

SUBMISSION COVER SHEET



**The House Standing Committee on Employment, Education
and Training inquiry into the use of generative artificial
intelligence in the Australian education system**

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Introduction

The Independent Education Union of Australia (IEUA) welcomes the opportunity to make a submission to the House Standing Committee on Employment, Education and Training inquiry.

The IEUA is the federally registered union representing over 75,000 education professionals (teachers and other education staff) in the non-government sector.

Schools are places of innovation and creativity, and teachers are often early adopters of new and emerging technologies. Generative artificial intelligence (AI) undoubtedly offers opportunities to the education sector. The IEUA asserts that it also presents challenges across the full suite of legal, industrial, professional and educational issues.

IEUA COMMENTS TO THE INQUIRY

The strengths and benefits of generative AI tools for children, students, educators and systems and the ways in they can be used to improve education outcomes:

The possibilities for enrichment of educative experiences for students and streamlining of workload for teachers offered by AI are manifold. Many of the proposed uses of AI are attractive to students and teachers, and, without doubt, also to employers and governments.

However, the profession is rightly concerned about numerous serious issues, including those related to veracity of information, respect for intellectual property, and security of data. This includes online privacy and safety concerns for students and teachers alike.

Since the need to address such concerns will continue to be necessary over the long term, it is evident that the potential benefits of generative AI may also be the source of additional workload for teachers. To date, consultation with the profession has been limited, raising concerns about the already-present issue of advances in technology outstripping the development of appropriate safeguards.

Employers and governments have a joint duty of care to students and teachers to work in close consultation with educators in their workplaces and through their unions to address these concerns.

IEUA RECOMMENDATIONS

Timely and ongoing consultation with the profession in their workplaces and through their unions is critical to establishing guidelines that protect both teachers and students, without diminishing the educative potential of AI.

A cohesive and collaborative approach to the development of AI guidelines is critical to ensure adequate school and sector-wide safeguards for teachers and students.

The future impact generative AI tools will have on teaching and assessment practices in all education sectors, the role of educators, and the education workforce generally:

The importance of professional teacher-student and support staff-student relationships in achieving learning outcomes and preserving student wellbeing cannot be underestimated. Any diminution of the role of relationships, risks to employment or de-skilling of teachers and support staff, is likely to have long-term negative consequences for students, families, schools and communities.

Teaching and learning activities will need to be underpinned by strong skills in ethical practices and critical literacy, both for teachers and students. In many cases, this will require a significant overhaul of curriculum and provision of appropriate resources. High-quality, ongoing professional development for teachers will be necessary, along with explicit and age-appropriate training for students, beginning in primary school.

The encroachment of commercial interests is also of significant concern. AI is an area likely to attract private enterprises dedicated to widespread take-up of the technology, with little interest in addressing concerns raised by education professionals. Inappropriate prioritisation of commercial interests has been a feature of the educational landscape for many years, leading to the delivery of content that is poorly tailored to student needs.

Differentiation of content and assessment practices must remain within the control of the classroom teacher, not dictated by education providers as digital technologies advance. The impact of AI in the assessment process is already apparent, as teachers struggle to guarantee the validity of work submitted by students through more frequent or more individualised testing and additional assessments, with a consequent increase in teacher workload.

IEUA RECOMMENDATIONS

The primacy of relationships in education outcomes must not be undermined by AI technologies.

In consultation with teachers, careful review of current curriculums should be undertaken to ensure the sequential and age-appropriate development of ethics and critical literacy skills in students.

Teachers need timely and ongoing access to high-quality professional development related to AI in education.

Commercial interests must be subservient to the over-riding interest of teacher and student wellbeing.

The professional judgement of the teacher is fundamental to the learning and assessment process. It must be respected and protected.

The risks and challenges presented by generative AI tools, including in ensuring their safe and ethical use and in promoting ongoing academic and research integrity:

The quote below appeared in an opinion piece by Human Rights Commissioner Lorraine Finlay in The Australian on Monday 15 May 2023:

Distinguishing between fact and fiction will become increasingly difficult as AI becomes commonplace in our daily lives. Even knowing whether we are interacting with a human or a machine may become challenging.

There are significant risks associated with student exposure to bias and misinformation already rampant on the internet. Students with insufficient knowledge and skills are at risk of accepting misinformation at face value, particularly when it is provided to them by generative AI. Teachers cannot be solely responsible for the veracity of this information and the cyber safety of themselves and their students.

Government agencies, education systems and employers must ensure that adequate safeguards are in place and that remedies are available should these safeguards fail.

Digital technology guidelines in the education landscape are often absent or ad hoc, an issue clearly demonstrated during the early stages of the Covid 19 pandemic. Employers and schools scrambled to put measures in place to deal with remote learning. Even where guidelines existed, adequate access to professional learning was inconsistent and communication with teachers, support staff, parents and students often lagged behind the implementation of new platforms and software programs.

In addition, as we have seen with the advent of other initiatives and technological advances in education, the trend towards accelerated implementation means that risks are sometimes overlooked or ignored in the haste to be seen as innovative. Ultimately, this haste frequently has a negative impact on successful implementation and desired learning outcomes for students.

