

Positive Learning Policy

(Last reviewed March 2024, last revised March 2024)

With reference to:

- The Equality Act 2010 ('the 2010 Act')
- 'Restorative Approaches in Schools (RAIS)' programme run by Wales Restorative Approaches Partnership (WRAP)
- Section 3 of 'Inclusion and Pupil Support' Welsh Government Guidance No: 203/2016 (2016)
- The Additional Learning Needs Code for Wales 2021 WG21–23
- Keeping Learners Safe, Welsh Government

Introduction

Cardiff Steiner School is undertaking a three-year programme to embed Restorative Approaches (RA) within our whole-School community. This Policy will be updated throughout the process, developing as new practices and approaches become embedded and are reviewed.

1. Our Approach

To be restorative means believing that decisions are best made and conflicts best resolved by those most directly affected by them. Restorative practices embrace early intervention, prevention and response and include a focus on accountability and responsibility, openness, mutual respect and inclusion. These values underpin our approach to behaviour.

The cornerstone of the way in which we manage relationships lies in our vision of our School as a Positive Learning Environment. Our starting point is the expectation that all pupils and adults are working together to create a positive, safe and secure environment, with an emphasis on positive, respectful relationships.

We aim to promote and acknowledge positive behaviour and conduct amongst both staff and pupils, believing that a positive, caring and secure environment is a prerequisite for good discipline and that good discipline promotes a positive environment. It is important to set clear boundaries and expectations for our pupils, and when pupils do not meet these expectations or disregard boundaries a member of staff will intervene. Interventions will be positive, fair, clear, consistent and 'age appropriate', making clear that it is the behaviour that is inappropriate not the child/young person.

In instances of continual inappropriate behaviour an individual approach will be taken. Some instances of are indicative of problems of a deeper nature and require that the teacher and parents/carers work together to find the best means of helping the child/young person. The School will provide individual guidance to pupils towards more positive behaviour and the support to develop, self-monitor and review behaviour and achievement. This will include the support of Pastoral Care staff. Teachers and parents/carers will, in these cases, look for discipline appropriate to specific circumstances and individual pupils. It is of considerable importance that conflicts are sought to be resolved through communication.

2. Aims

- To create a positive learning environment with an approach that is supported and followed by the whole School - staff, pupils, parents/carers, trustees and volunteers - based on a sense of community and shared values.
- To identify and reinforce behaviour which helps to make our School a safe and happy place where children, young people and adults come to work and learn.
- To enable teachers and parents to communicate and work together effectively to surround children and young people with clear, consistent boundaries within the context of a loving authority.
- To guide pupils towards positive behaviour in a way that is appropriate to their stage of development and respects the needs of the whole child.
- To treat problems when they occur in a fair, just and consistent manner, appropriate to the age of the child and young person.

3. Roles and Responsibilities

School Leadership are responsible for:

- The Trustees review this policy in conjunction with College
- The College and School Management Team monitor the policy's effectiveness on a regular basis, report to the Trustees on the effectiveness of the policy and, if necessary, make recommendations for further improvements
- The College and School Management Team:
 - promote positive behaviour and support staff members that implement the policy
 - provide staff with training and guidance on how to effectively apply the policy and take action where practice needs improvement or staff fail to adhere to the policy

- make positive behaviour management a general responsibility for all adults in the School
- ensure that staff and parents/carers are clear about the standards of behaviour that are expected
- The Designated Senior Person for Child Protection (DSP) is responsible for keeping records of all reported serious incidents of misbehaviour

All adults in the School are responsible for:

- establishing a safe and positive learning environment for all pupils
- reinforcing the All School Behaviour Values and taking appropriate action to support pupils to uphold them
- modelling positive relationships in interactions with pupils, colleagues and parents and helping all members of the School community to treat each other with respect
- taking reasonable care of their own health and safety and that of pupils or others affected by their actions or lack of action, and **following all** safety rules and procedures

Additionally all teachers are responsible for:

