

CLEAR CORPORATION

Employee Handbook

Company Organisational Structure, Policies and Procedures

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Approved by: Ade Adenikinju, Director

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Welcome to Clear Corporation

Welcome to Clear Corporation. This Handbook sets out our organisational structure and the core policies and procedures that guide the way we recruit, support and manage our people. It is written to be clear and practical. The aim is to help you understand what you can expect from the Company and what the Company expects from you as part of a professional team delivering executive training, consulting and strategic services.

This Handbook does not form part of your contract of employment. It is a governance document and may be updated from time to time to reflect changes in the law, our operations and good practice. Where there is any conflict between this Handbook and your contract of employment, the contract will take precedence.

Our Vision

Our vision is to provide value-added services that make a difference in businesses, communities and the people within them. We deliver strategic development, training, communications services and solutions. Our service excellence approach and extensive range of services provide a competitive advantage for our clients.

Our Mission

As a one-stop consulting firm, we provide services to the business community, government and its agencies, the private sector, charities and not-for-profit organisations. We operate at the nexus of business, public policy and politics. We form long-term partnerships and develop strategies that serve our clients' needs.

Our Expertise

Our expertise includes executive training and leadership development, business events, seminars and workshops, strategic planning, issue management, public affairs, governmental and corporate representation, political lobbying, fundraising, reputation management, social marketing, media relations and multicultural communication services.

Organisational Structure and Key Personnel (January 2026)

Organisational Structure Diagram

DIRECTOR Ade Adenikinju		
HR / TRAINING MANAGER Tosin Solanke		IT MANAGER Daniel Oguntifa
Operational support and delivery resourcing		
AD HOC STAFF (as required) Administrative / project support roles FACILITATORS / ASSOCIATE TRAINERS (as required) Programme delivery (in-person/online) Quality monitored via scheduled observations		

Clear Corporation operates with a governance-led structure designed to ensure accountability, effective decision-making and high standards of professional conduct. The Company's key roles are set out below. Where additional roles exist within specific projects, the Director will confirm reporting lines.

Role	Name	Core Responsibilities	Primary Contact Route
Director	Ade Adenikinju	Strategic leadership; governance oversight; final decision-making on employment matters; approval of policies and annual reports.	info@clearcorporation.net
HR / Training Manager	Tosin Solanke	Recruitment coordination; onboarding; staff development planning; performance	info@clearcorporation.net

		review administration; employee relations support.	
IT Manager	Daniel Oguntifa	IT systems oversight; user support; security controls; incident response; online delivery support and resilience.	info@clearcorporation.net
Ad hoc Staff (as required)	Named per project	Administrative, coordination or project support tasks assigned for specific delivery cycles; accountable to the HR / Training Manager and/or project lead as specified.	info@clearcorporation.net
Facilitators / Associate Trainers (as required)	Named per programme	Design and deliver executive training sessions; comply with institutional policies; maintain professional standards; participate in scheduled observations and quality reviews; submit required delivery documentation and feedback within agreed timeframes.	info@clearcorporation.net

Employees should raise day-to-day operational questions with their line manager in the first instance. HR-related matters should be directed to the HR / Training Manager. Issues requiring escalation may be referred to the Director.

How to Use This Handbook

This Handbook is organised into policies and procedures. A policy explains the Company's position and standards. A procedure describes how the policy is applied in practice. Where templates are provided, they should be used to ensure consistent record-keeping. Accurate records protect employees and the Company and support fair decision-making.

1. Employee Recruitment Policy & Procedure

Aim

Clear Corporation is committed to recruiting and selecting the best talent in a fair, transparent and consistent way. We are an equal opportunity employer and will not discriminate unlawfully during recruitment. Recruitment decisions are based on role requirements, competence, experience, values alignment and demonstrable capability.

Scope

This policy applies to employees involved in hiring and to all job applicants. It also applies to recruitment for contractors, associates and training facilitators where the Company appoints them directly.

Procedure

Recruitment begins when an operational need is identified and approved. The Hiring Manager (Line Manager) confirms the role requirements with the HR / Training Manager and agrees whether to recruit internally, externally or both. A job description and person specification are reviewed to ensure they accurately describe duties, accountability, required experience and any essential qualifications.

Vacancies are advertised through appropriate channels chosen by HR, taking into account the seniority and specialism of the role. Applications are reviewed against objective criteria. Shortlisted candidates are assessed using selection stages appropriate to the role, which may include an initial screening call, structured interview, presentation, written exercise or work-sample test. For remote roles, at least one live video interview will be conducted to confirm identity, communication ability and professional suitability.

Before issuing an offer, the Company completes proportionate pre-employment checks. These may include right-to-work verification, reference checks, qualification verification and, where relevant, background screening appropriate to the nature of the role. HR issues offers in writing and confirms key terms. Unsuccessful candidates are notified promptly.

