Productivity Commission Interim Report

Building a skilled and adaptable workforce

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The Independent Education Union of Australia

The Independent Education Union of Australia (IEUA) is a federally registered union representing all state and territory IEU branches, who in turn represent teachers, support staff and school leaders employed in faith-based schools, community colleges, early childhood education centres, preschools and kindergartens, and post-secondary services in the non-government sector. We are the only union with coverage of principals, educational leaders, teachers, school support staff and early childhood education professionals.

The IEUA has approximately 75,000 members and seven decades of experience in representing workers. Our union has won improvements in pay and conditions for school staff and negotiated hundreds of stand-alone collective agreements benefiting our members.

We have contributed submissions and participated in inquiry hearings and discussions with the federal government and other stakeholders on the full range of major reforms needed in the schools' sector to address unsustainable workloads and the national teacher workforce shortage crisis.

Our submission is informed by consultation with our members. The recommendations of the Productivity Commission will directly impact our members' professional lives and the operation of the schools in which they work.

The IEUA wishes the Productivity Commission Inquiry well in developing its final report and recommendations to government.

IEUA RECOMMENDATIONS: Interim Report Section 1.1 and 1.2

1. The IEUA supports the ACTU's call for AI Implementation Agreements that include enforceable guarantees around job security, skills development and retraining, transparency in technology use, genuine privacy, and protections for data collection and use. Employers must consult with employees and their union in developing these agreements before introducing new AI technologies into school workplaces**.**

2. Employers who do not have an AI Implementation Agreement in place should be deemed ineligible for any form of government funding.

3. Enforceable AI Implementation Agreements must be backed by a national Artificial Intelligence Act and a new National AI Authority, with the regulator resourced to support workers' interests.

4. Governments and employers must ensure that all training and professional development associated with AI use in the workplace occurs during paid working time. Adequate release time must be allocated to school staff to support implementation programs, and sufficient specialist support readily available.

5. Decisions about use in schools of the online national platform of lesson planning materials, AI and other educational technologies (edtech) must be subject to a mandatory Teacher Workload Impact Assessment;[1] in observance of the National Teacher Workforce Action Plan '*Priority 3: keeping the teachers we have*'.

6. Periodic progress reports should be introduced to measure whether the online national platform of lesson planning materials, and increasing AI and edtech use, results in any increase in out-of-field teaching; positive or negative impacts on teacher administration and compliance requirements; and effects on the number of teachers, classroom support and intensive tutoring support staff.

7. Lesson planning materials on the national platform must be adaptable to the full spectrum of classroom needs and diverse student cohorts. Their use must remain subject to teacher autonomy and professional judgement. These resources cannot be used by employers as a substitute for their core responsibility to reduce workload through adequate release time and genuine collaboration with employees and unions to identify meaningful workload solutions.

8. Equitable access to new technologies for all students must be guaranteed through sustained and substantial investment in infrastructure, and by eliminating disparities in access across all schools, teachers, and student cohorts.

[1] IEU Speaks: New workload assessment tool targets the key cause of teacher burnout https://www.ieu.org.au/wp-content/uploads/2024/04/IEU-Speaks-on-new-teacher-workload-assessment-tool-1.pdf

Interim Report Recommendation 1.1:
Invest in a single national platform for teachers to access lesson planning materials

9. The Productivity Commission's interim report correctly identifies unsustainable workloads as the largest issue driving the national teacher workforce shortage crisis.

10. 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 cannot sustain continuous demands to rewrite programs and include pre-service levels of detail and annotation.

11. The IEU supports the development of a single online national platform of authorised curriculum-aligned lesson planning materials developed by education experts that may have the potential to reduce unsustainable teacher workloads.

12. However, the IEUA representing employees in the non-government sector is aligned with the Australian Education Union (AEU) in regarding the proposed platform as only one measure among a range of necessary initiatives. It must not replace the need to increase the recruitment and retention of teachers and classroom support staff, provide appropriate support for students with special needs, and achieve genuine reduction of workload through the elimination of duplicative and excessive documentation and practices.

13. To maximise the platform's potential to ease workload pressures it should be freely, equitably and easily accessible to all schools, teachers and students in all states and territories and in all school sectors, including Catholic and Independent schools.

14. Meaningful consultation with teachers must occur prior to the implementation of any endorsed learning materials. 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.

15. Should a school decide not to adopt materials available on the national platform, 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.

16. Such programs should remain as endorsed materials unless or until there are changes to the syllabus.

17. In the development of professional learning programs to help teachers and schools to adopt a whole-school curriculum approach, lesson planning materials on the national platform must be adaptable to the full spectrum of classroom needs and student cohorts and be subject to teacher autonomy and judgement.

18. Out-of-field teaching is both a symptom and an outcome of the ongoing teacher shortage. Teachers report that out-of-field teaching is detrimental to learning outcomes and contributes to teacher turnover.[2] The platform's provision of planning materials should not be misrepresented or misunderstood as removing the need for teacher subject knowledge; and not function in effect as a pathway to increase out-of-field teaching or neglect the necessary steps to reduce out-of-field teaching.

