Lefa AI

RAPID RESEARCH · THEME 2 OF 9

AI and School Governance

What we're learning

THE QUESTIONS THIS BRIEF EXPLORES

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



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ABOUT THIS BRIEF

Rapid Research Theme: AI and School Governance

This is one of nine rapid research themes in **Lefa AI**, exploring what AI means for South African basic education. The research brings together existing evidence and expert perspectives to inform decision-making in a rapidly changing field.

This theme draws on **a survey of South African school staff and learners carried out by FEDSAS in January 2026**, alongside a review of literature and policy and interviews with sector stakeholders.

It is written with **school governing bodies, principals, school management teams and district and provincial officials** in mind, as well as the Department of Basic Education and its partners.

1 **Rapid review of literature, policy and stakeholder interviews**

436 **Survey responses**

99 staff and 337 learners, mostly from Eastern Cape schools (FEDSAS, January 2026)



99 STAFF 337 LEARNERS

Throughout, we set out to **weigh the opportunities and risks fairly**, rather than advocate for or against AI.

Thanks to Riaan van der Bergh and FEDSAS for their work on this theme.

Where this conversation starts

Generative AI is reaching South African schools **faster than policy can respond.** Learners, teachers and parents can use it on almost any phone, often for free. Schools are working out how to respond **without guidance from national or provincial government.**

Early responses have often swung between banning AI and allowing it freely. Yet AI is already part of school life, so the question is no longer whether it belongs in schools, but **how to guide its use well** without creating fear and confusion, or holding back teachers who are trying new things. For schools, that raises a practical question:

Do they need **entirely new rules** for AI,

Or can **the rules they already have** be applied to a new situation?

WHAT WE FOUND

Key findings

01 In schools surveyed, AI use is widespread, while guidance is still taking shape

A FEDSAS survey of 99 staff and 337 learners, mostly from Eastern Cape schools, shows **teachers already using AI widely while policy and leadership readiness lag behind.** Staff name assessment integrity and a lack of training as their biggest challenges, which suggests that **the main barrier is the institution's readiness rather than teachers' willingness.**

