# Australian Education Union – Victorian Branch **ENDORSED:** Technology and Teaching Policy

#### **Preamble**

- Over the course of history our physical, economic and cultural development has been linked
  to advances in the organisation and transmission of information. As such, these
  developments have changed the content and methods of education over time and will
  continue to do so at accelerating rates in the digital age.
  In such a rapidly changing landscape it is important to clarify the role of technology in
  education and its relationship to the teaching profession.
- The AEU supports the positive use of technology and its potential to enhance the quality of learning processes, enrich educational activities and support communications between educational institutions, educators, learners, and parents/caregivers. Information and communication technology (ICT) is an important part of the provision of quality public education for all.
- 3. However, technology which is used in education must be subject to control by the teaching profession and based on sound educational principles and a robust evidence base. Central to the development, implementation and use of technology is the relationship between teacher and learner which must remain the basis of the learning and development process and, while ICT can certainly supplement this, its appropriate use must be under the supervision of qualified teachers and other educators with expertise in pedagogy and student learning.
- 4. The increasing use of technology in schooling has implications for the equity and inclusiveness of the public education system. All government and Department ICT policies should address the issue of 'the digital divide' (the uneven access to, use of, or impact of ICT) in relation to students, parents/caregivers, teachers and schools. All teachers and students, education support professionals and administrators in education should be supported by an approach that is open and agnostic to the type of device used, and that provides free access to high quality dedicated ICT, necessary data allowance, adequate and timely technical support and high speed connectivity.
- 5. The expanding ICT use has also placed pressure on the nature and quantity of work of teachers and other educators and impacted their professional identity and sense of agency. The responsibility of the employer is to address these matters through needs-based resourcing and measures to enhance the professional role of teachers. This must be done in cooperation with the profession represented by the AEU.
- 6. Finally, the increased use of ICT hardware does not come without environmental costs. Raw materials, manufacturing processes, power consumption and waste issues (especially in a context of rapid obsolescence) pose real physical limits to the expansion of ICT hardware use under current systems of production and consumption. In these circumstances it is important to work towards a sustainable use of digital technology.

## 1. The professional role of teachers and other educators

- 1.1 The quality of education in schools is reliant upon the constant exercise of teacher professional judgement. This means that the use of technology must be based on a strong commitment to the professional autonomy and expertise of teachers.
- 1.2 The promotion of 'teacher-proof' digital education operated through artificial intelligence (AI) systems with claims that it is more effective and 'personal' than classroom teaching, is not supported by evidence of improved student learning progress and is a misrepresentation of the capacity of classroom teaching to meet student learning needs.
- 1.3 The pedagogical and developmental value of a physically present teacher in a class setting cannot be replicated by ICT. This was clearly demonstrated by the experiences of students and teachers during the COVID pandemic (see Section 10 below). Although ICT innovations may be used by educators as supplementary tools, entirely digital forms of instruction, unmediated by the expertise of a qualified teacher, cannot substitute for genuinely interactive human teaching and learning.
- 1.4 The design, trialling, implementation and governance of AI systems in schools must be based on solid research evidence and involve teachers and other experts who can provide independent evidence-informed guidance on effective use of the technology and the potential risks involved.
- 1.5 The teaching profession should be broadly and thoroughly consulted before technological innovations are introduced into schools to ensure that they demonstrably enhance teaching and learning and to critically assess any risks they may pose to effective and equitable schooling, and to ensure that their impact does not damage or undermine the curriculum, the learning process or the development and welfare of learners.
- 1.6 Where such innovations are mandated at a system or school level, their introduction should comply with the AEU's policies around curriculum development, assessment and reporting and pedagogy, as well as consultation requirements contained in relevant industrial instruments.
- 1.7 It is also important to recognise that digital technology may facilitate and promote the "datafication" of education which prioritises measurement over wider conceptions of pedagogy and learning. An outcome of this process is the 'naturalisation' of data as the most 'credible' medium for thinking about teaching and learning rather than as potentially useful evidence informing the professional judgement of teachers.

