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AI Governance, Policy and Regulatory Safeguards for South African Basic Education

Prepared for the AI in South African Basic Education Rapid Response Initiative

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Executive summary

South African schools are as exposed and vulnerable as schools in other countries when it comes to the impact of Generative Artificial Intelligence (Gen AI / AI). This is not just in broader society, but specifically the impact on learning and teaching - in school as well as outside school premises and hours. Adoption of AI is growing, use in education is increasing and governance needs to catch up.(UNESCO 2023)

Artificial Intelligence (AI) is rapidly reshaping education globally and is already influencing South African schools (Mak 2026). This is seen in learner use and experimentation, educator concerns, experimentation, integration and use, assessment practices and homework concerns, and administrative systems.

Generative AI has entered South African schools faster than policy could respond (Mak 2026; UNESCO 2023; FEDSAS) . AI adoption is a marathon, not a sprint, but the development of AI is at a sprint pace. This is not a future issue, but present. It is real, wide-spread and accessible to educators, learners and parents or caregivers. The question is no longer whether AI belongs in schools, but whether schools can govern and guide the use to extract the maximum opportunities and possibilities from its use and how to effectively do this to improve learning, teaching and management outcomes.(Kitshoff, 2025)

While schools play a central role in governing the use of AI, responsibility cannot rest with schools alone. Effective governance requires coordinated action across the Department of Basic Education, Provincial Education Departments, School Governing Bodies (SGBs), other government stakeholders and broader society.

The report can make the following policy argument:

Schools do not need AI policies because the AI environment has created entirely new values. They need AI governance because AI changes the way existing values are tested. Honesty, privacy, safety, accountability, academic integrity and human dignity existed before AI. The role of AI policy is to apply these existing principles clearly to new AI-influenced contexts.

This is a strong argument to the policy debate as it avoids both extremes:

- panic-driven overregulation; and
- careless under-regulation.

The appropriate and sensible response is not to regulate the machine alone, but to govern the human use of the machine. (Hattie, n.d.)

1. Introduction

As mentioned, Generative AI has entered South African schools faster than policy could respond. The initial reactions to AI in education mirrored that of the international community and reflected mainly fear, confusion, uncertainty and scepticism. The risks posed included the fear of cheating, loss of deep learning, plagiarism, lack of academic integrity and irresponsible use (Voigt, 2023). With early comments like "Cheat GPT" being branded about, the technology was targeted as the culprit for mostly human behaviour and non-technology issues.

Secondary concerns later surfaced on a more technological pillar of the argument. These included online safety, data security, online privacy, ownership of outputs and even relationships with chat bots. (Unicef, 2025)

The lack of policy is not necessarily an unnatural process and cause for exposure and fear. It is not uncommon that a new invention reaches society and only then triggers the need for regulation as testing is expanded to wider use. The automobile is but one example where the regulation of speed and safety features followed the innovation and use. (Hoffman and Beato, 2025).

It does not mean the sector was caught napping or unaware, but not responding rapidly is the indictment. The caveat with AI is two-fold. One the one hand it landed in all spheres of society at the same time and not just in either military use, government use, big business or a toy of the rich. It became domesticated, mobile and free with the flip of a switch. On the other hand the speed of adoption and use was the tsunami that brought more fear than the actual technology. Reaching 100 million users in less than two months, Chat GPT, tops the charts of reaching that goal. The speed is more visible when compared to other innovations. TikTok took 9 months, Instagram 30 months and the internet 7 years.(UNESCO 2023; Ebert and Louridas 2023)

Unscrambling the proverbial egg is possibly the most important leadership and governance tasks the education sector requires at this point in time. To assist in this we have identified five areas to consider:

1. **User**: Educator vs Learner use
2. **Setting**: In class (for class) vs at home (off campus)
3. **Platform design:** General purpose AI vs Educational designed platforms
4. **Responsible authority**: School governance vs Departmental governance
5. **Focus**: Human behaviour vs Technology protocol

Artificial Intelligence has moved rapidly from corporate or enterprise software to domestically accessible platforms available on any device by any member of the public. Most platforms have a freemium approach to enable accessibility but with an open data security layer and a licensed option for more capability and security. This is not per se a contravention of good governance, but attracts risk if not understood, managed and governed well.

This report is written in response to the pressing need for the Department of Basic Education and the education sector to respond to the rapid pace of development and the vast magnitude of the impact of AI, for the opportunities and risks, in school.

It directly responds to the FEDSAS research brief within the Humans Studios AI in the South African Basic Education Rapid Response Initiative and specifically addresses the following research questions:

Core overarching question:

AI is here, and it is already changing what learning looks like. Given what we know, at this point in time, what would it take for South Africa's response to strengthen — rather than erode — equitable, safe, meaningful, whole-human education for every child?

The questions and focus for this paper:

What minimum guidance, governance measures and support do South African schools need in order to respond to AI use by learners and educators safely, ethically and practically?

What minimum ethical, privacy, data governance and safeguarding measures should schools put in place when learners and educators use AI tools?

The report reflects on AI-integration as a governance, leadership, ethics, human behaviour and equality question, not primarily a technology question (UNESCO 2023). It proposes a practical governance framework based on the metaphorical difference between two elements:

> A Rulebook of stable legal and ethical principles, grounded in existing law, policy, regulation and professional codes,
> A Gameplan of living operational guidance on tools, licensing, permitted use, risks, opportunities, training needs and disclosure requirements.

Even though this moment in time may feel like unchartered waters, we have seen disruptions of huge magnitude in our history. Some people equate AI to the launch of the internet, electricity or the automobile. The invent of the mobile printing press made similar shockwaves and attracted very similar concerns. (Hoffman and Beato 2025)

This may be the "Printing press moment" of our generation when compared to the wider roll out or the mobile printing press in the late 1400's as described by Gregg Beato and Reid Hoffman in their book titled Superagency – What could possibly go with our AI future. Fear mongering about the spread of unverified information, the spreading of new ideas and the ability for regular people to participate in the opinion and information debate.

There is however still no governance, policy or regulatory responses within South African basic education or even government as a whole.

The purpose of this paper:

> *Goal:*
> *To provide practical, contextually relevant guidance to support school leaders in implementing safe, ethical, and responsible approaches to AI use in South African schools.*
> *Target audience: School governing bodies and their representative associations, school principals, school management teams, district officials and provincial education department officials responsible for school governance support*

The report argues that AI governance in education must not be approached as a technology issue. Rather, AI represents:

- a governance or perceived "new governance" challenge, (UNESCO 2023)
- an educational ethics debate, (UNESCO, 2021)
- an equity or access debate, (Spaull and Jansen, 2019)

- an educational model discussion, (UNESCO 2023)
- a curriculum and assessment challenge, (UNESCO, 2023)
- and a safeguarding concern, (UNICEF, 2025)

The report concludes that South Africa requires:

- a national AI-in-education governance framework,
- contextual approach and application of AI,
- minimum learner-safeguarding standards,
- AI data governance protocols,
- educator training and support structures,
- differentiated implementation models,
- and practical school-level governance and guidance.

