

Mulbarton Primary School PTA

Charity number 1036899

Code of Conduct

Introduction

This Code of Conduct binds both Committee and Non-Committee members of Mulbarton Primary School PTA (the "**PTA**").

These guidelines describe the basic expectations for behaviour and the importance for all members to conduct themselves professionally and ethically, and will run alongside our constitution, which is a legally binding document.

In order for the PTA to function successfully it is essential that all members agree to follow these guidelines while in acting in association with the PTA.

The Code

- Any parent or guardian of a pupil attending Mulbarton Primary School (the "**School**") and all members of school staff are deemed to be members of the PTA, with the vested interest in enhancing the school for all pupils.
 - > All work done on behalf of the PTA is voluntary and is done for no personal gain.
 - > All members will act in the best interest of the PTA and the school.
 - All members will be encouraged to make relevant and positive contributions to meetings they attend.
 - > All members have the right to be heard and must respect each other's opinions.
- All members have the right to communicate together responsibly via the PTA email, PTA Facebook Group and Facebook Messenger. Any matters relating to the school, should be directed to the school office.
- Any items emailed through to the PTA email address may not be answered immediately. All Committee Members work on behalf of the PTA on a voluntary basis, in their free time and may not be able to address issues straight away. Any query raised will need to be discussed by the Committee and if necessary will be added to their next meeting agenda.
 - The Committee will work to the rules stated in their constitution. As per the constitution, decisions will be made by a majority vote of the elected Committee Members. The Committee may from time to time consult with the wider membership, however the Committee's decision is final.
- All members must ensure that any material or discussion of a confidential nature, especially matters concerning individual staff, pupils or parents/guardians, is confined to the meeting, attended only by elected Committee members. Names will be blacked out of the meeting minutes, if necessary.
 - The Committee should be made aware of any conflict of interest and the person involved should withdraw from any discussion pertaining to that subject.
 - > All members must respect the School and personal property.
- All paperwork and assets relating to the PTA are the property of the PTA, and not that of the individual. When leaving the PTA a member should return any relevant paperwork or assets to the PTA Committee.
- Should it be deemed by the Committee that any member has disregarded this code or their actions have brought the PTA or the school into disrepute, the Committee has the right to exclude that member from future involvement. The procedure for removal of a PTA member or PTA Committee member is stated in the constitution.

This policy will be reviewed annually by the PTA Committee prior to the AGM.

Conflict of Interest Policy

Introduction

This policy sets out the principles for Conflict of Interest within Mulbarton Primary School PTA (the "**PTA**"). It is relevant to all within the PTA and is endorsed by the Committee Members and Trustees of the PTA. It will be reviewed annually to ensure that it remains appropriate to the PTA and its volunteers needs.

As Committee Members and Trustees of the PTA we understand it is our duty to make decisions that are in the best interests of the PTA. We know that where any of us hold a personal or other interest, this will stop us from achieving this duty and acting in the best interest of our PTA.

Applicability

This applies to every elected members of the PTA Committee.

Our PTA takes the following steps to identify and deal with any conflicts of interest:

- We make all new Committee Members aware of this policy
- We ask all Committee Members to declare any conflict of interest
 - 1) When they are appointed
 - 2) At the beginning of each meeting
 - 3) Whenever a Committee Member becomes aware of a possible conflict of interest
- Any Committee Member with an identified conflict of interest is asked to withdraw from any discussion of and/or vote on that issue.
- The PTA will work to make sure there is a good mix of parents and staff across the school involved within the PTA. This will stop any one part of the school being overly-represented.
- Where decisions made may favour one year group, subject area or particular aspect of the school over others we will ensure we have consulted with our members and over time will ensure that all aspects of the school will benefit equally.
- Where members have a child in one year group, members will not favour one year group and will take care to ensure that all aspects of the school will benefit equally.
- Where the PTA Committee contracts a member for supply of services, this will be detailed in the minutes of the meeting how this has been addressed and the member contracted cannot vote on appointing themselves to do work on behalf of the PTA.
- Where conflicts of interest arise we will detail in the minutes of the meeting how this has been addressed.

This policy will be reviewed annually by the PTA Committee prior to the AGM.

Financial Control and Expense Policy

Introduction

This policy sets out the principles for Financial Control and Expenses within Mulbarton Primary School PTA ("**PTA**"). It is relevant to all within the association and is endorsed by the Committee of the PTA. It will be reviewed annually to ensure that it remains appropriate to the PTA and its volunteers needs.

Applicability

This policy is applicable to all Trustees and Committee Members who are legally responsible for the running of the PTA and for all Members of the PTA who are entitled to be reimbursed for out-of-pocket expenses which they legitimately incur whilst supporting the delivery of the charity's objects.