#### 2. Professional Learning

- 2.1 Professional learning which is properly funded and relevant to educator needs is central to the successful introduction and developing use of ICT in schools. 'Proper funding' means ongoing resourcing which is sufficient to meet the Department's expectations of ICT use by education staff and their ICT-related professional learning needs. The starting point for the provision of these resources is to fund public schools to 100% of the Schooling Resource Standard.
- As existing evidence indicates that digital technology in education will continue to develop and its use expand at a rapid rate, the Government must fund, and the

- Department of Education and Training (DET) implement, an ongoing needs-based comprehensive professional learning program for all staff employed in schools.
- 2.3 Professional learning must be accessible during the ordinary employment hours of education staff and should cover what technology-enhanced learning is, its potential and its limitations. It should be device agnostic and brand neutral and not be provided by technology companies with a vested interest in selling their products.
- 2.4 The development and adoption of effective technology practices and programs also requires an appropriate level of resourcing to provide the time and space for educators to work collaboratively, with sufficient access to qualified ICT support staff.
- 2.5 DET should ensure that effective technology practices and programs developed by the profession are shared on a system-wide basis with due recognition to their developers. To enable this to happen, DET should establish a mechanism for sharing effective practice between teachers in collaboration and continued consultation with the broader culture of existing networks established to support teachers.

#### 3. Role of the State Government and DET

- 3.1 The State Government and Department of Education and Training must ensure that policies and decisions relating to technology use and purchase in schools are made in consultation with the AEU, school based employees, parents/caregivers, other members of the school and education community, and others with relevant expertise.
- 3.2 The Department must increase system oversight of technology use in schools to ensure that schools and their staff benefit from greater consistency, greater equity, on-demand advice, and the substantial cost-savings which arise from the Department's large scale procurement capacity. Such oversight should be device agnostic and take account of the range of ICT needs of education staff.
- 3.3 Any agreements entered into by the State Government and/or DET or schools with commercial companies for the provision of ICT hardware and ICT services in schools need to be made publicly transparent and available to the AEU and schools so that education staff, parents, students and the community more broadly understand the implications of such agreements including third party data sharing arrangements, the exact uses of the data by DET, and the risk assessments accompanying these.
- 3.4 The State Government and Department of Education and Training must allocate the necessary funds to:
  - develop appropriate ICT resources for schools and education institutions and ensure that the outcome of such development work is available freely to all
  - ensure that every public education institution has access to high quality ICT, both hardware and software, irrespective of where it is situated. Federal and State Governments should ensure that high quality internet and wireless access is available to all schools and educational institutions to meet their needs
  - provide accessible, needs-based, on-going professional development in the use of ICT for teachers and other educators
  - provide the necessary personnel to properly support and maintain ICT in a timely manner in all schools and for remote learning where applicable.

#### 4. Email

- 4.1 Email can be very useful in many circumstances, for example, to catalogue ongoing written conversations or formal communications. However, email has limitations as a means of communication and may be inappropriate in certain interpersonal contexts or where confidentiality is important. It also has a tendency to be over-used for bureaucratic purposes both at a school level and by the Department of Education and Training.
- 4.2 A substantial concern with email use in schools is the significant impact it has on the workload of teachers, principals, and other educators. In particular, it has added to the administrative work required within school hours as well as encroaching on out-of-school time during evenings, early mornings, and weekends. It has led to a situation where staff consider that they are 'on duty' whether they are at school or at home.
- 4.3 It is important that email communication is explicitly recognised as a major contributor to teacher workload and, as such, is subjected to agreed parameters about its use.
- 4.4 Schools must consult with staff about their email culture (including the need to limit its use) and develop policy setting out protocols for the use of email. The policy should relate to the Victorian Government Schools Agreement provisions around the work of employees, and indicate that unless there are defined special circumstances emails should not be sent or be expected to be read or responded to outside of ordinary working hours.
- 4.5 Schools should ensure that all members of staff, students and parents are aware of the school's email policy by, for example, an information hyperlink, automated messages or headers/footers attached to emails.

