

Chapter 2

Academic freedom for students

2.1 Academic freedom has been broadly defined as the right of professionally qualified people to discover, teach and publish the truth as they see fit within their fields of competence. It guarantees academics the right to engage in research, and to be free, independent and critical in the way they work. It is argued that this definition may be interpreted as broadly as is consistent with the entitlement of others to be free from harm caused by academic activity. It is also argued that while such freedom brings with it a duty, the burden of that duty falls on those who must honour those rights. In other words, people have a duty to refrain from interfering with those engaged in academic research and teaching.¹

2.2 This may be an ambit claim, but the protection claimed is clearly restricted to those who are 'professionally qualified'. This chapter looks at the arguments and evidence put forward by Liberal Students' organisations, and by individual students whose political stance is not always clear. It makes only general comments because it does not know the context in which views were expressed. It is also wary of the application of academic freedom rights to those who are not academics in the usually understood sense. The committee notes the view of Melbourne commentator Andrew Norton who has written:

Though there is precedent for the idea of academic freedom for students, I don't think this is a useful concept, especially not for school students or undergraduates. Their main task is to master a body of knowledge, the content of which is to be determined by those with expertise in the field.

In many disciplines, there will be disputes among experts on some issues. As part of learning their subject, students should be made aware of these disputes and able to take a point of view, within the constraints of scholarly argument. But it is reasonable that students be held within established debates rather than able to claim 'academic freedom' to take an idiosyncratic perspective.

The issue here is not the academic freedom of students, but the professionalism of staff. They should make students aware of the relevant debates and not try to force their own views on students by marking down those they disagree with or being rude to them in class.²

2.3 The committee regards this as a fair summing up of the issue. Nothing here precludes the stirring of debate and the robust exchange of ideas. In this chapter the committee has considered perceptions of bias, and whether such perceptions have

1 Margaret Blackburn, 'Academic Freedom and University Ethical Review: Freedom matched by Responsibility', *Australian Journal of Professional and Applied Ethics*, vol. 6, no. 2, pp 13–26.

2 Mr Andrew Norton, at: andrewnorton.info/2008/06/do-students-have-academic-freedom/

much significance even if it does exist, especially at university where the contestability of ideas is a normal and essential part of learning.

The nature of Liberal Students' complaints

2.4 At its hearing in Sydney the committee was told by the Make Australia Fair organiser:

Senators, ideological and political prejudice in schools and on campus is a reality. As the President of the Young Liberal Movement of Australia, I am one of the few witnesses coming before this inquiry who has direct feedback from students about the issues they face at school and on university campuses. We are here to give a voice to the students, who are so often overlooked in this debate, and I can categorically say that the overwhelming feedback is that ideological and political prejudice is an undeniable reality. Self-serving attempts by ideological warriors to deny bias would be laughable save for the fact that they are taken seriously, including by this committee. As you will see from the dossier, lecturers like our previous witness cannot be taken seriously when they deny bias. To the contrary, they prove the Young Liberals' thesis that bias deniers are usually the worst offenders.³

2.5 The core of the argument presented to the committee by Liberal Students' organisations is that the academic freedom of students is violated by courses which are constructed and presented so as to promote a particular ideological theme or mode of thinking. There is also complaint about lack of balance in course content and the concentration of course offerings on peripheral studies in particular disciplines, in place of basic mainstream content. Such peripheral studies focus on themes that resonate with those who have a supposedly left political stance.

2.6 The committee received 28 submissions from students commenting on the lack of diversity in courses offered and in the choice of texts and readings recommended for those courses. Some of these argued that students were not exposed to alternate views in a number of fields. Others complained about the tone of instruction, the flippant remarks about current political leaders, and the generally intemperate language used by some lecturers and tutors. As will become evident, it is very difficult for the committee to make any useful assessment of the gravity of what is being complained about in many of these submissions. They tell part of a story, or they convey a perception of an event or experience through the eyes and recollections of one person, and the anecdote is often told without context. In some cases, assuming the veracity of the reporting, a judgement may be hazarded, as in the case of the tone of instruction or the behaviour of a lecturer or tutor. More frustrating for the committee is that there is no conclusive ending to these anecdotes. Students appear not to have felt strongly enough at the time to complain, and so the outcome is unclear.

3 Mr Noel McCoy, *Committee Hansard*, 9 October 2008, p. 39.

Therefore, the committee can only make general comment on such matters, as will be found at the end of the chapter.