- implementing this Positive Learning Policy and applying the approaches and strategies consistently
- ensuring that all pupils understand the standard of work and behaviour that is expected of them in their lessons, and providing opportunity for pupils to explore and engage with the Whole School Values
- building positive and respectful relationships with pupils as the basis for positive behaviour management and change
- creating a positive classroom environment in which effort, achievement and positive behaviour are recognised and encouraged
- establishing classroom routines and expectations (both whole school and lesson specific) that underpin a positive learning environment
- ensuring that pupils are suitably and sufficiently supervised in their lessons and in their charge
- understanding the diverse learning needs of all pupils they are teaching and their responsibilities to support the inclusion of all children and young people
- providing differentiated work that recognises individual pupils' needs and provides an appropriate level of challenge
- giving regular informal and formal feedback, to demonstrate the value of pupils and their work.
- completing all relevant documents and recording and reporting information in line with this policy

- informing parents/carers, in line with this policy, of concerns or successes in achievement or behaviour

In addition to more targeted strategies, teachers work to promote a Positive Learning Environment in other ways including:

- Allowing pupils to assume responsibilities and including pupils in decision making, where appropriate, and promoting pupil leadership
- structuring lessons to allow for a breathing rhythm that promotes physical and mental wellbeing
- including stories and biographies from the curriculum that demonstrate the value of positive relationships and human values, where appropriate
- creating pedagogical stories to address specific situations, as appropriate to the pupils' ages

4. Staff Development and Support

Staff will be provided with training and guidance on how to effectively manage behaviour. Staff should speak to their faculty Education Coordinator to access support and resources to improve their practice. Training and support can include:

- induction in the Positive Learning Policy and School approach
- one-to one-mentoring from the Education Coordinator or another staff mentor
- peer observation
- focused or ongoing staff development in regular faculty meetings
- opportunities for staff to work collaboratively by reflecting on their current practice with a view to agreeing the most effective methods and approaches to address individual needs
- INSET day training from the School or external trainers
- intervention/advice from the DSP in relation to pastoral issues that may be affecting behaviour, including Adverse Childhood Experiences (ACE)
- intervention/advice from the Additional Learning Needs Coordinator (ALNCo) in relation to additional learning needs that may be affecting behaviour
- support in working with parents/carers
- external training

5. Parents/carers as partners

The School believes that a positive learning environment requires a close partnership between parents/carers, pupils and School. It is essential that pupils, parents/carers and teachers work together to ensure that a learning and social environment is maintained where concern for others, positive behaviour, responsibility and respect are valued and achieved. We expect parents/carers to support the

actions of the School to implement this policy. Before admission to the School we ask parents/carers to read the this policy and sign a declaration on the Registration and Contract that they have read and accept the information contained within. If parents/carers have any concern about the way that their child has been treated, they should follow the School's Concerns and Complaints Policy.

6. School Expectations - The Positive Learning Environment

All School Behaviour Values

In our School we strive to uphold the following values in our behaviour:

1. We come to school to work and learn (*'work, play and learn' for Kindergarten*)

- We make sure we do the right thing at the right time
- We try hard to do our best work
- We learn from our mistakes
- We listen to our teachers and treat them with respect

2. We treat other people as we would wish to be treated ourselves

- We listen and learn from each other
- We respect and value each other's differences
- We use words to resolve our problems
- We are fair and kind to each other

3. We work together to make our school a safe and happy place

- We are thankful for what we have
- We treat all things with care
- We take turns and we share
- We help each other to feel safe and well cared for

The purpose of these values is to help us all to remember the ways in which we need to behave in order to make our School the safe and happy place that we want it to be.

The repetitive reinforcement of these values guides a child's behaviour within clear, consistent boundaries. The rhythmic use of repetition strengthens the will and builds an inner sense of security.

The values are displayed in all Lower School classrooms and are explored and reinforced in regular Connection Circles in the classroom.

7. Strategies Used in the School - The Positive Learning Environment

The cornerstone of the way in which we manage relationships lies in our vision of our School as a Positive Learning Environment. Our starting point is the expectation that all pupils and adults are working together to create a positive learning environment.

The building of a Positive Learning Community has three strands:

1. Building and Maintaining Community
2. Recognising and Reinforcing Positive Behaviour
3. Restoring and Rebuilding Positive Behaviour

1. Building and Maintaining Community

Building and maintaining community in a class takes work. Teachers work with the class to build positive relationships. Fundamental to a Restorative Approach is the use of Connection Circles. These can be daily Check-in and Check-out circles, circles within a particular subject area, or a Circle Time lesson in which the class learns to take responsibility for the well-being of the class community and supporting a positive learning environment. The minimum expectation is to hold one Check-in and Check-out circle weekly per class.

