TRUE

POLICY 2 · WORKER POLICY

Eligibility and Onboarding

Who can work with TRUE, when school leavers can start, and every step a new worker completes before their first assignment.

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

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

No one does a TRUE assignment until they meet every eligibility rule and have completed every onboarding step in this policy. For anyone under 18, that includes direct confirmation from a parent or guardian.

1. Purpose and scope

1.1 This policy sets out who can work with TRUE and the steps every new worker completes before their first assignment.

1.2 It applies to everyone who applies to work with TRUE as a casual worker under the TRUE Worker Agreement, and to the TRUE staff who run onboarding.

1.3 It works alongside the Worker Agreement, the Parental Consent information, the Safeguarding and Child Protection Policy and the Worker Privacy Notice.

2. Who can join

2.1 To work with TRUE, an applicant must meet all of these:

Requirement	What we check	How
Aged 16 or over	Date of birth	Identity document at the right to work check
Finished compulsory school	Year 11 (England, Wales), S4 (Scotland) or Year 12 (Northern Ireland) completed	Applicant declares school year and leaving date
Lives in the UK	Home postcode	Application form
Right to work in the UK	Passport, or Home Office share code	Certified digital check, or manual check by TRUE
National Insurance number	NI number	Application form; payroll checks with HMRC
UK bank account in their own name	Account details	Payroll set-up in Staffwise
Smartphone	Can run the TRUE app	Applicant installs and signs in
Parent or guardian consent, if under 18	Direct confirmation from the parent or guardian	Staffwise consent link (step 3)

Requirement	What we check	How
No conflict of interest	Declares any job or family link with a TRUE client	Application form

2.2 Each person may hold only one TRUE account.

3. Who cannot join

3.1 TRUE will not accept an application from anyone who:

- is under 16, or has not yet reached their school leaving date;
- does not have the right to work in the UK;
- lives outside the UK;
- is under 18 and whose parent or guardian has not confirmed consent within 30 days;
- was previously removed from TRUE for a serious breach of the Worker Agreement, unless a director agrees otherwise; or
- already has a TRUE account.

3.2 If an applicant under 16 applies, the application is rejected automatically and their data is deleted within 30 days. We tell them, kindly, that they can apply after they finish Year 11 (or equivalent).

4. When school leavers can start

4.1 School leavers can apply at any time from 1 May in the year they finish Year 11 (or equivalent), so onboarding is ready in time. They cannot be activated or offered an assignment before the start date below.

Nation	Leaving point	Earliest activation
England	End of Year 11 (last Friday in June)	1 July
Wales	End of Year 11 (last Friday in June)	1 July
Northern Ireland	End of Year 12 (30 June)	1 July
Scotland, summer leavers	End of S4 (31 May leaving date)	1 July
Scotland, winter leavers	Christmas leaving date	First working day of January

4.2 Using 1 July for everyone in the summer keeps the process simple and fair across the UK.

4.3 Staffwise blocks activation before the earliest activation date, whatever stage onboarding has reached.

5. Onboarding steps

5.1 Every applicant completes these steps in the TRUE app, in this order. Staffwise will not move an applicant to the next step until the one before is complete.

1. **Apply.** The applicant gives their name, date of birth, home postcode, mobile, email, the school year they have completed and their leaving date, what they are doing alongside TRUE (education, training, work), and any conflict of interest.

2. **Age and eligibility check.** Staffwise checks the answers against section 2.
   - Under 16 or not yet at leaving date: rejected, data deleted within 30 days.
   - 16 or 17: goes to step 3.
   - 18 or over: goes to step 4.

3. **Parent or guardian consent (under 18 only).** The applicant gives a parent or guardian's name, email and mobile. TRUE sends the consent link directly to the parent or guardian, never through the young person. The parent or guardian reads the Parental Consent information, the Worker Agreement and the Worker Privacy Notice, and signs Schedule 2 of the Worker Agreement digitally. The link lasts 14 days, with reminders at day 3 and day 10. If no one confirms within 30 days, the application closes and the data is deleted. TRUE never asks for photos of a parent's passport or other ID.