2.7 The committee notes that there are claims of bias in both course content and teaching, and examples of this follow.

2.8 To begin with, a student enrolled in an international relations course at La Trobe University submitted that the issue of academic diversity and freedom was most relevant in the humanities where interpretation of facts and ideas was often subjective. An instance was cited of a lack of diversity in the required reading for one of the topics being studied in politics:

The topic for the week was Trade Related Aspects of Intellectual Property Rights (TRIPS). Presented were three essential readings for students to complete, as well as a number of supplementary readings they could read at their own discretion. The readings presented a view that TRIPS was unfair on the economies of the third world, using the example of patents on treatments available for HIV. Half a paragraph was devoted to why this may not be true. This is an example of the disproportionate volume of course materials dedicated to one political view over the other. This practice occurs on a wide range of issues discussed in politics classes.⁴

2.9 The committee notes the aggrieved tone of this complaint but such isolated claims of bias, without description of context, provide no evidence that there is much substance in what is complained about. The following complaint is much more commonly expressed, in line with a 'culture wars' argument that the study of history has been exploited by academics who disapprove of a previous emphasis on particular ideas and events as shapers of history.

The arts component of the degree, particularly the modern European and Australian history subjects were riddled with left wing bias. The whole structure of the way the subjects were taught caused me to dislike studying something I had previously loved. The study of 'history from below' as it was called, focused mainly on the impact of significant historical events on the 'masses', rather than what exactly these events were and how they occurred. This Marxist study of history was extremely repetitive, tedious and dull. ... In Australian history I was appalled to hear, in my tutorial, that we should not have ANZAC day because it commemorates a national disgrace (going to war).⁵

2.10 Undergraduates who are either unexposed to political discourse, or who come from conservative backgrounds, may be provoked by such views, which have been aired for decades. It should be noted that commemoration ceremonies for past wars increasingly attract large crowds of young people. There is some comfort for

4 Mr Robert Langdon, *Submission 38*, p. 2.

5 Ms Sasha Uher, *Submission 49*.

conservative students in the knowledge that bias of the kind which is commonly complained about is almost certainly either ignored or rejected.

2.11 A number of submissions indicated that students strongly disapproved of incidental or irrelevant and derogatory references to contemporary political figures. The following submission provides an instance where such comments are said to have been made:

At my first tutorial in this unit of study the tutor opened her remarks with “well thank God the Howard government is gone”. Whilst this statement by itself may be viewed as mere opinion amongst free-minded adult, it soon became apparent that the tutor had a clear vendetta to indoctrinate political views amongst the students. This manifested itself many times in the classroom. When a pupil made the statement that “WorkChoices was good for many businesses”, rather than discussing the point, the tutor made the statement “no, WorkChoices was bad for everybody, no good came out of that policy”.⁶

2.12 One view of this may be that this description, assuming its veracity, should be a matter of concern for the reason that it scarcely measures up to what is 'quality' teaching. It may be argued that academics lose credibility with some students not so much as a result of making known their personal views, or of declaring an interest, but by the arrogant manner in which this is expressed.

2.13 At least three submissions describe what were seen as attacks on Christian belief arising far out of context. In one submission a religiously-minded student has urged the committee to 'do something' about stopping academic staff 'from making unsubstantiated claims based on their own prejudices, and stop intimidating students whose views and beliefs differ from their own.'⁷ In another instance there was complaint about a lecturer who has a topic in his terrorism course named 'Christian terrorism', in which the case of the Oklahoma City bombing was cited as an example of this. The student also wrote that:

In another class on religion I recall the class tutor suggesting that the violent actions committed by the Prophet Muhammad in the Battle of Badar and the battle of Uhud were comparable to the story of Jesus turning over tables in a Synagogue. There seems a tendency on the part of academics when criticising 'minority' religions to also include a criticism of Christianity, even when the comparison is as absurd as the example above.⁸

2.14 A number of specific instances of perceived bias were described in submissions: a student described how in one Gender Studies class she was subjected to the eccentric and extreme views of an ex-Catholic academic re-living the

6 Mr Adrian Pryke, *Submission 11*, p. 1.

7 Mr Darly van den Brink, *Submission 51*

8 Mr Scott Gumley, *Submission 58*

experience of her apostasy;⁹ another complained about the obsession with 'fashionable victim groups' in his education diploma course;¹⁰ and another felt threatened by the constant 'liberal-bagging', jokes and 'Labor-pushing' agenda in lectures.¹¹ It appears that in none of these cases were complaints made.