South African education was already, in the pre-AI dispensation, very polarised when it comes to digital access (Spaull and Jansen, 2019). We are clearly aware of the "Digital Divide". However, with sensible and contextual guidance and regulation of the integration of AI (Cross and Feldman; Saal, Chetty, Ntshayintshayi, Moosa and Masuku 2025), it may improve:

- access,
- educator productivity,
- language inclusion,
- learner support,
- personalised learning styles,
- deeper questioning and curiosity,
- and real-time access to the same processing power and information.

AI has the potential to be a key building block in the "Digital Bridge" that could cross the divide.

The report proposes a four-quadrant governance model to guide decision-making and recommends a strongly contextual, phased, principles-based approach to AI governance in South African basic education.

It further propose another four-quadrant model on one page to demystify the differences between users (Educators and Learners), the setting of application (Class or Home) and the platform design focus (general purpose of educational focus). This model highlights the opportunities, risks and activities for licenced and free software in each quadrant.

> **"The future is already here, it is just not evenly distributed" – William Gibson**

General purpose, as opposed to specific educational designed tools, AI tools are already being used by South African learners (and parents), educators and other staff members. This is often done without institutional guidance, regulatory direction or formal or dedicated governance clarity. The report includes, as an annexure, results of a survey among educators and learners conducted by FEDSAS in January 2026 and highlights tools used and activities undertaken.

Schools therefore find themselves in a position where:

- learners are already accessing AI independently, (FEDSAS, 2026)
- educators and staff are experimenting informally with AI tools (for administrative tasks and academic support), (FEDSAS, 2026)
- early adopter educators are using it formally, (FEDSAS, 2026)
- school based protocols and policies are limited,
- government is silent;
- and local and contextual policy frameworks remain absent.

The central challenge facing the education sector is no longer whether AI should exist in schools (Kitshoff, 2026). AI has already entered educational environments. The question is how the sector should govern and guide its use responsibly, ethically and equitably without creating fear and confusion, or over-policing experimentation and hampering innovation.

The challenge is intensified within the South African context due to existing educational realities including:

- deep inequality,
- uneven physical infrastructure;
- uneven digital infrastructure,
- uneven and selective broadband and high speed connectivity deployment,
- high data costs,
- multilingual learning environments,
- lack of parent involvement;
- uneven levels of digital literacy and fluency of parents;
- educator workload pressures,
- literacy and numeracy concerns,
- and significant disparities between schools.

AI therefore enters an already unequal system and may either:

- deepen educational exclusion – the digital divide,
- or support inclusion and educational innovation – the digital bridge.

The outcome will depend largely on the governance, safeguards and leadership frameworks developed by the Department of Basic Education (DBE), provincial education departments (PED's) and School Governing Bodies (SGB's).

With that in mind, the current policy framework and existing policies should also be taken into account. The primary question of this report cannot be answered without taking into account that the education sector and schools in particular have existing policies that may be relevant to the discussion.

The question is not simply whether schools should have an AI policy, but more accurately the question should address whether schools need new rules for AI that are not yet dealt with in existing policy. Many of the initial fears, concerns and risks associated with the AI debate are not new, in fact they have been existing for many years and their management and mitigation have been dealt with in policy since the first infringements. Cheating did not start on 1 December 2022 (Chat GPT Launched

on 30 November 2022). The education sector has been used to exam conditions and invigilating for as long as most advocates against AI can remember. Plagiarism, dishonesty, bullying, misconduct, lack of academic integrity and many others have been reported on for many years. Data security, breaches and inappropriate use of technology came to the fore in recent years before the AI era. In the same frame, the concept and risk of "parent intelligence" have existed with all work not done in class.

Most of these generic human behavioural risks existed before AI and hence needed governing and guidance in the current policy framework. The scale, speed, accessibility and un-detectability of these behaviours are amplified by the power of AI.

Many of the existing policies could have, and should have, addressed the human behaviour elements. One of the first functions (SASA Section 8) of an SGB is the adoption of, among others, the Code of Conduct for learners with disciplinary procedures and sanctions for infringements. All schools (like other entities) are required to have a Protection of personal information policy.(POPIA) Many schools will have an assessment policy, staff office procedures manuals and acceptable-use policies related to ICT issues. All educators are also subject to the code of ethics and regulatory framework covered by the South African Council of Educators (the SACE Act) and the Employment of Educators Act (EEA).

If we frame the AI discussion as an isolated technology issue, schools may tend to ignore the fact that other, and existing, policies deal with many of the potential risks that require regulation.

2. Research design

This report is based on a rapid multidisciplinary literature review, current policy review, interviews with stakeholders and recording of interviews and presentations from relevant events.

The author of this report also draws on sectoral knowledge based on the extensive work with South African schools as an Exco member of FEDSAS and Manager of the FEDSAS Centre for Technology. This entails workshops with educators, mini-summits with school leaders, snap surveys with educators and learners and various panel discussions at conferences or in the media.

My research includes review of various articles, posts and blogs from multiple social media sites, videos of notable events from TED Talks to conference recordings, published books and also summaries (Blinkest) of published books. It also includes some interviews with stakeholders in the sector which has been anonymised.

Additional sources (other than already covered in the bibliography):

One of the immense challenges around research on AI is the speed at which development takes place. This impacts on the shelf life of material and the amount of new material that is produced. Longer term studies related to publication of articles soon find themselves outdated and less relevant given the fast evolving landscape.

Chat GPT launched version 3.5 on 30 November 2022 and was the fastest innovation to be engaged by 100 million people. At the time of writing this piece version 5.5 can be accessed in the free tier while subscribers have access to version 5.6.

Newer versions do not just bring increased performance, but also increased functionality. This in turn has an impact on the use case and the influence in general use but also in education.

Other sources were investigated including summaries of books on Blinkest-app and YouTube videos of interviews and sessions at recent international conferences like SXSW2026 and BETT2026.

We also conducted interviews with education sector leaders, educators and industry players in the education technology landscape.

