TRUE

POLICY 6 · WORKER SAFETY POLICY

Young Worker Health and Safety

How TRUE assesses and controls the risks of every assignment, so young workers stay safe in store, at home, on the go and in focus groups.

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

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

Every TRUE assignment is risk assessed before a young worker starts it. Work happens in public places or at home, within set hours and travel limits, and any worker can stop and leave if they feel unsafe, with no penalty.

Part A: Policy

1. Purpose and scope

1.1 This policy sets out how TRUE keeps its workers healthy and safe. It covers every TRUE worker aged 16 and over, with extra protection for those under 18 ("young workers"). It applies to all four TRUE activity types: mystery shopping, unboxing, pulse surveys and insight focus groups.

1.2 It works alongside the Worker Agreement, the Eligibility and Onboarding Policy, the Parental Consent Policy, the Safeguarding and Child Protection Policy and the Staff and Client Code of Conduct.

2. The law

2.1 This policy is written to meet:

- the Health and Safety at Work etc. Act 1974, which requires TRUE to keep its workers and anyone affected by its work safe, as far as reasonably practicable;
- the Management of Health and Safety at Work Regulations 1999, which require a risk assessment before a young person starts work (regulation 3), taking account of their inexperience, lack of awareness of risks and immaturity, and which ban certain work for young people (regulation 19);
- the Working Time Regulations 1998, which limit young workers' hours and set rest breaks;
- the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR); and
- the Employers' Liability (Compulsory Insurance) Act 1969.

2.2 Clients that host TRUE workers also have their own legal duties for the safety of their premises.

3. Who is responsible

Who	Responsibilities
Victoria Phillips, Director	Overall responsibility for health and safety. Approves every risk assessment and this policy. Reviews all incidents.

Who	Responsibilities
Assignment coordinators	Check each brief against the right risk assessment before it goes live. Set times, travel and venues within this policy. Monitor check-ins.
TRUE reps	Enhanced DBS checked. Lead focus groups, carry out the venue safety check, keep the register and report incidents.
Clients and host sites	Keep premises safe, give the TRUE rep a site safety briefing, name a first aider and follow Part B of the Code of Conduct.
Workers	Complete the safety induction, follow the brief and the safety rules, check in and out, and stop and leave if they feel unsafe.
Parents and guardians	Receive a summary of the risks and controls for each activity type, and can raise concerns with TRUE at any time.

4. Risk assessment

4.1 TRUE has a written risk assessment for each activity type (Part B). Each one is completed before any young worker starts that kind of work, and takes account of their age, inexperience, immaturity, lack of awareness of risk and whether they will be working alone.

4.2 Before each brief goes live, the assignment coordinator checks it against the right risk assessment. The check covers the venue, the product, the scenario, the timing and the travel. If the brief includes anything the risk assessment does not cover, TRUE either assesses the new risk and updates the assessment, or changes or declines the brief.

4.3 Workers make their own quick check on the day. If anything is different from the brief or feels unsafe, section 9 applies.

4.4 Workers see a plain English summary of the risks and controls in the TRUE app before their first assignment of each type, and confirm digitally that they have read it. Parents and guardians of workers under 18 receive the same summary in the information pack.

4.5 Risk assessments are reviewed every year, after any incident or near miss, and whenever an activity, venue type or the law changes.

5. Work young workers never do

5.1 TRUE never asks workers under 18 to:

- buy, handle, test or be served age-restricted products, such as alcohol, tobacco, vapes, knives, fireworks, lottery or gambling products, or age-rated games and films;
- enter stock rooms, warehouses, kitchens or any staff-only area;
- lift or carry heavy loads, use ladders, machinery, sharp tools or hazardous chemicals;
- act out scenarios designed to cause conflict, such as aggressive complaints;
- work at night, or carry passengers; or
- do anything beyond their physical or psychological capacity.