2.15 In another submission a third year economics student related that in his time at university he had several experiences where he felt that he was ignored, or that the opinions he raised in class were 'battered down' simply because they did not align with the perspective of the lecturer or tutor.¹²

2.16 The committee heard some evidence on how academics regard bias. An academic who appeared before the committee has commented elsewhere:

Now, what would constitute behaviour that is "biased" in teaching my courses? Would it constitute "bias" if I told the students in advance what my personal political beliefs were in relation to issues we were discussing? Would it constitute "bias" if I didn't tell the students in advance what my personal political beliefs were?

This is an open question. It's arguable that declaring one's viewpoint in advance actually reduces the potential for bias. Some academics tell their students if they are a member of a political party. When I teach human rights, I tell students that I am in favour of the protection of human rights. A declaration of viewpoint might occur because the academic does not want students to waste time trying to guess. It might happen because the academic thinks it is ethically responsible to declare one's interest (that's my reason). On the other hand, a decision not to declare might happen because the academic thinks it's no one's business, or because they don't want the students to pre-judge them and close down their critical capacities when the academic speaks. These are also good reasons.¹³

2.17 In the light of submissions about the discomfort some students feel about the teaching they are experiencing, it is interesting to note comment in the submission from the Australian Political Studies Association stating that students' perceptions of bias or prejudice are an extremely unreliable method for determining whether such bias or prejudice exists. The submission continues:

9 Ms Rachel Jude, *Submission 34*, p. 4.

10 Mr Nigel Rae, *Submission 57*.

11 Ms Sarah Barrott, *Submission 21*.

12 Mr Ben Potts, *Submission 10*, p. 1.

13 Dr Katherine Gelber, 'Academic freedom for whom?' *On Line Opinion- Australia's e-journal of social and political debate*, posted 4 July 2008 at <http://www.onlineopinion.com.au/print.asp?article+7584>

A recent study has demonstrated that a student's perception of the difference between their own views and the views of their teachers and fellow students affects their evaluation of the quality of the teaching they receive. The authors show that where a student perceives a difference between their own ideological views and the views of their teacher, they are more likely to evaluate the teaching quality negatively.¹⁴

2.18 Other conservatively-minded students, writing in forums other than this inquiry, provide evidence that balance and civility are still to be found in left-controlled cloisters. As one blogger wrote in connection with this inquiry:

A few years ago I wrote an essay explaining to a left-leaning lecturer (gently, as he is a nice old buffer) that everything he believed about unemployment and public policy relating to it was wrong. He gave me 90%. This is not an isolated experience. Possibly the problem for the Young Liberal students is that many of them are as irrational and narrow in their ideological positions as the lecturers they loathe, and they aren't able to argue their positions in a reasonable way on the basis of logic and facts. If you do that, you'll get a decent mark in my experience, even if the lecturer disagrees totally.¹⁵

2.19 On the same website students with apparently conservative views argue rather differently than those belonging to or affiliated with Liberal Students' organisations about content and bias, and how to 'get on'. For instance:

For most undergraduate courses, if something is written well and has an even half-baked argument, its going to be at the top of the pile in terms of grades — that's generally how things are marked. Worrying about whether you agree with the opinion of the student or whether any arguments presented are even particularly good is the last of your concerns. Just some sort of argument that is well related to the topic and well written is usually just fine. When you are getting into the lower end of the distribution, all you are really looking at is basic literacy (sad but true). Given this, the main concern people that mark these things have is usually getting through the other 50 sitting on their desk.¹⁶

2.20 There must be some question about the extent to which Liberal Students' organisations represent conservative opinion among students. A disdainful tone is evident in letters from bloggers of the same broad political persuasion. As one noted:

As I've said elsewhere, conservatives need to respect academic pursuits and start cultivating bright students into pursuing academic careers. Some problems simply can't be solved by bellyaching and require more complex writing than can be found in a press release. Peter Coleman and C D Kemp

14 Australian Political Studies Association, *Submission 13*, p. 6.

15 'Leopold', at: andrewnorton.info/2008/06/do-students-have-academic-freedom/

16 'Conrad', *ibid*

were the last Australian conservatives who encouraged young conservatives to hone their intellectual skills.¹⁷