3. Literature review, contextual analysis and interview responses

3.1 Global AI governance trends in education

Globally, governments and education systems are increasingly recognising that AI governance in education requires more than technological regulation. UNESCO 2023

Key international themes include:

- safeguarding children / learners online, (UNICEF 2025)
- protecting privacy and data, (UNICEF 2025; POPIA))
- addressing algorithmic bias, (OECD 2023)
- ensuring transparency,
- maintaining human oversight,(UNESCO 2025)
- supporting digital citizenship,
- and redesigning assessment systems.(UNESCO 2025)

These are mirrored in the South African context but to a lessor or greater extent depending on the individual micro-cosmos context of the individual school or community.

Local and international trends include other technology issues unrelated to AI but related to devices, social media, screen time and well-being (Haidt 2024). Schools in many countries have started to ban or limit smartphones on campus. Some countries have moved to regulate the entry age for social media platforms. Sweden and some South African schools are reversing the roll-out of tablets and returning to text books, pen and paper (Savage 2026). The anxiety and emotional well-being of the current generation is also under the spotlight with many believing that devices and access to platforms are to blame, either partly or in full. (Haidt 2024)

UNESCO's *Guidance for Generative AI in Education and Research* (2023) emphasises that AI governance should prioritise human agency, inclusion, safety, transparency, and educational integrity.

UNICEF similarly warns that children require specific protection in relation to profiling, surveillance, manipulation, harmful content,and commercial exploitation through AI systems.

Increasingly, education systems are moving away from simplistic "ban or allow" approaches toward:

- governed implementation,
- ethical regulation,
- and human-centred AI integration.

3.2 South African educational realities

The South African education system presents complex conditions for AI use, implementation and integration. It is however not all that unique as many countries face inequality, digital divides, multilingualism, migration and other similar challenges.

Key systemic realities include:

- severe inequality between schools and within schools, (DBE statistics show that 87% of schools are declared no-fee (poor schools in Q1-3 -) and 9 - 10,5 mil learners (around 80%) receive meals at school daily indicating poverty and other social ills in the system. (DBE Annual Report 2024/2025)
- connectivity disparities,
- inconsistent device access,
- inconsistent and unreliable connectivity,
- multilingual educational contexts,
- uneven educator digital literacy,
- and significant socio-economic challenges.

The South African schooling system is also increasingly influenced by:

- learner smartphone access,
- informal digital learning,
- WhatsApp-based communication ecosystems,
- and rapidly changing online environments.

The tension between the reality and perception of lack of access and on the other hand the data and statistics that indicate deep penetration of devices increasing access and opportunity creates a double narrative to be aware of. This may point to the fact that we have many different sizes that would make a one-size-fits-all approach very irrelevant.

Statistics and data indicate that a total of 127 million cellular mobile connections were active in South Africa in late 2025. This equates to 196% of the total population. It is also an increase of 963 000 connections when compared to 2024. There were 51,7 million individuals using the internet at the end of 2025 with online penetration at 79,6% of population. South Africa is home to 29,1 million social media user identities or 44,9% of the total population (DataReportal, 2026) .

Other AI indicators in SA:

South Africa is ranked at number 8 in the top 25 most AI-ready outsourcing destination. The AI readiness Index assesses population adoption, workforce AI literacy, enterprise AI adoption and AI education pipeline across the world's top 25 outsourcing destinations (Ataraxis Management Consulting, 2025) .

South Africa ranks 46th out of 147 in AI adoption (ITWeb, 2025) .

This double narrative of access and use means that some schools may rapidly adopt AI while others may be unable to access it meaningfully and others may lack leadership, management and governance readiness.

Without coordinated regulation and support, AI risks reinforcing the existing bimodal nature of South African education and widening the digital divide. However, with thoughtful integration, implementation, and governance, AI has the potential to enhance teaching and learning significantly. *Rather than asking whether AI could contribute to bridging* South Africa's digital divide, policymakers should intentionally develop the governance, infrastructure, and implementation strategies needed for AI to serve as an educational equaliser. Recent evidence suggests that AI tutoring tools may have substantial educational benefits. For example, Google successfully tested its AI tutor in real classrooms, demonstrating promising outcomes for tutoring, deep learning, practice assessments, and personalised learning support (Fitzpatrick, 2026).

South Africa's digital landscape is characterised by a striking paradox. On the one hand we have reports and statistics of high levels of smart phone penetration with 196% compared to the population (DataReportal, 2026) . Public debate to ban cell phones in schools which is dominating news headlines locally and internationally reflects concerns about the widespread availability of these devices and their association with cyberbullying, excessive social media use, online gambling, exposure to inappropriate content, and other forms of digital harm. South Africa also ranks among the world's highest users of the internet by time spent online (Masia, 2025). ,

High levels of online bullying and addiction to social media platforms, often referred to a "doom-scrolling" are prevalent. On the other side of the debate, and evidence of the double narrative, is the fact that access to devices is limited, data is expensive and online tools for learning are not viable. This will unfortunately carry forward into the AI debate and will constantly be the two sides of the coin. No access on the one side and irresponsible use in mass.

3.3 Existing South African Legislative and Regulatory Frameworks

Although South Africa does not yet have a dedicated AI-in-education regulatory framework, several existing legal frameworks already apply.

These include but are not limited to:

- The Constitution of South Africa,
- The South African Schools Act (SASA),
- POPI Act,
- The Children's Act,
- The Cybercrimes Act,
- The Electronic Communications and Transactions Act,
- Curriculum Assessment Policy Statement (CAPS),
- School based policy – including learner code of conduct
- SACE legislation

These frameworks already establish obligations relating to:

- right to education,
- learner dignity,
- learner safety

- learner development,
- learner conduct,
- SGB obligation - funding, development and quality education
- Government funding obligation – staff, LTSM and more.
- Connectivity of schools,
- privacy,
- child protection,
- administrative accountability,
- ethical governance,
- and institutional oversight.

The absence of explicit AI legislation does not remove governance responsibilities from DBE, PEDs, SGBs, school leadership structures, educators, parents and caregivers, or, the IT industry and suppliers. It also does not mean that current legislation is not relevant because it is not specific AI legislation. The question is thus not only focused on new and specific AI policy, but also how we strengthen the existing policy based on current legislation to accommodate, manage and mitigate the risks posed by AI use.

4. Research Findings

This study sought to answer the following primary research question:

What minimum guidance, governance measures and support do South African schools need?

It also explored the following sub-question:

What minimum ethical, privacy, data governance and safeguarding measures should schools implement?

Across the literature, stakeholder interviews and survey responses, a consistent set of governance priorities emerged. The findings are organised around six interconnecting areas and suggest that schools require minimum governance standards in the following areas.

- Educator focus, support and professional development
- Minimum AI governance policies or guidelines
- Assessment integrity frameworks
- Learner disclosure requirements
- Digital citizenship education
- Parent and community engagement.