6. Hours and timing

6.1 In-store mystery shops take place only between 09:00 and 19:00. Pulse survey notifications are only sent between 10:00 and 19:00. Focus groups are timed so the worker can be home by 19:00.

6.2 Workers under 18 work no more than 8 hours a day or 19 hours a week across all their work, have a 30 minute break if they work more than 4.5 hours, and have at least 12 hours' rest between working days and 48 hours' rest each week. The Working Time and Hours Policy has the full rules.

6.3 Assignments are never booked during a worker's timetabled college, school or training hours.

7. Public places, daylight and lone working

7.1 In-person assignments take place only in open, staffed, public places during normal opening hours, or at a client's office with a TRUE rep present. Workers are never sent to a private home other than their own.

7.2 Workers may travel after dark with extra care: well-lit, busy routes, public transport where possible, and a parent or guardian told their route and when they expect to be home. The Lone Working and Travel Policy has the full rules.

7.3 Mystery shops, unboxing and pulse surveys are done alone. For this lone working, workers check in and out of in-person assignments in the TRUE app, the app reminds anyone who has not checked out at 18:00, and TRUE's emergency line is open from 09:00 to 19:00 every day. Workers are never alone with an adult on TRUE work.

8. Travel limits

8.1 Mystery shops need no more than 20 minutes' travel in total, there and back. Focus groups can be up to 2 hours away, with the agreement of the worker and, if they are under 18, their parent or guardian. TRUE books and pays for focus group travel in advance. The Lone Working and Travel Policy has the full rules.

8.2 Workers aged 17 and over with a full UK driving licence may drive themselves to assignments if their insurance covers driving for work. No worker gives or accepts a lift on TRUE work, including from TRUE staff or client staff. If a taxi is needed, TRUE books it through a licensed operator.

8.3 Travel time to and from an assignment is not paid, but it counts towards the hours limits.

9. Stop, leave, tell

9.1 Any worker can stop an assignment and leave at any time if they feel unsafe or uncomfortable. They will not be penalised, lose future work or need to explain themselves first. They are paid for the time worked.

1. **Stop.** End the task straight away. Don't finish the scenario or take more photos.
2. **Leave.** Go to a busy public place, such as a shop counter, station or cafÃ©. In an emergency, call 999.

3 **Tell.** Tell a parent or guardian, then report it on the TRUE incident report form the same day. TRUE contacts the worker the same day.

10. Incidents, first aid and RIDDOR

10.1 Anyone can report an incident: a worker, a parent or guardian, a TRUE rep or a client. In an emergency, call 999 first. Then report it on the TRUE incident report form the same day. The form is linked on the teen page of the TRUE website and in the TRUE app.

10.2 Report every injury, illness caused by work, near miss, dangerous occurrence or worrying situation, however small.

10.3 Every report follows this workflow:

Step	Who and when	What happens
1. Report	Worker, parent, TRUE rep or client. Same day.	Completes the incident report form: date, time and place; what happened; any injury and treatment; who was involved and any witnesses; action already taken; the reporter's contact details.
2. Log and alert	Automatic. Immediately.	The form logs the report in the incident log with a reference number and notifies Victoria Phillips straight away.
3. Respond	Victoria Phillips. Same day.	Contacts the worker, tells the parent or guardian of a worker under 18 about any injury, pauses work at the site if needed, and passes any safeguarding concern to the DSL.
4. Decide if RIDDOR applies	Victoria Phillips. Within 24 hours.	Checks the incident against the table in 10.5 and records the decision and the reason in the log.
5. Report to HSE	Victoria Phillips. Within the RIDDOR time limits.	Reports online to the Health and Safety Executive and records the HSE reference number in the log.
6. Investigate and act	Victoria Phillips. Within 7 days.	Finds the cause, updates the risk assessment, briefs the client if it happened on their premises, and tells the reporter the outcome.
7. Close	Victoria Phillips. Once all actions are done.	Closes the log entry. Records are kept for at least 3 years.