Staff who say teachers at their school already use AI

73%

Staff who use free AI tools only

90%

Staff who say their school has a formal AI policy

4%

Staff who feel leadership is ready to make AI decisions

16%

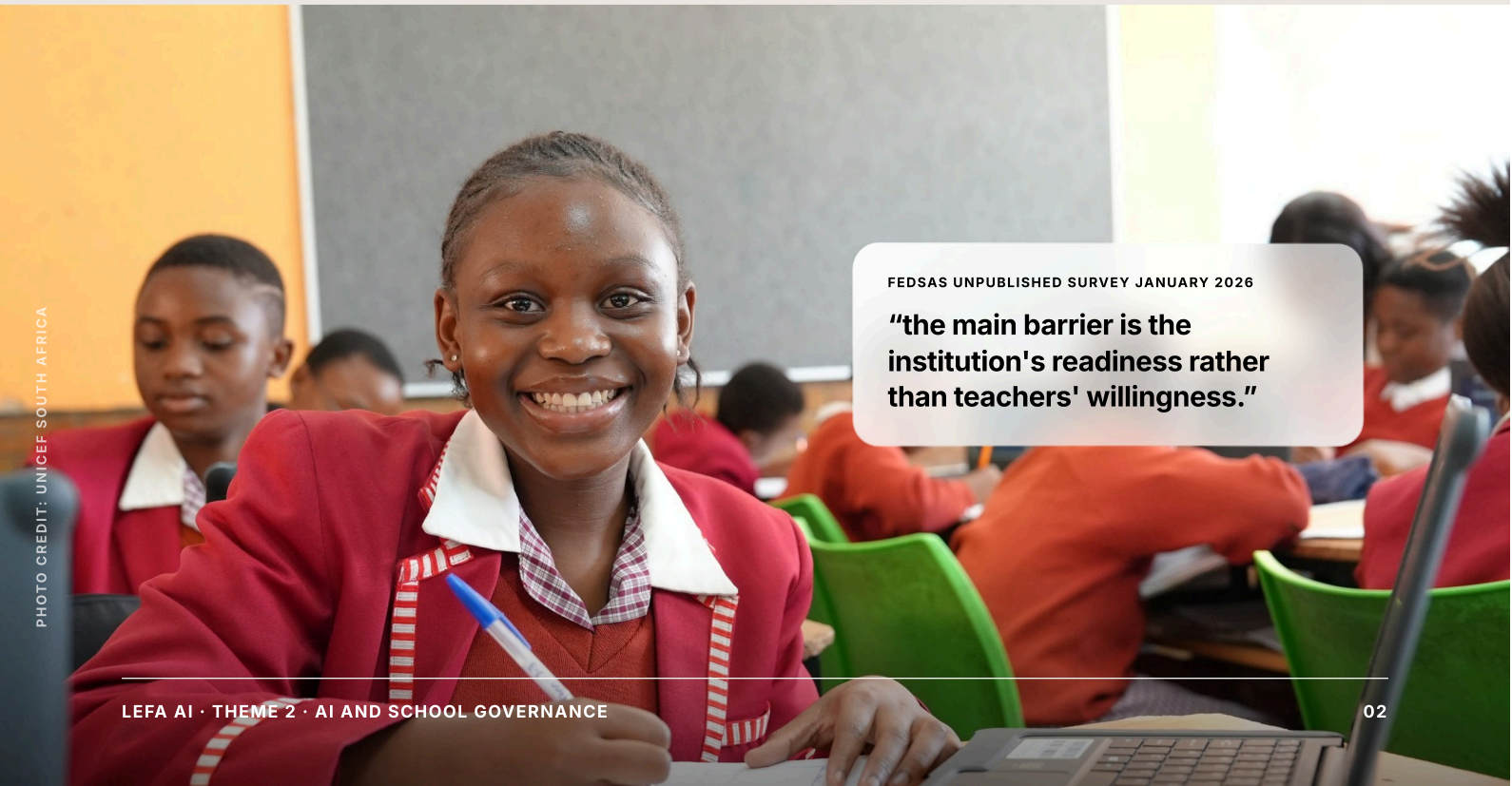
Learners who have used an AI tool

87%

Learners not sure whether their school has rules about AI

59%

Source: FEDSAS unpublished survey January 2026 (staff survey, n=99; learner survey, n=337).



FEDSAS UNPUBLISHED SURVEY JANUARY 2026

"the main barrier is the institution's readiness rather than teachers' willingness."

PHOTO CREDIT: UNICEF SOUTH AFRICA

02 Most of the risks linked to AI are not new. What AI changes is their scale, speed and visibility.

Cheating, plagiarism and the misuse of technology were part of school life long before AI.

WHAT AI CHANGES IS THEIR **scale** **speed** **visibility**

Homework has always carried the risk of help from a parent or caregiver;	→	**AI now offers that help to anyone with a phone, at any hour.**
Bullying has always existed;	→	**AI can now create realistic fake images of real learners in minutes.**

The values schools rely on, such as honesty, privacy, safety and dignity, are not new; what is new is that they are now being tested in new ways.

Sources: Gawdat, 2025; UNESCO, 2023.

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03 Schools already hold many of the rules and structures they need.

South Africa does not yet have an AI-specific education policy, but **existing law and school policy already cover much of the ground.** What is often missing is clarity on how these rules apply when AI is involved, such as whether submitting AI-generated work counts as dishonesty under a school's code of conduct.

EXISTING FRAMEWORK	WHAT IT ALREADY COVERS
Learner code of conduct (SASA, section 8)	Dishonesty, misconduct, bullying and sanctions
Protection of Personal Information Act (POPIA)	How schools collect, share and protect learner and staff data
SACE Act and code of ethics; Employment of Educators Act	Professional conduct and accountability of educators
School assessment policy	Academic integrity and the conditions under which work is assessed
Children's Act and Cybercrimes Act	Child protection, harmful content and online abuse
SGB functions and committees (SASA, sections 20 and 30)	The SGB's responsibility to develop the school, with the option of an ICT committee

Sources: South African Schools Act 84 of 1996; Protection of Personal Information Act 4 of 2013; South African Council for Educators Act 31 of 2000.

04

Because schools start from very different places, guidance on AI needs to be flexible enough to adapt to each school's context.

Unequal digital access and connectivity is a cross-cutting theme that runs across the Lefa AI series, explored most fully in Brief 3 (Ecosystem and Digital Connectivity) and Brief 9 (Digital Citizenship). For school governance, the question is **how guidance can work across such different realities.** While some schools may adopt AI quickly, others may not have access or connectivity to reach it meaningfully and yet **learners in under-resourced schools often reach AI on their phones regardless.**

A single, fixed policy is unlikely to work.

→

What may serve schools better is **a small set of shared principles or an AI ethos**, a simple starting point with room to adapt as each school learns from its own experience and as the technology continues to evolve and change.