Recruitment Records

HR retains recruitment records in accordance with the Data Retention Schedule. Recruitment records are treated as confidential and stored securely.

2. Training and Professional Development Policy

Aim

Clear Corporation supports employees to maintain and strengthen the knowledge, skills and professional behaviours required for excellent performance. Because our work involves executive training and professional services, our standards depend upon staff remaining current in their field and continually improving delivery quality.

Scope

This policy applies to all permanent employees (full-time and part-time). It may apply to fixed-term employees where appropriate. Contractors and associates may be offered development opportunities at the Company's discretion.

How Development is Identified and Approved

Development needs may be identified through onboarding, day-to-day coaching, project debriefs, participant feedback, or the annual performance appraisal process. Employees are encouraged to propose relevant learning activities and to discuss them with their line manager. The HR / Training Manager supports managers to evaluate requests based on role relevance, operational timing and budget availability.

Types of Supported Development

Development may include on-the-job learning, shadowing, mentoring, role-specific technical training, facilitation skills training, compliance training, attendance at professional events, and structured qualifications where appropriate. Where the Company funds training, employees may be asked to share learning with the team and apply it in practice.

Recording and Evidence

Where development is undertaken, the employee and manager should record the activity and intended application. Records support organisational learning and evidence of staff capability. Records are maintained by HR in accordance with the Data Retention Schedule.

3. Performance Appraisal and Staff Performance Review Policy

Aim

Performance management at Clear Corporation is designed to support high standards, professional growth and fair recognition. We base our approach on constructive feedback, clear objectives and open communication. Performance review is also a governance control: it ensures that the Company monitors quality, manages risk and maintains consistent standards.

Scope

This policy applies to all employees and, where relevant, to trainers/facilitators engaged by the Company.

Performance Review Cycle

In addition to regular informal check-ins, Clear Corporation operates an annual performance review meeting for each employee. The review considers performance against role objectives, behaviours aligned with Company values, quality of outputs, collaboration and reliability. Where performance improvement is required, a documented improvement plan will be agreed, including actions, support and review dates.

Trainer / Facilitator Quality Monitoring (Scheduled Observations)

To ensure consistent training quality, the Company operates a scheduled observation system for trainers and facilitators delivering programmes. Each trainer will be observed at least once within a 12-month period, and more frequently where programmes are high-risk, newly introduced, or where previous feedback indicates development needs. Observations may be in-person or via live online delivery. Observations will use the Teaching/Training Observation Template (Appendix 3).

Following an observation, a written report will be completed capturing strengths, development points and agreed actions. Where actions are identified, a follow-up review will be scheduled to confirm improvement. Observation outcomes form part of the annual performance review and feed into the Company's Annual People & Performance Review Report (Appendix 4).

Recognition and Reward

Managers may recommend recognition or reward for strong performance. Clear Corporation may operate bonus or reward arrangements linked to business targets and individual contributions. Any bonus or pay increase is discretionary unless contractually stated.

Records

Managers should keep brief, factual records of performance discussions and material incidents relevant to performance management. HR will retain formal review documentation in accordance with the Data Retention Schedule.

4. Disciplinary Policy & Procedure

Clear Corporation's disciplinary procedure is designed to encourage improvement in conduct or performance and to address issues consistently and fairly. No disciplinary action will be taken until the matter has been investigated, and the employee has had a reasonable opportunity to respond.

Principles

At each stage, employees will be informed in writing of the allegations and invited to a meeting. Employees may be accompanied by a work colleague. Employees have the right to appeal against any disciplinary decision. The Company may suspend an employee on full pay during an investigation where this is necessary and proportionate.

Informal Resolution

Where appropriate, issues will be addressed informally through coaching and guidance. If conduct or performance remains unsatisfactory, or the matter is serious, formal action will follow.

Formal Stages

Stage 1: First Written Warning. A written warning may be issued where conduct or performance is unsatisfactory. The warning will set out the required improvement and a review period. Warnings will normally remain live for six months, subject to satisfactory improvement.

Stage 2: Final Written Warning. A final warning may be issued for serious misconduct or where there is no sustained improvement. It will specify the required improvements and the consequences of further issues. Final warnings may remain live for up to twelve months.

Stage 3: Dismissal or Action Short of Dismissal. If there is still no improvement, the Company may consider dismissal or another sanction such as demotion, reassignment, or withdrawal from a project role, depending on circumstances.

Gross Misconduct

Gross misconduct may lead to dismissal without notice following an investigation. Examples include theft, fraud, deliberate damage, violence, serious bullying/harassment, serious breach of confidentiality, or serious insubordination. This list is not exhaustive.

Appeal

Appeals must be submitted in writing to HR within five working days of the decision. The appeal will be heard by a senior manager not previously involved, where possible, and a written outcome will be issued.

