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SUBMISSION TO THE HOUSE STANDING COMMITTEE ON EMPLOYMENT, EDUCATION AND TRAINING

Response to the **Inquiry Into Generative Artificial Intelligence in the Australian Education System**

14 July 2023

About: Studiosity's mission is to increase the life chances of every student by helping them succeed in their studies. We partner with 150 Higher Education Institutions to serve 1.6 million students, delivering immediate, personalised, 24/7 support. With more than 20 years experience in online education, 80% of Australia's universities now partner with Studiosity to grow a variety of institutional and regulatory student success metrics, including: student satisfaction, academic integrity, retention (16.5% measured increase), and academic success (8% measured increase in course average). Australian founded and owned, Studiosity is also the global leader in student success services, preferred for our quality academic and technological standards.

This submission is made by Studiosity, delivered by our **Australian Academic Advisory Board: Professor Judyth Sachs, Professor Sally Kift, Professor John Rosenberg, and Professor Chris Tisdell, along with CEO and Managing Director, Mike Larsen, Founder Jack Goodman, and the Studiosity Senior Leadership Team.**

We welcome the Hon Jason Clare MP's prompt of an inquiry into generative artificial intelligence (GAI) in the Australian education system. It is paramount that the Australian education sector generally, and higher education in particular, take steps to protect and enhance its reputation for quality and learner outcomes given the disruptive impact of generative artificial intelligence.

This Federal inquiry is essential to maintaining the highest international standards of education. This is not only so that GAI positively contributes to Australia's largest services export, but so that GAI applications within education settings are ethically sound and positively impact the learning process of students, whose knowledge and skills will form the future backbone of Australia's economy.

Ref	Inquiry Terms of Reference	Recommendation
1	*The strengths and benefits of generative AI tools for children, students, educators and systems and the ways in which they can be used to improve education outcomes;*	It is clear that the strengths and benefits of GAI will need to be combined with the creative input, lived experience, and personal accountability of humans. We need to understand and articulate the potential and evolving role that GAI can play in the teaching and learning experience. To maintain learning standards , GAI must be provided within a framework of human oversight. This includes: management of

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		quality inputs and foundations for large learning models; quality assurances for ethical use, content, and academic integrity; human accountability for the technology's appropriate and fair function; and, continual review of outputs, including continual vigilance for replication of bias.
2	*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;*	GAI will form part of a wider system of assessment that collectively gives educators' evidence of each student's authentic, multi-faceted learning journey. Students' use of GAI in education settings will therefore need to be scaffolded with new skills, including universal delivery of: critical thinking, digital literacy, personal communication and writing style, and opportunities to develop higher-order thinking skills. Teachers will also need to be (re)skilled to provide this scaffolding. In higher education, there is a need for the sector to work closely with professional and accreditation bodies to understand current and future learning and assessment requirements in the context of competency certification.
3	*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 Australian Government needs to hold developers of publicly-used GAI resources accountable for the veracity of output in education settings. As for the use of any new technology, it will be necessary to think through regulatory compliance and broader ethical considerations. Developments internationally should be monitored carefully, particularly for regulatory responses applicable to education providers. Quality, ethical outputs from GAI require quality inputs. Australian higher education can help ensure GAI is fit for purpose - avoiding inaccurate, irrelevant, biased, or deceptive outputs, or information that is counter to either regulatory or teachers' pedagogical design. This can be done by undertaking ongoing due diligence to ensure the inputs of GAI are relevant to educational settings, and that the outputs of GAI in education settings are robust, ethical, increase the quality of learning outcomes, and are protecting the reputation of Australian education. GAI systems will need appropriate controls to allow educational institutions to undertake this work. Misconduct is also a known risk, where some students may pass off AI-generated work as their own. Widespread evidence from within the field of academic integrity suggests that students are well-intentioned but may be opportunistic when under pressure. Misconduct - both unintentional and

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		intentional - can be mitigated when education institutions provide students and teachers with clear advice and guidance and sanctioned alternatives, including appropriately-trained GAI, as trusted, readily-accessible options. Risks and challenges can be mitigated with transparency of use. Policy should dictate that where a student or researcher uses GAI tools this should be disclosed to assessors, reviewers, and other audiences, just as referencing is used to disclose access to archive materials.
4	*How cohorts of children, students and families experiencing disadvantage can access the benefits of AI;*	Implemented well, GAI has the potential to improve access to and the accessibility of learning and enhanced learning outcomes for disadvantaged learners. It has the potential to complement classroom teaching with smart, adaptive, and personalised formative feedback at scale and high frequency for individual learners, in modes that suit individual circumstances. It will be important to work with experts, advocates, and communities to understand the potential for different groups of students experiencing disadvantage. GAI is best delivered at scale via Australia's strong, existing education infrastructure as part of enrolment. Australia's education institutions already include a wide ecosystem of expertise and resourcing that comes from teachers, administrators, student mentors, families, and scaffolding by others, including education scholarship programs. Students in Australian education institutions should receive equal access to quality-assured GAI tools via these existing channels, including equal-access to the associated personal scaffolding required to use GAI ethically and effectively, including critical and digital literacy. Further, partners in Australian education - including scholarship managers, advocates, and community leaders for First Nations students, refugees, learners with disability, and socio-economically disadvantaged groups - can provide valuable connections to students' communities in combination with teaching and learning ecosystems within institutions.
5	*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*	There is extensive evidence in the Australian context for the impact of personal feedback on student confidence and other academic success metrics. Studiosity can offer the Minister for Education this evidence, and access to early evidence within the higher education sector for the use of GAI on student engagement, confidence,

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	lessons applicable to the Australian context;	and outcomes. An example of a considered and iterating international response is to be found in the work of Jisc in the UK, which has now established a National Centre for AI and produced reports such as, for example: *A pathway towards responsible, ethical AI* (2021), and a conceptualisation of a (G)AI maturity model for the education sector (AI in tertiary education: A summary of the current state of play 2nd edition, June 2022*).*
6	*Recommendations to manage the risks, seize the opportunities, and guide the potential development of generative AI tools including in the area of standards.*	Australian education is already globally renowned. There is an urgent need to adjust standards to incorporate the use of GAI to protect and augment those high standards. Use of GAI in Australian education settings should include: **1. Human oversight and quality assurance, ongoing due diligence of GAI outputs, including proactive management of associated large language models.** **2. Access at scale - including investment in digital and critical literacy skills; authentic learning opportunities; higher-order thinking skills; and, peer-based learning - to ensure students don't simply have 'access' to GAI but are equipped for a lifetime of considered and appropriate use as citizens.**

Sincerely,

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