Sources: Lefa AI Brief 3, Ecosystem and Digital Connectivity; Lefa AI Brief 9, Digital Citizenship.

05

Most staff use AI tools the school hasn't chosen, which leaves data protection to individual judgement.

Almost all staff in the FEDSAS survey **rely on free AI tools they have found for themselves** (see finding 1), usually without school guidance on which tools to use or what information is safe to share. Schools already carry data protection obligations under POPIA, and **these apply whether learner information is entered into an AI tool or anywhere else.**

FROM FINDING 1

Staff who use free AI tools only

90%



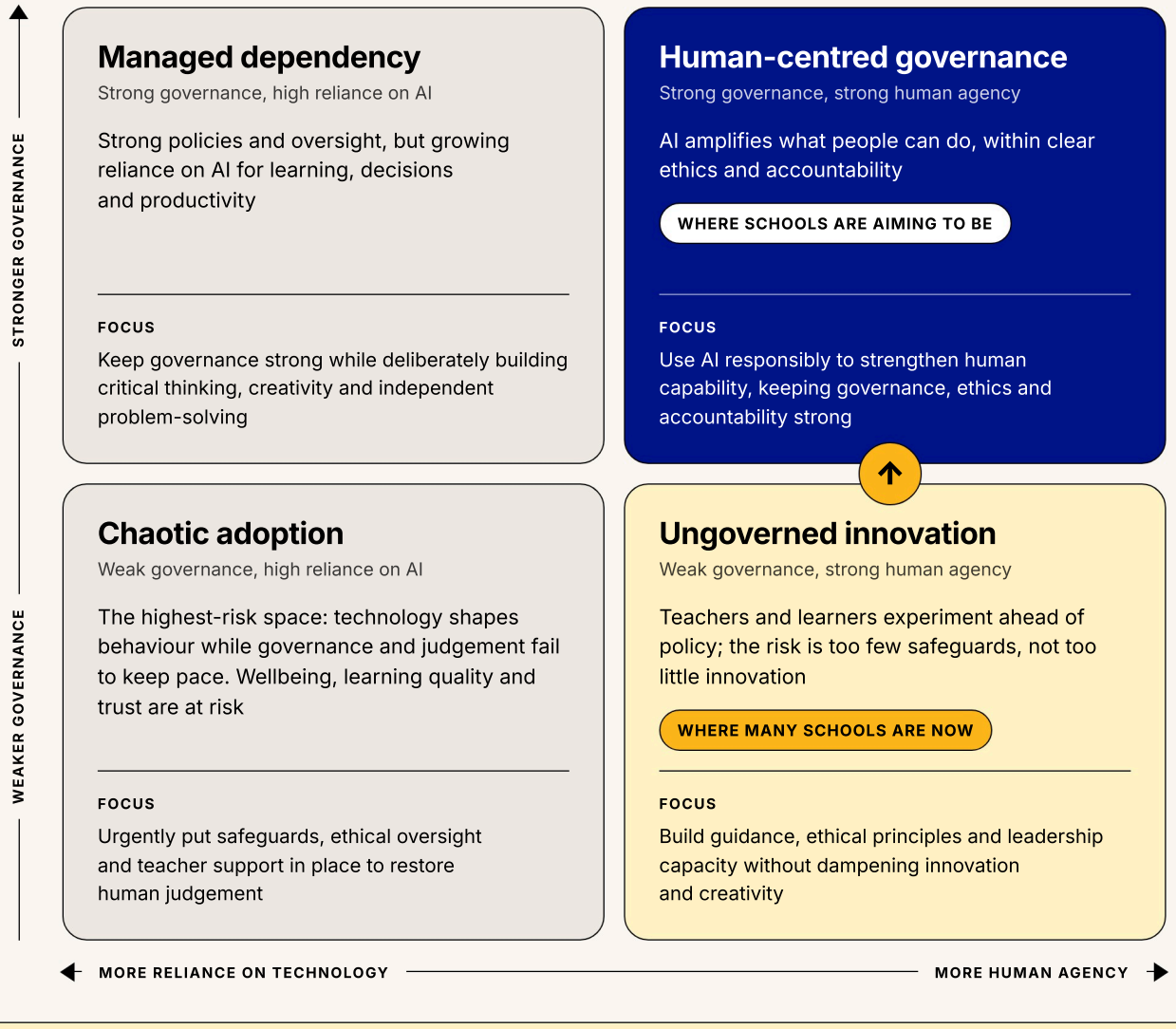
Clear guidance on licensed and free tools, along with **a school-approved set of tools that staff and parents know about**, can help schools meet those obligations without discouraging teachers from using AI.

