

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL

Wai 3310

KEI RARO I TE MANA O

te ture o te Tiriti o Waitangi 1975

Ā

I TE TAKE O

the Education Services and
Outcomes Kaupapa Inquiry
(Wai 3310)

**MEMORANDUM OF COUNSEL FILING SUPPLEMENTARY EVIDENCE IN
SUPPORT OF PRIORITISING A KAI AKO MĀORI RECRUITMENT INQUIRY**

Dated 13 January 2025

TamakiLegal
Barristers & Solicitors

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Waitangi Tribunal


13 Jan 25

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of Te Urunga Evelyn Aroha Kereopa, for and on behalf of the Kereopa whānau and members of Te Ihingārangi, hapū of Ngāti Maniapoto (Wai 762) (the “claimants”).
2. On 20 December 2024, Counsel filed a memorandum to prioritise a kaiako Māori recruitment inquiry. In the memorandum, at paragraphs 79 to 82, counsel submitted that an official information request had been sent to the Ministry of Education regarding Crown efforts and policies to increase the number of te reo Māori teachers.
3. The Ministry of Education provided their response towards our request in a letter dated 20th December 2024. A copy of the letter (Marked as **Appendix A**) is attached to this memorandum in support of our claim to prioritise a kaiako Māori recruitment inquiry.
4. We respectfully seek leave for the response from the Ministry of Education to be added to the record of inquiry.
5. We submit that no prejudice is likely to accrue to any party should the leave be granted.

DATED at Tamaki Makaurau this 13th day of January 2025



Darrell Naden
Counsel Acting



Siaosi Loa
Counsel Acting



Jessica Zhao
Counsel Acting