

Code of Governance Policy

Contents

Introduction

The Core Governance Values of Lomax Training Services Limited

The Seven Themes of Good Governance for the Independent Training Sector

Theme 1: Strategy and Leadership

- Policies

Theme 2: Corporate Structures, Accountability and Roles

Theme 3: Financial Strategy and Audit

- Financial
- Audit
- Partnerships

Theme 4: Teaching and Learning

- Quality performance data

Theme 5: Equality, Diversity and Safeguarding

- Safeguarding

Theme 6: Transparency

Theme 7: Effective Governance

- Remuneration of Senior Post Holders
- Induction, Training and Development
- Governance Review

Introduction

This Code of Governance has been developed to support governance of Lomax Training Services Limited to be able to successfully achieve its Vision, Mission Statement and Values.

The Code of Governance sets out the governance themes and principles which Lomax Training Services Limited aspires to show that it is conducting its business in the best interests of learners, employers, key stakeholders and funding bodies.

There are several policies and documents in place to ensure this Code of Governance is fully implemented. These are referenced throughout this policy and set out fully in the appendix along with individual responsibilities.

The Core Governance Values of Lomax Training Services Limited

In setting out its core values, this Code of Governance adopts the seven themes of good governance for independent training providers, this provides an ethical framework for the personal behaviour of governor/s. The principles of public life are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

This Code of Governance is based on the following expectations of good governance, which illustrates the values and beliefs of the senior management and governor/s of Lomax Training Services Limited.

- **L**earners are at the heart of everything we do
- **E**xcellence in delivery and service
- **A**ccountability in meeting our commitments
- **R**esponsiveness to industry and market changes
- **N**ew Opportunities to always embrace innovation

This Code of Governance is set out in seven sections in line with the seven themes of good governance for Independent Training Sector.

The Seven Themes of Good Governance for the Independent Training Sector

To implement and embed the values of providing a quality experience for learners, and meet the expectations of funding bodies and regulators, those with a governance role (governors, directors and senior management) will undertake the following:

Theme 1: Strategy and Leadership

Formulate and agree the vision and strategy, including defining the ethos and policies of Aspiration Training.

Theme 2: Corporate Structures, Accountability and Roles

Provide clarity of managing director, governors and management team governance responsibilities.

Theme 3: Financial Strategy and Audit

Adopt a financial strategy and funding plans which are compatible with the duty to ensure sustainability and solvency Lomax Training Services Limited.

Theme 4: Teaching, Learning and Outcomes for Learners

Ensure exceptional teaching, training and learning by adopting effective underpinning policies and systems, including the monitoring of performance data, which also encourage and facilitate the learner and employer voice.

Theme 5: Equality, Diversity and Safeguarding

Meet, and aim to exceed statutory responsibilities for equality, diversity and inclusion, and ensure that the safety of learners and staff is the number one priority.

Theme 6: Transparency

The managing director, governors will be transparent and openly accountable in order to demonstrate assurance that public funds are spent appropriately and efficiently.

Theme 7: Effective Governance

Determine effective governance arrangements, robustly reviewing and challenging governance performance and effectiveness on a regular basis.

Theme 1: Strategy and Leadership

Formulate and agree the vision and strategy, including defining the ethos and policies of Lomax Training Services Limited.

- To be successful we must be led by an effective and entrepreneurial board, whose function is to promote the long-term sustainable success of Lomax Training Services Limited.
- The managing director, governors establish Lomax Training Services Limited purpose, strategy and values, and satisfies itself that these are aligned with the organisation's culture.
- All managing director, governors must work in the best interests of Lomax Training Services Limited and act with integrity. They lead by example, and the workforce should be able to raise concerns about management and colleagues where they consider that conduct is not consistent with Lomax Training Services Limited values and responsibilities, for example through the Whistleblowing policy.
- The managing director, governors approve Lomax Training Services Limited strategy which will be reviewed each year (Business Plan).
- The managing director, governors ensures that managers have established an operating plan that identifies those aspects of the business plan being implemented. The managing director, governors ensures that the business plan is realistic and underpinned by a financial strategy (Business Plan).
- To ensure successful implementation of the business plan, the managing director, governors will identify and adopt a set of Key Performance Indicators (KPIs) which include financial health, teaching, training and learning, learners' experience and outcomes, staff performance and stakeholder opinions (business plan KPIs).
- In doing so, the managing director, governors should make clear the division of responsibilities between strategic governance and leadership by the managing director, governors and the operational management and leadership by Lomax Training Services Limited senior management team.
- The managing director, governors will monitor and scrutinise Lomax Training Services Limited activities effectively, including the use of external benchmarking comparators, challenging shortfalls in performance and ensuring that weaknesses are addressed (Quality report).

