



Training & Development Policy

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Responsible for document management	Head of Regulation

Introduction

Objective

Golden Leaves Ltd understands that the training and continuous professional development of its employees is crucial to the success of the business, to better serve our customers, and to ensure regulatory, statutory and legal compliance with the relevant rules and laws.

We are committed to providing our employees with a comprehensive and relevant training programme which supports them from their initial induction and throughout their employment with us.

We will equip our employees with the knowledge, experience and skills to carry out their role effectively and adequately and ensure that they have access to the appropriate resources, training and guidance for understanding any laws, regulations and codes of conducts under which the company has obligations.

The purpose of this policy is to ensure that Golden Leaves provides an adequate, relevant and supportive program of training and development for all employees and that any such training is readily available and fit for purpose.

Policy Definition

Where we have obligations under laws, regulations and/or codes of conduct, all employees are provided with extensive training programs, mentoring and access to continual support and resources with the aim of ensuring adherence to, and compliance with, such requirements.

Our training and development programme provides a fair and systematic approach to training and development, which also offers multiple benefits to employees during their employment with the firm. Training and resources are accessible to all employees, regardless of position, contract type or job role.

We are committed to ensuring that all employees are suitable for their role and that customers can engage with helpful, knowledgeable and skilled staff who can meet their needs and demands.

As well as helping to achieve Golden Leaves' strategic objectives, our training programme is essential to understanding and complying with the General Data Protection Regulation (GDPR) and the company's and employees' obligations when processing personal data.

Scope

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

Roles and Responsibilities

Golden Leaves' Head of Regulation is responsible for overseeing regulatory training whilst line managers assist in the development programme of all employees.

Line Managers work alongside the HR Manager and are responsible for assisting employees in assessing and identifying their learning needs and for ensuring that skill reviews are completed on a regular basis.

In conjunction with appropriate managers, the Human Resources role includes:

- Facilitation of the training and development of all employees.
- Provision of the tools and resources required to support training and development.
- Assessment and identification of training needs and skills gaps.
- Sourcing training, development and mentoring opportunities.
- Provision of advice and support to employees regarding their training needs and requirements, as well as role and job development and progression.
- Coordinating the delivery of training and development activities.
- Organising and communicating with external training providers.

The HR Manager's role includes:

- Records management regarding employee training and development
- Providing feedback to providers, managers and employees on training adequacy, effectiveness and delivery to improve training and development access

Golden Leaves ensures that all staff are provided with the time, resources and support to learn, understand and implement any training and skills. Assessments are carried out by the Line Managers to ensure employees have the training that they need, and that training evaluations take place frequently to assess the method, usefulness, relevance and adequacy of any training, ensuring that it is relevant and fit for purpose.

HR is responsible for the overall Training Programme and supporting procedures and controls; however, direct managers are expected to assess, support and mentor their employees.

Our Commitment

Golden Leaves is committed to investing in our employees and provide access to a wide range of learning, development and training opportunities which enable and encourage role suitability, confidence and skill development.

Golden Leaves is also committed to equal opportunities in the workplace and ensuring equality through all learning opportunities. No employee will ever be excluded from, or denied access to training and development on the grounds of gender, sexual orientation, age, disability, pregnancy/maternity, disability, religion, race and/or marital status.

Policy Standards

Approach to Training

Golden Leaves has implemented a structured and flexible training and development programme, which has been designed to help employees become more effective and confident in their role and to promote best practice and idea sharing within the organisation. By assessing, improving, updating and refining employee knowledge, skills and understanding, the Company recognises the benefit to both individual and company.

Our approach to training and development is multi-faceted, with activities including:

- Internal workshops and training sessions
- External courses and training
- Coaching and mentoring
- Support groups and peer-to-peer learning
- Assessments
- Work shadowing and cross-department learning

Golden Leaves understands that training and development is a continuous process and in certain legal and regulatory areas, it is essential to stay ahead of any changes and developments and to ensure that staff are up to date in their knowledge and skills.

We will allocate appropriate resources, support and funding for training and development endeavours. At present HR is responsible for the oversight of management and employee training mandatory training needs whilst individuals and team managers are responsible for course selection and training needs analysis.

Where applicable, employee understanding of training is assessed and records maintained as evidence of competence.

Induction Training

Golden Leaves provides all new starters with relevant training which aims to provide support, skills and knowledge for performing their own individual job roles, for meeting business standards and objectives and for understand and complying with all regulatory, statutory and legal requirements.

Induction training includes employee assessments to ensure that staff are competent for their role.

Induction training is provided in the first four weeks of an employee starting with the company. Scope of induction training is set out in a Training Matrix maintained by the HR Manager and Head of Regulation.

Ongoing Training

Annual refresher training is provided to ensure that staff training and competence remains current. Scope of annual refresher training is detailed in a Training Matrix maintained by the HR Manager and Head of Regulation.

Conduct Rules Training

The FCA has been given powers under Section 64B of FSMA to make rules about the conduct of certain employees within a firm. These rules and associated requirements are outlined under the Code of Conduct (COCON) sourcebook in the FCA Handbook and are known as the Conduct Rules. The FCA has also outlined a requirement for relevant employees to be trained in and have a full understanding of those Conduct Rules.

SMCR training for Conduct Rules is tailored to meet individuals' needs and requirements and offers guidance and examples of how each Conduct Rule applies to their role and their wider business activities and functions.

We have also allocated to the CEO the Prescribed Responsibility (PR) for Conduct Rules training development and delivery.

Training Needs Assessment

Golden Leaves assesses the competence and training needs of its employees and provides additional training, learning opportunities and support where need or gaps are identified:

- Available training courses and individual needs are discussed once each year during one-to-ones.

- Any not-approved training is discussed with the employee and reasons for declining the training are given.

Training Records

HR maintains records of all training completed by Golden Leaves staff and, where applicable, of assessments of ability to understand and apply training received. Records are maintained to demonstrate levels of competence achieved.

Specialist Exams and Required Competences

Golden Leaves will only employ those with the necessary skills incorporating achievement of any specialist examination passes required for their role. Existing employees will be encouraged to pass examinations that may be required for their roles.

Required competences are documented in Person Specifications relevant to each role that are maintained by the HR Manager.

Awareness & Training

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

Record Keeping

Human Resources will maintain details of all regulatory training and testing.

Information relating to training and competence will be retained for the lifetime of employment plus 3 years.

Annual Review

This policy will be reviewed by the Head of Regulation every year to ensure its alignment to appropriate legal and regulatory requirements as well as best practice compliance standards and its continued relevance to Golden Leaves' current and future operations.

Any changes to the policy will be approved by the CEO.