#### 5. BYOD schemes and mobile phones

- 5.1 Bring your own device (BYOD) schemes raise important equity issues and have the potential to amplify inequalities between students. They act as a cost-shifting exercise which moves the funding of ICT from the government to parents and carers. It is an action which further privatises public education.
- 5.2 BYOD schemes do not address the fundamental digital divide issues and undermine digital inclusion related to access (including hardware, data allowances, and reliable and available networks), affordability and digital ability.
- Public schools have an obligation to ensure that students are not disadvantaged in their learning because of their socioeconomic background. Where technology is incorporated into the curriculum, every student must be entitled to equitable access to appropriate hardware, relevant software, data allowance, and technical support.
- 5.4 DET and schools should have clear and consistent policies about the presence and use of student mobile phones in schools. These policies should be evidence-based and subject to review.
- 5.5 Schools should consult about the use of staff personal mobile phones for school purposes. School staff should not be required to use their personal mobile phones for school business.

5.6 In general, DET should provide all school staff with the appropriate computer hardware, software, data allowance, and technical support to enable them to carry out their required work, either on-site at their school, or remotely at home.

### 6. Learning Management Systems

- 6.1 Learning management systems (LMS) which have the potential to streamline many aspects of school administration and reporting must be used to support rather than shape or determine educational goals and functions. This includes the potential of LMS to transform communication within schools and between schools and families.
- 6.2 It is important that LMS complement rather than add to the work of school staff by not duplicating administrative processes required by the Department of Education and Training. To this end, the Department should require schools to use LMS that 'talk' to, and synchronise data with, the Department's administrative and reporting systems. This will increase the Department's oversight of LMS use and support equitable LMS implementation and integration across schools.
- 6.3 There should be agreed upon protocols at the Department and school levels to prevent LMS being used for surveillance (overt or covert) and measurement of teachers' work. These protocols should be agreed upon with the AEU.
- 6.4 The use of LMS in reporting should not disadvantage families with limited access or unfamiliarity with ICT systems/networks. Similarly, all reporting must be sensitive to linguistic and cultural diversity.

# 7. Collection and Management of Data

- 7.1 The purposes of any data collection need to be clearly stated and, before the data is collected, publicly available to all of those from whom it is collected or who are in any way involved in its collection. Education staff must have access to any data which they have contributed to or which are derived from the classes they teach, or which are collected from their school and relate to their professional role.
- 7.2 Schools and systems need to articulate the purposes for which the different kinds of data are collected. The collection and dissemination of data must be the result of consultation with educators.
- 7.3 Schools should have a system for managing their electronic and hard copy data records to ensure the authenticity, security, reliability, and accessibility of these records.
- 7.4 The collection of student data through software programs and platforms should be subject to a standard, legally binding, transparent privacy, and data security agreement. This agreement should clarify the school ownership of, and access to, that data and prohibit the collection of any data not directly relevant to an agreed-upon specified educational purpose or the use of any data collected for any purpose other than the agreed-upon specified educational purpose.
- 7.5 Properly resourced training should be available for school staff to increase awareness about data protection and privacy issues. This could be facilitated by a data control office or officer at regional or school levels. This role could also support educators' engagement with digital technology and algorithmic learning programs.
- 7.6 Any form of data mining of information from schools, teachers and students by the Department should be subject to an accessible and transparent policy statement which is

publicly available and which sets out its educational purposes and the apparent benefits within the public education system which will flow from it. The Department should ban any form of data mining of information from the public education system by private companies for their own purposes.