2.21 Finally, Professor Sinclair Davidson was asked about the reaction of students to bias. Did they understand it and discount it? Or did they accept it as orthodoxy and take it seriously? The response was:

I think different students have a range of different impressions. I am not convinced that students are as impressionable as was suggested by earlier speakers. A lot of students take everything on board and a lot discount everything. Unfortunately, the argument that bias is important presupposes that students believe everything they hear at university. From bitter experience, I can assure you that that is entirely false; that is not at all the case. It really depends on the individual and it differs from case to case.¹⁸

Student assessment

2.22 For most students, marks are what count. Their tolerance level for alleged bias appears to be far higher than for less-than-expected marks which are responsible for the overwhelming number of students complaints and appeals.

2.23 However, some submissions suggest that assessment of written work was also fraught with anxiety for some students on grounds of political bias, mainly because of perceptions of unfairness:

As a whole, I would say the conduct of most academics at La Trobe University in their assessment of student work is fair and reasonable. However, there have been times I have felt I have been a victim of academic bias; receiving marks for items of work that I felt were undervalued. I understand, however, that assessing such an accusation is difficult, given the lack of an objective standard to examine such claims. ... There are large numbers of students in my experience who would say that their work has been marked down due to the political point of view offered in their work.¹⁹

2.24 Professor John Galligan from Melbourne was asked about his experience of students who complained that they had been marked down because they had contrary view to the lecturer. Galligan responded:

It seems this is coming from sort of right-wing students now. Traditionally in my experience it has come from Marxists and people on the hard left who are much more radical in their rejection of the whole system than are

17 'Andrew Elder', *ibid*

18 Professor Sinclair Davidson, *Committee Hansard*, 8 October 2008, p. 44.

19 Mr Robert Langdon, *Submission 38*, p. 2.

right wingers. But on the whole it is almost as though this thing plays at two levels. As a head of department for some years, most of the grievances you get from students concern more individual matters, such as they have not finished their assessment or they have not got proper consideration for some disability, or something like that. I do not think in my case I have ever had a case of 'My mark was taken down.' Students appeal, and they are very ready to appeal their marks if they do not think they have got the right one. It is often not just a pass, it is an H1 because they are trying to get into the law school, or something like that. But often they feel that their paper has not been properly assessed, and it is usually not on bias grounds. It is usually that the person has not taken the proper consideration of their novel approach or their level of research, or something like that.

2.25 Another academic had this to say:

I believe that there is a relatively common occurrence of perceptions of bias on the part of students. Sometimes that is because they are unhappy with how they are faring in a course; sometimes it is because they are unhappy with their marks; sometimes it is because they disagree with the lecturer. I think those kinds of events are relatively common and it has happened to me.... . I think that sustained evidence of actual ideological prejudice—and you are talking about ideological prejudice on the part of a lecturer—leading to lower marks for students is rare. I would never be so foolish as to say it never occurs. I do believe that it is rare, simply because in my time at university I have not seen a complaint of that nature upheld. I have seen complaints occur, but I have not seen them upheld.²⁰

Quality assurance

2.26 The view of a majority of this committee is that what is complained about in the relatively tiny number of submissions made to the inquiry amounts to poor teaching. Bias by itself does not necessarily indicate poor teaching. The teaching may be stimulating because it presents one point of view. The committee has looked closely at the evidence and other sources which detail quality assurance processes in the delivery of university courses, and the procedures set up by universities to allow students to complain about poor teaching, unfair assessment and biased course content.

2.27 AUQA has submitted that the spirit of academic freedom is currently protected by the National Protocols for Higher Education Approval Processes. Protocol A, for instance, states that a university must have 'a clearly articulated higher education purpose that includes a commitment to and support for free intellectual inquiry in the institutions' academic endeavours'. Other relevant criteria under this protocol relate to the delivery of advanced knowledge and inquiry, the existence of quality assurance processes and the provision of properly qualified academic staff.²¹

20 Dr Katherine Gelber, *Committee Hansard*, 9 October 2008, p. 23.

21 AUQA, *Submission 17*, p. 2.

2.28 AUQA auditors normally spend about 5 days at a university once every 5 years, examining a portfolio of documents put together by the university for the purpose of demonstrating compliance with quality assurance protocols. An open session is held with students to allow their views to be taken account of. Auditors also look at grievance procedures. If student comment about bias was recorded it would be brought to the attention of the relevant faculty head or dean. AUQA would make a recommendation about addressing the issue and the university would need to follow it up within 18 months, with evidence that the issue was being addressed.²²

