

Thuma Mina Teaching's Child & Youth Safeguarding Policy

1. Policy Purpose

This policy aims to protect people, particularly children, at-risk adults, and beneficiaries of assistance, from any harm that may be caused by their coming into contact with Thuma Mina Teaching.

This includes harm arising from:

- The conduct of staff or personnel associated with Thuma Mina Teaching
- The design and implementation of Thuma Mina Teaching's programmes and activities

The policy lays out the commitments made by Thuma Mina Teaching and informs staff and associated personnel of their responsibilities in relation to safeguarding.

2. What is safeguarding?

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Safeguarding puts beneficiaries and affected persons at the centre of all we do.

3. Scope

This policy applies to all Thuma Mina Teaching staff members, freelance contractors, and volunteers who engage directly with children and youth through the organisation's programmes and activities. This includes, but is not limited to, facilitating training sessions or representing the organisation in school-based or learner-facing contexts.

All representatives are required to adhere to the principles and requirements outlined in this safeguarding policy and to act in accordance with applicable South African child protection legislation. Organisations or individuals contracted by Thuma Mina Teaching to support the delivery of learner-facing work must uphold the standards set out in this policy. Where appropriate, such partners are expected to maintain their own safeguarding policies that meet or exceed the principles outlined herein and to ensure alignment with relevant legal obligations.

4. Policy Principles

Thuma Mina Teaching is committed to protecting the safety, dignity, and rights of all children and youth. In accordance with Section 28 of the Constitution of the Republic of South Africa and the provisions of the Children's Act 38 of 2005, we believe that every child has the right to be protected from all forms of abuse, neglect, exploitation, and violence.

We recognise that abuse and exploitation of children and youth occur across all communities and can take many forms, including physical, sexual, and emotional abuse and neglect. As an organisation working in the education sector, Thuma Mina Teaching takes its responsibility to contribute to the protection and well-being of children seriously. We are committed to creating safe environments, embedding child protection principles into our training materials, and promoting awareness among those who engage with learners through our programmes.

We are committed to listening to and including the voices of children and youth in programme design, evaluation, and in shaping our safeguarding policies. Participation is central to their protection and well-being, and their views will be sought, respected, and integrated where possible in any action or policy that affects them.

Any form of abuse or exploitation by individuals representing Thuma Mina Teaching will not be tolerated. All staff and associated personnel who work directly with children and youth are expected to uphold these principles and act under South African child protection laws.

This policy aligns with the following legislation:

- United Nations Convention on the Rights of the Child (UNCRC) (ratified by South Africa in 1995)
- Constitution of South Africa (1996) – Bill of Rights (Section 28)
- Children's Act 38 of 2005 & Amendment Act 41 of 2007
- Criminal Law (Sexual Offences & Related Matters) Amendment Act 32 of 2007
- Prevention & Combating of Trafficking in Persons Act 7 of 2013
- Protection of Personal Information Act (POPIA)

5. Definitions Used in This Policy

The following definitions apply throughout this policy and should guide all safeguarding practices within Thuma Mina Teaching:

Abuse: Abuse includes physical abuse, sexual abuse, emotional abuse, exploitation, and neglect. These forms of harm may be perpetrated by adults or other children and may occur in person or online.

Physical Abuse: The non-accidental infliction of physical harm on a child. This may include hitting, shaking, burning, poisoning, biting, kicking, choking, holding a child underwater, or using any form of physical restraint in a harmful manner.

Sexual Abuse: Any act in which a child is used for sexual purposes by another person. This includes acts such as fondling, penetration, exposure to sexual material, and sexual exploitation (e.g. child prostitution or pornography). It also includes grooming and engaging in sexually explicit language or behaviour, regardless of whether the child appears to consent.

Emotional Abuse: A pattern of behaviour that harms a child's emotional development or sense of self-worth. This may include constant criticism, threats, rejection, social isolation, intimidation, or withholding love and support.

