



THUMA MINA Teaching

PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended).**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
1.3	“IO”	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa
1.9	“TMT”	Thuma Mina Teaching NPC

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;

- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE THUMA MINA TEACHING NPC

3.1. Information Officer

Name:	Leopold van Velden
Registration reference:	2026-049888
Registration date:	29 June 2026
Email:	connect@tmteaching.co.za

3.2. Name: Juan Kidd
Title: Director of Operations and Strategic Growth/ Deputy Information Officer
Appointment date: 1 June 2026
Email: connect@tmteaching.co.za

3.3 Access to information general contacts

Email: *connect@tmteaching.co.za*

3.4 National or Head Office

Postal Address:

Thuma Mina Teaching NPC, Wellington, Western Cape, South Africa

Physical Address: 23, Van Der Merwe, Wellington, Western Cape, South Africa

Telephone: N/A

Email: connect@tmteaching.co.za

Website: www.tmteaching.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

- 4.3.1. the objects of PAIA and POPIA;
- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://info regulator.org.za/paia/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English

5. CATEGORIES OF RECORDS OF THE THUMA MINA TEACHING NPC WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Privacy Policy	Policy document	Yes	Yes
Terms and Conditions	Policy document	Yes	Yes
Safeguarding Policy	Policy document	Yes	Yes
PAIA Manual	This document	Yes	Yes
Educational content	CAPS-aligned video lessons	Yes	No

6. DESCRIPTION OF THE RECORDS OF THUMA MINA TEACHING NPC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
NPC registration documents	Companies Act 71 of 2008
NPO registration documents	Non-Profit Organisations Act 71 of 1997
PBO registration	Income Tax Act 58 of 1962
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy Policy	Protection of Personal Information Act 4 of 2013
Employment records	Basic Conditions of Employment Act 75 of 1997
Financial records	Companies Act 71 of 2008

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE THUMA MINA TEACHING NPC

Subjects on which the body holds records	Categories of records
Teachers and school staff	Name, email address, school name, province, registration declaration, platform login activity on LearnLab
Learners (minors aged 12–15)	- First name, surname, school name, grade — held only under parental consent or school Data-Sharing Agreement

Parents and guardians	Name, email address, cell phone number, child's first name, school, grade, parental consent declaration — provided either via direct LearnLab registration completed by the parent, or via a signed parental consent form collected by the teacher and provided to TMT before any learner account is created
Donors	Name, email address, donation amount, transaction reference, Section 18A certificate records
Newsletter subscribers	Email address, subscription date
Staff and personnel	Employment contracts, payroll records, safeguarding declarations, police clearance certificates
Schools and partners	Data-Sharing Agreements, Operator Agreements, contact details
Financial records	Donor records, grant agreements, annual financial statements, bank records
Programme records	Teacher training attendance, monitoring and evaluation data, funder reports

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Thuma Mina Teaching NPC processes personal information to deliver CAPS-aligned educational content and teacher training to under-resourced South African schools; to manage access to the LearnLab learning platform (learn.tmteaching.co.za); to communicate with teachers and supporters via newsletter; to process donations; and to comply with legal and regulatory obligations under POPIA, PAIA, and applicable South African law.

Where schools enrol learners on LearnLab, the process requires two instruments. First, the teacher and school sign a written Data-Sharing Agreement with TMT. Second, TMT requires confirmed parental consent for each individual learner before any account is created. This is satisfied through one of two methods: the teacher directs each parent to register directly on LearnLab, where the parent completes a parental consent declaration themselves and TMT holds the consent record directly; or where direct parent registration is not practicable, the teacher obtains a signed parental consent form from each parent specifically authorising TMT to process their child's data on LearnLab, and provides these signed forms to TMT before any learner account is created. No learner account is created until TMT holds confirmed evidence of parental consent through one of these two methods.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Teachers and school staff	Name, email address, school name, province, account type declaration, platform usage data
Parents and guardians	Name, email address, cell phone number, child's first name, school, grade, parental consent declaration
Donors	Name, email address, donation amount, transaction reference
Learners (minors aged 12–15)	First name, surname, school name, grade
Newsletter subscribers	Email address
Staff and personnel	Name, contact details, employment records, qualifications, police clearance certificate, safeguarding declaration
School and partner contacts	Name, contact details, Data-Sharing Agreement records

8.3 The recipients or categories of recipients to whom the personal information may be supplied

<i>Category of personal information</i>	<i>Recipients or Categories of Recipients</i>
<i>Teacher and learner platform data</i>	<i>AWS (Amazon Web Services), af-south-1, Cape Town — LearnLab hosting provider</i>
<i>Newsletter subscriber data</i>	<i>Brevo — email marketing platform</i>
<i>Website usage data</i>	<i>Google Analytics (GA4) — website analytics; analytics cookies placed only after active visitor consent</i>
<i>Donor payment data</i>	<i>PayFast — payment processor</i>
<i>Teacher login data</i>	<i>Google and Meta — OAuth login providers for LearnLab</i>
<i>Website performance data</i>	<i>WP Rocket — WordPress caching plugin</i>
<i>Website hosting data</i>	<i>Afrihost and WordPress — website hosting and platform</i>
<i>Regulatory compliance data</i>	<i>Information Regulator — on request or in the event of a security compromise</i>

8.4 Planned transborder flows of personal information

Thuma Mina Teaching NPC's primary data storage is located in South Africa. All LearnLab platform data is stored on AWS servers in Cape Town, South Africa (af-south-1 region). Certain third-party processors used by TMT operate servers outside South Africa. TMT relies on section 72(1)(b) of POPIA for these transfers, as the relevant processors are subject to data protection laws providing a level of protection substantially equivalent to POPIA. These transfers are: Brevo (newsletter data, EU servers); Meta (Facebook OAuth login on LearnLab, US and EU servers, governed by Meta's Global Data Transfer Addendum); Google (Google OAuth login on LearnLab); Google Analytics (website usage data, collected only after active visitor consent); and WhatsApp (adult stakeholder communication, Meta infrastructure). Full details are disclosed in TMT's Privacy Policy at www.tmteaching.co.za.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Thuma Mina Teaching NPC implements the following security measures to ensure the confidentiality, integrity, and availability of personal information:

LearnLab is hosted on AWS af-south-1 (Cape Town) with SSL encryption.

Access to learner data is restricted to authorised TMT administrators only.

LearnLab accounts become active immediately upon registration. When a new account is created, TMT receives an email notification and a staff member reviews the registration within one week to confirm it is valid. Where the review identifies a concern—for example, where the account appears to have been created using inaccurate information or by a learner without appropriate parental involvement—TMT may suspend the account, contact the account holder for clarification, and, if the registration remains unverified 30 days after the concern is identified, delete the registration data.

Password protection is applied to all systems holding personal information.

Written Data-Sharing Agreements are in place with schools governing secure data handling.

Staff who work directly with children are required to sign a safeguarding declaration and provide a police clearance certificate.

The Safeguarding Policy and Privacy Policy are reviewed annually.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 Head office of Thuma Mina Teaching NPC, Wellington, Western Cape, South Africa, for public inspection during normal business hours.

9.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.3 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

Leopold van Velden, Information Officer of Thuma Mina Teaching NPC, will on a regular basis update this manual.

Issued by

Leopold van Velden

Information Officer

Thuma Mina Teaching NPC