2.29 AUQA have fewer reservations than do other submitters in relating academic freedom to students. It submitted that:

Students must also be aware of the academic freedom they are accorded. Students have many opportunities to research and learn in areas of interest and as they learn to explore and develop divergent opinion this must also be respected and protected as a right to academic freedom. This diverse pursuit of knowledge is how students learn to think independently and to form opinions and debate within an academic context, ultimately contributing to the creation of new knowledge.²³

2.30 The committee noted that the audits conducted so far by AUQA – there have been over 50 since 2001 – do not appear to have uncovered any instance of violations of academic freedom, and certainly not from the perspective of aggrieved students. The committee was told that while student opinion, as expressed in course experience questionnaires, was taken into account by AUQA auditors, the questionnaires do not ask for student opinion as to balance and lack of bias in the courses they are taking. However, students do not 'hold back' in giving their opinions about teaching quality.²⁴ The committee was told that bias in the delivery of course content was not 'coming up' as an issue in meetings between AUQA auditors and students.²⁵

2.31 Some committee members appeared surprised that AUQA was unaware of complaints made about bias by Student Liberals. Apparently, these complaints appear not to have been 'processed'. Surprisingly for a political organisation, there was no attempt made by Student Liberals to at least register a complaint, or organise students to attend an AUQA student forum. The committee noted the efforts made by AUQA to advertise the presence of auditors when they appeared on campus. The evidence that AUQA brings to this inquiry suggests to the committee that there is no real basis for believing that widespread and systematic bias in university teaching exists other than in the minds of students who are aggrieved by what they see as a prevailing leftist orthodoxy dominating academic life and values.

22 Ms Karen Treloar, *Committee Hansard*, p. 20.

23 *Submission 17*, AUQA, p. 1.

24 Ms Karen Treloar, *Committee Hansard*, 8 October 08, p. 19.

25 *ibid.*, p. 23.

University procedures to ensure fairness

2.32 Evidence was given to the committee about the practices in use to ensure the quality of university courses, in regard to curricula, to teaching and in evaluation processes which required the participation of students. Faculties and departments adopted conventions for formulating curricula and for approving new courses. A submission from Dr Ben Saul, an academic at the Sydney University Law School submitted that:

- Universities routinely issue teaching and course evaluation forms to students, to allow students to provide feedback on teaching methodologies and course content;
- New academic staff at many universities are required to undertake courses of instruction in teaching and learning practices, to equip and train them in teaching skills;
- Complaints can be made informally or formally at any time about academic misconduct in teaching or in relations with students.

Collectively, these regulatory measures ensure that university teaching is ordinarily of a high standard and includes sufficiently critical perspectives on course materials. As an academic I have never come across a case where an academic has negatively assessed a student's performance because that student does not share the political or other views of that academic. In my experience, some of the very best student essays or exam answers are those which take issue with the assumptions underlying the selection of course materials or assessment topics, including by criticising flaws in the scholarly publications of the lecturer himself!²⁶

2.33 On the matter of student assessment, the committee heard evidence from a senior academic from Melbourne about the process at work:

Let me mention some of the procedures at Melbourne University; most universities have variations of these. At the Department or School level there are procedures for reviewing overall results, including the spread of grades—a bell curve is not used but there are pretty precise rules of thumb—and show cause procedures, for examination results in any subject before the Head counter signs the return sheets. All high and fail marks are double marked as a check. At the Honours level, theses and individual papers are all double marked with at least one independent examiner. Overall Honours thesis and subject results are pored over at a special meeting of the Department/School as a whole, and uneven marks for particular students examined and reasons sought for noticeable variation. Other Universities have an external examiner who assesses a selection of theses and participates in the final Honours meeting when all grades are finalised—I have done this for University of Tasmania for the last 5 years.²⁷