Harm: Psychological, physical and any other infringement of an individual's rights

Exploitation: The use of a child for someone else's advantage, gratification, or profit, often resulting in unjust or cruel treatment. Exploitation may be sexual, economic, or involve manipulation of power imbalances, including online.

Neglect (Failure to Provide): The failure by a parent, caregiver, or responsible adult to meet a child's basic physical, emotional, medical, or educational needs, despite having the means and knowledge to do so. This includes failure to protect the child from harm or danger.

Best Interests of the Child: All actions and decisions concerning children must prioritise their safety, well-being, development, and rights. This includes giving due consideration to children's voices and opinions in matters affecting them, as required by Section 28(2) of the Constitution of the Republic of South Africa, 1996.

Child: Any person under the age of 18 years, in accordance with the Children's Act 38 of 2005 (South Africa).

Youth: Any person between the ages of 18 and 35 years. While not legally classified as children, youth may still be vulnerable to abuse, exploitation, and harmful practices.

Safeguarding: The proactive measures taken to protect children and youth from abuse, exploitation, and neglect, and to promote their well-being in all environments where Thuma Mina Teaching is active.

Thuma Mina Teaching Personnel: Includes all directors, employees, interns, volunteers, consultants, contractors, and anyone acting on behalf of or in partnership with the organisation, whether working in a paid or unpaid capacity.

Representative: Any individual or organisation acting on behalf of Thuma Mina Teaching in any capacity where they may interact with learners, teachers, or beneficiaries.

6. Prevention

Thuma Mina Teaching's responsibilities

Thuma Mina Teaching will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Thuma Mina Teaching. This includes how information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
- Require all permanent personnel who work directly with Children or Youth to provide a valid police clearance certificate and be screened against the National Child Protection Register.
- Ensure that all individuals working directly with Children sign the organisation's Child Protection Declaration, included as an addendum to this policy.

Staff and personnel responsibilities

The staff and personnel will:

- Adhere to ethical standards in developing and distributing learning materials.
- Ensure all teacher training includes child protection awareness.

- Avoid any form of inappropriate engagement with children during training sessions, events or when communicating with children online.
- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by a Thuma Mina Teaching staff member or associated personnel to the appropriate staff member
- All personnel must ensure gender equality and non-discrimination in safeguarding practices, ensuring protection measures apply equally to all Children and Youth, regardless of race, colour, sex, language, sexuality, disability, religion, opinion, origin, birth, or status.

The staff and personnel will not:

- Abuse or exploit a Child or Youth, or behave in any way that places a Child or Youth at risk of harm.
- Exchange money, gifts, employment, goods or services for sex with a Child or Youth, including sexual favours or other forms of humiliating, degrading or exploitative behaviour or any other behaviour that could be deemed exploitative of a Child or Youth.
- Do things for Children or Youth of a personal nature that they can do for themselves
- Offend, insult, humiliate or degrade a Child or Youth or perpetrate any form of Emotional Abuse.
- Discriminate or provide favourable treatment to one Child or Youth.
- Restrain a child or youth unless absolutely necessary to prevent immediate harm to themselves or others, and only use the least restrictive intervention necessary.
- Discipline a Child or Youth using any form of physical contact, or emotional or psychological pressure, Abuse or intimidation.

7. Enabling Reports

Thuma Mina Teaching will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff.

[How to report a safeguarding concern](#)

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their line manager. If the staff member does not feel comfortable reporting to their line manager (for example, if they feel that the report will not be taken seriously, or if that person is implicated in the concern), they may report to any other appropriate senior staff member.

8. Sanction and Discipline of Organisational Personnel

The Organisation will include within their policies to protect Children and Youth a statement indicating that where an allegation is made that Organisational Personnel has committed Abuse of a Child or Youth, the accused personnel may be suspended from duties as a precautionary measure during the investigation, in accordance with South African labour law and organisational procedures. Where Organisational personnel are convicted of Abuse of a Child and/or Youth, the said personnel will be immediately terminated with cause from his or her position. Where Organisational Personnel is terminated as an employee or volunteer, such personnel will not be permitted to participate in activities of the Organisation following termination.