Sometimes in classes we can observe that those who impact negatively on learning become dominant in the social group. They also demand, and receive, a lot of teacher attention. Other pupils have adopted subordinate roles and/or adaptive strategies. The needs of the majority of the pupils in a class can become subservient to the habitual behaviour of a few. This is not a community and relationships are based on stuck, habitual patterns.

Circle Times, including Check-ins and Check-outs, shift the focus away from dominant individuals, places emphasis on the whole and upholds the fact that each member of the community has the right to be heard and have their needs met.

Circle Times are also an opportunity for pupils to explore and engage with the Whole School Values. These values are displayed in every classroom as an indication of our expectations regarding behaviour. However, each teacher should take some time to work with the class to establish shared expectations within their lessons.

Class Needs Agreement: At least once a year each class will have the opportunity to create a Needs Agreement. The Class Teacher or Guardian will lead the pupils through a process using the question:

“What do we need from each other in order to do our best at school?” The needs agreement is then displayed in the classroom as a reference and reminder for pupils and teachers.

2. Recognising and Reinforcing Positive Behaviour

Recognising Positive Behaviour

Our aim is to make positive learning an everyday reality in our School. The use of conditional rewards: “If you do this, then you get this”, does not support the establishment of a positive learning environment. However, teachers should focus on ways to recognise success. This recognition may include meaningful praise, a celebratory experience or some kind of treat.

Reinforcing Language

The use of Reinforcing Language helps pupils to recognise and build upon habits and ways of working that make a positive contribution to our learning environment.

In using Reinforcing Language, the teacher’s attention is focused on where the pupil is using helpful strategies for learning and for building positive relationships. By recognising, acknowledging and describing positive behaviour we emphasise success rather than failure.

Reinforcing Language is different from praise. A teacher may also use praise, but Reinforcing Language goes on to explain why a strategy, piece of work or behaviour is successful.

Examples of Reinforcing Language

- Reinforce effort: “You worked really hard on this and put in a lot of detail.”
- Reinforce strategy: “You discovered an interesting new way to solve this, tell us how you did it.”
- Reinforce specific objectives: “You are using a lot of descriptive language in this story; it really brings it alive!”
- Reinforce positive behaviour: “I see more and more people standing ready and helping us to finish the lesson on time.”

3. Restoring & Rebuilding Positive Behaviour

Level 1: In-Class Strategies

At some point, most pupils will need help to remember what is needed for School to be a positive place in which learning happens. Frequently during a lesson, teachers will use I-Statements, Reminding Language and Redirecting Language to help maintain the learning environment.

I-Statements are a useful tool that allows the speaker to express assertiveness without causing listeners to feel blamed or defensive. It allows the speaker to express control and ownership of their emotions without directly accusing the other person of being at fault. I-Statements follow the format:

- **What happened:** “When I walked in and saw paper all over the floor...”
- **How you are feeling:** “I feel frustrated...”
- **Why:** “because I only have 3 minutes to get ready for the next lesson.”
- **Meeting Needs:** “Can you help me by cleaning it up quickly? Thank you.”

Reminding Language helps pupils to remember what strategies and choices will help them to learn effectively.

- **Reminding Language can be proactive:** “Let’s take a minute to remember our rules for class discussion.”
- **Reminding Language can be reactive:** “This is learning time, which task are you working on now?”

Redirecting Language

In a positive learning environment, people, things and the opportunity for learning all need to be safe. Redirecting Language is used when actions or choices are not safe.

A **Redirection** is a short, clear instruction that needs to be immediately followed.

- **Example:** “Stop. Now focus.”, “Hands up to speak.”, “Stop. Sit down.”

Persistent Disruption - The Four R’s

Most of the time, pupils will respond positively to the teacher’s reminders or redirections. The Four R’s is a process to address persistent disruptive behaviour for those pupils who struggle to respond.

IMPORTANT: All of these stages are positive strategies to help a pupil to be part of the learning environment. If the teacher is effective in maintaining professional objectivity, then these strategies should neither be given or regarded as a punishment. The concept of punishment has no place in a Positive Learning Community.

