IN THE WAITANGI TRIBUNAL	**WAI 3327** **WAI 3349**
CONCERNING	the Treaty of Waitangi Act 1975
AND **IN THE MATTER OF**	Te Reo Māori in the Public Sector Inquiry (Wai 3327)
AND **IN THE MATTER OF**	Interested Party Janice Panoho (Kaihautū) and Georgina Kerr (Kuia and Māngai) on behalf of kaimahi Māori members of Te Pūkenga Here Tikanga Mahi - the New Zealand Public Service Association (PSA) (Wai 3349)

MEMORANDUM OF COUNSEL FILING BRIEF OF EVIDENCE OF JOSEPHINE O'CONNOR

Dated this 20 May 2024

RECEIVED
Waitangi Tribunal
20 May 24
Ministry of Justice
WELLINGTON

TE WHENUA LAW

Tania Te Whenua
Principal
P: 021 026 00026
E: tania@tewhenua.māori.nz

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum is filed on behalf of Interested Party Janice Panoho (Kaihautū) and Georgina Kerr (Kuia and Māngai) on behalf of kaimahi Māori members of Te Pūkenga Here Tikanga Mahi - the New Zealand Public Service Association (PSA) (Wai 3349).

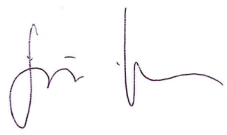
2. Counsel has today received instructions from my clients to file on their behalf evidence with respect to the public service Reo Māori allowances and collective bargaining. Counsel therefore respectfully seeks leave to file out of time on the basis that little prejudice arises from doing so and on the basis that any prejudice arising is outweighed by the benefit of this evidence being presented in this inquiry.

3. In particular, the evidence provides useful information for this inquiry on the variance in reo Māori allowances across the range of Collective Agreements in the public sector and provides detail on the gold standard provision and lesser quality reo Māori allowance clauses, and what the practical implications of the difference can be for active protection of the reo as a taonga and kaimahi Māori in the public sector.

4. Accordingly, accompanying this memorandum of filing is the brief of evidence of Josephine O'Connor along with exhibits.

5. Counsel respectfully requests that they be added to the record of inquiry.

DATED this 20th day of May 2024



……..
T Te Whenua
Counsel