9. Confidentiality

Confidentiality must be maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.

10. Data Protection (POPIA Compliance)

All personal data relating to programme participants must be collected, stored, and processed securely and in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA). No unauthorised sharing of personal information is permitted, and personal information may only be disclosed to third parties in line with TMT's Privacy Policy, Data-Sharing Agreements, or legal obligations.

LearnLab access model and consent

TMT operates a two-path registration model on LearnLab (learn.tmteaching.co.za) as its primary safeguarding and POPIA compliance mechanism:

- Teachers self-register and complete a teacher declaration confirming their role and consenting to TMT processing their personal information.
- Parents or legal guardians register on behalf of their child and complete a parental consent declaration as a competent person under section 35(1)(a) of POPIA. Learners never self-register under any circumstances.
- Where a school enrolls learners on LearnLab, the process requires two documents. 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 the 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. The school's general enrolment consent is not treated as sufficient.

- 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.
- For learners aged 12 and older, the learner must give their own assent at first login before accessing any content. If a learner withholds or withdraws assent, TMT will not process that learner's personal information regardless of parental consent.

Photography, video, and voice recordings

Participants or their parents or guardians must provide written consent before any photographs, video recordings, or voice recordings are captured or used in any TMT material. For learners aged 12 and older, the learner's own assent must also be obtained separately from parental consent, consistent with the Children's Act 38 of 2005 and the best interests of the child standard.

TMT's video content on YouTube features teachers delivering curriculum content only. Learner faces do not appear in TMT's published video content. Any future use of children's images or stories in marketing or programme materials requires a separate, specific consent form naming each platform on which the content will be published.

Monitoring, evaluation, and learning

Consent must be obtained for participation in any monitoring, evaluation, and learning activities, including surveys, interviews, or focus groups. Where participants are minors, parental or guardian consent is required and learner assent must be obtained for learners aged 12 and older.

Information Officer

In compliance with POPIA and the Promotion of Access to Information Act (PAIA), TMT has designated Leopold van Velden, CEO, as its Information Officer. Leopold van Velden has been registered with the Information Regulator as required by section 55(2) of POPIA, with registration reference 2026-049888, effective 29 June 2026. Juan Kidd, Director of Operations and Strategic Growth, has been appointed as Deputy Information Officer, effective 1 June 2026.

The Information Officer is responsible for:

- Encouraging compliance with the conditions for the lawful processing of personal information.
- Dealing with requests made to the organisation pursuant to POPIA and PAIA.
- Working with the Information Regulator in relation to investigations conducted in accordance with POPIA.
- Ensuring that a compliance framework is developed, implemented, monitored, and maintained.

Data breach response

In the event of a security compromise involving personal information – particularly where learner data is affected – TMT will immediately contain and secure the affected systems, assess the scope and risk of harm, and notify the Information Regulator as soon as reasonably possible via the Regulator's eServices Portal at eservices.inforegulator.org.za in compliance with section 22 of POPIA. Where a breach creates a risk of harm to a child, parents and the relevant school will be notified as soon as reasonably possible. Any breach involving a child must also be assessed for safeguarding implications and reported through TMT's safeguarding reporting procedures in addition to the POPIA notification process.

11. Online Safety & Cyberbullying

Online Conduct and Cyberbullying Prevention

Thuma Mina Teaching is committed to ensuring safe digital engagement. All personnel must follow appropriate cyber-conduct standards, including respectful, professional interactions in virtual spaces, including our YouTube Channel and other social media platforms. Cyberbullying, including harassment, humiliation, or intimidation of children and youth in any online environment, will not be tolerated.

