

Senate Inquiry into Adopting Artificial Intelligence (AI)

10 MAY 2024





ABOUT THE REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to make a submission to the Select Committee on Adopting Artificial Intelligence's (AI) Inquiry into the opportunities and impacts for Australia arising out of the uptake of AI technologies in Australia.

RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast.

This submission reflects the positions of RUN institutions, and in doing so, also aims to represent the views of those students and communities which RUN universities serve; the one-third of Australians who live outside of metropolitan centres in Regional, Rural and Remote locations.

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OVERVIEW

There is clear potential for AI to be an incredibly powerful and beneficial tool not only within the context of higher education, but more broadly in the workforces, industries, and economies that Australia's tertiary students graduate into. Likewise, AI and its multitude of applications can have the potential to manifest in many harmful ways as well, to both individual and society. Ultimately however, AI is now an unavoidable reality that will inevitably embed itself into almost all aspects of life, including our homes, our education, our healthcare system and of course our places of employment.

Australia needs to ensure that its citizens are not excluded from the global race of the application of AI – a race that will likely define the century ahead. For this to happen in a safe and ethical manner, RUN has provided considerations to this Select Committee Inquiry from the contextual perspectives of students/graduates, higher education providers, and Government/regulators alike.

Australia's universities are ensuring that Australia's citizens have strong and discerning AI literacy skills that enable healthy and productive engagements with emerging AI advancements in ways that uphold a prosperous, civil society and a functioning, transparent democracy. Australia's university sector is best placed, as an early adopter of AI tools for knowledge generation, to inform best practice for the implementation of, and appropriate use of AI tools in an educational context. RUN is highly supportive of a risk-based regulatory approach to AI systems as they continue to evolve and recommends Australia vigilantly observes how risk-based frameworks from other jurisdictions are implemented.

This submissions supports previous submissions made by RUN on issues related to Artificial Intelligence, including the RUN submission to the House Standing Committee on Employment, Education and Training regarding the use of generative artificial intelligence in the Australian education system, which may be found [here](#). RUN is supportive of the submission made by Universities Australia.



CONSIDERATIONS FOR STUDENTS AND GRADUATES

The use of AI-derived tools by tertiary students can, in certain instances, greatly assist with the productivity of learning and the richness of student experience. As a study aid, AI tools have the potential to support students through tutoring-like support, the provision of real-time feedback, and act as a 'thought-prompt'. Educators and students can collaborate to use AI tools to develop learning activities tailored to different learning styles, preferences, and abilities. These tools can also be used to improve accessibility for students with different linguistic backgrounds, and even overcome disability, learning difficulties or other traditional barriers to learning.

Beyond the potential learning advantages, the broader adoption of AI across a range of sectors – including health, engineering, social services, and creative industries for instance¹ – means that the use of these tools will be an expectation of students entering the workforce. Students with a reluctance to engage with AI during their studies may well find themselves disadvantaged upon graduation into the workforce where familiarity with AI may be an expectation.

However, the ethical use and integration of AI systems into a tertiary student's studies requires a proactive and thoughtful approach. There is a growing requirement for students (and university staff) to be sufficiently educated in their use. This includes an understanding of the limitations of the technology, the social benefits, and of course, the risk² and implications upon academic integrity. This would be in addition to instructional guidance of the practical use of the AI tools themselves. Universities are undertaking a key role in educating students about AI and are ensuring that students are not only workforce ready but have the skills in critical thinking and analysis to use AI tools effectively and ethically.

Within the context of RUN's student cohorts – who are typically more likely to come from traditionally underrepresented student backgrounds (low socio-economic, rural/regional/remote, First Nations, disability, first-in-family) – issues of digital equity are an important consideration. Here, RUN universities acknowledge the need to ensure that the benefits of AI tools (as a study aid) are accessible across cohorts of students, while recognising the potential for barriers to emerge where inequity exists. For example, the 2021 Australian Digital Inclusion Index shows an accessibility divide between regional and metropolitan areas,³ and a lack of digital equity continues to be a barrier for some students. Such a divide has the potential to have wide ranging impacts on the capacity of students to engage with AI technologies. Additionally, migrant, or international students from countries where AI tools are highly restricted (if not banned altogether) will lack prior experience and thus there are additional considerations in the implementation of university curriculum. Cost of access and a student's ability to afford an equitable level of AI tool provision is also a growing issue to consider. While basic AI tools like ChatGPT are free and accessible, many students are reporting their purchase of premium AI products with additional capabilities, such as the subscription-based ChatGPT Plus. This has the potential to lead to advantage imbalances within the classroom, however the eventual availability of enterprise level AI integration may mitigate some of these issues.

RUN member universities recognise there is a need to educate students in the effective use of AI tools and provide a safe space for learning and experimentation, as well as ensuring that any tools that may eventually be required for student participation are made available to all students.

