TRUE

POLICY 16 · RESEARCH POLICY

Research Ethics

How TRUE runs focus groups, pulse surveys and mystery shops in line with the MRS Code of Conduct.

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

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

TRUE follows the Market Research Society (MRS) Code of Conduct in all its research. Every participant knows who the client is and what is involved, gives their permission, can stop at any time and is treated with respect, and research is always kept separate from selling.

1. Purpose and scope

1.1 This policy applies to insight focus groups, pulse surveys, research unboxing and mystery shops. TRUE follows the MRS Code of Conduct and the MRS guidelines for data collection with children, as well as the UK GDPR.

1.2 TRUE workers are both research participants and workers, so this policy works alongside the Worker Agreement and every other TRUE policy.

2. Research is not selling

2.1 Insight work is research. It is never used to sell to, or market at, the people taking part. Any promotional or activation work is a separate project, as set out in the Independence and Conflicts Policy.

3. Permission and informed consent

3.1 Workers give their date of birth first when they register, before any other personal information. No one under 16 can register.

3.2 Before each project, the app tells the worker:

- that TRUE is running the project, and the name of the client it is for;
- the general subject and the purpose of the research;
- the types of personal data collected, including any sensitive data;
- that they can withdraw at any time;
- whether it will be recorded or observed, and who will see it live or recorded;
- how long it will take, in minutes;
- that it will cost them nothing;
- how long their data is kept, and their right to complain; and
- that the project is run in line with the MRS Code of Conduct and UK data protection law.

3.3 The client is always named. TRUE does not run research for a client who will not be named.

3.4 The worker confirms their permission in the app before starting. For workers under 18, TRUE also has their parent or guardian's consent, under the Parental Consent Policy. The MRS Code requires this for under-16s. TRUE goes further and requires it for everyone under 18.

4. Taking part is voluntary

4.1 Workers can skip any question, take a break or leave at any time, with no penalty. They are paid for the time they took part, as the Quality Review and Disputes Policy sets out.

5. Recording, photos and observation

5.1 Workers are never photographed in mystery shops, pulse surveys or focus groups. Focus groups are only audio or video recorded with consent under the Image, Voice and Video Consent Policy, announced and always visible.

5.2 Every observer, including client staff, is named to the group before the session starts. There is no hidden observation, and participants are always told about any viewing room or one-way mirror.

5.3 Before the session, every observer gets a short briefing from TRUE on their legal and ethical duties, and signs an observer agreement. The agreement covers confidentiality, no contact with workers, no photos or recordings of their own, and following the Staff and Client Code of Conduct.

6. Moderator conduct

6.1 Every focus group is led by a DBS checked TRUE moderator who has been trained in the MRS Code and in safeguarding. A second TRUE adult is present throughout.

6.2 Moderators:

- stay neutral and never ask leading questions;
- never sell, promote or give their own view of a product;
- treat every participant with respect and make sure everyone can speak;
- manage the group so no one is pressured, mocked or left out; and
- never have contact with participants outside TRUE channels, as the Staff and Client Code of Conduct sets out.

6.3 The app shows each worker the name of the TRUE moderator running their session and TRUE's company details, so they can check who is running it.

7. Sensitive topics

7.1 Sensitive topics include health, mental health, body image, sexuality, religion, politics, money, crime and family life. TRUE avoids them unless the research genuinely needs them and the DSL has approved the discussion guide or question set.

7.2 Where a sensitive topic is approved, workers are warned before they start, can opt out of those questions, and are given details of where to get support.

7.3 TRUE reviews every discussion guide and question set before use.

8. Incentives

8.1 The reward for taking part is set under the Rewards, Pay and Holiday Policy. Every brief says who pays the reward (TRUE), what it is, when it is paid (the last working day of the month) and any conditions, such as passing quality review.

8.2 Rewards are proportionate to the time involved and never so large that they pressure anyone to take part. They are never alcohol, tobacco, vapes, gambling or any age-restricted product, and never depend on the answers a worker gives.

8.3 Client products are never used as a reward for research. Workers return products after a research unboxing. If a client wants workers to keep products, the project is run and clearly labelled as non-research marketing work.

9. Pulse surveys

9.1 Surveys are written in plain, age-appropriate language, take no more than 10 minutes, have no trick questions, and collect only what the research needs.

9.2 Survey notifications and all other messages are only sent between 10:00 and 19:00, never before 10:00 on any day.

9.3 Results are reported to clients without names. TRUE does not report results for groups of fewer than 10 people, so no one can be identified.

10. Reporting to clients

10.1 Findings are anonymous. Quotes are never linked to a name. Clients only get identifiable content where the worker has opted in under the Image, Voice and Video Consent Policy.

10.2 If a worker asks TRUE to pass a complaint to the client, such as about a store or a product, TRUE agrees the wording with them and passes it on. It is not linked to any other data or used for anything else.

10.3 TRUE only describes results as representative of a group when it can show how the sample was made up.

11. Mystery shopping

11.1 Video is never recorded in a store during a mystery shop. Photos show store displays only, never staff, customers or the worker.

11.2 Stores and staff are not told about mystery shops in advance.

11.3 Reports never name or identify individual members of staff. Results are used to improve service, and are not used to discipline individual staff.

12. Breaches and review

12.1 Any breach of this policy is reported to Victoria Phillips and handled under the Staff and Client Code of Conduct.

12.2 This policy is reviewed every year, and when the MRS Code changes.

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