account of this.

¹⁵ See Huebener et al. (2017), Wedel (2021), Kraft and Novicoff (2022), Radinger and Boeskens (2021) etc.

¹⁶ Battistin, E., & Meroni, E. C. (2016). Should we increase instruction time in low achieving schools? Evidence from Southern Italy. *Economics of Education Review*, 55, 39-56.

¹⁷ Language time also included history and geography; mathematics time also include science.

Annex B: Design of the teaching times requirement

Key features	Description of approach	Summary of the rationale
5 hours of teaching and learning a week for maths, 10 hours a week for reading and writing	<p>The statement mandates:</p> <ul style="list-style-type: none"> 10 hours a week of teaching and learning focused on supporting students' progress and achievement in reading/pānui and writing/tuhituhi in a typical school week, 5 hours a week of teaching and learning focused on supporting their progress and achievement in maths/pāngarau in a typical school week. 	<p>The framing provides certainty to make planning easier, while also allowing schools some flexibility to manage their teaching and learning programmes (for example to take into account school camps and athletics days).</p> <p>Combining reading and writing reflects how teaching of these is typically integrated, and splitting them out would not be consistent with a structured approach to literacy</p>
Integration with other learning areas	<p>Pānui/reading, tuhituhi/writing and/or pāngarau/maths teaching and learning time can occur within the context of other learning areas, as long as students' progression in their knowledge and skills for pānui/reading, tuhituhi/writing and/or pāngarau/maths is explicitly and intentionally planned for and attended to.</p>	<p>Ensures that teaching is intentional in its focus, while also enabling students to learn across the curriculum (for example, in history).</p> <p>This is particularly important for students as they get older, where they can benefit from applying and developing these skills (particularly reading/pānui and writing/tuhituhi) through other learning areas.</p>
Recognition of oral language	<p>The draft statements explicitly acknowledge the importance of oral language or kōrero development for reading and writing teaching and learning.</p>	<p>Oral language is recognised because:</p> <ul style="list-style-type: none"> in the early years, oral language or kōrero development supports the development of reading and writing skills oral language skills are an important part of structured approaches to literacy/te reo matatini.
Flexibility to vary for individuals in limited circumstances	<p>The statement enables:</p> <ul style="list-style-type: none"> Schools to vary a specific student's hours of reading, writing and/or maths learning from these requirements, as part of a student's individual education plan where appropriate and agreed to by themselves and their family. 	<p>This provides for schools to develop teaching and learning programmes to meet the needs of diverse learners.</p>

Specialist schools	Implementation from term one in 2025	<p>A longer transition period is proposed to allow time to take account of the different characteristics of specialist schools.</p> <p>Specialist schools take a much more personalised approach to their programmes, including responding in the moment to what a learner needs on any given day (which may mean adjusting what had been planned).</p>
Kura run by a specified board ¹⁸	Implementation from term one in 2025	A longer transition period is proposed to allow time to consult with kaupapa Māori education providers, as part of meeting our Te Tiriti o Waitangi obligations.

¹⁸ This refers to kura in one of the following categories: (a) a Kura Kaupapa Māori; (b) a designated character school with a character that is hapū- or iwi-based or that affiliates with Ngā Kura ā Iwi o Aotearoa; (c) a State integrated school with a special character that is hapū- or iwi-based.