5. Grievance Policy & Procedure

Clear Corporation encourages employees to raise concerns early. We aim to resolve issues fairly, consistently and efficiently. Employees will not be subjected to retaliation for raising a grievance in good faith.

Informal Stage

Where possible, employees should raise concerns with their line manager first. Many issues can be resolved through early discussion.

Formal Grievance

If informal resolution is not possible or appropriate, the employee should set out the grievance in writing. If the grievance concerns the line manager, the grievance should be submitted to the HR / Training Manager, who will determine an appropriate manager to hear the grievance.

Meeting and Outcome

A grievance meeting will normally be arranged within five working days. Employees may be accompanied by a colleague. The Company will provide a written outcome as soon as reasonably practicable. If further investigation is required, the employee will be kept informed.

Appeal

If the employee is dissatisfied with the grievance outcome, an appeal may be submitted in writing to HR. An appeal will be heard by a more senior manager where possible, and the decision will be final.

6. Handling Personal Data Policy and Guidelines

Clear Corporation is committed to protecting personal data and handling information responsibly and lawfully. The Company processes personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Employees must follow this policy and related procedures; failure may result in disciplinary action.

Scope

This policy applies to personal information relating to employees, training facilitators, participants, clients and other individuals whose data is held by the Company. Personal data includes information that can identify an individual directly or indirectly in hard copy or electronic form.

Core Requirements

Personal data must be limited to what is necessary for legitimate business purposes, kept accurate and up to date, and retained only for as long as needed. Access to personal data must be restricted to those with a genuine business need.

Security and Good Practice

Employees must use strong passwords, keep credentials confidential, lock devices when unattended, and store paper records securely. Personal data should not be stored on unencrypted personal devices. Personal data must only be shared where there is a lawful basis and on a need-to-know basis.

Incident Reporting

Any suspected data loss, theft, or unauthorised disclosure must be reported immediately to the IT Manager (Daniel Oguntifa) and the HR / Training Manager (Tosin Solanke). Prompt reporting enables the Company to take remedial action and, where required, meet regulatory reporting obligations.

Retention and Disposal

Employees must follow the Data Retention Schedule (Appendix 1). Paper records must be disposed of securely (e.g., shredding). Digital information must be deleted in a way that puts it beyond use, including deletion from live systems and, where feasible, from backups according to IT procedures.

7. Equal Opportunities Policy

Clear Corporation is committed to equality of opportunity in employment and in our training and client environments. We aim to provide a workplace and learning culture free from unlawful discrimination, harassment and victimisation, and where everyone is treated with dignity and respect.

This policy applies to employees, associates, contractors, training facilitators, participants and other stakeholders. The Company will comply with the Equality Act 2010 and related legislation.

How We Apply the Policy

Recruitment and selection decisions are made objectively against role-related criteria. Reasonable adjustments will be considered for applicants and employees with disabilities. Access to development opportunities, benefits and rewards will be applied fairly and transparently. Any discriminatory conduct may result in disciplinary action.

Raising Concerns

Employees who believe they have been discriminated against should raise the matter under the Grievance Procedure. Reports will be treated seriously and handled sensitively. Retaliation for raising concerns in good faith is prohibited.

8. Bullying & Harassment Policy and Code of Conduct

Clear Corporation is committed to a safe and professional environment of mutual respect and personal responsibility. Bullying and harassment are unacceptable and will not be tolerated. This policy applies to conduct in the workplace, during client engagements, at events and on work-related social occasions, including conduct on social media where it impacts the Company, colleagues or participants.

Definitions

Harassment is unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Bullying is offensive, intimidating, malicious or insulting behaviour involving misuse of power which makes someone feel vulnerable, upset or threatened. Legitimate, reasonable and constructive criticism does not amount to bullying.

Reporting and Resolution

If you experience or witness bullying or harassment, you should raise it as early as possible. Where appropriate and safe, employees may explain directly to the person that the behaviour is unwelcome. Where this is not possible or appropriate, concerns should be reported to the line manager or HR / Training Manager. Serious allegations should be raised immediately and may be handled under the formal Grievance Procedure. Confidentiality will be maintained as far as possible and retaliation against complainants is prohibited.

Code of Conduct (Professional Standards)

As an employee, you represent Clear Corporation's values. You are expected to act professionally, treat others with respect, maintain confidentiality in client and participant matters, and use good judgement. The dress code is business casual and/or formal for client-facing engagements.

Email and IT Acceptable Use

Company email and systems are primarily for work purposes. Limited personal use is permitted provided it does not interfere with work, expose the Company to risk, or breach policies. You must not use Company systems for illegal activities, discriminatory communications, unauthorised marketing or sharing confidential information. If in doubt, consult the IT Manager.