# 8. Commercialisation of schooling, edu-business and commercial ICT companies

- 8.1 The AEU is concerned about the increasing role of technology corporations and related 'edu-businesses' in public schooling. These corporations operate in a commercially lucrative relationship with education authorities which enables then to both constitute policy problems and then profit through selling policy solutions. They work with education authorities in the production of education policy and with schools in the delivery of these policies through software and hardware resources, and related services.
- 8.2 The scope of these resources and services cover most of the main functions and operating procedures of schools: curriculum, pedagogy, assessment and reporting, test analysis, student records, teacher evaluation, staff training (for company products), statistical services, online learning systems, school administrative systems, maintenance and problem-solving services, as well as a range of customisable and integrated services.
- 8.3 The danger is that this relationship compromises the transparency of decision-making, accountability, and the 'publicness' of public education based on democratic processes and control. It reduces the professional autonomy of the teaching profession, by expanding the influence of for-profit private companies that ultimately are accountable to shareholders, not the students, teachers, schools, and systems to which they provide services.
- 8.4 The evidence is that the business model of the major international technology companies involves entrenching their products in education systems and schools, with little concern about their educational value and without transparency about the pedagogical, curriculum, and assessment and reporting algorithms integral to them. Without this transparency the technology sold by such 'edu-businesses' can have an undue and inappropriate influence on the processes of teaching and learning, and other work carried out in schools and by the system as a whole.
- 8.5 Of equal concern is the gathering of student, teacher and school data by the products and services of technology corporations being used in Victorian public schools. This data adds commercial value to corporate products and services not only in Victoria but in education markets across Australia and internationally. These data mining processes occur without the express permission of school staff, and students and their parents, and have major privacy implications.
- 8.6 Where the products and services of technology corporations and related edu-businesses are being used in schools they should be subject to transparent agreements which:
  - recognise the professional integrity and independence of the education institutions and personnel who are affected
  - ensure that the primary purpose of the engagement is to provide support for teaching and learning
  - make explicit the scope and limitations of the products and services and the capacity of the school and its staff to re-shape the embedded systems to meet their own needs

- ensure that ongoing consultative processes with education staff are an essential element in the development and introduction of the software and hardware provided
- involve rigorous privacy provisions
- include provision for monitoring mechanisms, which include education staff, for the implementation of any such agreements
- preclude the endorsement of products or companies by schools
- avoid vendor lock-in through having sufficient hardware diversity options and software customisation to suit the teaching needs of all staff
- ensure that companies do not have an ongoing product or services monopoly or that associated technical staff maintain an associated support monopoly.

## 9. Artificial Intelligence and Machine Learning

- 9.1 Artificial intelligence can presently be defined as computer systems that perform specific tasks or make specific decisions and predictions that would usually require human intelligence. These processes include learning (the acquisition of information and rules for using the information), reasoning (using rules to reach approximate or definite conclusions) and self-correction. Machine learning (ML) is a sub-field of AI and involves getting computers to learn over time in an autonomous fashion through the provision of data from the real world.
- 9.2 The development of artificial intelligence (AI) software and super-fast computers, combined with sophisticated and highly capable robotics, has the potential to revolutionise the work of teachers and professionals in education.
- 9.3 Evidence suggests that the use of AI technologies to assist teachers in the classroom and the home, as well as learning based on adaptive online courses and virtual environment applications, will expand significantly over the next ten years.
- 9.4 It is important that these developments and their implementation in schools should be influenced at all stages by the teaching profession under the aegis of the AEU.
- 9.5 The introduction of AI technologies will require education staff to obtain new skills which will require accessible and relevant professional learning programs fully funded by the state and federal governments.
- 9.6 A major concern is that AI in the education market is dominated by a small number of corporations, such as Google, Microsoft, IBM, Pearson, and Amazon. The development and promotion of AI by these technology companies, including as a substitute for human agency in pedagogy, research, and life skills, and the introduction of automated and/or often opaque processes and outcomes related to machine learning, provide a significant challenge to the democratic and public control and monitoring of these developments.
- 9.7 When algorithmic processes (including AI) are used in digital education processes it is a pedagogical necessity that teachers understand how specific algorithms and formula are employed to shape learning. To this end, if they are to be employed, these formula and programs need to be available to teachers in an interpretable format.
  Where this is not possible due to such factors as the speed with which information flows are processed in real time, or if the algorithmic process is so complex and multi layered that even the engineers who create the program don't understand the exact algorithmic decisions the machine has made between input and output, there needs to be agreed transparent algorithmic audit mechanisms and independent expert oversight with transparent communication and contestability built into systems of governance.