10.4 If Victoria Phillips is unavailable, the alert also goes to the deputy DSL, who carries out steps 3 to 5.

10.5 TRUE is responsible for reporting incidents involving its workers under RIDDOR:

Event	When TRUE reports to HSE
A death, or a specified injury such as a fracture, amputation or loss of consciousness	Without delay, and within 10 days

Event	When TRUE reports to HSE
An injury that stops a worker doing their normal work for more than 7 days	Within 15 days of the incident
An injury that stops a worker working for more than 3 days	Recorded in the incident log, not reported
A member of the public taken to hospital for treatment because of TRUE's work	Without delay, and within 10 days
A dangerous occurrence: a near miss listed in RIDDOR, such as the collapse of a structure, an electrical fault causing a fire, or an accidental release of a harmful substance	Without delay, and within 10 days
A reportable occupational disease diagnosed in a worker	As soon as TRUE receives the diagnosis

10.6 When an incident happens on a client's premises, the client also records it in its own accident book and reports it to TRUE the same day.

10.7 The form and the incident log are secure. Reports hold personal and health information, so only Victoria Phillips and the DSL can see them, and they are handled in line with the Worker Privacy Notice.

11. Insurance

11.1 TRUE holds employers' liability insurance as the law requires, and public liability insurance. Workers can see the certificate in the TRUE app.

12. Training

12.1 Every worker completes TRUE's safety induction in the app before their first assignment. It covers this policy, stop, leave, tell, reporting and the summary for each activity type they will do. TRUE reps complete the training set out in the Team Training Workflow.

Part B: Risk assessments

13. How risks are rated

13.1 Each hazard is scored for likelihood (1 unlikely, 2 possible, 3 likely) and severity (1 minor, 2 serious, 3 major). The risk score is likelihood multiplied by severity, after the controls are in place.

Score	Rating	What it means
1 to 2	Low	Acceptable with the controls listed.
3 to 4	Medium	Acceptable only with every control in place. Checked at each brief.
6 to 9	High	The activity does not go ahead until the risk is reduced.

13.2 All four assessments were carried out by Victoria Phillips, Director, on 3 November 2026, and will be reviewed by November 2027 or sooner under section 4.5.

RA1. Mystery shop in store

Activity profile	
What	Worker visits a store as a normal customer, follows a set scenario, then reports in the TRUE app.
Where	Open, staffed, public areas of retail stores during opening hours.
When	Between 09:00 and 19:00. A visit takes up to 30 minutes.
Who	One worker, aged 16 or over. TRUE coordinator on hand through the app.
Travel	No more than 20 minutes in total, there and back.

Hazard	Who and how	Controls	Risk
Travel to and from the store	Worker hurt in a road accident, lost or stranded.	20 minute travel limit. Walking, public transport, or driving for those 17 and over with a full UK licence. No lifts. Extra care after dark. Check in and out in the app.	**Medium (3)**
Personal safety in public	Worker approached, harassed or robbed.	Busy stores during opening hours only. Public areas only. No large cash, and workers never spend their own money. Stop, leave, tell.	**Low (2)**

Hazard	Who and how	Controls	Risk
Being challenged by store staff	Worker confronted if recognised as a mystery shopper.	Clients must not challenge shoppers (Code of Conduct). Worker stays calm, does not argue and leaves. Reported the same day.	**Low (2)**
Age-restricted products or staff-only areas	Worker exposed to illegal sales or unsafe areas.	Banned in section 5. Every brief checked before it goes live. Worker declines and reports any request.	**Low (2)**
Slips, trips and falling stock	Worker injured in the store.	Store's duty as occupier. Worker stays in customer areas and does not lift or climb for stock.	**Low (2)**
Lone working in public	Worker alone with no quick help.	App check-in and check-out. App reminder at 18:00 if not checked out. TRUE emergency line open 09:00 to 19:00.	**Low (2)**
Role-play stress	Worker anxious about the scenario.	Simple, realistic scenarios with no conflict. Worker can skip any step. Support from TRUE after the visit.	**Low (1)**
Recording other people	Privacy of staff or customers, especially children.	No video in store, ever. Photos of store displays only, never of people. Images go only to the TRUE app.	**Low (1)**
Food or drink tastings	Allergic reaction or illness.	Tasting is never part of a mystery shop. Workers can always say no to a sample.	**Low (2)**
Fire or emergency in store	Worker caught in an evacuation.	Follow store staff instructions, leave by the nearest exit, report to TRUE.	**Low (2)**