Sources: FEDSAS unpublished survey January 2026; Protection of Personal Information Act 4 of 2013

A way of thinking about where *schools* are

The below model offers a simple way for schools to locate themselves. It sets **the strength of a school's governance** against **how far AI strengthens or replaces human thinking.** It is a way of thinking rather than a tested framework, but it may help school leaders and governing bodies talk about where they are and where they hope to go.

Many schools are innovating without safeguards; the aim is human-centred governance



The survey suggests many schools are innovating ahead of guidance. The aim is to build governance without dampening that energy, so schools **move up rather than sideways** into dependence on technology.

Source: van der Bergh, 2026 (unpublished).

WHAT THIS MEANS

Decisions for South African basic education

AI is already in South African schools, so the question is **how to guide its use well across a deeply unequal system.** Schools, provinces and the national department each have a part to play, and the decisions below are grouped by who is best placed to take them.

FOR SCHOOLS AND GOVERNING BODIES

01 Building on the policies schools already have.

Reviewing the code of conduct, POPIA policy and acceptable-use policy to show how each applies to AI may achieve more than starting a new policy from scratch.

02 Starting with a short, clear school position on AI.

A position note, approved by the SGB and developed with staff, learners and parents, could set out acceptable use, disclosure and safeguarding. Sharing it directly with learners is as important as sharing it with staff, and it can be revisited as the school learns.

03 Agreeing which tools the school uses.

An agreed set of AI tools that staff and parents know about, with simple guidance on what learner information is safe to share, can help schools meet their obligations under POPIA.

04 Trusting teachers to lead.

Giving staff time to learn and experiment before rules are set for learners, and trusting their judgement in their own classrooms.

05 Making AI a standing governance item.

An ICT committee of the SGB, or a standing item on the SGB agenda, could keep AI under regular review alongside other technology risks.

06 Bringing parents in as partners.

Much of learners' AI use happens at home, so parents can help shape and support the school's approach.

FOR PROVINCES AND DISTRICTS

07 Recognising different starting points.

Schools with strong connectivity and those with little or none will need different kinds of support, rather than a single route to adoption.

08 Building school leaders' and SGBs' capacity.

Training on AI and data safety for school leaders, SGB members and teachers could build the readiness and help schools develop their own guidance.

FOR THE DEPARTMENT OF BASIC EDUCATION

09 Developing a national AI governance framework for education.

Alongside it, clear safeguarding standards and privacy guidance would give schools a common foundation, leaving room to adapt to their own context.

10 Keeping guidance current.

Separating lasting legal and ethical principles from practical guidance on tools and use, revisited regularly, may help national guidance keep pace as AI changes.

LOOKING AHEAD

Areas for further *research*

South African evidence on how schools are governing AI is still limited. The areas below are where local research could most strengthen future decisions.

01 **A national picture of AI use and readiness.** The FEDSAS survey offers a first snapshot from mostly Eastern Cape schools. A survey across provinces, fee and no-fee schools and school phases would show how use and readiness differ across the system.

02 **How schools are adapting their policies.** Research into the schools that have updated their codes of conduct, assessment policies or data practices for AI would show what is working, and what support others need.

03 **Learner and parent perspectives.** How learners and families understand the rules around AI, and what they think would help, is largely unknown.

04 **Data practices in free tools.** What happens to learner information entered into widely used free AI tools, and what this means for schools' obligations under POPIA, requires closer study.

PHOTO CREDIT: UNICEF SOUTH AFRICA

Lefa AI

Honesty, privacy, safety and *dignity* were here long before AI.

They remain the foundation for how schools respond to AI in education.

NOTES

SCOPE

The paper also draws on the author's work with schools through FEDSAS, including workshops, summits and panel discussions.

This was a rapid review, not an exhaustive one. AI in education is moving quickly, and relevant research may have been published after this brief was finalised.

LIMITATIONS

The survey was a self-selected online survey of schools mostly in the Eastern Cape. It shows practice in these schools, not across South Africa.

Stakeholder interviews reflect the views of a small number of people and were anonymised. They add local perspective rather than representative findings.

The governance model described in this brief is offered as a way of thinking, not as a tested framework.

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For corrections or to request the underlying source list, contact the Lefa AI programme team at connect@humanstudios.org.

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