1. **Remind** - The teacher will use Reminding Language (as above) to help the pupil remember the positive choice they need to make. This time, however, they will also give the pupil a visual reminder, such as writing their name and an ‘R’ on the blackboard, or a reminder note on a pupil’s desk.
2. **Redirect** - If the reminder has not helped the pupil to remember, the teacher will use Redirecting Language (as above) to give a short, clear instruction about what needs to be done. They will also give the pupil a second visual reminder.

3. **Relocate** - If the pupil has been reminded and redirected without effect, then they are moved to the quiet desk in the classroom away from other people where a pupil can work with less distraction. If this happens in a situation outside the classroom then they are moved as appropriate, e.g. to a bench. They will also give the pupil a third visual reminder .
4. **Reflection** - If the previous steps have not had effect then the pupil needs to leave the classroom to reflect on their choices and complete a **Think Sheet (Prepare to Share Sheet)**. Time out of the classroom can also be an opportunity to defuse or deescalate a situation.
 - The pupil completes the Think Sheet either outside the classroom or in another supervised class depending on their age (younger pupils are taken there by the teacher or another pupil). Other staff support can be requested where a pupil needs help to regulate their emotions first.
 - The pupil returns when they have completed the Think Sheet, where the teacher will greet them at the door and look over their Think Sheet.
 - The teacher uses what the pupil has written as a basis for a short restorative conversation that focuses on how the pupil can re-join the learning environment (ideally quietly while other pupils are getting on with their work). The teacher completes the “Teacher Response” section on the Think Sheet.
 - At some point during the day or at the end of the School day the teacher will meet with the pupil for a 10-minute restorative conversation using the Prepare to Share Sheet, reviewing the lesson and agreeing with the pupil about what the teacher and pupil can do to make things better in the future.
 - The Think Sheet is then filed in the Behaviour Folder on the teacher’s desk in the relevant classroom.

In Kindergarten visual reminders and Think Sheets are replaced by alternative age-appropriate methods to help remind and support reflection.

Playground Strategies Pupils in the playground will regularly need help to remember what is needed for the playground to be a positive place for play and social interaction. Staff on duty will use Reminding Language and Redirecting Language to help maintain the social environment. Staff will intervene as required, and may support a short restorative conversation between pupils where appropriate. Staff will complete a Record of Concern or an Incident Form as appropriate to the circumstances, and give this to the DSP. If further action is needed then the DSP may speak with the pupil’s Class Teacher/Guardian for them to take this forward, or may speak directly with the pupil/s involved and facilitate a restorative conversation.

Sequence: If a pupil's behaviour is unsafe, the teacher may immediately escalate the process, either to Stage 2 (Redirect – 2 R's) or to a Think Sheet. A teacher may also give a pupil a Think Sheet to help them reflect on a situation without it being part of a behaviour process.

Level 2: School Support Strategies

Pupils who have needed to complete more than one Think Sheet during the week will attend the Intervention Lesson run by the Educational Coordinator. During this lesson the pupil and the Educational Coordinator go through the Think Sheets and set specific targets for positive behaviour for the week ahead. This meeting is a Restorative Conversation: the focus is on what can be done to make things better in the future. The DSP may also be consulted at this stage regarding any pastoral or safeguarding aspects and how these can be supported.

In Kindergarten Teachers bring these support strategies in an age-appropriate way.

Behaviour Passport

The Educational Coordinator or ALNCo works with the pupil to create a Behaviour Passport, detailing the pupil's targets. After each lesson, teachers complete the Behaviour Passport to form a record of the pupil's progress in meeting their targets.

Parents will be informed by email that their child has received a Behaviour Passport and receive a copy of the passport. However, since this is in-school support, a meeting with parents is not needed at this stage.

Review of Behaviour Passport

The following week, during the Intervention Lesson, the Educational Coordinator or ALNCo will meet with the pupils again to review their passports. The emphasis of this review is on success. There are three possible outcomes of this review:

- **Pupils have successfully met their targets** – the Coordinator will use Reinforcing Language to highlight and describe their success and they will return to their lesson. Parents will be informed of their success.
- **Pupils have met some of their targets** - the Coordinator will use Reinforcing Language to highlight and describe their progress and work with them to create a modified Behaviour Passport for the following week. Parents will be informed of their progress and receive a copy of the new passport.

