TRUE

POLICY 4 · WORKER POLICY

Safeguarding and Child Protection

How TRUE keeps young people safe, and what everyone at TRUE does when they have a concern.

True Intel Ltd, trading as TRUE · Company no. 17255261

Version 1.0 · Approved by Victoria Phillips, Director · 3 November 2026

Every TRUE worker aged 16 or 17 is a child in law. Their welfare comes before any client, deadline or commercial interest, and everyone at TRUE has a duty to act on a concern the same day.

1. Policy statement

1.1 TRUE engages young people aged 16 and over to give honest feedback through focus groups, unboxing, mystery shopping and pulse surveys. We direct them into shops, give them briefs, hold their data and pay them. That puts TRUE in a position of trust.

1.2 TRUE is committed to keeping every young person who works with us safe from harm, and to acting quickly and properly when we have a concern.

2. Scope

2.1 This policy applies to:

- TRUE directors, staff, contractors and volunteers, including focus group moderators;
- all workers on the TRUE panel, especially those aged 16 and 17; and
- clients, as far as their staff come into contact with TRUE workers (section 17).

2.2 In this policy, "young person" means anyone under 18.

3. Law and guidance

3.1 This policy follows:

- the Children Act 1989 and Children Act 2004;
- Working Together to Safeguard Children 2023 (England);
- Information sharing advice for safeguarding practitioners 2024;
- the Safeguarding Vulnerable Groups Act 2006;
- UK GDPR and the Data Protection Act 2018;
- the Equality Act 2010; and
- the Management of Health and Safety at Work Regulations 1999 (young workers).

3.2 Workers live across the UK. When a concern involves a young person in Wales, Scotland or Northern Ireland, the DSL follows that nation's procedures: the Wales Safeguarding Procedures, the National Guidance for Child Protection in Scotland, or Co-operating to Safeguard Children and Young People in Northern Ireland.

4. Principles

- The young person's welfare is paramount.
- Safeguarding is everyone's responsibility.
- It could happen here. No concern is too small and no one is too trusted.
- We notice, record and report. We do not investigate.
- We listen to young people and take what they say seriously.
- Data protection is never a reason not to share information to keep a young person safe.

5. Roles and responsibilities

Role	Responsibilities
Directors	Own this policy; appoint the DSL and deputy; make sure everyone is trained; review the policy every year and after any serious incident
Designated Safeguarding Lead (DSL)	Receives every concern; decides on referrals to children's services, police or the LADO; keeps safeguarding records; advises staff; keeps training current
Deputy DSL	Covers when the DSL is unavailable, so no concern waits
All staff, contractors and moderators	Follow this policy and the Code of Conduct; report every concern to the DSL the same day; complete training before contact with workers
Workers	Follow safety rules; tell TRUE about anything that worries them, about themselves or others

Contact	Name
Designated Safeguarding Lead	To be confirmed
Deputy DSL	To be confirmed

Workers and staff reach the DSL through the TRUE app or the TRUE team.

6. Recognising harm

6.1 The four main categories of abuse are physical, emotional and sexual abuse, and neglect.

6.2 The risks most relevant to a teenage workforce are:

- **child criminal exploitation and county lines:** young people with phones, travel and cash can be targeted to move drugs or money;
- **child sexual exploitation:** money, gifts or attention exchanged for sexual activity;
- **online harm:** grooming, sextortion, sharing images, harassment;

- **domestic abuse,** including in a young person's own relationship;
- **peer-on-peer abuse:** bullying, coercion, sexual harassment;
- **radicalisation;** and
- **mental health, self-harm and suicidal thoughts.**

6.3 Warning signs TRUE staff may see include:

- an adult answering messages for a worker or insisting on being their contact;
- a request to pay a worker's earnings to someone else;
- tasks submitted late at night, far from home or in unusual numbers;
- a report, photo or video showing an injury, distress or an unsafe setting;
- a sudden change in a worker's tone, or hints that something is wrong; and
- unexplained money, gifts or expensive new items.

6.4 One sign on its own rarely proves anything. Staff pass it on; the DSL joins the dots.

7. Responding to a concern or disclosure

7.1 A young person may tell us something in person, by phone, in an app message, an email or inside a report. Staff follow the five Rs:

1. **Receive.** Listen calmly. Don't show shock or disbelief.
2. **Reassure.** Tell them they were right to tell you and it isn't their fault. Never promise to keep it secret.
3. **React.** Ask only open questions to clarify. Don't lead, investigate or contact the person named.
4. **Record.** Straight away, write down what was said in their words, when and how, and what you did.
5. **Report.** Tell the DSL the same day. If the young person is in immediate danger, call 999 first.

7.2 For written disclosures, keep the message, report or image and screenshot it with the date and time. Never forward or copy an indecent image of a young person, even to report it. Describe it and tell the DSL.

7.3 If a young person may need support straight away, give them Childline's number, 0800 1111.

8. Reporting

8.1 Every concern goes to the DSL the same day. The DSL decides, within one working day, whether to:

- refer to children's services in the area where the young person lives;
- call the police;
- refer to the LADO (section 9);
- seek advice without naming the young person; or
- record and monitor.