While governance is essential, several experts cautioned that AI policies should not become static compliance documents. Rather, governance should support ongoing learning, experimentation and responsible practice. As Clark (cited in OneAdvanced, 2025) argues, the emphasis should be on creating a living governance process rather than simply producing a policy document, which can become outdated very quickly.

4.1 Educator Focus, Support and Professional Development

Institutional discussions need to prioritise equipping and enabling educators, giving staff space to explore and use AI themselves, before they are effectively conscripted into the role of "AI detection police" (Bowen & Watson, 2024; UNESCO, 2023; Oxford, 2025).

The formal integration and implementation of AI on an institutional level in education should start with the educators. Although evidence suggests that learners (in higher grades) and parents (society) in the broad use AI, it is not necessarily yet based on school promoted activities or required by the school.

Educators and staff should be the first beneficiaries of the opportunities from AI use. They should also be the first to be trained in AI literacy, AI risks and the consequences of AI use. A further clear distinction should be made between use in preparation of lessons, use in the class exposing learners to the platforms and the exposure of student data to the platforms.

Educator training should include more than the general purpose AI tools. Specific education focussed AI tools exist with a dedicated education focus. Many of these tools are generic education tools and not aligned to South African curriculum frameworks.

Educators require:

- AI literacy training,
- safeguarding guidance,
- ethical use guidance,
- and practical classroom strategies.

Educators and staff members require guidance on the use of licensed and unlicensed software and the data security implications of online software. Disclosure requirements for staff need to be reviewed. Protocols need to be developed based on local context.

4.2 Minimum AI Governance Policies or Practice notes.

Every school should develop an AI governance policy or practice note that address:

- acceptable AI use by staff and learners for school work,
- ethical use for education purposes outside of school hours and off-campus,
- responsible use of AI,
- prohibited uses,
- educator responsibilities,
- learner responsibilities and expectations,
- disclosure requirements,
- and safeguarding obligations (including POPIA and any other data protection requirements).

Policies, when required, should be formally approved through governance structures including SGB oversight (SASA). Policies should be drafted in consultation with stakeholders.

School governing bodies are encouraged to establish committees with specific focus. In this digital and technological age, it is proposed that schools establish an ICT committee(SASA section 30). Such a committee should cover all technology issues for the school including operational technology, education technology and cyber-related risks. AI issues should be included in the scope of the work of this committee. Where no committee exists, the SGB should include these issues as standing items on the agenda of the SGB meetings.

4.3 Assessment Integrity Frameworks

Traditional homework and take-home assessments have always reflected unequal access to support outside the classroom, whether from parents, peers or private tutoring. AI did not create this challenge, however, amplifies it by the ease of use, availability and low cost of AI. A critical factor to consider is the inequality within a group of learners (which is also not a new factor) and access to resources and support at home.

Schools should focus assessment integrity on achieving the goals of learning and not the compliance of policy. Compliance is not an outcome but part of the process to ensure the outcome. Deep learning, academic integrity and relevant feedback should be prioritised above the policing of compliance, fulfilment of departmental reporting requirements and assessment for ranking or awards.

The issue is no longer merely plagiarism detection, AI detection or cheating. It is assessment redesign. Plagiarism at its core is also under the spotlight as the AI response based on algorithms and patterns does not infringe on the intellectual property of an author. (Griffiths 2023; Bowen and Watson 2024).

The existing Code of Conduct of a school should, in theory, have had to deal with many of these elements. Cheating and academic lack of integrity are not issues ring-fenced to the use of AI. The Code of Conduct of a school forms an integral part of the behaviour management process at the school. The ethics around any issue should be discussed and taught with far more importance than the training and use of a technology platform.

Many speakers on the topic of AI in society highlight the ethics discussion as the most important issue facing society and it is only amplified by AI and not created by AI. AI does not determine outcomes independently; rather, it amplifies human choices and intentions. As Gawdat (2025) argues, the greatest risks associated with AI stem not from the technology itself but from how it is used by people. This reinforces the importance of ethics and governance as foundational considerations for the responsible adoption of AI (Gawdat, 2025).

Schools require guidance relating to:

- AI-assisted plagiarism,
- disclosure requirements,
- assessment redesign,
- oral assessment integration,
- and process-based evaluation.

The issue is no longer merely cheating detection. It requires rethinking how we assess learning, and in this sense it is about assessment transformation

4.4 Learner AI Disclosure Requirements

We know that learners have access to AI and in the absence of direction, learners may default to using it blindly. It may not be right or wrong to use AI, but based on the directive of the assignment transparency and disclosure is required therefore Learners should be encouraged to disclose their use of AI at home for tasks or projects. Disclosure requirement could include for example:

- whether AI tools were used,
- which tool/s were used,
- how they were used,
- and what role AI played in completing work.

The policy or practice note may include a requirement to disclose the prompt/s used. The focus should be transparency and integrity rather than purely punitive responses.

The flipped classroom concept established in the early years of education technology may be the ideal strategy to apply to the use of AI at home (Ekanayake and Silva (2025). In this model the learners do research and gather information at home for critical evaluation and presentation in class.

4.5 Digital Citizenship Education

The introduction of AI into day to day life is not in a silo of technology, but in a broader digital environment. As with licensing the use of dangerous objects like vehicles and firearms, the skill level to use a tool and the ability to understand the possible risks could ensure responsible use and adoption. AI literacy education may be required as part of the broader digital citizenship education (Unicef 2025). Digital citizenship training should include educators, non-educators and learners. If capacity allows digital citizenship training, especially pertaining to AI, should be extended to parents and caregivers.

The literature and expert interviews (inc. references) suggest that learners would benefit from developing understand of the following concepts with the risks they pose:

- misinformation,
- hallucinations,
- deepfakes,
- privacy risks,
- ethical use,
- intellectual property,
- and cognitive dependency concerns.

One of the risks of AI responses is that it is very eloquent (Bowen and Watson). Even if completely based on incorrect facts or unverified sources, the level of confidence and the polished communication styles may mislead users and build undue trust. It is not just the misinformation or hallucinations but the confident inaccurate smart-sounding results that poses high risk.

4.6 Parent and Community Engagement

The public school nature of the South African basic education design emphasises parent and community involvement and participation (SASA). This is underlined by the parent majority on the

School Governing Body and the onus on the SGB to stand in a position of trust towards the school and community. Section 20 of the SASA requires the SGB to develop, not merely maintain, the school to ensure the delivery of quality education for all learners at the school.

Schools, through the SGB, should communicate that it is on an AI journey and aware of the impact on education. The maturity levels of adoption will vary from school to school. We suggest that the schools engage the community and include an agenda item in the parent meeting/s on the status of AI guidance and the school during the report from the Principal of Chairperson.