IEUA RECOMMENDATIONS

Government agencies, education systems and employers must take joint responsibility for a co-ordinated approach to managing the risks for teachers and students across the many potential interactions between AI and the education sector.

The rush to implement emerging technologies should be tempered by a considered approach to managing risks, including the spread of misinformation and threats to security and privacy.

How cohorts of children, students and families experiencing disadvantage can access the benefits of AI:

Regional and remote areas of Australia and students from disadvantaged backgrounds already face inequitable access to the same technological resources as their metropolitan counterparts.

A joint position paper developed by the Queensland Teachers Union (QTU) and the Independent Education Union of Australia Queensland and Northern Territory Branch (IEU-QNT) highlights in their Discussion Points:

“Currently those who already possess the knowledge and skill to access meaning in AI generated material, and to critically evaluate what is provided, are unfairly advantaged. The reproduction of inherent bias within much material on which AI is trained has dangerous implications. Critical literacy is more important than it has ever been, as the platforms being used are written by a group of people with a particular world view and AI is designed to replicate the current status quo. To avoid creating new power imbalances, access to AI needs to be equitable and inclusive of diverse views.”

(From: Artificial Intelligence: A Joint Position Paper on New and Emerging Digital Technologies – Queensland's Decision-Making Framework)

Teachers have consistently raised concerns about the potential exposure of students to damaging misinformation. Since AI is drawn from a conglomeration of the information and attitudes that already exist online, there is an urgent need for careful screening of AI-generated material to ensure that it does not present students with gender-biased or racist content, further entrenching social, educational, and political disadvantage.

There are also inherent costs associated with accessing more sophisticated levels of AI. Schools will vary in their capacity to pay for the additional features built into paid content, further perpetuating disadvantage and inequity.

Generative AI may also have negative impacts on cultural diversity and indigenous languages, as it prioritises content for English speakers and the written word. Relying on AI for accurate portrayal of the diversity of cultures within Australia is problematic.

Issues arising from the national teacher shortages have emphasised the importance of relationships in teaching. This is particularly acute in terms of Aboriginal and Torres Strait Islander teachers and support staff, who are severely under-represented in the education workforce. Discussion on improving access and support for Aboriginal and Torres Strait Islander teachers and support staff is emerging through the National Teacher Workforce Action Plan and the National School Reform Agreement review and is to be further encouraged.

IEUA RECOMMENDATIONS

Significant and enduring investment in equitable access through securing reliable internet connection and appropriate infrastructure across Australia will be required to prevent the perpetuation of inequity.

Appropriate screening of generative AI content, continuing support for cultural diversity, training in cultural competence and an increase in the Aboriginal and Torres Strait Islander teachers and support staff workforce will be necessary.

International and domestic practices and policies in response to the increased use of generative AI tools in education, including examples of best practice implementation, independent evaluation of outcomes, and lessons applicable to the Australian context:

The IEUA cannot comment with any certainty on this term of reference at this time. The IEUA is aware of school policies and measures that have been developed to address the issues raised by AI, but they are in their infancy, and longer-term outcomes are uncertain.

Our union will continue to engage with employers and members to develop policies and identify practices which provide the necessary protections for students and teachers while capitalising on the opportunities AI provides.

Teachers and school leaders are already overloaded with administrative duties and excessive compliance requirements. The workload implications of any proposed AI practices or policy responses will be a critical assessment undertaken by teachers and their union.

Recommendations to manage the risks, seize the opportunities, and guide the potential development of generative AI tools including in the area of standards.

The IEUA commends to the Committee the joint position and discussion papers developed by the Queensland Teachers Union and the Independent Education of Australia Queensland and Northern Territory Branch. The papers have been attached to this submission for your reference.

In summary, the IEUA makes the following recommendations, based on the issues highlighted throughout this submission:

IEUA RECOMMENDATIONS

The National AI Taskforce and all other agencies collaborating on AI guidelines must include meaningful engagement with practicing teachers and union representatives in their consultations.

Guidelines must be developed in a cohesive and considered fashion to ensure sector-wide safeguards for students and teachers and support to manage inevitable failures in protocols.

AI policy responses and amended school practices designed to safeguard the integrity of student work and academic assessments must also be evaluated in terms of impact on teacher workload. Workload and work intensification in schools is already at unsustainable levels. Additional time will be required for teachers and school leaders to manage such challenges.

Access to high-quality, easily accessible and ongoing professional development for teachers will be a critical component of safe and effective utilisation of AI technologies in schools.

An urgent review of curriculum content to embed strong ethics education and critical literacy training is necessary.

Equitable access for all students should be guaranteed through significant and ongoing investment in infrastructure and the elimination of any disparity between levels of use available to schools.

CONCLUSION

The IEUA urges the government to prioritise the voice of the profession during this inquiry and any other consultations to develop AI guidelines for the education sector.

The IEUA remains ready to engage with governments and other stakeholders to meaningfully address the challenges posed by the rapid emergence of generative AI technologies in schools.