CONSIDERATIONS FOR EDUCATION PROVIDERS

Universities acknowledge their role in preparing graduates for workforces and work practices that will inevitably – if not already – be transformed by AI. This extends beyond a vocational familiarity/competency in the use of AI and includes the development of skills in critical thinking and analysis to use the tools ethically, safely, and effectively. Many universities – including RUN universities – are engaging with AI beyond the practicalities of how the technology is embedded most effectively within curriculum delivery. For instance, RUN universities are continuously reviewing how AI can be used to enhance the student experience at an institutional level via better student support, student engagement, and productivity enhancements. Beneficial AI applications in learning and teaching have the potential to enhance student experiences as well improve productivity for academic and professional staff. An example of this is the use of AI enabled university chat bots which can help guide students through enrolment and provide instant, natural language responses to student enquiries. Using AI to automate routine tasks such as answering frequently asked questions can also alleviate workload for academic and professional staff, allowing more time to be spent on higher level work.

RUN member institutions are already responding to the multitude of academic and ethical issues raised by AI through the review of academic and integrity policies and changes to assessment practices. They are also educating staff and students to ensure that guidelines for acceptable use of AI are clearly communicated to all. RUN universities acknowledge the necessity of education to leverage the benefits of AI and reduce risk and are taking steps to ensure their ethical use and integration.

While some universities have made the decision that generative AI tools are not permitted to be used in assessment unless stated otherwise, at other institutions use is permitted if appropriately acknowledged and within acceptable limits. Importantly, RUN universities acknowledge that the appropriate use of AI can depend on discipline and level of study, and understand certain industries and fields may have a greater demand for AI use in future careers (such as in marketing, customer operations, and software development⁴). In response, universities are, where applicable, embedding appropriate and ethical use of generative AI into the curriculum.

The incorporation of AI in tertiary curriculums is not without risk and RUN member universities are addressing many of these hazards in their approaches to learning and assessment. One of the challenges facing universities is detecting the use of generative AI in assessment and in ensuring that AI use is in line with institutional policies. In response, universities are redesigning assessment practices to ensure students demonstrate understanding of their work, such as focusing more on oral and authentic assessment.⁵

AI systems have been shown to, at times, exhibit biases that stem from their programming and the datasets they are trained on, which may be incomplete or discriminatory. As well as a potential for reproducing false, biased or misleading information, the technology can sometimes "hallucinate" fabricated details or sources.⁶ In addition, the use of AI raises legal and ethical questions around privacy, defamation, and intellectual property.⁷ While developers like OpenAI are introducing strategies to mitigate these issues⁸, there is a role for universities in ensuring students have the skills to critically engage with and evaluate the output of generative AI tools as well as make ethical choices about their use. The need for these critical AI literacy skills extends far beyond a student's time at university as these skills will undoubtedly be called upon in the workforce, and in broader society.

CONSIDERATIONS FOR GOVERNMENT & REGULATORS

The issue of AI and its interface with tertiary education is a fluid and constantly evolving dynamic that requires ongoing reassessment and response from universities. It is essential for universities to be able to act quickly and have flexibility in decision-making regarding AI. Similar to the many waves of technological advancement over time that educators have had to adapt to, AI has the potential to be used in both positive and detrimental ways. The primary response from universities is the safe, ethical, responsive deployment of educational tools. To be effective in this, universities need to remain hyper-flexible in an environment where the evolving engagement with AI is not throttled by hasty or reactionary over-regulation.

Here, the continued provision of flexible and responsive best practice guidelines through the Tertiary Education Quality and Standards Agency (TEQSA) is helping support universities to engage with AI most effectively in order to encourage a citizen body with strong and discerning AI literacy skills. The provision of best practice guidelines and advice through TEQSA supports universities to implement proactive approaches, particularly in areas such as assessment, academic integrity, ethics and data security.

To inform such guidelines, and Australia's policy/regulatory response to AI's place in society more broadly, RUN notes the progress of the European Union (EU) Artificial Intelligence (AI) Act, the first piece of legislation of its kind worldwide. The EU has been proactive in establishing regulations to address the ethical and societal implications of generative AI, which seeks to regulate the use of AI generally (rather than in particular contexts or for particular applications) and proposes classifying different AI systems according to perceived level of risk. The EU's AI Act and associated regulatory framework utilises a risk-based approach, distinguishing between higher and unacceptable risk-based AI systems requiring intervention/regulation, and limited and lower-risk AI systems which attract more minimal levels of regulatory oversight. This risk-based approach to regulation appears compatible with the Commonwealth Government's interim response to the Safe and Responsible AI in Australia consultation process⁹, which identifies the need for regulatory requirements commensurate to the level of risk they (specific AI systems) pose. A risk-based approach allows low-risk AI development and application to operate freely while targeting regulatory requirements for AI development and application with a higher risk of harm.

RUN is highly supportive of such a risk-based regulatory approach to AI systems as they continue to evolve and would see value in watching how the EU approach (alongside other emerging frameworks arising from other comparable jurisdictions, such as the US) works in practice, before fully committing to our own domestic risk-based framework. A broad, society-wide regulation (such as the proposed EU AI Act) could well be a model to help guide the safe and responsible use of AI in Australia.

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