Based on the SGB mandate to develop the school and prepare learners for the future, school are required to develop and consider the following:

- AI use guidelines, risks and opportunities,
- safeguarding concerns,
- assessment implications,
- academic integrity concerns
- the potential loss of deep learning,
- the future of work, jobs and employment,
- risk of misinformation and hallucinations,
- and responsible digital behaviour.

Parents remain important stakeholders because learner device access largely occurs through family environments. The school cannot manage in 7 hours what parents and society do not manage in 17 hours. Irresponsible use off-campus and outside school hours may fall outside of the school's Code of Conduct, but it has a direct impact on the learning journey.

4.7 Other considerations

Research carried out by FEDSAS on school values systems revealed the following ethical principles that many schools in South Africa subscribe to. And these are also relevant in the governance structures to support ethical, equitable, meaningful AI use in schools.

Schools should strengthen (as we assume they have been established pre AI) ethical principles including:

- honesty,
- integrity,
- accountability,
- transparency,
- fairness,
- non-discrimination,
- and respect for human dignity.

With respect to privacy and data governance schools should:

- prohibit unauthorised uploading of learner data,
- avoid unsafe AI platforms,
- ensure POPIA compliance,

- and carefully evaluate third-party AI tools.

Regarding learner safeguarding schools should establish protocols relating to:

- learner pictures upload and manipulation (even if non-malicious)
- explicit AI-generated imagery,
- cyberbullying,
- deepfake abuse,
- impersonation,
- harmful chatbot interactions,
- and digital manipulation.

AI governance should form part of broader school risk management frameworks.

5. Discussion and Implications for the South African Basic Education Context:

A Four-Quadrant Governance Framework for AI in Education

Drawing together the evidence presented throughout this report, we propose a four-quadrant governance framework as a way of interpreting and applying the findings to the South African basic education context.

AI IN SOUTH AFRICAN SCHOOLS

FOUR-QUADRANT GOVERNANCE FRAMEWORK

A HUMAN-CENTRED PATH TO SAFE, ETHICAL AND EQUITABLE AI USE

> "AI should increase human agency, not replace it."
> – Superagency (Hoffman & Beato, 2025)

STRONG GOVERNANCE

QUADRANT 1

HUMAN-CENTRED GOVERNANCE

Strong governance + strong human agency
Desired destination.

WHAT IT LOOKS LIKE

- AI used to enhance teaching and learning
- Human judgment and creativity remain central
- Clear policies, transparency and accountability
- Learners use AI responsibly and critically
- Safe, inclusive and equitable access

FOCUS

Amplify human potential with AI as a partner, not a replacement.

QUADRANT 2

MANAGED DEPENDENCY

Strong governance + high technological dependence
Governance exists but human capability risks being displaced.

WHAT IT LOOKS LIKE

- Over-reliance on AI tools reduces critical thinking
- Academic dishonesty and misinformation
- Privacy risks and unsafe practices
- Inconsistent or poorly implemented policies
- High dependence with low human agency

FOCUS

Manage risk through strong governance, enforce boundaries and build human capability.

HUMAN AGENCY (High Human Agency)

SUPERAGENCY
Human capability amplified by AI, not replaced by it.

TECHNOLOGICAL DEPENDENCE (High Technological Dependence)

QUADRANT 3

UNGOVERNED INNOVATION

Weak governance + strong human agency
Innovation and experimentation occur without sufficient safeguards.

WHAT IT LOOKS LIKE

- Blanket bans and fear-driven policies
- Innovation suppressed
- Learners use AI in secret outside school
- Schools fall behind societal and global shifts
- Missed opportunities to support learning

FOCUS

Shift from "ban" to "govern and guide."
Build capacity, trust and practical support.

QUADRANT 4

CHAOTIC ADOPTION

Weak governance + high technological dependence
Highest systemic risk.

WHAT IT LOOKS LIKE

- No access to AI tools or infrastructure
- No policies, support or training
- Widening gap between schools and communities
- Learners left behind in AI-enabled world
- Inequality deepens

FOCUS

Prioritise infrastructure, access, skills and inclusive AI readiness.

WEAK GOVERNANCE

KEY TO MOVING TOWARDS HUMAN-CENTRED GOVERNANCE

1. **Establish Clear Policies & Ethics (The Rulebook)**
   Protect learners, privacy and human dignity.
2. **Build Capacity & Confidence**
   Training for educators, learners and leaders.
3. **Provide Practical Guidance & Tools (The Gameplan)**
   Approved tools, use cases and disclosure norms.
4. **Monitor, Support & Adapt**
   Review, learn and improve as technology evolves.

AI can be a bridge to opportunity – or a bridge to greater inequality. Governance makes the difference.

Human agency today.
Better education tomorrow.

FEDSAS

Version 1 June 2026

Quadrant 1: Human-Centred Governance

Strong Governance + Strong Human Agency

This represents the preferred implementation environment and the intended destination for South African schools.

Focus: Amplify human capability through responsible AI use while maintaining strong governance, ethics and accountability.

Quadrant 2: Managed Dependency

Strong Governance + High Technological Dependence

This environment is characterised by strong policies, oversight and governance structures, but increasing reliance on AI systems for learning, decision-making and productivity.

Focus: Maintain strong governance while deliberately strengthening human agency, critical thinking, creativity and independent problem-solving.

Quadrant 3: Ungoverned Innovation

Weak Governance + Strong Human Agency

This environment is characterised by innovation, experimentation and initiative occurring without sufficient governance, policy guidance or institutional safeguards.

Many schools currently occupy this space as educators and learners explore AI ahead of formal policy development.

The primary risk is not a lack of innovation but a lack of consistent safeguards and governance.

Focus: Build governance frameworks, ethical guidelines and institutional capacity without suppressing innovation and creativity.

Quadrant 4: Chaotic adoption

Weak Governance + High Technological Dependence

This represents the highest-risk environment within the framework. In this environment, technology increasingly shapes behaviour while governance and human judgement fail to keep pace.

This quadrant presents significant risks to:

- learner wellbeing,
- educational quality,
- institutional trust,
- and responsible AI adoption.

Focus: Urgently establish governance, safeguarding measures, educator support and ethical oversight to restore balance between human agency and technological capability.

The Four-Quadrant AI Adoption Model for South African Schools

To assist schools, governing bodies, provincial departments and policymakers in understanding the practical realities of AI adoption, we propose a Four-Quadrant AI understanding and implementation

model. The model aims to manage some tensions mentioned earlier and makes a distinction between the educators and learners, the working environments of school or off-campus and the risks associated with free software compared to licensed software.

