

ISA SUBMISSION TO DEPARTMENT OF INDUSTRY, SCIENCE AND RESOURCES - SUPPORTING RESPONSIBLE AI: DISCUSSION PAPER

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1. INTRODUCTION

Independent Schools Australia (ISA) has prepared this submission in response to the Department of Industry, Science and Resources' *Supporting responsible use of AI: Discussion Paper*.

Since the commencement of the 2023 academic year, with the rapid emergence of OpenAI's advanced language model ChatGPT, Independent schools have been investigating the implications of the use of generative AI technologies in education. As generative AI is a relatively new technology with the ability to generate new content (image, text or animation) through 'machine learning' and imitate human writing, its long-term educational impacts on teaching, assessment and student outcomes are unclear.

Many Independent schools are seeking evidence-based guidelines to manage privacy risks, data security and copyright considerations to support the ethical implementation of generative AI, including examples of best-practice policies. Although there are many recognised benefits and potential for generative AI to contribute to education, the speed with which new AI products are being released on the market is raising concern for Independent schools as they investigate and navigate the risks and opportunities for teachers, students and the future of education.

A comprehensive national framework for the ethical and safe use of AI in education, such as that currently being developed for the school sector under the auspices of the Education Ministers Meeting (EMM), would therefore be of great benefit as the education sector navigates this difficult terrain.

ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

2. ABOUT ISA

ISA is the national peak body and the voice for the Independent school sector. Our membership and board are comprised of the state and territory Associations of Independent Schools (AISs). We work closely with our members to promote choice, diversity and partnership in education, and advocate for ongoing and sustainable levels of Australian Government support through effective policy and fair funding.

Through these Associations, ISA represents more than 1,209 schools and 688,638 students, accounting for 17 per cent of Australian school enrolments and a workforce of 115,090 people.

ISA's major role is to bring the unique needs and contributions of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

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Independent schools are a diverse group of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. A number of Independent schools have been established by community groups seeking to meet particular needs or to reflect the religious values of a community. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Independent schools include:

- Schools affiliated with Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Quaker and Seventh Day Adventist schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as grammar schools in some states
- Community schools
- Indigenous community schools
- Schools that specialise in meeting the needs of students with disabilities
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other factors.

Most Independent schools are set up and governed independently on an individual school basis. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example Lutheran schools. Systemic schools account for 20 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

3. SUMMARY OF RECOMMENDATIONS

The use of generative AI holds transformative potential for the education sector however this technology must be used discerningly to benefit, and not harm, individuals and society. Advances in the development of digital technology and especially generative AI are rapid and exponential. This creates a significant challenge for the education sector as governments, systems, sectors, universities, schools, educators, students and parents all attempt to chart a safe and ethical pathway that maximises opportunities and minimises risk within extremely short timeframes.

ISA recently made a submission to the House of Representatives Standing Committee on Employment, Education and Training's *Inquiry into the use of generative artificial intelligence in the Australian education system* : [Submission: The issues and opportunities presented by generative AI – Independent Schools Australia \(isa.edu.au\)](https://isa.edu.au/submission-the-issues-and-opportunities-presented-by-generative-ai-independent-schools-australia)

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In the submission, ISA recommends the following seven actions and considerations to ensure the responsible and ethical use of generative AI in education:

- 3.1 Leveraging the benefits of generative AI for a future focused, inclusive and equitable education system will require proactive planning and careful consideration of the effects of generative AI technologies on social relationships and human qualities. [ISA recommends the formation of a federal education advisory body of key stakeholders and cross sectoral school education representatives and academics to examine the benefits and risk of generative AI to inform education policy.](#)
- 3.2 To harness generative AI benefits that provide opportunities to support teacher workload in curriculum design, lesson planning, creating learning resources and assessment, [ISA recommends investigation and implementation of funded initiatives to support the national teacher workforce in all education sectors in the effective use of AI technology.](#)
- 3.3 Addressing the digital divide in disadvantaged and regional and remote communities by providing access to technology and internet connectivity as well as training and support for both teachers and students is essential. [ISA recommends the implementation of funded programs to develop and deliver safe, effective educational AI technologies which can reduce educational disadvantage and improve outcomes for students by supporting individual learning needs.](#)
- 3.4 As the ability to detect AI generated responses becomes more difficult, plagiarism concerns require widescale review of traditional methods of assessment to design authentic, rigorous assessments that measure the learning process. [ISA recommends that safeguarding, ethical use, equity and integrity are core principles of a national AI framework for education.](#) This framework should also underpin initial teacher education courses to inform the next generation of teachers with effective integration of generative AI into their teaching and assessment practices.
- 3.5 Educator generational differences may increase the digital divide between early adopters and those reluctant to embrace generative AI. School leaders and educators require professional development to gain confidence, to understand the risks and opportunities of generative AI and have the knowledge and experience to teach students how to use these technologies ethically and with discernment. International experiences can inform policies and practices in the Australian context but need to be adapted to the local educational landscape and cultural contexts. [ISA recommends the creation of a national generative AI in education website that is freely accessible to all educators to increase their knowledge base](#) by including:
 - examples of best practice guidelines and human-centred policies for schools to adjust according to their context and adapt to a rapidly changing technological environment
 - up to date information about cybersecurity, privacy, data security, data governance and copyright implications
 - information on the quality and safety of available educational technology tools; testing validity and providing suggestions of evidence-based tools
 - a clearing house of evidenced-based AI research.
- 3.6 It is essential that generative AI pedagogical practice is developmentally appropriate and informed by evidence-based research considerate of the potential long-term impacts of generative AI on the human condition. As generative AI is relatively new, it is important that early childhood and primary aged children have the opportunity to develop healthy social-emotional skills and become critical and creative learners before they experience the world of generative AI.

As generative AI is targeted to adult thinking processes, age-appropriate implementation of AI tools in education should be evidence-based, reviewed and evaluated and students need to be explicitly taught how to apply critical thinking skills to determine bias, relevance and accuracy in AI generated outputs. [ISA recommends that the importance of culture, play-based learning, social](#)

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connection, teacher/student relationships and protecting the holistic development of children and young people informs and is at the core of generative AI education policy.

- 3.7 Independent schools are in various stages of researching, investigating and implementing generative AI practices, aligning with their values and individual school community contexts. The Independent school case studies in Appendix A highlight that having a digital technology 'expert' on staff provides more confidence for those Independent schools wishing to explore generative AI opportunities.

Independent schools without staff expertise in digital technologies are more reluctant to embrace a generative AI journey and seek further guidance. Many Independent schools, particularly smaller Independent schools, seek support from their state or territory AIS for professional development and policy advice. *ISA strongly recommends that funding be provided to AISs to ensure that schools in all sectors have the necessary support to implement effective and ethical generative AI strategies.*

4. CONCLUSION

ISA commends the scope of the *Safe and Responsible AI in Australia Discussion Paper* in balancing potential risks with fostering innovation and adoption, noting that these are not mutually exclusive and that the future opportunities and challenges of generative AI are not yet fully understood.

Harnessing the opportunities that generative AI might bring to education and industry requires a coordinated, collaborative approach between government, regulators, universities, school sectors, industry and other key stakeholders incorporating best practice, evidence-based research and futures thinking.

And it is also imperative that while we grapple with how best to harness the benefits of generative AI technologies in education, we do not lose sight of the core purpose of education and collectively, we must ensure that human beings retain human agency and the capacity to learn, think critically, be creative and confident with the capacity to make informed choices and make a positive difference in the world.

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