Social Media

Employees must avoid sharing confidential information or content that could harm the Company's reputation or breach our standards. When expressing personal views, ensure it is clear these do not represent the Company. Employees who manage Company social channels must follow brand, confidentiality and legal requirements, and consult management before posting high-impact content.

Conflicts of Interest

Conflicts of interest arise when personal interests conflict with duties to the Company. Employees must disclose any actual or potential conflict to their manager or HR. Bribery or unlawful conduct is prohibited and may result in dismissal and legal action.

For More Information

The Code of Conduct, policies and procedures outlined in this Handbook do not form part of your contract of employment and may be reviewed on an ad hoc basis. For general guidance on employment practice, please visit ACAS (www.acas.org.uk).

Key company policies are made available to stakeholders through the Clear Corporation website or can be provided on request by the HR / Training Manager. If you cannot access a policy you require, please contact HR.

Appendix 1: Schedule for Data Retention

The retention periods below guide how long records are retained before secure disposal, unless a longer period is required by law, contract or an ongoing dispute.

Record Type	Retention Period
Commissions/Bonuses/Incentives/Awards	7 years
Employee Earnings Records	Separation + 7 years
Employee Handbooks	1 copy kept permanently
Employee Medical Records	Separation + 6 years
Employee Personnel Records (including attendance, applications, status changes, evaluations, termination papers, training/qualification records)	6 years after separation
Employment Contracts – Individual	7 years after separation
Recruitment adverts/agency correspondence	3 years from the hiring decision
Non-hired applicants (applications, CVs, screening notes)	2–4 years (4 years if correspondence could be construed as an offer)
Job Descriptions	3 years after superseded
Personnel Count Records	3 years
Right to Work evidence	As required by UK law; minimum 2 years after employment ends (or longer if required)
Training Participants’ recruitment records	6 years after last contact or completion (unless contract requires longer)
Training Participants’ training records/completion evidence	6 years after completion (or longer if required by client contract)
Training Participants’ personal information & equal opportunities records	6 years after completion
Training Participants’ attendance records	6 years after completion
Prospective participant enquiries	2 years

Unsuccessful participant applications	2 years
Facilitator/Associate Service Level Agreements	7 years after the end of the agreement
Facilitator/Associate invoices	7 years
Facilitator/Associate CVs, interview notes, personal information	6 years after the end of the engagement

Appendix 2: Staff Performance Review Form (Template)

Employee Name: _____ Role: _____ Review Period: _____

Manager: _____ Date: _____

Summary of Key Objectives and Outcomes:

Strengths and Positive Contributions:

Areas for Improvement / Development:

Agreed Actions and Support (with dates):

Overall Performance Outcome: _____ Next Review Date: _____

Appendix 3: Teaching/Training Observation Form (Template)

Observation Area	Rating (1-5)	Evidence/Comments
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Learning outcomes are clearly stated and achieved

Subject expertise and credibility demonstrated

Session structure and time management

Participant engagement and inclusivity

Use of resources and materials

Professional conduct and tone

Handling of questions and discussion

Close and recap/action points for participants

Observer Summary (strengths, improvements, actions):

Follow-up date (if required): _____

Appendix 4: Annual People & Performance Review Report (Template)

Purpose: This annual report provides management with an overview of staff performance, trainer quality monitoring, key people risks and improvement actions. It supports governance oversight and continuous improvement.

Reporting Year: _____ Prepared by (HR/Training Manager): _____

Approved by (Director): _____

1) Workforce Overview (headcount, roles, changes):

2) Performance Review Completion Rate (%): _____ Summary of outcomes:

3) Observation Summary (number completed, themes, improvement actions):

4) Training/Development Summary (high level):

5) Key risks and mitigations (e.g., skills gaps, capacity):

6) Action Plan for next year (top 5 actions):

Appendix 5: Action Plan Tracker (Template)

Ref	Issue / Improvement	Source	Owner	Due Date	Status	Update / Evidence
AP-01					Not started / In progress / Complete	
AP-02					Not started / In progress / Complete	

Action plans are reviewed quarterly by management. Completed actions should be supported by evidence (e.g., updated document, screenshot, meeting notes).

Appendix 6: IT Support & Service Escalation (Process Note)

Clear Corporation maintains structured IT support to ensure systems are operational and secure, including support for staff working remotely and for online delivery. The IT Manager (Daniel Oguntifa) is responsible for overseeing IT resilience, access controls, incident response and user support.

How to raise an IT issue:

- 1) Email the IT Manager with a clear subject line, a short description of the problem, and screenshots where relevant, including an urgency level (Low/Medium/High).
- 2) For urgent issues affecting live delivery, contact the IT Manager by phone/Teams and notify the HR / Training Manager.
- 3) All incidents involving personal data must be escalated immediately to IT and HR.

Where specialist support is required, the IT Manager may engage external technical support providers to ensure continuity, security and timely resolution.