Financial records

- The Treasurer will maintain a detailed receipts and payments summary in Microsoft Excel and report to the Committee on the financial position of the association as a regular standing item, each quarter at a minimum.
- The Treasurer will prepare the Annual Return, Accounts and Trustees' Annual Report ("TAR") for the financial year ended 31 August each year.
- The Accounts will be reviewed by an independent qualified accountant. The Annual Return, Accounts and TAR will be reviewed and approved by the Committee before submission to the Charity Commission within ten months from the end of the financial year (i.e. 30 June the following year).
- All financial records (including expense claims and receipts) will be retained in a file or on the PTA Google Drive for six years.

Financial controls – banking

- The bank mandate will require two signatories from a pool of three to four signatories.
- The Treasurer will operate the bank account and retain passwords for online banking, however more than one Committee Member must have visibility of the online bank account at all times.
- Any online banking details issued are to be stored safely and only known to the person they have been issued to.
- If online banking details have been issued to an individual it is for their use only and not to be shared.
- If online banking details have been issued for the association rather than individuals then these should only be known to the current bank signatories that have authority to act on behalf of the association.
- If a person with banking access leaves the Committee they should be removed as a bank signatory and the bank notified to remove their online access.
- Any changes to signatories and online bank access requires approval by the full Committee at a Committee meeting.
- All payments made through the online bank account should be authorised in line with the approval limits below.
- Bank cards should only be issued and used by the authorised bank signatories named on the card (the Treasurer).
- Any bank card issued is the property of the PTA and should be returned to the Committee if the card holder is no longer an elected Committee Member.
- Any purchases made using the PTA bank card should be authorised in line with the approval limits below.

• Paper bank statements will be sent to the Treasurer. The Treasurer will reconcile the bank statement to the receipts and payments summary once a month.

Financial controls – petty cash

- The Treasurer is permitted to hold petty cash of no more than £200 for use to reimburse expense claims. Petty cash retained at home should be secured in a locked box.
- Petty cash can only be used for payments of less than £200.
- The Treasurer will prepare floats for events using the petty cash and bank withdrawals. A record will be kept of the cash in each float.

Financial controls – expenses

- All members of the PTA may be reimbursed for reasonable expenses incurred whilst carrying out their duties (i.e. purchases made in relation to events organised).
 - Telephone calls no reimbursement will be made for telephone calls that have incurred no actual cost as they were covered by a contract which included an allocation of 'free' calls.
 - Travel expenses public transport should be used where possible, and if travel is by private vehicle then a mileage allowance will be paid as agreed by the PTA Committee in line with guidance provided by HMRC, providing the vehicle used has a valid certificate of Insurance, a valid MOT certificate and road tax (if required). Mileage will be calculated from the normal place of charity work (school address).
 - Parking costs incurred when on charity business away from the normal place of charity work will be reimbursed.
- Expense payments will only be paid upon receipt of a completed expense claim with supporting receipts for all expenses.
- All claims for reimbursement must be made within 30 days of the date of expense.
- Any member who has not received pre-approval for a purchase is not guaranteed reimbursement.

Financial controls – donations and payments

- The PTA shall purchase items to donate to the school in line with the PTA's purpose, rather than providing cash funds wherever possible.
 - > All donations should be approved in line with the limits below.
 - If the PTA does agree to a cash donation, the School must provide a receipt or invoice detailing the items being bought to include in the PTA Accounts.
 - If you a cash donation is provide for the full amount of an item, any VAT due will be included on that item (the PTA is required to pay the full amount for an item inclusive of VAT).
- The following approval limits will be adhered too for all payments:

Threshold	Pre-approval	Payment approval	
Under £50	One Committee member	Treasurer permitted to pay using petty cash.	
		Bank mandate rules apply – two bank account mandate signatories to sign, receipts and invoices retained for review	
£50 - £500 Two Committee members (evidenced via email or other form of communication)		Bank mandate rules apply – two bank account mandate signatories to sign, receipts and invoices retained for review	

Over £500	Full Committee via Committee meeting	Bank mandate rules apply – two bank account mandate signatories to sign, receipts and invoices retained for review.
		All items above £500 reviewed and evidenced on statements. All recorded at regular meetings for visibility.

Financial controls - receipts

- The PTA receive money through cash at events, online payments from SumUp and other online fundraising activities.
- All cash received at events will be counted on site in sight of the Treasurer and another Committee Member / School staff member on the same day of the event, or as soon as possible. Cash should be retained on the School site in the safe until it is fully counted and recorded.
- All cash will be banked as soon as possible.
- SumUp machines will be securely stored by a Committee Member.
- The Treasurer and one other Committee Member will have access to SumUp and reconcile takings once a month.

This policy will be reviewed annually by the PTA Committee prior to the AGM.