Policies

- A summary of policies, processes are listed on the policy, procedures review schedule which acts as a control to monitor that they are reviewed and up to date.
- The managing director, governors ensure that there are effective underpinning policies & systems in place to support the implementation of this Governance Code.
- All policies are reviewed and formally approved by the managing director, governors (Quality report).
- The managing, governors, through constructive challenge & effective support, monitors the implementation and impact of each policy.
- Policies, processes and strategies linked directly to this Code of Governance are included in the appendix.

Apprentices, Learners & learner Voice

- The managing director, governors have a close regard to the voice of its apprentices, learners and the quality of their experience, welfare and monitor the impact on the learner experience.
- Learners are actively engaged with Lomax Training Services Limited which provides effective ways in which the learners voice can be heard. The managing director, governors receive regular reports on how learners on how learners are being engaged and what the impact their voice is having on their experiences at Lomax Training Services Limited.
- The managing director, governors actively listen to what the learners have to say and ensure identified actions are actioned in a timely manner.

Employer Voice

- The managing director, governors effectively engage with employers and ensure that the apprenticeships and qualifications delivered.
- The managing director, governors engage with employers to ensure that the qualifications provided are relevant and meet local, regional and national requirements.

Theme 1: Corporate Structures, Accountability and Roles

Provide clarity between the governance roles of the Board, chief executive and management team.

- The Chair and is responsible for its overall effectiveness in directing Lomax Training Services Limited. The Chair demonstrates independent and objective judgement, and promotes a culture of openness and debate, by facilitating constructive relations between managing director and governors.
- Governors provide constructive challenge, strategic guidance and hold management to account. Lomax Training Services Limited will have no fewer than one governors.
- Members of the Board comply with relevant legislation.
- The managing director and governor's sets out its primary responsibilities in this Code of Governance. These are published widely and are known to all Board members.
- The Board seeks assurance that it meets all legal and regulatory requirements imposed on it as an organisation and as a publicly funded learning and training provider, and organisational compliance should be kept under regular review.

Theme 3: Financial Strategy and Audit

Financial

Adopt a financial strategy and funding plans which are compatible with the duty to ensure sustainability and solvency of the organisation.

- The managing director, governors and finance & business manager sets and approves the annual budget.
- The managing director and governors presents a fair, balanced and understandable assessment of Lomax Training Services Limited position and prospects, the managing director and governors satisfied themselves of the integrity of financial information by regularly reviewing financial performance against profile, budget & cash flow (Financial report).
- The managing director and governors ensures that the necessary resources are in place for Lomax Training Services Limited to meet its objectives and measure performance against them
- The managing director and governors have effective systems of control and risk management that promote value for money, efficient use of public funds, the capital estate and technology, and meet mandatory financial audit requirements (Risk Register/Business continuity).
- The managing director and governors ensures compliance with the financial memoranda and ensures it understands and meets the conditions of funding, as set by the funding organisations.
- Lomax Training Services Limited has financial regulations and appropriately documented delegations and procedures, approved by the managing director and governors, which specify its financial responsibilities and authority and those of any committees and its staff.

Audit

The Board ensures effective arrangements are in place for the management and quality assurance of financial performance data.

- The managing director and governors complies with the funding organisations' mandatory requirements relating to audit, including adherence to the internal audit plan.
- The managing director and governor's uses its annual report to account to all stakeholders for the performance and prospects of Lomax Training

Services Limited, as well as to demonstrate compliance with statutory and regulatory requirements (Annual Report).