- 9.8 The AEU is concerned about the promotion by technology companies and others of AI technology as a superior means of 'personalising' learning for each individual student. The use of the term 'personalisation' is largely a corporate marketing strategy by technology companies linked to the cost-cutting agendas of some education authorities. There is no evidence that machine-based learning is more able to 'personalise' learning than a qualified classroom teacher or that 'teacher-free' machine learning will lead to better learning outcomes than those enabled by qualified teachers.
- 9.9 There is evidence that existing 'personalised learning' systems are not 'personal' in any real sense of this term and do not meet the learning needs of many students who have experienced them. Their model undermines the critical role of student and teacher agency in the learning process. Student learning is seen as a passive process of knowledge consumption with few interactions with teachers or other students, while the use of professional judgement by teachers in curriculum development and pedagogy is significantly diminished.
- 9.10 Any personalised learning applications or systems used in public schools must be informed by robust evidence of effectiveness for diverse groups of learners, and their pedagogical principles (their conceptions of learning and teaching) must be made explicit in order for teachers to use their professional judgement regarding the suitability for their learners and school context. In addition, curriculum pathways subject to machine-driven decision-making must be auditable and transparent to teachers, students, and parents.
- 9.11 Al-powered biometric technology such as automated biometric recognition systems used to identify a student through biometric data about an individual's physical or behavioural characteristics including their fingerprints, facial shape, retina and iris patterns, and hand measurements, should be subject to privacy legislation involving, among other things, the explicit written consent of parents and students.
- 9.12 Where AI is used within educational programs, qualified teachers need to be involved in the decision-making about the design, trialling, implementation, and governance before and during its use.
- 9.13 The AEU recommends the following ethical guidelines for AI implementation:
  - the Department of Education and Training must be accountable for the implementation, use and decisions of AI in schools. This accountability should be set out in clear, publicly available guidelines for schools and their communities
  - an AI system should be deployed only after an adequate evaluation of its purpose and objectives, its benefits, its risks, and evidence of the accuracy, reliability, and validity of its decisions
  - Al implementation should be based on the principles of transparency, interpretability, and explainability so that school oversight can be enabled, and school communities can understand its processes, and decisions. These principles provide a basis for justifying, tracking, and verifying decisions, improving the algorithms being used, and exploring new facts
  - the use of AI systems in schools should not result in unfair discrimination against individuals, communities, or certain groups. DET must ensure that AI systems do not reflect unfair bias or make impermissible discriminatory decisions. For this purpose, it must ensure that the quality and relevance of AI training data is such that it is free from bias or characteristics which may cause the algorithm to behave unfairly

- all individuals have the right to know and challenge in a timely way the basis of an Al decision that concerns them. This includes access to the factors, the logic, and techniques that produced the outcome
- all individuals impacted by AI have the right to a final decision made by a person
- Al systems employed in schools must comply with all relevant international,
   Australian Local, State/Territory and Federal government obligations, regulations,
   and laws, and ensure that private data is protected and kept confidential. They
   should also prevent data breaches that could cause harm to people
- an institution that has established an AI system has an affirmative obligation to terminate the system if human control of the system is no longer possible
- as all AI systems replicate and magnify human biases and subjective decisions, each AI system needs to provide a logical thought piece, or literature review, explaining the thinking and ideas that underpin its processes.
- 9.14 The AEU will work with other education unions through Education International to make recommendations regarding the scope and use of artificial intelligence and robotics in the workplace and their impact on educational and industrial policies and conditions.

# 10 Technology and remote learning

- 10.1 ICT is now a central component of school-based remote learning when students and teachers are separated by conditions such as distance and time, and therefore cannot meet in a traditional classroom setting.
- 10.2 Remote learning may be implemented for state-wide, regional or local emergencies such as a pandemic or at a more individual level where the circumstances of students (or their schools) prevent them from attending school or accessing a full curriculum through face-to-face classroom learning. Schools may also choose to use forms of remote learning as part of their curriculum policies, including asynchronous learning and blended learning.
- 10.3 Remote learning in this policy refers to school-based learning within the public system of education carried out by primary, secondary, P-12 and special settings schools as well as schools specifically designed for remote learning such as Virtual School Victoria or local arrangements at multi-campus schools. It does not refer to online learning outside of this context.
- 10.4 Remote learning delivered online is substantially different to on-site face-to-face learning in terms of: planning time, pedagogy, curriculum applications, assessment, welfare and wellbeing of students and education staff, communication with students and parents, screen time, duty of care, equity, workload, administration, technology resources and support. DET policies and planning must address the impact of the full range of these issues on students, educators, parents/carers, and schools.
- 10.5 DET must have comprehensive plans in place for the rapid transition to remote learning for emergencies such as a pandemic. Appropriate policy development and planning should be undertaken to ensure that schools and educators are equipped to deal with future situations, rather than resorting to emergency responses. This would include clear guidance about the many educational, welfare, and curriculum issues involved, accessible and relevant professional learning, and the necessary support and resources that meet the diverse needs of all education staff, students, and schools.