Safeguarding Policy

Introduction

This policy sets out the principles for Safeguarding within Mulbarton Primary School PTA ("**PTA**"). It is relevant to all within the association and is endorsed by the Committee of the PTA. It will be reviewed annually to ensure that it remains appropriate to the PTA and its volunteers needs.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that PTA members and volunteers play a role in this. All PTA members and volunteers are expected to maintain an attitude of *'it could happen here'* where safeguarding is concerned. When concerned about the welfare of a child, PTA members and volunteers must always act in the best interests of the child.

The PTA's safeguarding policy is in line with the Mulbarton Primary School's ("**the School**") own policy. The PTA will always work to:

- Protect children and young people at the School from maltreatment;
- Prevent impairment of children's and young people's mental and physical health or development;
- Ensure that children and young people at the School grow up in circumstances consistent with the provision of safe and effective care; and
- Undertake that role so as to enable children and young people at the School to have the best outcomes.

This policy will give clear direction to all PTA members including volunteers about expected behaviour and our responsibility to safeguard and promote the welfare of all children at the School.

Procedures

The PTA will always aim to support the School's approach to establish and maintain an ethos where pupils feel secure, are encouraged to talk, and are listened to and are safe. Should any cause for concern arise, the PTA will inform the School's Designated Safeguarding Lead ("DSL").

- All Committee members will be DBS checked.
- All PTA run events will be risk assessed and guidance provided to Committee members and volunteers as it appropriate to each event.
 - At all events where children are present, parents/guardians are required to supervise their own children, or nominate another parent/guardian to do so, e.g. PTA members or volunteers will not supervise toilet visits and the PTA cannot be responsible for the whereabouts of children at events. The exceptions to this are PTA-sponsored events held during school hours, where children may be unaccompanied. In this case, as the School's teaching staff will be present the School's safeguarding policy will be followed.
 - If any unsupervised regulated activities are planned, all PTA members and volunteers involved will be required to have a DBS check.

This policy will be reviewed annually by the PTA Committee prior to the AGM.

General Data Protection Regulation ("GDPR") Policy

Introduction

The General Data Protection Regulation ("**GDPR**") became law in the UK on 25 May 2018 and has an effect on all organisations that use personal information.

PTAs are small independent charities that make their own decisions about what personal information to collect, how to store it, who can access it and how to use it. That means they count as a "**Data Controller**" — an organisation responsible for processing data — so have to obey the GDPR.

This policy sets out the principles on how the Mulbarton Primary School PTA ("**PTA**") will comply with GDPR regulations. It is relevant to all within the association and is endorsed by the Committee of the PTA. It will be reviewed annually to ensure that it remains appropriate to the PTA and its volunteers needs.

Overview of GDPR Regulations

- The Data Protection Act 2018 (DPA 2018): the General Data Protection Regulation ("GDPR") was adopted on 25 May 2018, because the UK is in the EU. The Data Protection Act 2018 will maintain the requirements of the GDPR now we have left the EU.
- The **Privacy and Electronic Communications Regulations (PECR)** sets out what organisations can do when communicating electronically. These communications cover marketing calls, emails, texts and faxes, as well as "cookies". The EU is in the process of replacing the e-privacy Directive with a new e-privacy Regulation to sit alongside the GDPR. However, the new Regulation is not yet agreed and for now, PECR continues to apply alongside the GDPR.

The GDPR covers the processing of **Personal Data**, or personal information, by any organisation (including PTAs) wherever that takes place. Personal data means anything that can identify an individual, including Names, Email addresses, Home addresses, Phone numbers, Photographs/Images/Video, Medical history, Dietary requirements, Age and more.

If a piece of information tells you anything at all about a living person, no matter how small or trivial, assume that it's covered. It doesn't matter what format the data is in — digital or hard copy — it is still likely to be covered by GDPR regulation.

Processing can mean doing something with the data, such as using it to send an email or the storage of data is. However, it is only when what you do involves the processing of personal information that is it covered by this regulation. If, for example, we produce a general newsletter, and ask the school to put a copy in every book bag, because they are not addressed to anyone, and we have used no personal data such as email or name and address to send them, then this is not covered. On the other hand, if the newsletter goes by email, all the email addresses we send it to are personal information of the recipient, therefore it is covered.

In the GDPR there are six reasons, or "Lawful Bases", why you are allowed to collect, keep and use personal information:

- 1. **Consent:** to rely on consent as a reason, the person whose data you have, or their parent/guardian if they are a child, must have (a) had it made completely clear to them what they were consenting to have their data used for, and then you must stick to those reasons; and (b) clearly told you that they agree to you using their personal information by doing something active to tell you, such as ticking a box, putting their name down, or replying positively to an email.
- 2. Contracts: if you need someone's personal information to perform a contract with that person
- 3. Legal obligation
- 4. **Vital interests:** this basically means that you need to hold and use personal information to protect someone from serious injury or death

- 5. Public task: n/a
- 6. Legitimate interests: n/a

The GDPR states that children under a certain age cannot give consent themselves to use online services, e.g. Facebook, Mathletics or Minecraft, and a person with parental responsibility needs to give consent.

