TRUE

POLICY 3 · WORKER POLICY

Parental Consent

How TRUE gets, checks, records and respects parent or guardian consent for workers aged 16 and 17.

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

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

No one under 18 is activated, offered an assignment or has assignment data processed until a parent or guardian has signed their consent digitally, directly with TRUE. Consent is a gate, not a formality.

1. Purpose and scope

1.1 This policy sets out how TRUE gets, records and respects parent or guardian consent for workers aged 16 and 17.

1.2 It applies to every applicant and worker under 18, their parents and guardians, and the TRUE staff who run onboarding and safeguarding.

1.3 It works alongside the Worker Agreement (Schedules 2 and 3), the Eligibility and Onboarding Policy, the Safeguarding and Child Protection Policy and the Worker Privacy Notice.

2. Principles

- **Direct.** Consent comes from the parent or guardian directly to TRUE, never passed on by the young person.
- **Informed.** The parent or guardian sees what their child will do, how they are kept safe, how they are paid and how their data is used before they sign.
- **Specific.** Consent to take part is separate from consent to images, voice or video.
- **Two-way.** The young person must want to take part too. We never rely on a parent's consent against the young person's wishes.
- **Easy to withdraw.** Either of them can withdraw at any time, without penalty.
- **Minimal data.** We collect only what we need to confirm and record consent. We never ask for copies of a parent's passport or other ID.

3. When consent is needed

Situation	Consent needed
Joining TRUE and doing any assignment under 18	Parent or guardian signs Schedule 2 of the Worker Agreement
Any assignment that captures the young person's face, voice or video (unboxing, recorded focus groups)	Young person and parent or guardian both sign Schedule 3

Situation	Consent needed
An assignment that needs sensitive information, such as allergies before a product trial	Young person's explicit consent for that assignment, and the parent or guardian is told
A new type of assignment not listed in Schedule 1 (for example events or in-store activation)	Fresh parent or guardian consent before it is offered
A material change to the Worker Agreement or how data is used	Fresh parent or guardian consent

4. Who can give consent

4.1 Consent must come from someone with parental responsibility for the young person. This is usually a parent, but can be a guardian, special guardian or someone named in a court order.

4.2 If the young person is looked after by a local authority, consent comes from the local authority, usually through their social worker. Foster carers can only consent if the local authority has delegated that to them in writing.

4.3 If a young person says they live independently or have no contact with a parent, the onboarding lead refers it to the Designated Safeguarding Lead, who decides how to proceed. We do not activate them until the DSL has recorded a decision.

4.4 One person with parental responsibility is enough. If another person with parental responsibility objects, section 11 applies.

5. What parents and guardians are told

5.1 Before they sign, the parent or guardian is given:

- the Parental Consent information for parents and guardians;
- the Worker Agreement, including the assignment types in Schedule 1;
- the Worker Privacy Notice;
- the safety rules for under-18s, including no age-restricted products, public places, all work between 09:00 and 19:00 and notifications only between 10:00 and 19:00;
- how pay works: at least the National Minimum Wage for their age, paid to the young person's own bank account, with holiday pay;
- that TRUE follows the Market Research Society (MRS) Code of Conduct in all research (www.mrs.org.uk/standards/code-of-conduct); and how to ask questions and how to withdraw consent.

5.2 The information is written in plain English and works on a phone.

6. How consent is obtained

6.1 Consent is obtained in Staffwise, in this order:

1. **Young person gives contact details.** At sign-up, the young person gives their parent or guardian's name, relationship, email and mobile number.
2. **TRUE sends the link directly.** Staffwise sends a secure consent link to the parent or guardian by email and text. It never goes through the young person's account.
3. **Parent or guardian verifies.** They open the link and enter a one-time code sent to their mobile. This confirms they control the contact details given.
4. **Parent or guardian reads.** They read the documents in section 5.
5. **Parent or guardian signs.** They confirm they have parental responsibility, tick each statement in Schedule 2 of the Worker Agreement and sign digitally by typing their full name.
6. **Optional consents.** They are asked separately whether they also consent to images, voice and video (Schedule 3). Saying no does not affect anything else.
7. **Confirmation.** Staffwise sends a confirmation email to the parent or guardian and a confirmation in the app to the young person.

