

The State of AI Governance in Queensland Independent Schools

Public governance signals from 156 independently governed Queensland schools · Term 3 2026

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AI reached Queensland schools before their governance did. Use is now ordinary, through the platforms schools already run, and through students' own devices, while a published position on it remains rare. None of it arrived as a decision anyone made: in late June, within a day of each other, Microsoft announced student AI tools for 365 Education that only a school's own administrators can switch on, and Google connected Classroom to Gemini for teachers, routing class assignments, grades and materials into the AI. No framework above the school will close the gap: the national framework offers principles, not rules. And from 10 December 2026, the gap carries its first legal dates: the Privacy Act's automated decision-making disclosure duty and the Children's Online Privacy Code. Two terms of runway.

8 of 156

independently governed Queensland schools publish a dedicated AI policy. **Roughly one in twenty.**

+38

carry a substantive AI position inside other published policies, **nearly all added within the last three school terms.**

GOVERNANCE MATURITY · BAND DISTRIBUTION

Advanced

9 · 5.8%

Established

53 · 34.0%

Developing

70 · 44.9%

Low

24 · 15.4%

The 156 independently governed Queensland schools by governance maturity band, Term 3 2026.

HOW TO READ THIS

Each school is scored from 0 to 100 on what it publishes: its board and committees, its policies, its strategy and who is accountable for it, and the technology it puts in students' hands. The bands group those scores.

Advanced publishes all three: a named board committee, a position on AI, and a privacy policy that covers automated decisions.

Established the governance structures are largely there. AI is the gap.

Developing real structures published, with real gaps.

Low little public governance structure.

A high score alone does not reach Advanced. **All three have to be published.**

The distribution says something specific. Governance structures are common: **40 per cent of the schools reviewed sit in the Established or Advanced bands**, 143 publish a privacy policy anyone can read, and at least one in five names a board-level risk or audit committee. Dedicated AI governance is rare: eight schools. But the sector is not standing still. **Thirty-eight more schools have added a substantive AI position to other policies, almost all within the past three terms.** The gap is no longer between governed and ungoverned schools. It is between the schools that have started on AI and the majority that have not: **110 of the 156, roughly seven in ten, publish no AI position of any kind**, with two terms until the December obligations.

The gaps, and what closes them

Three patterns recur across the 156 schools. No school is named; each pattern describes many.

01 The governed school, silent on AI

More than half of the schools that name a board-level risk, audit or governance committee publish no position on AI at all. **The structure to make the decision exists. The decision has not reached it.**

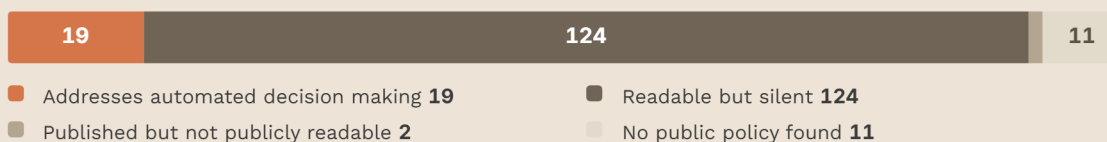
02 Started on AI, still exposed in December

Forty-six schools publish some position on AI. Twenty-nine of them, three in five, have a privacy policy that says nothing about automated decision making. Even among the eight schools with a dedicated AI policy, six are silent on it. Doing the AI work does not close the December gap. **The document that gets tested is the privacy policy.**

03 The privacy policy written before AI

COMMENCES 10 DECEMBER 2026

Of the 143 privacy policies that can be publicly read, 124 say nothing about automated decision making. From 10 December 2026, the Privacy Act requires privacy policies to disclose the kinds of decisions made by automated systems using personal information. In a school, that can be as ordinary as class placement, enrolment triage, or the software that flags AI use in assessment. Nineteen schools have already made that update; the dated policies run from April 2025 to May 2026. **The sector has started moving. Most of it has not.**



Privacy policies of the 156 schools against the 10 December 2026 automated decision-making disclosure duty.

ON READING THIS PICTURE

It measures public posture, not internal practice, and at many schools practice runs ahead of what is published. But the December disclosure duty tests what a privacy policy says, not what a school does. On that date, what a school has published is what gets tested.

What each band typically closes first

ADVANCED 9 schools

A live register of AI tools in use across teaching and operations, and a dated review of the privacy policy against the December disclosure duty. **At this maturity the work is keeping the picture current, not building it.**

ESTABLISHED 53 schools

A published position on the platform AI features now live in 365 Education and Classroom: enabled or not, for whom, on what conditions. Then the automated decision-making section in the privacy policy that December actually tests. **The structures are in place. The statements are not.**

DEVELOPING 70 schools

A stated risk appetite for AI, one page, owned by the board: what the school will and will not accept before individual tool decisions get made. **It turns every later AI question from an argument into a test.**

LOW 24 schools

An owner and a date against the two December obligations. One name, one date. **Everything else follows from that.**

METHOD

This report reads only what a school publishes: its website, policy index, privacy policy, annual report, and board papers where these are public. Signals were read as at July 2026 and confirmed against the source document. We reviewed 191 Queensland non-government schools and scored the 156 that govern themselves; operator-run, systemic and congregationally governed schools are assessed separately, because the governance that matters for them sits above the school.

Schools do not always publish an AI position where you would look for it: some announce it in school news rather than in a policy index, so a policy can exist and still not surface. The counts in this report are a floor, not a ceiling.