- 10.6 While remote learning provides a valuable option for students who are unable to access the curriculum on-site at their school, it cannot replicate the quality of face-to-face learning concerning: in-person discussion and demonstration, peer interaction and learning, hands-on learning, lesson modification and adjustment through present time classroom feedback, and student wellbeing.
- 10.7 Teaching and learning remotely can significantly increase teacher workload due to a range of factors associated with student attendance and welfare, communication with students and their parents/carers, enabling student engagement with online learning including regular interaction between students and teachers, the need to modify and upload coursework, technology and internet issues, and the difficulty of limiting contact to within the 38 hour week. Whole school policies developed in consultation with the AEU are required to address the shifts in workflow and workload as a result of this mode of learning.
- 10.8 The AEU is opposed to any DET or school-based directions or requirements for teachers to concurrently teach both face-to-face and remotely as this approach has major workload implications.
- 10.9 The State Government and DET must attend to a range of student equity issues before remote learning is implemented. The consequences of social and educational disadvantage which are already present in normal on-site learning are often exacerbated through remote learning.
- 10.10 The Government and DET must ensure that all students have appropriate technology, access to reliable internet services, and technical support whether they are learning onsite at their school or remotely.
- 10.11 Additional resources should be provided to enable meaningful access to remote learning for students with disabilities to enable their parents/carers to assist them in their learning. Where parents/carers are not able to effectively assist these students, provision should be made for on-site learning.
- 10.12 DET needs to develop policy to clarify the duty of care and responsibilities of schools and educators toward students who are learning from home.
- 10.13 The home situation of students needs to be taken into account when schools are designing and implementing remote learning programs. Concerns include: access to a safe home and on-line environment, the facilities to enable effective learning, adequate supervision of children, and measures to address personal danger due to abuse, neglect, and family violence.
- 10.14 DET must ensure that welfare services such as personal check-ins, counselling, mental health support and consultation, and referrals are widely available to both students and educators during remote learning. During the COVID pandemic many students and staff experienced stress, anxiety, and other mental health concerns. In some cases, this was harder to identify when learning was not face-to-face.
- 10.15 Schools in the public system of education should have access to a comprehensive database of digital curriculum and related assessment resources linked to the P-12 Victorian curriculum and covering all year levels and learning areas which they can use for remote learning. The database resources should be developed by and/or approved by Victorian schools and teachers with due acknowledgement for their contribution. The database should include professional learning resources for teachers related to different year levels and learning areas to enhance their capacity to teach online.

- 10.16 Assessment of student achievement and progress needs to be adjusted during remote learning to take account of the wide differences in students' learning environments due to their home circumstances, and available resources.
- 10.17 Education staff must be provided with comprehensive professional learning to support the design, delivery, and assessment of online learning during remote learning. Relevant programs should incorporate the range of experience and skill levels educators have in the use of education platforms and Learning Management Systems.
- 10.18 When educators are required to implement remote learning from home they should: be provided with appropriate technology, access to reliable internet services, and technical support; not be required to use their personal phone or other personal technology to make calls and receive emails, and be compensated for expenses incurred in working remotely.

# 11. Impact of ICT on professional /personal lives of school staff

- 11.1 ICT brings employees' private lives into the workplace. This includes internet access to personal email and social networking sites, or access to such sites as online banking and superannuation. The AEU supports reasonable use of ICT in the workplace for these purposes.
- 11.2 DET policies on the use of social media should be developed after consultation with the teaching profession and made available in an accessible form to all staff employed in schools. The Department should provide staff with relevant professional learning programs during school hours on the issues in these policies.
- 11.3 As well as policies to protect students from cyber bullying, DET should have policies which protect and support school staff who have been subject to cyber bullying whether by parents, students, or other members of the school community. Staff should receive appropriate professional learning to be conversant with and implement DET cyberbullying policies and programs covering students and staff.
- 11.4 The AEU opposes the use of technologies for staff surveillance and monitoring.