4. **Identity and right to work.** The applicant completes a right to work check through a certified digital identity provider using their passport, or gives a Home Office share code. Anyone without a passport or share code can book a manual check with the TRUE team. This confirms their date of birth too.

5. **Payroll details.** The applicant gives their National Insurance number, UK bank details and completes the HMRC starter checklist in Staffwise.

6. **Agreement and policies.** The applicant reads the Worker Agreement, signs it digitally in the app, and confirms they have read the policies listed in clause 20 of it. Optional choices are offered separately: image, voice and video consent (Schedule 3), marketing messages, and the 48-hour opt-out (18 and over only).

7. **Induction.** The applicant completes the short induction in the app: staying safe, restricted activities, how assignments and pay work, staying independent, and how to raise a concern. They must pass the 10-question check at the end. They can retake it.

8. **Activation.** The onboarding lead checks the record is complete and activates the account. Under-18s cannot be activated without a recorded parent or guardian confirmation. Activation sends a welcome message with how to find assignments.

9. **First assignments.** Under-18s complete at least one remote assignment, such as a pulse survey or unboxing, before their first in-store mystery shop or in-person focus group.

5.2 We aim to complete steps 4 to 8 within 5 working days of the applicant finishing step 3 (or step 2 for anyone 18 or over).

5.3 If any check fails, we tell the applicant why, unless doing so would be unlawful, and whether they can try again.

6. Records and retention

6.1 We collect only what each step needs, and keep it as follows:

Record	Why we keep it	How long
Applications that don't go ahead	Running the application process	Deleted within 30 days
Right to work check and document copy	Required by Home Office rules	Length of engagement plus 2 years
Parent or guardian confirmation	Evidence of consent	Length of engagement plus 6 years
NI number, bank details, payroll and holiday records	Pay, tax and minimum wage law	6 years after the end of the tax year
Induction completion and Agreement acceptance	Evidence of onboarding	Length of engagement plus 6 years

6.2 Records are held in Staffwise, with access limited to the TRUE staff who need them. The Worker Privacy Notice explains this in full.

7. Changes in circumstances

7.1 Workers must update the app if their address, bank details, right to work or education status changes.

7.2 If a parent or guardian withdraws consent, the account is paused straight away and closed. The worker is paid everything owed in the next pay run.

7.3 If a worker's right to work ends or can't be confirmed, they are not offered assignments until it is resolved.

8. Turning 18

8.1 When a worker turns 18, Staffwise:

- removes the under-18 hours limits and assignment restrictions;
- asks the worker to confirm they want to continue;
- updates their pay rate to the 18 to 20 National Minimum Wage; and
- checks whether they need to be told about the workplace pension.

8.2 Parent or guardian consent is no longer needed. The consent record is kept as set out in section 6.

9. Reapplying

9.1 Anyone whose application closed, or who left TRUE, can reapply at any time and goes through onboarding again from step 1.

9.2 Anyone removed for a serious breach of the Worker Agreement can only rejoin with a director's written approval.

10. Fairness and adjustments

10.1 We apply this policy in the same way to everyone, in line with the Equality Act 2010 and our Equality, Inclusion and Reasonable Adjustments Policy.

10.2 Applicants who need help with any step, such as an alternative to the digital identity check or support with the induction, can ask in the app. We will make reasonable adjustments.

11. Roles and review

Role	Responsible for
Onboarding lead	Running onboarding, manual checks, activation, keeping records complete
Designated Safeguarding Lead	Any safeguarding concern raised during onboarding; checking the consent process works
Payroll (through Staffwise)	Payroll set-up, HMRC starter checklist, minimum wage rate changes at 18
Directors	Approving this policy, rejoining decisions under 9.2, annual review

11.1 This policy is reviewed every year, and sooner if the law changes, including when right to work checks are extended to casual workers.

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