6.2 The link lasts 14 days, with reminders on day 3 and day 10. If no one signs within 30 days of sign-up, the application closes and the data is deleted.

7. Checks on consent

7.1 Staffwise flags a consent for a manual check if:

- the parent or guardian's email or mobile is the same as the young person's;
- the same parent or guardian contact is used for more than three young people;
- the consent is signed within 2 minutes of the link being sent; or
- anything else suggests the young person may have signed it themselves.

7.2 For a flagged consent, the onboarding lead phones the parent or guardian on the number given to confirm. The young person is not activated until this is done.

7.3 The onboarding lead also phones a random 1 in 10 of all parents and guardians who sign, to confirm the process is working.

7.4 If a parent or guardian says they did not sign, the consent is cancelled, the account is paused and the DSL is told.

8. The young person's agreement

8.1 The young person signs the Worker Agreement digitally themselves, and confirms they want to take part.

8.2 If a young person tells us they feel pressured to take part, or don't want to, we will not activate or keep them on the panel, whatever their parent or guardian has said. The onboarding lead tells the DSL.

9. Withdrawing consent

9.1 A parent or guardian, or the young person, can withdraw consent at any time, through the link in their confirmation email, in the app, or by contacting TRUE.

9.2 When consent is withdrawn:

- the account is paused straight away and no new assignments are offered;
- any assignment already accepted is cancelled, with no penalty;
- the young person is paid everything owed, including holiday pay, in the next pay run;
- if image, voice or video consent is withdrawn, that content is not used again and is deleted, unless it has already been shared with a client in a report; and
- the account is closed, and data is kept only as set out in section 13.

10. When fresh consent is needed

10.1 TRUE asks the parent or guardian to sign again before:

- offering a type of assignment not in Schedule 1;
- a material change to the Worker Agreement; or
- using the young person's data in a new way.

10.2 Until they sign again, the young person keeps doing only the assignments the existing consent covers.

11. Disagreement between parents

11.1 If another person with parental responsibility tells us they object, we pause the account and contact both parents or guardians. We will not offer assignments while there is an unresolved objection.

11.2 We do not take sides in family disputes. If there is a court order about who decides, we follow it.

12. Safeguarding

12.1 Anything in the consent process that worries us is referred to the DSL the same day. Examples include:

- a parent or guardian who seems to be pressuring the young person to work;
- a request to pay the young person's earnings to someone else (pay always goes to the young person's own account);
- signs that the person signing is not who they say they are; or
- anything the young person tells us that suggests they may be at risk.

12.2 The DSL follows the Safeguarding and Child Protection Policy.

13. Records and retention

13.1 For each consent, Staffwise records:

- the parent or guardian's name, relationship, email and mobile;
- how they verified (one-time code) and any manual check;
- each statement they signed, their typed signature, and the date and time;
- the versions of the documents they were shown; and
- any optional consents and any withdrawal.

13.2 Consent records are kept for the length of the engagement plus 6 years, so TRUE can show consent was given. Consents for applications that don't go ahead are deleted within 30 days.

13.3 Access is limited to the onboarding lead, the DSL and the directors.

14. Turning 18, roles and review

14.1 When the young person turns 18, parent or guardian consent no longer applies. The young person confirms in the app that they want to continue. The consent record is kept as in section 13.

Role	Responsible for
Onboarding lead	Running the consent process, manual and random checks, activation
Designated Safeguarding Lead	Referrals under 4.3, 8.2 and 12; reviewing failed or disputed consents
Directors	Approving this policy and annual review

14.2 This policy is reviewed every year, and sooner if the law or our activities change.

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