- **Pupils have not met their targets** and have received one or more further Think Sheets will move on to Level 3: Intervention Meeting with the pupil, their Class Teacher and their parents.

Level 3: Intervention Meeting

Positive Behaviour Agreement

The Intervention Meeting is a meeting between the pupil's Class Teacher/Guardian and Parents. The meeting is facilitated by the Educational Coordinator or ALNCo. The aim of the meeting is to review the pupil's behaviour and draw up a Positive Behaviour Agreement. The pupil may be present for the whole meeting or join towards the end, at the Class Teacher's discretion.

The Positive Behaviour Agreement will:

- detail SMART targets to help the pupil to build more positive behaviour habits and set a timeframe for the review of those targets
- detail specific strategies that teachers and parents will put in place to support the pupil in achieving their targets
- be shared with the pupil's parents/carers - progress will be shared with them as advised in the Agreement.
- be communicated to all relevant staff so that there is consistency of approach.

At this stage the pupil will be flagged for observation and assessment by our ALNCo to explore the possibility of additional learning or behavioural needs. The DSP will also be consulted regarding any pastoral or safeguarding aspects. The DSP may help the pupil draw up a 'Pupil Specific Safety Plan' to help protect the pupil from their own actions and/or protect other pupils, where appropriate.

The pupil will receive a **Positive Behaviour Diary** for teachers to record the level of success in meeting the targets in each lesson. This diary will be discussed weekly during the Intervention Lesson in a restorative conversation between the pupil and the Educational Coordinator.

Positive Behaviour Agreement Review

The Positive Behaviour Agreement will be reviewed during a second Intervention Meeting between Class Teacher, parents and pupil, facilitated by The Educational Coordinator or ALNCo (as agreed at the previous meeting).

The review will consider the level of progress that the pupil has made in building positive behaviour habits. Possible outcomes for the review are:

- **Consistent, sustained success:** a behaviour agreement is no longer necessary.
- **Partial Success:** some targets achieved, or most targets partially achieved. A modified agreement is created with SMART Targets and an agreed review date.
- **Limited Success:** the pupil continues to cause significant disruption to the learning environment, despite parental and in-school support. At this point it is necessary to consider:
 - Calling upon additional support for the child, through a referral to external agencies in agreement with the parents/carers - with a support strategy put in place with clear objectives, methods and timeframes and a date at which to report and review progress with parents/carers
 - How the learning environment can be protected from on-going disruption. Possibilities include Internal Seclusion and fixed-term exclusion (with due consideration given to the External Exclusions policy)
 - Informing the Chair of College and Chair of Trustees of the position

8. Internal seclusion

Internal seclusion is one supportive strategy that may be helpful in maintaining a Positive Learning Environment. In employing this strategy then the Educational Coordinator in consultation with the Class Teacher/Guardian, and the ALNCo as necessary, will consider what is best for the individual pupil and the Class as a whole.

- Internal Seclusion can be helpful for pupils who struggle to maintain focus in a social learning situation.
- Internal Seclusion may also be helpful in maintaining the learning environment for the Class when an individual pupil is not able to participate in normal classroom expectations.
- Internal Seclusion may be helpful following a significant incident such as physical or emotional violence or repeated inability to respond to teacher guidance. In this case it allows time out to diffuse the situation and gives teaching staff time to decide on how to respond most effectively, since the timetable does not always allow an immediate response.

The length of the seclusion will depend on the circumstances. Normally it would last for a lesson (45 minutes) or a double lesson of the same subject (90 minutes).

The seclusion will take place in another class, usually an older age group, and the pupil is supervised by the teacher teaching that lesson. A seclusion must not take place in an older class where a period of the lesson is unsupervised. Available classes to receive pupils on Internal Seclusion are identified on a weekly timetable available to all teachers. The pupil must be accompanied to. And collected from, the

other classroom by the teacher issuing the seclusion. The pupil will complete work set by the teacher issuing the seclusion.

In Kindergarten seclusions are managed by the teachers in an age-appropriate way.

The seclusion will be followed by a short restorative conversation to assess whether the pupil is ready to re-join the learning environment. At the end of the School day the pupil will have the chance to participate in a restorative conversation with the Class Teacher/Guardian and/or Educational Coordinator to agree on what the School and pupil can do to make things better in the future.