It introduces the concept of the Rulebook (legislation, regulation and policy) and the Gameplan (experimentation and innovation if a safe environment).

Governance Principles: The Rulebook

This paper incorporates a set of governance principles that form the school's policy framework. This establishes the AI Rulebook detailing right and wrong, risk and mitigation and infringement and sanction.

These principles include:

- Acceptable and responsible use
- Child protection and safeguarding
- Data security
- Transparency and accountability
- Equity and inclusion
- Academic honesty

These principles provide the ethical boundaries within which AI may be used.

Practical Guidance: The Gameplan

The model also incorporates practical implementation guidance, referred to as the Gameplan. This encourages innovation and experimentation in a safe and secure environment. It creates a sandbox where all activities and not measured against the policy framework (Rulebook) but allows for low risk probes, experimentation and room for failure and mistakes.

AI IN SCHOOLS: 4 QUADRANT MODEL

Safe • Ethical • Responsible • Human-Centred

A practical guide for South African schools, SGBs, educators and learners

> *"AI should increase human agency, not replace it."*
> – Superagency (Hoffman & Beato, 2025)

IN CLASS (SCHOOL)

Part 1 of 2

HUMAN AGENCY AT THE CENTRE

EDUCATORS

Teaching, planning, assessment, admin

LICENSED / APPROVED SOFTWARE

Opportunities
- Lesson planning & differentiation
- Rubric and assessment design
- Content summarisation
- Language translation
- Administrative support

Risks
- Over-reliance on AI outputs
- Sharing learner data inappropriately
- Inaccurate or biased information
- Reduced professional judgment

Activities (Examples)
- Generate activity ideas
- Create reading summaries
- Draft communications
- Analyse assessment trends

FREE / PUBLIC SOFTWARE

Opportunities
- Quick explanations
- Brainstorming ideas
- Drafting resources
- Language support

Risks
- Data privacy concerns
- Ads / commercial use
- Unreliable information
- Limited data protection

Activities (Examples)
- Quick content drafts
- Explain complex ideas
- Translate short texts
- Create quiz questions

Training Needs
AI literacy • Prompting skills • Ethical use • Fact-checking
Data privacy • Assessment redesign

LEARNERS

Learning, creating, researching, collaborating

LICENSED / APPROVED SOFTWARE

Opportunities
- Personalised learning support
- Writing feedback
- Concept explanations
- Assist with research
- Accessibility (text-to-speech, translation)

Risks
- Over-dependence
- Inaccurate answers
- Academic dishonesty
- Limited critical thinking

Activities (Examples)
- Get feedback on drafts
- Explore topics deeply
- Translate / explain ideas
- Study & revision support

FREE / PUBLIC SOFTWARE

Opportunities
- Easy access
- Free tutoring support
- Language translation
- Quick answers

Risks
- Privacy & data exposure
- Inappropriate content
- Misinformation / bias
- Cheating & plagiarism

Activities (Examples)
- Homework help (with care)
- Practice questions
- Summarise long texts
- Learn new languages

Training Needs
AI literacy • Digital citizenship • Fact-checking
Academic integrity • Safe & responsible use

KEY OPPORTUNITIES FOR SOUTH AFRICAN SCHOOLS

- Bridge learning gaps with personalised support
- Reduce educator workload
- Support multilingual teaching & learning
- Improve access in under-resourced communities
- Strengthen learner engagement and motivation

KEY RISKS IF UNMANAGED

- Privacy breaches & data misuse
- Misinformation & bias
- Academic dishonesty & plagiarism
- Over-dependence replacing thinking
- Exposure to harmful or inappropriate content

GOOD GOVERNANCE STARTS WITH YOU

- Adopt an AI Policy
- Vet and approve tools and licences
- Protect learner privacy (POPIA)
- Educate and train educators & learners
- Communicate with parents & community
- Monitor, review and update regularly
- Promote equity of access and support

DISCLOSURE MATTERS

Be transparent about AI use. Example disclosure: *"I used AI for brainstorming / language editing / research support. I checked the information and take responsibility for the final work."*

Continued on next page: Out of Class (Home) →

AI IN SCHOOLS: 4 QUADRANT MODEL (continued)

OUT OF CLASS (HOME)

Part 2 of 2

HUMAN AGENCY AT THE CENTRE

EDUCATORS

Teaching, planning, assessment, admin

LICENSED / APPROVED SOFTWARE

Opportunities

- Long-term planning support
- Data analysis & reporting
- Policy & document drafting
- Professional development
- Parent communication

Risks

- Privacy of school information
- Over-reliance on AI
- Copyright / accuracy issues
- Blurring of work-life boundaries

Activities (Examples)

- Develop schemes of work
- Analyse learner data trends
- Draft policies & reports
- Communication & newsletters

FREE / PUBLIC SOFTWARE

Opportunities

- Accessible from anywhere
- Quick research
- Drafting & summarising
- Self-learning / upskilling

Risks

- Data not secure
- Ads / tracking
- Inconsistent quality
- Limited data protection

Activities (Examples)

- Draft lesson plans
- Upskill with online courses
- Summarise research
- Create visuals / slides

Training Needs

Advanced prompting • Data literacy • Ethics & privacy
Time management • Tool evaluation

LEARNERS

Learning, creating, researching, collaborating

LICENSED / APPROVED SOFTWARE

Opportunities

- Structured tutoring
- Personalised feedback
- Writing improvement
- Exam preparation
- Skill development

Risks

- Subscription / cost barriers
- Over-dependence
- Reduced perseverance
- Privacy of personal data

Activities (Examples)

- Practice problems
- Writing feedback
- Study planning & tracking
- Career exploration tools

FREE / PUBLIC SOFTWARE

Opportunities

- Free learning support
- Language tools
- Homework help
- Creative exploration

Risks

- Exposure to harmful content
- Data harvesting
- Misinformation
- Cheating / copy-paste culture

Activities (Examples)

- Get help with homework
- Explain the work
- Learning assistant
- Translate text

Training Needs

Digital citizenship • Online safety • Fact-checking
Managing screen time • Academic integrity

GUIDING PRINCIPLES (THE RULEBOOK)

- Human dignity & agency first
- Child protection & safeguarding
- Privacy, data protection & confidentiality
- Transparency, accountability & fairness
- Equity, inclusion & access for all
- Academic integrity & honesty
- Quality, reliability & critical thinking

PRACTICAL GUIDANCE (THE GAMEPLAN)

1. Choose the right tool for the right purpose
2. Use AI to augment, not replace, human effort
3. Think critically. Verify everything.
4. Respect copyright & intellectual property
5. Ask, learn, create, reflect – don't just copy
6. Disclose meaningful use
7. Take responsibility for your learning & actions