RA2. Unboxing at home

Activity profile	
What	TRUE sends a product to the worker's home. The worker opens it, tries it and gives feedback, which may include photos or video.
Where	The worker's home, in a shared living space.
When	At a time that suits the worker, within the deadline in the brief. Usually up to 60 minutes.
Who	One worker, aged 16 or over. Parent or guardian told when a parcel is due.
Products	Everyday consumer products checked by TRUE. Nothing age-restricted or hazardous. Returned after a research unboxing.

Hazard	Who and how	Controls	Risk
Sharp packaging and opening tools	Cuts from knives, blades or packaging edges.	Use scissors, not knives. Cut away from the body. Ask an adult for help with tough packaging.	**Low (2)**

Hazard	Who and how	Controls	Risk
Product hazards	Batteries, electricals or small parts cause injury.	TRUE checks every product first. No food, drink, creams, cosmetics or anything needing an allergy or patch test. Nothing age-restricted, no chemicals, no power tools. Follow the maker's instructions. Keep small parts away from young children.	**Low (2)**
Heavy or bulky parcels	Strain from lifting.	Parcels sent to workers weigh no more than 10kg.	**Low (1)**
Personal details in content	Worker's address, school or location revealed.	Content rules below. No house numbers, post, street views, school uniform or badges. Location data turned off. TRUE checks every upload.	**Low (2)**
Inappropriate content	Content that is unsafe or harmful to the worker.	Film in a shared living space, never a bedroom or bathroom. Everyday clothes. No other people in shot. TRUE checks every upload before anyone else sees it.	**Low (2)**
Online harm if content is published	Comments, abuse or contact from strangers.	Published only with Image Consent from the worker and, if under 18, their parent or guardian. First name only at most. No tagging of personal accounts. Comments managed by TRUE or the client.	**Low (2)**
Misleading content	Content presented as an independent customer review.	Never posted as a customer review or testimonial. Any marketing use is clearly labelled as advertising.	**Low (2)**
Home address shared	Client gets the worker's address.	Parcels sent by TRUE or a fulfilment partner under a data agreement. Clients never receive addresses.	**Low (2)**
Time spent filming	Pressure or long screen time.	Tasks capped at 60 minutes. Clear, simple shot list.	**Low (1)**

Content rules for unboxing

- Do film in a tidy, shared room with a plain background, in everyday clothes.
- Do show the product, your hands and, if you choose, your face.
- Do upload only to the TRUE app, and delete your copies after TRUE confirms receipt.
- Don't show your address, post, house number, street, school, uniform or anyone else.
- Don't film in a bedroom or bathroom, or post the content on your own social media.
- Don't swear, act out risky stunts or use the product in a way the maker doesn't allow.

RA3. Pulse survey on mobile

Activity profile	
What	Short surveys answered on the worker's phone in the TRUE app.

Activity profile	
Where	At home or on the go.
When	Between 10:00 and 19:00. Each survey takes no more than 10 minutes.
Who	One worker, aged 16 or over.