Partnerships

- In establishing new business, the managing director and governors ensures effective governance arrangements are put in place with appropriate control, reporting and delegation systems. This includes any subcontracting arrangements if required.
- New ventures (such as acquiring new organisations or creating providers in other countries) must be approved by the managing director and governors.

Theme 4: Teaching and Learning

Ensure exceptional teaching, training and learning by adopting effective underpinning policies and systems, including the monitoring of

performance data, which also encourages and facilitates the learner and employer voice.

- Appropriate teaching, learning, training and achievement performance indicators, which monitor quality indicators and learner progress, are regularly reviewed by the managing director and governors (Quality report).
- The managing director and governors ensures that the learning and training experience is effectively monitored and that appropriate learning resources have been made available (Teaching and Learning Policies).
- The Managing director and governors have high regard for the voice of its learners and employers, in relation to the quality of the learner experience, which is central to all Board decisions (Learner & Employer Voice).
- The managing director and governors approves the annual Self-Assessment Report (SAR) and the Quality Improvement Plan (QIP) and ensures it is benchmarked against sector comparators and best practices.
- The managing director and governors ensures effective, timely and appropriate careers and progression advice is provided to all learners (Information, Advice and Guidance policy).

Quality Performance Data

- The managing director and governors are accountable for Lomax Training Services Limited overall performance of government-funded provision and outcomes for all learners (Quality cycle and strategy).

- The managing director and governors receive accurate performance data of each type of provision monthly. Where appropriate, this is confirmed through external sources. This data covers the recruitment of learners, achievement of qualifications and, where relevant, attendance and progress from their starting point and their destination on completing their learning programme (Quality Report).
- The managing director and governor's reviews the results of learner and employer surveys and monitors the impact of the resulting quality improvement plans.
- The managing director and governors have the expertise required to interpret data and reports to identify trends in performance and progress against agreed challenging targets and improvement measures and to compare Lomax Training Services Limited performance with relevant national and regional averages. This information is used to hold senior managers to account for the quality of the provision and outcomes for all learners and to inform plans to improve performance where necessary.
- The managing director and governors also uses this data to evaluate the impact of each type of provision on meeting the needs of learners, employers, local communities and other stakeholders in the Annual Report.

Theme 5: Equality, Diversity and Safeguarding

Meet, and aim to exceed statutory responsibilities for equality, diversity and inclusion, and ensure that the safety of learners and the Lomax Training Services Limited team is the number one priority.

- The managing director and governors ensures that it meets, and aims to exceed, its statutory responsibilities for equality, diversity and inclusion through its actions and behaviour in all aspects of its affairs. The managing director and governors promotes equality, diversity and inclusion through leading by example.
- The managing director and governors approves and reviews the equality, diversity and inclusion policy, and adopts agreed performance indicators for implementation.
- The managing director and governors complies with all legal obligations in relation to equality, diversity and inclusion. These go much further than avoiding discrimination, and require the active promotion and championing of equality, diversity and inclusion in several defined areas.
- The managing director and governors ensures that the safer recruitment policy considers equality, diversity and inclusion.

- The managing director and governor's reports fully on its actions on equality, diversity and inclusion in the operation of governance. The annual report includes a description of its policy, including any measurable objectives, and progress on implementation.

Safeguarding

- The managing director and governors ensures a safe environment is provided for all learners and team members, supported by a robust and regularly assessed and monitored Safeguarding policy which includes measures relating to extremism, radicalisation and staying safe online (Safer Recruitment).
- The managing director and governors has in place a Prevent risk assessment which identifies risks related to extremism and radicalisation alongside the strategies that have been implemented to minimise these risks. The Prevent risk assessment is informed by the national and regional terror threat alert levels and is reviewed twice a year by the managing director and governors.
- The managing director and governors ensure all policies, particularly those related to safeguarding, are actively implemented for any associates.
- There are clear and published Complaints and Whistleblowing policies. The managing director and governors receives regular reports on the number and types of complaints made, how these complaints are resolved and whether any trends are developing.