19. Employers have primary control over workload. Governments and other employers should increasingly engage in consultation with school employees and their unions to develop measures specifically to ease teacher workloads.

20. The criteria the IEU applies when endorsing resources for schools also underpin - and are a prerequisite for - our continued support of the national platform for lesson planning materials, as well as current and future AI and other educational technologies.

Interim Report Recommendation 1.2: Lead national efforts to ensure equitable access to educational technology (edtech) and artificial intelligence (AI)

21. The potential of AI and edtech to reduce teacher workloads and assist student learning outcomes is emphasised in the Commission's report.

22. Rolling out implementation of untested or poorly managed AI programs and edtech tools can be counter-productive and exacerbate workloads. It is concerning that implementation of AI education trials and pilots have already begun in some schools without comprehensive consultation.

23. The IEUA supports AI use to reduce workloads, provided that programs are tested by the profession, endorsed by the profession and support teacher autonomy.

24. Good faith consultation and agreement with employees and their unions through collective bargaining or other joint consultative processes is vital if AI and edtech are to deliver workload relief and improvements in learning outcomes. Comprehensive consultation with employees and unions is also necessary to remove regulatory gaps and develop and continuously monitor safety standards and guidelines.

25. Teacher Workload Impact Assessments (as required by the National Teacher Workforce Action Plan Action 20 prior to the introduction of any of the national Enabling Initiatives) should also be applied before the introduction of new AI tools.

[2] Deakin University Research for Educational Impact. https://redi.deakin.edu.au/2024/12/teachers-are-being-employed-outside-their-areas-of-expertise-should-we-be-concerned/

26. The IEUA agrees with the Productivity Commission recommendations regarding equitable access for all schools and supports combined purchasing power and other equity measures to begin reversing entrenched inequities.

27. Ensuring equitable access to edtech and AI use in education is non-negotiable if the federal government is to achieve its goal of building a better and fairer education system. Implementation requires ongoing vigilance, collaboration and transparency.

28. Regional, remote and very remote areas of Australia, students from disadvantaged backgrounds and First Nations teachers and support staff already face inequitable access to the same technological resources as their metropolitan counterparts.

29. Equity of access to new technologies is important to level the playing field across schools, social economic status, locations and diverse communities.

30. There are 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.

31. Equitable access to AI, edtech and internet for all students should be guaranteed through major ongoing investment in infrastructure.

32. Collaboration and sharing of education-specific platforms (such as the NSW Department of Education's EduChat) may be useful, but will require successful negotiation of mutual sharing agreements between the government and non-government sector.

33. Targets for measurable reductions in teacher administration and compliance requirements should be introduced to ensure that AI initiatives intended for that purpose meet their workload reduction objectives.

34. School staff must be given adequate and paid release time for professional development and specialist support to implement and manage these changes safely and effectively. Teacher training must be differentiated to meet teacher needs.

35. Programs intended to reduce teacher workload, such as AI marking tools and other education technologies, must be tested and guaranteed for accuracy, adaptability to diverse classroom needs, and compatibility with teacher autonomy and professional judgement.

36. The introduction of new AI programs and tools in schools, combined with broader considerations around job impacts and explicit AI deepfake abuse, reinforces the need for strong regulatory oversight. This should include a National AI Authority and a Artificial Intelligence Act with a regulator resourced to support workers' interests.

37. The IEUA supports implementation of the recommendations of the *Senate Select Committee on Adopting Artificial Intelligence* to provide national protections including:

    - an over-arching AI Act to provide consistent coordination and oversight of AI and ensure regulatory responses strive to keep up with rapid technological change;
    - the use of Occupational Health and Safety frameworks in response to the workplace risks posed by the adoption of AI; and
    - placing a positive duty on employers to proactively identify and mitigate AI risks.

38. The *Australian Framework for Generative Artificial Intelligence (AI) in Schools* must also be fully implemented as a minimum standard.

39. Further, transparency and accountability of AI commercial interests operating in the education space should be specified in relation to algorithmic and machine learning bias and other risks with major education and social implications.

40. Clear and reasonable responsibilities for teachers, principals, and schools regarding the use and impact of AI and educational technologies must be defined through consultation and agreement with affected employees and their union.

Interim Report Recommendations 2.1 to 3.4

41. Our union shares the concerns of the ACTU in relation to recommendations 2.1 to 3.4 of the Productivity Commission's Interim Report '*Building a Skilled and Adaptable Workforce*'.

42. These sections of the report fail to prioritise meaningful solutions to Australia's skills and training challenges, as well as the safety and quality standards essential for workers and, by extension, the broader community.

43. The IEUA shares the ACTU's assessment that much of the interim report appears to prioritise employer cost-cutting measures over the establishment of robust quality standards.

44. We also reject the Productivity Commission's proposal to address workforce shortages by lowering the occupational entry requirements that are the minimum level of skills and suitability to operate safely and effectively in an occupation.

45. The IEUA calls on the Productivity Commission to include recommendations that address job quality issues in occupations experiencing a shortage; improving employer investment in training; and addressing the uptake of apprenticeships and traineeships through pay increases and better support.