Options analysis for time requirements

Key				
++	+	0	x	xx
Strong positive alignment with the criteria	Positive alignment with the criteria	Neutral/no alignment with the criteria	Negative alignment with the criteria	Strong negative alignment with the criteria
Criteria and considerations	Option 1 – 180 hours per year (or double for reading and writing) <i>This is roughly equivalent to requiring an hour a day for 95% of school opening day</i>	Option 2 – an hour on average on typical school days (or two hours for reading and writing)	Option 3 – 5 hours a week in typical school weeks (or double for reading and writing)	
Ensure students get consistent, daily instruction of at least an hour each for maths, reading, and writing	<p style="text-align: center;">+</p> <p>This is equivalent to just under an average of an hour per day of teaching for each area – but it may not always incentivise daily instruction as teaching could vary across the year.</p> <p>Because the expected number of opening days varies per year, some years meeting the requirement may mean slightly less time per day (though they tend to only vary by a few days).</p>	<p style="text-align: center;">++</p> <p>Students are likely to get an average of an hour per day of teaching for each area, most days.</p> <p>Though it may not always mean daily instruction, it looks the most similar to the “hour a day” election commitment.</p>	<p style="text-align: center;">++</p> <p>Students are likely to get an average of an hour per day of teaching for each area, most days.</p> <p>Though it may not always mean daily instruction, it will incentivise regular instruction.</p>	
Uphold our obligations under Te Tiriti o Waitangi	N/A – marginal difference between options			
Practical for schools to implement	<p style="text-align: center;">+</p> <p>Provides clear flexibility, but will require significantly more planning and tracking to make sure they meet the hour requirement, as its more exact.</p>	<p style="text-align: center;">+</p> <p>Provides clear flexibility, though may require some tracking to make sure they meet the “on average” requirement</p>	<p style="text-align: center;">++</p> <p>Suggested by some schools – would provide additional flexibility and likely make it easier to plan/track.</p>	
The requirement is clear and unambiguous	<p style="text-align: center;">++</p> <p>Unambiguous requirement for schools to meet</p>	<p style="text-align: center;">0</p> <p>Not clear what time period the average would be taken over – so may not always be clear whether or not a school has met the requirement. May sometimes be ambiguity about what is a “typical school day,” though guidance can help cover this off.</p>	<p style="text-align: center;">+</p> <p>In general, it would be easy to tell if a school had met this requirement. May sometimes be ambiguity about what is a “typical school week,” though guidance can help cover this off.</p>	
Support all ākonga to achieve across the full curricula	N/A – marginal difference between options			
Overall assessment	<p style="text-align: center;">+</p> <p>Provides flexibility and a clear line in the sand for schools, but may be hard to plan and track</p>	<p style="text-align: center;">+</p> <p>Provides flexibility and looks the most similar to “an hour a day”, but not as clear a requirement</p>	<p style="text-align: center;">++</p> <p>Provides clarity, flexibility and may make it easier for schools to track</p>	

Other longlisted options

We also considered two other options, but discounted them so have not analysed them in more detail:

- **Setting a percentage of instruction time** – discounted as its likely to result in a lot of variability, given New Zealand only has minimum open hours, but many schools are open for longer than this.
- **Setting a term-based requirement** – discounted as the length of school terms can vary substantially, so would lead to too much variability across the year.

Annex C: Initial Te Tiriti o Waitangi analysis against the articles and principles

Relevant Te Tiriti o Waitangi article and principle		Advice on potential implications
Article 1	Partnership	<p>Genuine consultation with Māori representatives on any new requirement is critical to upholding Te Tiriti partnership – which would include across both Māori-medium and English-medium settings.</p> <p>Signalling minimum teaching hours for tuhituhi, pānui and pāngarau without adequate engagement could undermine this obligation – particularly as the election commitment primarily refers to evidence around English-medium schools.</p>
Article 2	Tino rangatiratanga	<p>Setting minimum teaching times for these subjects may potentially be seen as a limit on kaiako and kura autonomy. It may not fit with the aspirations of the connected iwi, hapū and whānau – particularly if it takes away from the time kura can spend on other literacy-related skills like speaking/presentation that are highly valued within a Te Ao Māori context.</p> <p>It could, therefore, be seen as the Government undermining tino rangatiratanga. Broader engagement to more fully understand how Māori, iwi, and hapū may perceive the impact on rangatiratanga can help to mitigate this.</p>
	Active protection (over taonga)	<p>The Crown has a responsibility to actively protect te reo Māori and mātauranga Māori as taonga and support its revitalisation.</p> <p>It is possible that the teaching times requirement could mean that there is less time for ākonga at English-medium schools to learn te reo Māori.</p>
Article 3	Equity Active protection	<p>The Government has an obligation to actively protect Māori ākonga to ensure that they achieve equitable achievement rates. Data suggests that Māori ākonga, compared to non-Māori ākonga have lower achievement rates in mathematics, reading, and writing (NMSSA 2019 and 2022)</p> <p>Making minimum teaching times a requirement (in either English medium or Māori medium settings) could have two different impacts on equity:</p> <ul style="list-style-type: none"> • It could increase equity by ensuring that teaching is more consistent across schools, potentially improving achievement rates – though there is not necessarily evidence to support this outcome. • If it creates unintended consequences (like reduced teaching quality) – it could reduce equity. This could be a higher risk in Māori-medium settings where there may not always be the same level of choice around teaching resources.