  Technologies which have been used in some industries to allow the employer to monitor employee whereabouts and performance should not be used in schools for these purposes. These include video cameras, GPS devices, barcode scanners, electronic sign-in machines, computer keystroke trackers, automatic captioning, and facial recognition software.
- 11.5 The Department of Education should have clear systemwide guidelines covering the use of these technologies and not leave it up to individual schools to make decisions about their introduction and use. These guidelines should be developed in consultation with the AEU.
- 11.6 The AEU has particular concern for both students and staff about the use of facial recognition and detection technology in schools. An individual's facial data lends itself to constant and permanent surveillance and the use of technology in a school to collect and store such data raises fundamental questions of human rights, ethics, and privacy. Until these issues can be satisfactorily resolved, the union is opposed to any use of facial recognition technology in public schools in Victoria.

#### 12. Consultation

- 12.1 DET should not introduce any major new technologies in the workplace without first consulting employees and the AEU.
- 12.2 Education staff must be consulted about the introduction of ICT into schools and other education institutions and involved in the design and development of appropriate ICT for teaching and learning, and school administrative purposes.
- 12.3 The role of the AEU is to ensure that proper educational, industrial, and occupational health and safety consultation occurs prior to and during the introduction of technology, including the use of technology in remote learning.

# 13. Occupational Health and Safety (OHS)

13.1 DET must meet its OHS obligations under the OHS Act to provide and maintain safe and healthy workplaces, and systems of work. A risk assessment approach must be used to assess and monitor the introduction and use of technology at the workplace.

This includes consulting with employees about:

- identifying hazards and risks to health and safety (including psychological)
   associated with the new practice or equipment to be implemented at the
   workplace. This particularly includes any risks associated with increased workload
   and the installation and use of electrical equipment
- making decisions about the measures to control risks to health and safety, including about how workload will be managed within paid hours
- proposing changes to the conduct of work performed at the workplace.

DET must ensure that schools are following, and are properly resourced to follow, relevant workplace safety guidelines for technology use in schools, including to:

- provide training in the use of new technology equipment and software
- assessing the likely workload impact of changes to practice
- implement protocols to avoid the likelihood of injury resulting from computer-based or written tasks which are done continuously or repeatedly
- design workplaces, and workplace processes to support staff wellbeing in relation to technology, including to:
  - encourage staff to move by locating printers at a distance from the workstations
  - o provide adjustable equipment for the safe use of technology, including:
    - suitable adjustable chairs provided for all workstations where computer or written work is done
    - suitable desks provided at each workstation
    - height adjustable keyboards, a mouse and monitor where laptop computers are used.

#### 14. Workload

- 14.1 Whole school policies developed in consultation with the AEU are required to address the shifts in workflow and workload as a result of the use of ICT.
- 14.2 While some programs and uses of technology may have potential to reduce certain elements within the workload of teachers and other educators, the evidence strongly points to a substantial overall increase in workload involving work intensification, work extension, and a duplication of work.
- 14.3 Digital technologies have led to the expansion of education work across space and time blurring the distinction between personal and professional time and increasing unpaid working hours. Schools should have technology appropriate-use policies to ensure that the private time of school staff is respected, utilising the concept of digital business hours within the normal hours of paid employment.
- 14.4 Wellbeing and welfare policies aimed at providing staff with a healthy work/life balance should underpin and set limits to the use of ICT in schools and for remote learning.
- 14.5 An appropriate workload impact statement, developed through consultation processes, which incorporates and addresses industrial and OHS obligations and issues should be implemented to:
  - identify the impact of existing policy and procedures and ways of reducing the associated workload
  - accompany any change to policies and procedures.
- 14.6 The rapidly changing technology environment means that educators are frequently required to adapt to new systems as part of their professional role. Enough time within ordinary hours for professional development is essential to ensure that new systems and tools are employed effectively and are not a drain on educators' limited time resources.