This includes sharing or encouraging offensive memes, texts, images, or videos about a learner. All online communication with children must:

- Be transparent and preferably conducted in group settings.
- Avoid private messaging unless necessary and approved by a supervisor.
- Be respectful, constructive, and related strictly to the programme.
- To support this, all of TMT's official social media platforms are managed by more than one administrator, ensuring an added layer of accountability and oversight in all digital interactions.

Digital Platform Safeguarding – LearnLab

The following rules apply to all TMT staff and personnel in relation to LearnLab (learn.tmteaching.co.za):

- Learners may not self-register on LearnLab under any circumstances. This is both a POPIA compliance requirement and a safeguarding control. Any attempt by a learner to self-register must be rejected and reported to the Information Officer.



- Learner accounts on LearnLab are created only by TMT administrators via bulk upload under a school Data-Sharing Agreement, or by a parent registering on behalf of their child. No staff member may create a learner account outside these two pathways.
- TMT staff must not communicate directly with learners via WhatsApp, personal email, SMS, or any private channel outside the LearnLab platform and school-mediated communication. All learner communication must go through the school as the responsible institution.
- Access to learner data on LearnLab is restricted to authorised TMT administrators only. No staff member may access, export, or share learner data without authorisation from the Information Officer.
- Any safeguarding concern identified through the LearnLab platform – including inappropriate content, suspicious account activity, or potential contact between an adult and a learner outside school-sanctioned channels – must be reported immediately through TMT’s safeguarding reporting procedures.

YouTube Content and Comments

TMT’s published YouTube content features teachers delivering curriculum content only. No learner faces appear in any published TMT video content.

To protect the child audience that engages with TMT’s YouTube channel, TMT commits to the following:

- Comments on child-focused videos will be disabled or actively moderated by TMT staff.
- Any comment containing harmful, identifying, or unlawful content relating to a learner will be removed promptly.
- Any serious concern identified through YouTube comments – including potential contact between an adult and a learner – will be escalated through TMT’s safeguarding reporting procedures and, where appropriate, reported to the relevant authorities in accordance with the ECT Act notice-and-takedown regime.
- TMT’s YouTube channel is managed by more than one administrator to ensure accountability and oversight.

12. Record-Keeping

Thuma Mina Teaching will maintain secure, confidential written records of all safeguarding concerns and incidents. These records will include:

- Date and nature of the concern/incident
- Names of affected individuals
- Actions taken, including referrals and follow-ups
- Who was informed



Records will be retained securely for 7 years or as per applicable South African law. Reports involving abuse must be shared with relevant legal authorities and will also be disclosed to funding partners in line with reporting obligations.

Records containing personal information of children must be securely deleted or de-identified at the end of the 7-year retention period in accordance with section 14 of POPIA. Deletion must be carried out in a manner that prevents reconstruction of the personal information, consistent with section 14(5) of POPIA. The Information Officer is responsible for overseeing the deletion process and maintaining a deletion log.

13. Policy Review

This policy will be reviewed annually to ensure continued alignment with evolving safeguarding standards, child and youth protection laws, and best practices.



Child & Youth Safeguarding Declaration

This declaration must be signed by all TMT employees, as well as by any contractors, trainers, and volunteers who work directly with children as a condition of their engagement with TMT.

Thuma Mina Teaching – Safeguarding Code of Conduct Declaration

I, _____, acknowledge that I have read, understood, and agree to uphold Thuma Mina Teaching's Child & Youth Safeguarding Policy.

I commit to:

- Promoting the rights, dignity, and safety of all children and youth I engage with.
- Maintaining appropriate professional boundaries at all times.
- Never engaging in any form of abuse, neglect, exploitation, or discrimination.
- Reporting any concern or suspicion of abuse immediately, following TMT's reporting procedures.
- Participating in safeguarding training as required.
- Complying with all screening, vetting, and legal requirements, including police clearance if applicable.

I understand that any breach of this Code may result in disciplinary action, including termination of engagement and legal consequences.

Employee Name: _____

Employee Signature: _____

Date: _____