8.2 The DSL records every decision and the reason for it.

8.3 If anyone thinks the DSL has not acted, they can and should contact children's services or the police themselves. Anyone can make a referral.

Who	When	Contact
Police or ambulance	Immediate danger	999
TRUE DSL	Every concern, same day	Through the TRUE app or TRUE team
Norfolk Children's Advice and Duty Service	Young person lives in Norfolk; professionals' line	0344 800 8021
Children's services where the young person lives	Young person lives outside Norfolk	Their local authority's children's services
Police non-emergency	Crime with no immediate danger	101
NSPCC helpline	Advice for adults worried about a child	0808 800 5000
Childline	Support for young people	0800 1111

9. Allegations against adults

9.1 This section applies if an adult who works with young people may have harmed a young person, committed an offence against one, or behaved in a way that shows they may pose a risk. This includes TRUE staff, contractors, moderators, and client or store staff met during an assignment.

9.2 Staff report the allegation to the DSL straight away. If the allegation is about the DSL, report it to the deputy DSL or a director.

9.3 The DSL contacts the Local Authority Designated Officer (LADO) within one working day: Norfolk's LADO (LADO@norfolk.gov.uk) for TRUE staff, or the LADO for the area where it happened for client staff. The DSL does not investigate or warn the person involved.

9.4 While the LADO process runs, the person is removed from any contact with workers. For client staff, TRUE stops sending workers to that site and tells the client, after taking the LADO's advice.

10. Safe working

10.1 Everyone at TRUE follows the Code of Conduct. In particular:

- contact with workers only through official TRUE channels: the app, TRUE email or TRUE phone;
- no personal social media contact, gifts, private meetings or comments on appearance;
- in-person focus groups have at least two adults present, in a public or open venue; and
- any contact that goes off track is logged and reported to the DSL.

10.2 Assignments for under-18s follow the Restricted Activities Policy and the Young Worker Health and Safety Policy: public places, normal hours, no age-restricted products, never alone with an adult in a private area, and all work between 09:00 and 19:00, with notifications only between 10:00 and 19:00. In all research, TRUE follows the Market Research Society (MRS) Code of Conduct (www.mrs.org.uk/standards/code-of-conduct) and the MRS guidelines for data collection with children.

11. Safer recruitment

11.1 Anyone at TRUE with contact with workers, or access to their data, is checked before they start: identity, two references, and a DBS check at the highest level their role is eligible for. The DSL uses the DBS eligibility tool for each role.

11.2 No one has contact with workers until their checks are back and they have completed the training in section 15.

12. Online safety

12.1 All contact with workers happens through TRUE's systems, so it is recorded and can be reviewed.

12.2 TRUE never publishes a worker's name, school, location or image without separate consent from them and, if they are under 18, their parent or guardian.

12.3 Workers are told how to stay safe online and how to report anything that worries them, including contact from anyone claiming to be from TRUE through personal channels.

13. Information sharing and confidentiality

13.1 Safeguarding information is shared only with those who need it to protect the young person: necessary, proportionate, relevant, accurate, timely and secure.

13.2 We are open with the young person, and their parent or guardian if appropriate, about what we will share, unless that would put the young person at greater risk.

13.3 We never promise a young person complete confidentiality.

14. Records

14.1 Safeguarding records are factual, dated and signed, and kept separate from general worker data in a secure system that only the DSL and deputy can open.

14.2 Records about a young person are kept until their 25th birthday. Records of allegations against adults are kept for at least 10 years, or longer if the LADO advises.

14.3 The DSL reviews records regularly for patterns. Several small concerns can add up to a serious one.

15. Training

15.1 Everyone completes the training below, at the times shown.

Who	Training	When	Refresh
All staff, contractors and moderators	TRUE Safeguarding Training (in-house)	Before any contact with workers	Every year
All staff, contractors and moderators	NSPCC Introduction to Safeguarding and Child Protection (elearning, CPD certified) or equivalent	Within their first month	Every 2 years
DSL and deputy DSL	NSPCC Designated Safeguarding Officer (England) Core, or Norfolk Safeguarding Children Partnership multi-agency training	Before taking on the role	Every 2 years, with annual updates
Workers	Induction module, including staying safe and how to raise a concern	Before their first assignment	When it changes

15.2 Training completion is recorded for every person.

16. Whistleblowing and complaints

16.1 Anyone worried about how TRUE handles safeguarding raises it with a director. If that doesn't work, or they can't, they can contact the LADO, the NSPCC Whistleblowing Advice Line on 0800 028 0285, or the police. Raising a genuine concern is protected.

16.2 Workers and parents can also use the Complaints and Concerns Policy.

17. Clients

17.1 Client contracts require that:

- client and store staff never contact TRUE workers directly or ask for their personal details;
- any incident involving a TRUE worker on their premises is reported to TRUE the same day; and
- they cooperate with any safeguarding referral or LADO process.

17.2 TRUE stops sending workers to any site where it has a safeguarding concern until the DSL is satisfied it is safe.

18. Review

18.1 This policy is reviewed every year, after any serious incident, and when the law or TRUE's activities change.

Version	Approved by	Approved on	Next review
1.0	**Victoria Phillips, Director**	**3 November 2026**	**November 2027**