Parents will be informed about the seclusion by standard email before the end of the School day. It is the responsibility of the teacher issuing the seclusion to ensure this happens.

A 'Record of Seclusion' form should be completed by the teacher issuing the seclusion and filed in the class Behaviour Folder and a copy provided to the DSP.

9. General Principles

- The implementation of this policy will consider a broader picture of the facts and factors involved including:
 - whether an incident may have been provoked, for example by bullying or by racial or sexual harassment
 - Adverse Childhood Experiences (ACE) or Additional Learning Needs (ALN) identified or unidentified
 - taking account of School attendance as a possible indicator of behavioural issues such as general class discipline or bullying
- In line with the School's duties under the Equality Act and the School's Access Plan, the School ensures that:
 - It does not discriminate against pupils with protected characteristics*, including directly or indirectly, in the application of this Policy.
 - Behaviour Folders are monitored by the Education Coordinators and DSP for emerging patterns of behaviour, and to ensure this policy doesn't unintentionally discriminate against certain groups of pupils with protected characteristics.
 - It recognises that some pupils require a more sensitive and differentiated approach, and makes reasonable adjustments for pupils with ALN, ACE and disabilities both to any behaviour strategies and to any exclusions process. Positive Behaviour Agreements that

are in place for will reflect any individual variance and reasonable adjustment to the implementation of this policy and procedure for that pupil, unless it can be shown to be a proportionate means of achieving a legitimate aim.

- The relevant protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. A person has a disability if they have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. A physical or mental impairment includes learning difficulties, mental health conditions, medical conditions and hidden impairments such as specific learning difficulties, autism, and speech, language and communication impairments. A person has additional learning needs if he or she has a learning difficulty or disability (whether the learning difficulty or disability arises from a medical condition or otherwise) which calls for additional learning provision.
- Staff use of reasonable force is only within the context of positive touch and positive handling with the intention of protecting a pupil from harming themselves or others or seriously damaging property. Positive handling is applied as an act of care and control with the intention of re-establishing verbal control as soon as possible and, at the same time, allowing the pupil to regain self-control. It should never take a form which could be seen as a punishment. Any incident is recorded and parents/carers informed on the day (for more information see the School's 'Positive Touch, Positive Handling of Pupils and Positive Restraint Policy and Procedures').

10. Incident Recording and Reporting

Where behaviour constitutes an 'incident', this will be recorded and reported in appropriate detail on the 'Incident Form' (red) or 'Record of Concern Form' (yellow) and given to the DSP.

An 'incident' is defined as an occurrence relating to health and safety, or safeguarding/child protection, even if nobody is hurt. Such incidents might include a fire, a child leaving the premises unsupervised, a child's behaviour causing a risk or harm to themselves, others or School property, a broken window etc.

Where appropriate, these are reported to parents/carers in line with the School's 'Accident and Incident Procedure and Policy'. Incidents recorded by staff other than the Class Teacher/Guardian, must be reported to the Class Teacher/Guardian before the end of the School day. It is the responsibility of the staff member recording the incident to inform the Class Teacher/Guardian. The

Class Teacher/Guardian informs parents/carers on the same day at pick up if possible, or otherwise by telephone the same day.

Bullying if the unacceptable behaviour is recognised as bullying, then the teachers will record the matter in the Incident Book and then use the procedures in the Anti-Bullying Policy.

The Incident Forms and Record of Concern Forms are monitored at least termly by the DSP for emerging patterns of behaviour or other issues.

Issue date

This policy came into effect from January 2020, and was last revised in March 2024.

Review date

This policy will be reviewed and revised by College at least every three years.

Endorsement

Full endorsement to this policy is given by:

Name: Kate Attfield

Position: Trustee for Safeguarding, Cardiff Steiner School

Signed:

K Attfield

Date: 7 March 2024

Related policies

This policy should be cross-referenced to related School policies including:

- Exclusions Policy
- Accident and Incident Procedure and Policy
- Anti-Bullying Policy
- Positive Touch, Positive Handling of Pupils and Positive Restraint Policy and Procedures
- School Access Plan
- ALN Policy
- Equality and Diversity Policy
- Child Protection Policy and Procedures
- Conflict of Interest policy for staff and trustees