EXAMPLES OF TOOLS (CHECK BEFORE YOU USE)

LICENSED / APPROVED (Examples)

- ✓ Microsoft Copilot for Education
- ✓ Google Gemini Education
- ✓ Diffit
- ✓ Brisk
- ✓ Chalkie
- ✓ Notebook LM

FREE / PUBLIC (Examples)

- ✓ ChatGPT (free tier)
- ✓ Claude (free)
- ✓ Perplexity AI (basic)
- ✓ Notebook LM (free)

WHO TO GO TO FOR SUPPORT

- School: Principal / SMT / AI Champion
- District: Subject Advisors / ICT Coordinators
- Province: EMIS / ICT Units / Policy & Governance Support
- DBE: Official communications & guideline updates

FEDSAS Secretariat Centre for Technologie Technology

REMEMBER: AI is a tool. Humans are the decision-makers. Our goal is to build capable, ethical, compassionate learners and educators.

Let's use AI to build a future where every child, in every school, can thrive.

Govern with wisdom.
Use with purpose.
Keep humanity at the centre.

FEDSAS

Version 1 June 2026

Drawing on the evidence presented in this report, the following practices emerged as important for supporting responsible AI use:

- choose the right tool for the right purpose,
- use AI to augment rather than replace human effort,
- iterate multiple times to refine outputs,
- debate outputs and evaluate sensibility of replies,
- think critically and verify outputs,
- respect copyright and intellectual property,
- ask questions and explore ideas,
- disclose meaningful AI use,
- take responsibility for final work.

A South African Perspective

The model is intentionally grounded in South African realities.

It recognises the realities of our unequal society mentioned earlier, including:

- urban-rural differences,
- fee-paying and no-fee school contexts,
- varying levels of connectivity,
- unequal access to devices,
- differing levels of educator readiness.

Most importantly, it recognises that AI may become either a bridge to educational opportunity, or a division to greater inequality. The outcome will depend on governance. The purpose of the model is therefore not merely to manage technology. Its purpose is to help schools create environments in which AI strengthens learning, supports educators, protects learners and expands human agency.

Ultimately, the goal is to ensure that South African schools move toward a future where AI is safe, ethical, responsible and human-centred, with human agency remaining firmly at the centre of education.

Recommendations

Across the literature, stakeholder engagement and research findings, a consistent theme emerged: one of the greatest risks is not AI itself, but the extent to which education systems are unprepared to adopt it responsibly. The following recommendations are intended to address that gap.

At a national level, examples of priority actions include:

- develop a national AI governance framework,
- establish safeguarding standards,
- provide privacy guidance,
- and consider the development of assessment reform guidance.

At a Provincial level, PED's priority actions include:

- support educator training,

- strengthen governance capacity,
- provide implementation support,
- and assist schools with safeguarding readiness.

At School Level, priority actions include:

- adopt an AI governance policy, practice note or guidelines for educators, staff and learners,
- strengthen existing policies to include the impact of AI,
- facilitate training and experimenting with AI for educators
- establish disclosure standards,
- strengthen safeguarding systems related to networks and devices,
- educate parents and learners,
- and integrate digital citizenship education.

Conclusion

AI is already reshaping the educational environment in South Africa.

The challenge now facing the sector is whether governance systems will evolve quickly enough to:

- protect learners,
- support educators,
- uphold ethical standards,
- and ensure equitable implementation.

The evidence suggests that unmanaged AI adoption may:

- deepen educational inequality,
- weaken assessment integrity,
- create governance instability,
- and expose learners to significant risks.

However, governed, human-centred and ethically grounded implementation may support:

- educator productivity,
- enriched curriculum delivery,
- accessibility,
- multilingual support,
- language inclusion,
- personalised and differentiated learning,
- and more adaptive learning systems.

Ultimately, the future impact of AI in South African education will depend less on the technology itself and more on the quality of governance, leadership, safeguarding and human judgement surrounding it.

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Annexure A: FEDSAS snap survey results: AI use by educators and learners – Jan 2026:

AI IN SOUTH AFRICAN SCHOOLS

Staff & Learner Survey — Key Findings

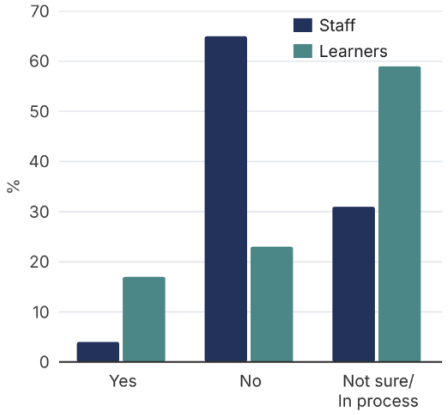
Top Highlights

- Adoption is high but ungoverned: 90% of staff use free-tier AI tools, yet 65% say their school has no formal AI policy (only 4% do).
- 87% of learners have used an AI tool, but only 35% use it daily/weekly — most (53%) use it rarely or never.
- Policy perception gap: 65% of staff say there's no policy, while 59% of learners are simply "not sure" — a communication gap, not just a policy gap.
- Staff attitudes are cautiously positive (85% positive/optimistic), but only 26% rate AI's impact on teaching as clearly positive; most sit at neutral.
- Assessment integrity is staff's #1 concern: 60% rate learner AI use as a serious assessment challenge (4-5/5).
- Only 16% of staff feel leadership is well-equipped to make AI decisions; 29% rate readiness as low.
- Learners mainly use AI to "understand better," not to cut corners — 59% say it helps learning vs. 10% who say it hurts.

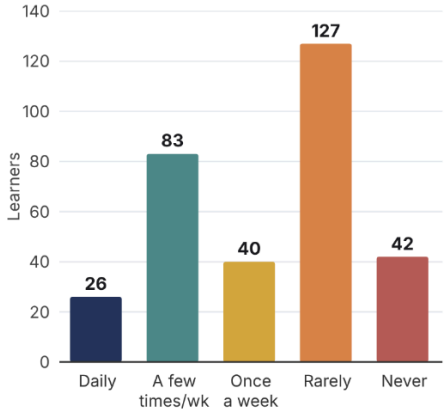
Recommendations

- Publish a clear, simple AI-use policy — communicate it directly to learners, not just staff.
- Train staff on AI-aware assessment design to address academic integrity concerns.
- Give learners explicit, teacher-led rules on acceptable AI use per subject/task.
- Address device/data access gaps (23% share or lack a device) before any school-wide rollout.
- Equip school leadership with decision frameworks or external guidance.

