



Productivity Commission: Building a skilled and adaptable workforce

**5 Pillars inquiry consultation responses
28 May 2025**

Policy Reform Area 1:

Improve school student outcomes with the best available tools and resources

What (if anything) needs to be done to improve the use of edtech tools (including GenAI) in schools?

- The IEU welcomes the Productivity Commission's consultation objective of diffusing the best innovations in educational technology across the country.
- To achieve this consultation objective the *Australian Framework for Generative Artificial Intelligence (GenAI) in Schools* must be fully implemented as a minimum standard. In addition:
 - close ongoing consultation with the profession and unions is necessary to remove regulatory gaps and develop and continuously monitor safety standards and guidelines.
 - regulatory responses must strive to keep up with technological change.
 - comprehensive and consultative workload impact assessment must take place before any introduction of new AI, along with retrospective assessments where necessary. Teacher training must be tailored to teacher needs and take place during work hours.
 - the IEU supports the use of AI to reduce workloads, provided that proposals are tested by the profession and teacher autonomy is preserved.
 - commercial AI interests must not be allowed to supersede the interests of, and relationships between, teachers, support staff and students.
 - equity issues in terms of access to paid levels of Generative AI and adequate infrastructure remain a concern.

What more (if anything) needs to be done to improve awareness and access to high quality lesson planning and curriculum materials in schools?

- Our union also welcomes the Productivity Commission's consultation objective of improving access to high-quality, accredited curriculum and lesson planning materials.
- While qualified teachers are more than capable of designing programs and lessons that are aligned to the curriculum and tailored to the needs of their students, they are not able to sustain continuous demands to rewrite programs and include pre-service levels of detail and annotation.
- The IEU has advocated for endorsed resources based on the principles that:
 - meaningful consultation with teachers must occur prior to the implementation of any endorsed programs. Teachers should have the option to adopt the endorsed programs, if agreed by the school, without any additional annotation other than what is necessary for student differentiation.
 - Should a school not approve of programs endorsed externally, they should endorse their own extant programs and lessons so that teachers can adopt without any additional annotation, other than what is necessary for student differentiation.
 - Such programs should remain as endorsed materials unless or until there are changes to the syllabus.

Is there anything more you would like to say about edtech, GenAI or lesson planning and curriculum materials?

- Consistent with our union's own existing positions on AI in schools, outlined above, IEU supports implementation of the 25 recommendations of the Study Buddy or Influencer parliamentary inquiry [report](#) (2024) (the report), to manage risks, seize opportunities, and guide potential development of GenAI tools.
- Our union is strongly committed to principles of equity, inclusion and choice in education. Schools in both the government and non-government sector will vary greatly in their capacity to pay for accessing increasingly sophisticated and expensive levels of AI and additional features built into paid content, further perpetuating disadvantage and inequity.
- Academic results have stagnated in Australian schools in recent years not primarily because of lack of innovation or commitment deficit on the part of teachers; and instead because of under-resourcing that has also caused a workforce attraction and retention crisis.
- Our union therefore strongly supports recommendation 2 of the report:

2.97 - "that the Australian Government work with State and Territory Governments to ensure that all Australian schools are funded to 100 per cent of the Schooling Resourcing Standard.

2.98 This could support access to high-quality educational GenAI tools by students and educators, especially in marginalised communities."

- School funding must be fair across all sectors. Education funding models must be centred on student need. In addition to 100% SRS funding for all public schools there must also be long-term funding certainty for non-government schools.
- Teachers and our union continue to advocate for urgent screening of AI-generated material to prevent gender-biased or racist content in education and similarly the algorithmic exclusion of non-English languages and cultures. We draw attention to disturbing cases of AI ‘deepfake’ harassment of female teachers and students, an AI exacerbation of [gendered harassment in schools](#). AI developments must be consistent with a zero tolerance response to harassment.
- We therefore support recommendation 3 of the report, particularly the need to “build high-quality GenAI education products with datasets based on curriculum, and that meet Education Service’s Australia’s (ESA) product standards, based on the learning outcomes of current pilot programs”.
- Similarly, we support recommendation 4, including that GenAI tools feature “a higher-quality filter to restrict the data used to train an LLM”; and are trained on datasets based on the Australian Curriculum”.
- To capitalise on the educational opportunities afforded by GenAI while ensuring adequate safeguards and protections, guidelines that uphold academic integrity and embed ethics education and IT literacy must be developed in collaboration with teachers and their unions.
- AI has the potential to reduce some of teachers’ administrative workloads. However, the introduction and ongoing monitoring of new technologies’ impacts also increases the need for greater government and employer support to tackle teacher workload and support teacher wellbeing.
- Addressing teacher workload through government action on excessive compliance and the application of workload impact tests on all education policies is urgently needed including in the area of AI impacts. In relation to AI, therefore, our union also supports recommendation 5 of the report, that is, providing funding “to set up virtual and physical hubs to provide expert and technical advice and support to institutions”; and “provide GenAI literacy and training, to leaders, teachers, support staff, students, parents and guardians, and policy makers”. Training for teachers and educational staff must always occur during paid school hours.
- Governments and employers must consult consistently and comprehensively with practising teachers and their unions to develop shared responses to workload and safety concerns arising from the new technology.
- We support the findings of UNESCO’s *AI and education: guidance for policy-makers* (2021) which suggests that “policymakers should strategically review how AI can transform the role of teachers and how they can prepare to work in education settings...”.
- Our union is committed to supporting the future of the teaching profession and are informed by UNESCO research, including the OECD’s [Education for Human Flourishing](#) (2024) analysis of the contested impacts of AI on work and livelihood.

- This includes the view that, while in the short to medium term employment is likely to remain stable, in the longer term the majority of existing tasks across sectors will be automated; and, “in nearly all areas, demand will be satisfied with very few humans required.”
- We call for ongoing recognition and reiteration of the vital importance of human relationships in school teaching, and especially so for Aboriginal and Torres Strait Islander students, teachers and support staff, who are severely under-represented in the education workforce.
- The voice of the teaching profession during this and future consultations to develop AI guidelines, legislation and regulations must be prioritised across all relevant legal, industrial, professional and educational issues.
- The IEU will continue to actively engage with governments and other stakeholders to maximise AI’s potential to equitably improve aspects of education for students and to streamline teacher workloads; and to urgently mitigate the detrimental effects and potential risks brought by the rapid and often commercially driven emergence of generative AI technologies in schools.