Theme 6: Transparency

The managing director and governors will be transparent and openly accountable, considering the views and concerns of all stakeholders, to demonstrate assurance that public funds are spent appropriately and efficiently.

- The purpose, vision and strategy are reviewed annually and published in the Annual Report.
- The Annual Report includes a section that sets out governance arrangements, including the extent to which this Code of Governance has been adopted.
- As Lomax Training Services Limited receives funding from government sources, it sets the expectation that managing director and governors undertake their role with due regard to the standards of public life. The managing director and governors must always avoid conflicts of interest and act solely in the interests of the organisation.
- The managing director and governors ensures that the Whistleblowing and Complaints procedures are easily accessible and that complaints, and resulting actions and trends, are monitored.

- The managing director and governors ensures that Anti-Bribery and Anti-Fraud activities are standing items on the Lomax Training Services Limited Risk Register and that these are reviewed regularly.
- Lomax Training Services Limited has a stakeholder plan in place which facilitates engagement with external stakeholders regularly, pro-actively and effectively.
- The managing director and governors publishes in the annual report an account of Lomax Training Services Limited engagement with the main communities that it serves, the progress made towards meeting their needs for education and training, and how it aims to meet future needs.

Theme 7: Effective Governance

Demonstrate effective governance arrangements, regularly reviewing governance performance and effectiveness.

- Board membership is regularly reviewed and, if appropriate, refreshed to ensure a balance of skills, experience, independence and knowledge.
- Appointments to the Board are subject to a formal, rigorous and transparent procedure, and an effective succession plan is in place for Board and senior management.
- Both appointments and succession plans are based on merit and promote diversity of gender, social and ethnic backgrounds, and cognitive and personal strengths.
- The managing director and governors meet as often as is required to undertake its responsibilities. Members attend all meetings where possible and the Board must have 2 statutory directors in attendance to constitute a quorum.
- There is a presumption of openness and engagement with all matters open to discussion by the whole Board. Occasionally, there will be matters where specific Board members should not be a party to discussions; these are dealt with either by 'conflict of interest' declarations or may involve a two-part meeting.

Remuneration of Senior Post Holders

- The Managing director and governors ensures that company remuneration, workforce policies and practices promote its long-term success and are aligned with its strategy and values.

- A formal remuneration policy for employees and management is in place. Performance-related elements are clear, stretching, rigorously applied and aligned to the successful delivery of the strategy (remuneration policy).
- The managing director and governor's exercises independent judgement and discretion when approving remuneration outcomes, taking account of the company and individual performance and wider circumstances.

Induction, Training and Development

- All Board members have an induction to both corporate governance and the business.
- Ongoing training is provided for Board members that cover their statutory responsibilities and areas such as Safeguarding, including minimising risks related to extremism and radicalisation.

Governance Review

- Regular evaluation of the Board takes into consideration the balance of skills, experience, objectivity, knowledge, diversity and how effectively members work together to achieve objectives.
- The Board reviews its performance, including that of the managing director, annually.

Policy, Strategy or Plan	Owner
Board Report/KPI's	Managing Director
Anti-Bribery Policy	Managing Director
Board Schedule of Delegation	Managing Director
Business Continuity	Facilities Manager
IAG Policy	Training Manager
Complaints Policy	Quality Manager
Equality & Diversity	Managing Director
GDPR Policy	Quality Manager
Internal Audit Plan	Quality Manager
Learner/Employer Voice	Business Support
Prevent Risk Assessment	Quality Manager
Quality Cycle	Quality Manager
Policy Review Register	Quality Manager
Risk Register	Quality Manager
Safeguarding	Quality Manager
Safer Recruitment	Recruiting Manager
Self-Assessment Report	Quality Manager
Business Plan	Managing Director
Teaching and Learning	Training Manager
Whistleblowing	Training Manager
Financial Delegation and Authority	Managing Director
Quality Reports	Quality Manager

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1.0	October 2024	2.0
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