



Care Quality Governance Framework

*A systematic approach to quality, safety, and compliance
for enterprise wellness partnerships*

October 2025

Governance and Advisory Board

The Company board of directors act as the governing body for clear minds. The governing body has direct oversight and jurisdiction to clear minds corporate and is set up with a clear mandate with responsibility for the governance document, related policies and all associated frameworks necessary to manage and maintain quality assurance and the safe and effective delivery of the clear minds provision of services.

The core purpose of the Governing Body is to ensure that the company is managed in accordance with its own established plan and is compliant to the external standards referenced within the core governance document.

The Governing Body will mandate the Advisory board to oversee, audit and report on the performance of all staff and associates who create and deliver content for clear minds. This will include feedback from customers and changes to legislation.

Care Quality Governance Structure

Board of Directors

Strategy • Financial oversight • Risk management • Legal compliance • Data protection

Advisory Board

Content quality • Customer feedback • Legislative monitoring • Performance reporting

Management Team

Operations • Policy implementation • Service delivery

Principles: Transparency • Clear responsibilities • Accountability • Diversity • Inclusivity

Leadership: Governance and Advisory Board

The Governance and Advisory Board:



Alastair Stewart
Founder
CEO
Governance Board



Kainne Clements
Executive Chairman
Governance Board



Tom Cassidy
CIO
Governance Board



Sarita Manzi
Head of Corporate
Partnerships
Governance Board



Mandy Kloppers
Cognitive
Behavioural
Therapist
QA Team
Advisory Board



Ron Stewart
CFO
Quality Control
Governance Board



Catherine Jackson
Head Hypnotherapist,
Certified Trainer in
NLP & Hypnosis
Advisory Board



Edward Omran
Head Hypnotherapist,
Advanced Diploma in
Evidence-Based
Psychotherapy (IAEBP)
Advisory Board

Four Core Pillars of Governance

Proven: 70,000+ users | 91,000+ community | 24/7 operations

User Safety & Safeguarding

Crisis protocols • Duty of candour • Emergency signposting

Data & Information Governance

Privacy-first • GDPR compliant • Employee confidentiality

Corporate Governance

Board accountability • Financial governance • Regulatory compliance • Risk management

Quality & Continuous Improvement

Evidence-based content • 99.5% uptime • User satisfaction • Staff development

For digital wellness platforms like clear minds, this structure ensures board-level accountability, risk management at scale, regulatory compliance and continuous improvement.

Employee Confidentiality



'Zero Individual Visibility'

Employers NEVER see:

- ✗ ***Names***
- ✗ ***Individual Usage data***
- ✗ ***Individual Participation***

Employers CAN see:

- ✓ ***Uptake statistics***
- ✓ ***Aggregated utilization rates***
- ✓ ***Anonymised trends***

Protected by: *Contractual agreements • Technical controls • GDPR compliance*

Investment and Commitment

THIS INCLUDES

- Security: *Industry-standard encryption • Secure payment processing (Shopify/App Stores) • Cloud infrastructure • Access controls ICO • registration, Cyber Essentials*
- *Full EAP Development*
- Compliance: *GDPR • Consumer Rights Act • Care Act 2014 • Mental Capacity Act • Equality Act*
- Platform & Analytics: *Native apps proven at scale (70,000+ users); user life-cycle, retention, satisfaction, efficacy*



Community Safety

24/7 Professional Moderation

Current scale ~ 100,000 members across all langs.

Team: 3 moderators, international coverage

All posts pre-approved

Response: <15 minutes, Zero serious incidents to date

B2B Adaptations:

Mandatory anonymity • Employer non-participation •

*Crisis escalation • Clinical pathways • In-app
communities with company segmentation as option to
move away from externally hosted communities*



Data Room

Full access to our complete documentation is available upon request

Core Governance

 Data Protection & Privacy (8 policies)

 Clinical Safeguarding (6 policies)

 Service Delivery & Quality (5 policies)

 HR & People Management (4 policies)

 Information Security (4 policies)

 Legal & Compliance (5 policies)

🤝 B2B/EAP-Specific ⭐

Employer Non-Snooping Agreement

Contractual prohibition with enforceable breach penalties

Community Risk Assessment

8 privacy/safety risks identified & mitigated

24/7 Enhanced Moderation

Employer infiltration detection protocols

k≥10 Anonymization Standard

Zero individual employee visibility to employers

External Validation

 Cyber Essentials Plus (Q2 2025)

 Annual Penetration Testing

 ICO Registered (Data Controller)

 DPIA Completed

 Professional Indemnity Insurance

 CQC Partnership (SmartStartMinds)

Next Level - available Q4 2025

Additional capabilities developed for B2B clients

Intelligent Triage

General wellness screening
'Neuroindicator' (with 7 clinical pathways)

Clinical Partnerships

CQC-registered providers facilitate pathways to treatments e.g. ADHD testing, CBT & Precision Psychiatric treatments

24/7 AI Coaching

Mental health support available online using proprietary AI wellness models

Enterprise Integration

SSO, dashboards, analytics

The complete mental health EAP stack - from prevention to intervention - with proven engagement, clinical outcomes, and enterprise governance.



Summary

Community: *91,000+ members, 24/7 professional moderation, proven safety protocols*

Governance: *Board accountability, enterprise compliance, comprehensive policy framework*

User Satisfaction: *70,000+ engaged users, evidence-based outcomes, scalable platform*

EAP capability *developed and ready for presentation.*