Hazard	Who and how	Controls	Risk
Distraction on the go	Worker hurt crossing a road, cycling, driving or on a platform.	Never answer while crossing roads, cycling, driving or near a platform edge. Safety reminder on every survey. Surveys can be paused and finished later.	**Medium (3)**
Phone theft	Phone taken while in use in public.	Advice to stay aware and answer somewhere safe and seated.	**Low (2)**
Screen time and posture	Eye strain or discomfort.	10 minute limit per survey. A small number of surveys a day.	**Low (1)**
Upsetting questions	Worker distressed by a topic.	TRUE reviews every question set. Sensitive topics need DSL approval. Every question can be skipped. Support information in the app.	**Low (2)**
Data privacy	Answers seen or intercepted.	Encrypted app. No personal details asked in free text. Advice not to answer where others can see the screen.	**Low (1)**
Timing	Notifications during lessons or late at night.	Notifications only between 10:00 and 19:00, and never during the worker's college or school hours.	**Low (1)**
Pressure to respond	Worker feels they must answer every survey.	Every survey is optional, with no penalty for skipping.	**Low (1)**
Contact from strangers	Clients or others message workers.	The app has no messaging between workers and clients.	**Low (1)**

RA4. Insight focus group at a client office

Activity profile	
What	A group discussion of 2 to 4 hours about a brand, product or idea.
Where	A meeting room at the client's registered office, visible and close to reception.
When	Timed so every worker can be home by 19:00.
Who	6 to 10 workers aged 16 or over. Led by a DBS checked TRUE rep, with a second TRUE adult present throughout. Client observers may attend.

Activity profile	
Staffing rule	No worker is ever alone with any adult, including TRUE staff and client staff.

Hazard	Who and how	Controls	Risk
Travel to an unfamiliar venue	Worker lost, late or unsafe on a longer journey.	Up to 2 hours each way, with agreement. TRUE books travel in advance. Journey plan and meeting point at reception. Parent or guardian may come and wait nearby.	**Medium (3)**
An adult alone with a young person	Safeguarding risk to workers and false allegations against adults.	Two TRUE adults present at all times. Room visible, door open or glazed. No one-to-one conversations. Client observers are briefed by TRUE, sign an observer agreement, and do not approach workers or swap details.	**Medium (3)**
Fire, evacuation and first aid	Workers unsure what to do in an unfamiliar building.	Client gives the TRUE rep a site safety briefing before the session. Rep tells the group about exits and the assembly point. Sign-in register used for the roll call. Client first aider named.	**Low (2)**
Conflict between participants	Bullying, harassment or unkind comments.	Ground rules agreed at the start. Rep manages the discussion. Anyone who breaks the rules is asked to leave and their parent or guardian told.	**Low (2)**
Upsetting topics	Worker distressed by the discussion.	Discussion guide reviewed by TRUE. Anyone can pass on any question or take a break. Reps trained to spot distress and follow the DSL route.	**Low (2)**
Food, drink and allergens	Allergic reaction or illness.	Dietary needs asked before the day. Allergen information for all refreshments. Water always available. No alcohol.	**Low (2)**
Recording and images	Images used without consent.	Audio or video recording only with consent under Schedule 3, announced and visible. Workers are never photographed.	**Low (1)**
Long periods seated	Tiredness or discomfort.	Comfort break around every hour. Sessions of 3 hours or more include a 30 minute break. Accessible room.	**Low (1)**
Arriving and leaving	Worker missing or leaving with the wrong person.	Sign in and out. Rep contacts any worker not arrived within 15 minutes, then their parent or guardian. Nobody leaves with client staff. Rep checks everyone has left before closing.	**Low (2)**

Part C: Sign-off and review

14. Signing and review

14.1 Workers confirm digitally in the TRUE app that they have read the safety induction and the summary for each activity type before their first assignment of that type. No paper signatures are used.

14.2 This policy is published on the teen page of the TRUE website, with a link to the incident report form.

14.3 This policy and its risk assessments are reviewed every year, after any incident or near miss, and sooner if the law or TRUE's activities change.

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