TRUE

POLICY 8 · WORKER SAFETY POLICY

Restricted Activities

The work TRUE never offers to workers under 18, and how every brief is checked before it goes live.

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

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

Some work is never offered to TRUE workers under 18. No brief goes live until it has been checked against this policy, and any worker asked to do something on this list can refuse and leave, with no penalty.

1. Purpose and scope

1.1 This policy lists the activities TRUE workers under 18 must never be asked to do, and how TRUE makes sure they never are. It applies to every TRUE assignment: mystery shopping, unboxing, pulse surveys and insight focus groups.

1.2 It supports the Young Worker Health and Safety Policy, which bans work beyond a young person's capacity, and works alongside the Lone Working and Travel Policy, the Safeguarding and Child Protection Policy and the Staff and Client Code of Conduct.

2. The restricted activities

Restricted	The rule
Age-restricted products and services	Never buy, handle, test, be served, review or be shown how to use them (section 3).
Private areas	Never enter stock rooms, offices, kitchens, warehouses or any staff-only area, a private home other than their own, a hotel room or a vehicle.
One-to-one time with adults	Never alone with any adult, in person or online, including TRUE staff and client staff (section 4).
Alcohol venues	Never visit pubs, bars, nightclubs, off-licences, betting shops, casinos, adult gaming centres, or any venue that mainly sells alcohol, even if it also serves food (section 5).
Late or early tasks	No task before 09:00 or after 19:00, no notification before 10:00, and nothing during the worker's college, school or training hours (section 6).
Travel outside set limits	Mystery shops no more than 20 minutes' travel in total, focus groups within 2 hours. No overnight stays and no travel outside the UK (section 7).

3. Age-restricted products and services

3.1 Workers under 18 are never asked to buy, handle, test, be served, review or film:

Product or service	Main law
Alcohol	Licensing Act 2003
Tobacco, cigarette papers, vapes and nicotine products	Children and Young Persons Act 1933; Nicotine Inhaling Products (Age of Sale and Proxy Purchasing) Regulations 2015
Knives, blades and corrosive products	Criminal Justice Act 1988; Offensive Weapons Act 2019
Adult fireworks, lighter refills and solvents	Pyrotechnic Articles (Safety) Regulations 2015; Cigarette Lighter Refill (Safety) Regulations 1999; Intoxicating Substances (Supply) Act 1985
Lottery, scratchcards, betting and gaming	Gambling Act 2005; National Lottery rules
18-rated films and games	Video Recordings Act 1984; PEGI age ratings
Sunbeds, tattoos, and cosmetic injections or fillers	Sunbeds (Regulation) Act 2010; Tattooing of Minors Act 1969; Botulinum Toxin and Cosmetic Fillers (Children) Act 2021
Medicines, supplements, and 18+ apps or websites	TRUE policy: no testing, sampling or reviewing

3.2 TRUE never uses workers under 18 to test whether a store sells age-restricted products to young people. That work is for local Trading Standards.

3.3 Workers can shop in stores that also sell age-restricted products, such as supermarkets, as long as the assignment does not involve those products.

3.4 **Age-verification work for workers aged 18 and over.** This policy covers workers under 18. TRUE does not offer age-verification work, such as Challenge 25 checks on whether stores ask for ID, to workers aged 18 and over until it has its own policy and risk assessment, approved by Victoria Phillips.

4. No one-to-one time with adults

4.1 In person, focus groups always have two TRUE adults present, and no worker is ever alone with any adult. Mystery shops involve only the normal contact any customer has with store staff, in a public area.

4.2 Online, TRUE does not hold one-to-one video or phone calls with workers under 18. Online interviews take place in a group with two TRUE adults present, or with the worker's parent or guardian in the room.

4.3 All messages between TRUE and workers go through the TRUE app, as set out in the Staff and Client Code of Conduct.

5. Alcohol venues

5.1 Workers under 18 are never sent to a venue that mainly sells alcohol, gambling, tobacco, vapes or adult products. This includes pubs and bars that also serve food, hotel bars, and vape shops.

5.2 Restaurants, cafés and shops that sell some alcohol are allowed, as long as the assignment does not involve alcohol and the worker is not seated in a bar area.

5.3 No alcohol is served at any TRUE focus group or event attended by workers under 18.

6. Hours

6.1 No assignment or task starts before 09:00 or finishes after 19:00. No notification or message is sent before 10:00 or after 19:00.

6.2 No assignment is booked during the worker's timetabled college, school or training hours.

6.3 Daily and weekly limits, rest breaks and rest periods are set out in the Working Time and Hours Policy.

7. Travel

7.1 Mystery shops need no more than 20 minutes' travel in total, and focus groups within 2 hours, as set out in the Lone Working and Travel Policy.

7.2 No assignment involves an overnight stay, travel outside the UK, or a lift from anyone.

8. Other work young workers never do

8.1 Workers under 18 are also never asked to:

- lift or carry heavy loads, use ladders or machinery, or handle hazardous chemicals;
- act out scenarios designed to cause conflict, such as aggressive complaints;
- carry or handle large amounts of cash;
- record video in a store, or photograph any person during a mystery shop;
- perform stunts or use a product in a way the maker does not allow; or
- answer questions on sensitive topics unless the DSL has approved the question set.

9. How TRUE checks every brief

1. **Brief check.** Before a brief goes live, the assignment coordinator checks it against this policy and the right risk assessment.
2. **Age filter.** Staffwise only offers a brief to workers who meet its age requirement. Briefs that include anything in this policy are never offered to workers under 18.
3. **Decline or change.** Anything that breaks this policy is removed from the brief, or the brief is declined. Victoria Phillips approves any change.

4 **Client agreement.** Clients agree to this policy as part of the Client Terms and Part B of the Code of Conduct.

10. If a worker is asked to do something restricted

10.1 Any worker asked to do something on this list, by a client, store staff, TRUE staff or anyone else, should refuse, leave if they need to, and report it on the TRUE incident report form the same day. They will not be penalised, and they are paid for the time worked.

10.2 TRUE investigates every report. A breach by TRUE staff is handled under the Code of Conduct. A breach by a client may lead to TRUE pausing work at the site or ending the contract. Any safeguarding concern goes to the DSL.

11. Signing and review

11.1 Workers confirm digitally in the TRUE app that they have read this policy before their first assignment. No paper signatures are used.

11.2 This policy is reviewed every year, after any breach, 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**