26 Sydney Centre for International Law, *Submission 1*, pp 2–3.

27 Professor Brian Galligan, *Submission 66*.

2.34 As to student evaluation, Professor Galligan described an additional set of monitoring procedures, whereby all subjects must be assessed by students in an elaborate, confidential process in which they are asked to rank the subject and lecturer on 9 key points, including 'whether the subject was well taught'. The results are sent to departments or schools and to individual lecturers; and published and reviewed by the Academic Board. Those academics with low scores are highlighted and they and their departmental head asked to show cause, and to detail remedial procedures. These scores are considered in the individual lecturer's annual review.²⁸

2.35 In Galligan's opinion the level of monitoring, checking and reviewing tends to be excessive in modern universities. It is far more rigorous than in earlier decades. He argues that it has ensured a higher standard of teaching, 'and cut out much of the reputed casualness and idiosyncratic peculiarities that older generations like to recall about their university experience.' Galligan concludes that consistent lecturer bias and a preference for pet views would be hard to persist with in such a system, and in his view, they do not.²⁹

2.36 The submission from the Australian Political Studies Association pointed out that the remedies for dealing with incidents of prejudice or bias already exist in every university.

In relation to the conduct of teaching professionals, university teachers are subject to regular student evaluations of their courses. The results of such evaluations are made available to university administrators, and individual academics use these results as a means of professional development and self-improvement. Best learning and teaching practice routinely requires university teachers to list explicitly in their course outlines the ways in which they have responded to critical feedback from students in previous years. Continuous course improvement is a university requirement. Finally, the results of student evaluations are used in promotion applications, which are entirely merit based, and evidence of bias or prejudice would be counter to academics' self-interest.

In relation to the conduct of assessments, appeal procedures are in place in every university which permit students to lodge appeals against marks and to argue their case. These procedures permit students to appeal at the school level, then the Faculty level, and finally at the level of the University Senate. It is our view that these existing procedures are more than adequate to deal with any genuine instances of prejudice.³⁰

Conclusions

2.37 The committee finds it difficult to assess the significance of evidence provided by students. The committee remains puzzled as to why it has not been

28 *ibid.*

29 *ibid.*

30 Australian Political Studies Association, *Submission 13*, p. 7.

presented through formal complaints processes rather than to a Senate committee. The main issue at stake here is more likely to be teaching quality. If descriptions in submissions are to be believed, even allowing for imprecise recollection or exaggeration, it appears that there are some, no doubt very few, academics who are impolite and disrespectful to students, or patronising toward them, and prone to egotistical behaviour.

2.38 That may be a breach of professional behaviour, to be addressed at faculty or departmental level. Comment from Professor Jim Jackson can be noted on this point:

One test which may prove very useful in determining whether an academic is acting professionally is to test whether the speech of the academic interferes with either the knowledge discovery and dissemination process or the exercise of an academic freedom right of other academics. ... Speech or writing which is of a bullying nature or constitutes intimidation or severe disruption could constitute a denial of academic freedom in colleagues or students rather than any lawful exercise of it by the academic. Such conduct would have a chilling effect on fellow academics or students who choose to maintain their silence, repeat unquestioningly the “doctrines” of the colleague or teacher or simply avoid the research area for fear of upsetting their aggressive or obnoxious fellow. In this way the manner of speaking may be of more danger to the aggressive academic than what is said, because the manner may portray a complete lack of respect for the discovery and dissemination process and rights of others.³¹

2.39 Finally, the committee note comments from Professor Brian Martin of Wollongong which puts much of the issue surrounding problems of students in a broader context. Professor Martin drew on knowledge about staff problems in order to make some preliminary comments about what most worried students. The most common problems facing academics were interpersonal and organisational, including personality clashes, damaging policies, bullying, patronage and nasty behaviours in the competition for scarce resources. Ideological bias is, in the greater scheme of things, a lesser concern. He continued:

I know enough about the area to know that lots of problems can occur that adversely affect students, such as bias against individuals, bias in assessment, harassment and incompetence. But the prevalence and seriousness of such problems is a matter of speculation. There simply isn't enough sound information to make strong conclusions. ... My impression is that the same patterns apply at the student level. As for ideological bias, no doubt it occurs but it's a low-profile issue for most students. In terms of dissent, the biggest factor for students is their pursuit of grades and degrees and hence willingness to adapt to whatever the teacher wants.³²

The committee concurs.

31 Dr Jim Jackson, 'When Can Speech Lead to Dismissal in a University', *Australia and New Zealand Journal of Law and Education*, vol. 10, no. 1, p. 21.

32 Professor Brian Martin, Additional Information, Tabled Documents