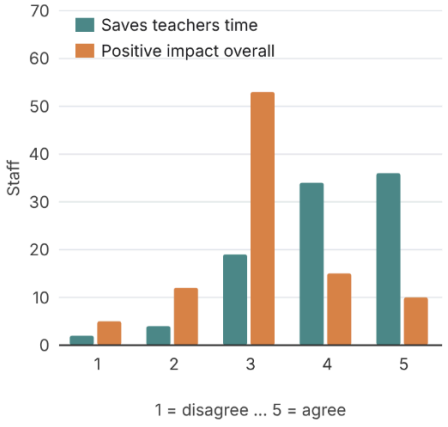
School Has an AI Policy? (Staff vs Learners)



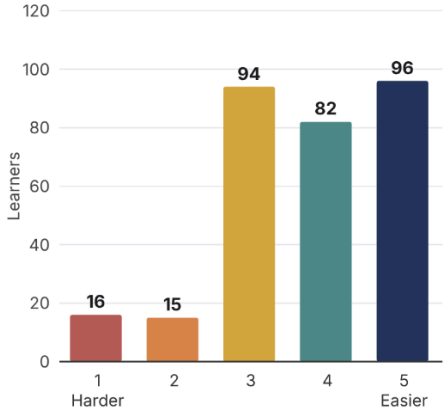
How Often Learners Use AI (n=318)



Staff Sentiment on AI



AI Effect on Learning (Learner view)



99	337	87%	65%
staff responses	learner responses	learners have used AI	staff: no formal policy

Source: "AI in Schools: The Use and Impact" (staff, n=99) and "Learners' Experiences with AI" (learners, n=337) — Google Forms surveys, predominantly Eastern Cape schools.

EDUCATOR / STAFF USE OF AI — A CLOSER LOOK

How teachers and school leaders are actually using AI today

Awareness, Attitude & Usage

- Self-rated understanding is moderate: 42% call it "reasonably good," 38% "basic" — few claim expert knowledge, yet confidence hasn't stopped adoption.
- 73% of staff say teachers at their school already use AI "sometimes" or "regularly" — it's mainstream practice, not a fringe experiment.
- 85% describe their outlook as positive or cautiously optimistic; only 3% are outright negative.

Tools & Access

- ChatGPT dominates as the tool of choice, well ahead of Gemini and Copilot.
- 90% of staff who use AI rely on free-tier tools rather than paid subscriptions — a resourcing gap for any school considering formal AI licences.

Benefits Educators Report

- Time-saving is the clear #1 benefit, followed by better access to teaching resources and ideas.
- Several staff also cite improved lesson differentiation and faster admin/marking support.

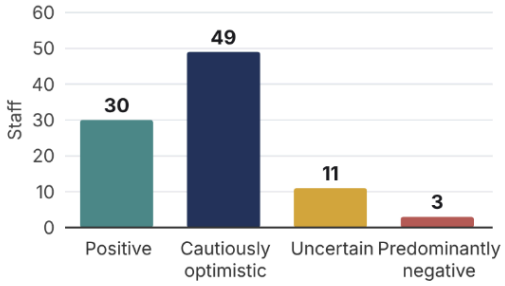
Challenges Educators Report

- Academic integrity / assessment credibility is the dominant concern — cited far more than any technical issue.
- Lack of training is a close second: 31 of 94 respondents named it their single biggest challenge.
- Policy and infrastructure gaps follow — 14 mentions each — reinforcing that the barrier is institutional readiness, not staff willingness.

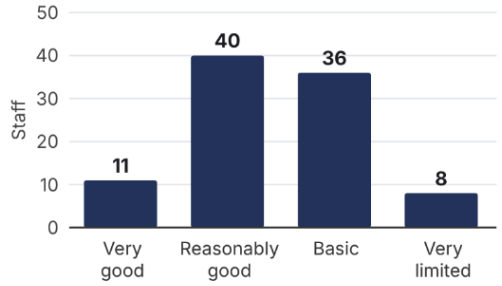
Governance Snapshot

- Only 4% of staff say their school has a formal AI policy; 65% say there is none at all, 31% say one is "in process."
- For learner-specific guidelines: 43% say none exist, 47% say they're still "in development."
- Just 16% of staff feel school leadership is well-equipped (4-5/5) to make AI decisions — most ratings cluster at a neutral 3/5.

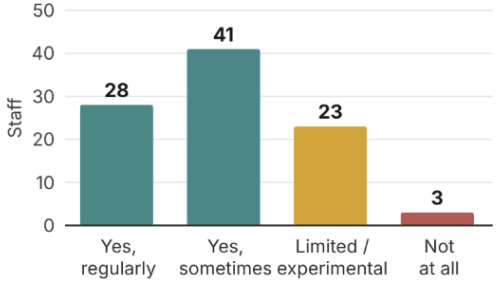
Attitude Towards AI



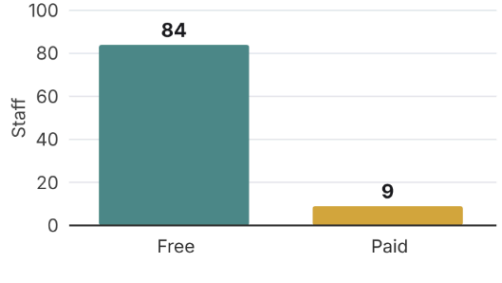
Self-Rated Understanding of AI



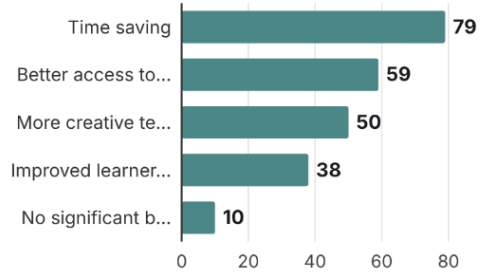
Do Teachers Already Use AI?



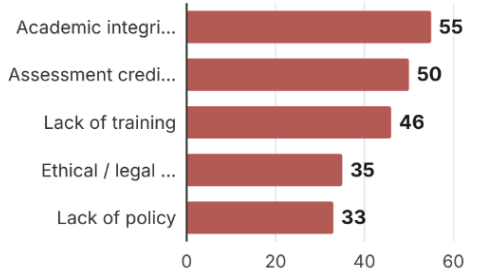
Free vs Paid AI Tools Used



Top Benefits (mentions)



Top Challenges (mentions)



73%	90%	4%	16%
teachers already using AI	use free-tier tools only	schools with a formal policy	staff: leadership AI-ready

Source: "AI in Schools: The Use and Impact" — staff survey, n=99 (Eastern Cape schools, mostly teachers, principals and HODs).