Applicability

This policy is applicable to all Trustees and Committee Members who are legally responsible for the running of the PTA and for all Members of the PTA who are may have access to any Personal Data.

A data retention schedule is provided in Appendix A.

This policy will be reviewed annually by the PTA Committee prior to the AGM.

Appendix A. Data Retention Schedule

Ref	Type of information	Lawful basis for processing	Retention / storage	Destruction
1	Committee member / regular volunteer details Names, email addresses and phone numbers of committee members / regular volunteers	Consent given by individual for purposes of communication of PTA matters within the PTA group	Retained on the PTA's secure Google Drive or within the PTA Microsoft Outlook account Email addresses only seen by other committee members If wider emails sent email addresses moved to bcc	Destroyed after six years
2	Volunteer details Names, email addresses and phone numbers of volunteers for individual events	Consent given by individual for purposes of actively managing the event and communicating with other volunteers (even if the email comes via the School Office)	Retained on the PTA's secure Google Drive	Destroyed at the end of the event (unless consent obtained to retain as a regular volunteer)
3	Online raffle Names, email addresses and phone numbers of purchasers of raffle prize	Consent given via online raffle platform	Report downloaded for finance purposes but all personal data removed before saving the report to committee member PCs or the PTA's secure Google Drive Platform emails list of winners to PTA email account with winner contact details	Held on online raffle platform Emails destroyed after six years
4	Suppliers Name, address, contact details and bank account details of suppliers	Contractual purpose for the purpose of booking and payment	Retained on the PTA's secure Google Drive for seven years for audit purposes Invoices retained in paper files for one year until accounts are filed for that financial year	Destroyed after seven years
5	School parent / pupils The PTA does not at present send emails direct to the parents – this is all done via the School Office	n/a	n/a	n/a
6	Photographs taken at events / within School Any photos taken during events or within School should not include identifiable faces of any individual (especially school children)	Consent obtained from any individual identifiable in any photo if any photo is used for marketing purposes or the PTA Facebook page etc	Any photos should be retained on the PTA Google Drive and deleted immediately from any individual phone / camera (if taken for PTA purposes and not personal purposes at event (i.e. of said person's own child))	Photos deleted every two years
7	Dietary requirements The School Office provide a list of dietary requirements of children attending events	Consent obtained by School	Retained in paper copy at the event	Destroyed immediately after the event

Social Media Policy

Introduction

Mulbarton Primary School PTA ("**PTA**") has a Facebook page at <u>Mulbarton UK Primary School Parent And</u> <u>Teacher Association (facebook.com)</u>.

This policy covers activity on the PTA Facebook page. The policy exists to ensure that our social media output is as good as it can be and doesn't do anyone any harm.

Purpose of the Facebook Page

The Facebook page is a Private group only accessible to the school community of the school. Users have to answer a question to gain access.

The PTA Facebook page is used as a means of sharing information on PTA events, outcomes and to encourage the school community to become involved in the life of the school.

Who can post to social media?

Our PTA Facebook Page is managed by two or more appointed PTA Facebook Administrators who will post all updates.

Members of the broader community are able to react to the information, post comments and post their own posts – however their posts will need to be approved by one of the PTA Facebook Administrators and be subject to the following rules. Members will also be able to message the PTA Facebook Administrators via private messenger.

Community Rules

- We encourage members to ask questions and share ideas but request that you keep discussions focused directly concerning our school's PTA activities.
- We encourage posts that highlight the PTA's accomplishments and constructively raise issues for discussion.
- When posting, please use appropriate language. Children can see our page (or group).
- Do not post photos of the children. If you have any questions about posting a particular photo, please check with the PTA Facebook Administrators
- Do not post about concerns, problems, or conflicts with individual teachers, administrators, students, or parents.
- Online threats will be taken seriously, and proper authorities will be immediately notified. Any inflammatory statements that make allegations against individuals or organisations will be deleted.
- Keep in mind what you post is public information. Do not post information commonly understood as confidential, such as student grades.
- Any advertising for businesses is not allowed.

How is this monitored?

The social media output of the PTA is monitored daily by the PTA Facebook Administrators.

PTA Facebook Administrators reserve the right to delete comments and block users who are not following the rules stated above. The school also has the power to remove inappropriate content.

What are the responsibilities of people who have access to the organisation's social media tools? The PTA Facebook Administrators' role is:

- General upkeep of the PTA Facebook Page
- Ensure that users follow the rules above
- Informing parents of upcoming events and general promotion of the PTA
- Highlight the PTA's accomplishments
- Monitoring content and responding to messages

This policy will be reviewed annually by the PTA Committee prior to the AGM.