

Revealing Reality

Ethics & Safeguarding Policy

Last updated: January 2022

1. Introduction

1. We are specialists in ethnographic research, accustomed to conducting research in 'natural' settings and with vulnerable/hard-to-reach audiences, we regularly come into contact with children and vulnerable adults from a wide range of backgrounds. Sometimes the experience of these individuals/groups is the core focus of our research; at other times, we may encounter them incidentally while the main focus of the research is elsewhere.
2. Regarding the necessity of our contact with children and vulnerable adults, we firmly believe that conducting primary research with these audiences – understanding their experiences and perspectives – is essential for those who wish to design products or services specifically for them. It is all the more important when the subject under consideration is sensitive, and the participants (particularly children) may be unwilling or unable to discuss their experiences in the presence of other people.
3. As researchers, we are bound by a strict set of codes that emphasise the over-riding importance of confidentiality and respondent anonymity to the successful conduct, delivery and use of research. When conducting research with adults, this means that our primary responsibility is safeguarding anonymity – i.e. if adults tell us they wish for their identities and testimonies to remain anonymous, then we must respect this wish above other considerations. This is also true of conducting research with children, except in those instances where under 16s disclose allegations of harm or abuse, in which case – in line with The Children Act (2004) – we have a duty to disclose what we have been told to the appropriate authorities. This policy has been written to reflect this important distinction between children and vulnerable adults.
4. This policy is for use by all of our staff, our commissioners and their stakeholders.
5. The general principles in the policy apply broadly across all our projects (including those with non-vulnerable individuals); however, specific details and definitions may be adapted on a study-by-study basis, with the agreement of the commissioning team.

2. Definitions and Objectives

The purpose of this policy is to ensure that our employees do all they can to protect participants (including children and vulnerable adults) from personal and social harm resulting from their participation in a research process.

It is also designed to ensure that researchers act appropriately in identifying and disclosing signs of abuse among participants – whether that involves potential disclosure regarding under 16s, including abuse by a person in a position of trust or of children that are not able to disclose their abuse (due to developmental difficulties or age, or respecting individuals' right to confidentiality and anonymity in the case of all but the most exceptional vulnerable adult cases. The policy covers all aspects of our operations, including recruitment of staff.

The specific objectives of the policy are:

- To ensure good quality research and promote professionalism
- To respect the right of children to participate in research – but also to support the appropriate authorities in protecting them from different kinds of abuse, harm and exploitation
- To respect the right of adults to participate in research – and doing so, wherever required, by respecting their wish for anonymity and confidentiality, and only breaching this in the most exceptional circumstances (see section 6 and 8)
- To protect researchers from accusations of improper behaviour

The policy has been conceived in line with all relevant industry codes, including:

- ‘Code of Conduct’ (Market Research Society)
- Guidance on ‘Ethical Assurance for Social Research in Government’ (Government Social Research Service)
- Guidelines of the Social Research Association
- Best Practice Rules and Guidelines of the Association for Qualitative Research
- Guidelines of the Association of Social Anthropologists

Definitions

For the purposes of this policy – in line with the (research industry-standard) Market Research Society *Code of Conduct* – **children** are defined as those aged under 16 years old (although we also include certain guidance applying to those aged 16 and 17). There is no ‘official’ minimum age below which children are prohibited from participating in research; however, our expectation is that researchers will involve very young children directly in research only where necessary and appropriate to the particular project in question.

In line with the Care Act 2014 definition¹, **adults at risk of harm** (commonly referred to as adults at risk) are defined as those who are over 18 years old who have needs for care and support, who are experiencing, or at risk of, abuse or neglect and as a result of their care needs - are unable to protect themselves. Among those who commonly fall under the definition are: older people, people with mental health problems, disabled people, people with learning difficulties, people with acquired brain damage and people who misuse substances.

Regarding **potential harm** arising from participation in a research process, we understand the key risks to include:

- Inappropriate intrusion into personal affairs
- Creation of false hopes
- Detriment to a person’s reputation
- Creation of avoidable anxiety or distress
- Inadvertent negative impact of research process on non-participating members of the target group²

Regarding the potential disclosure of abuse of research participants by others, we understand **abuse** to constitute a violation of an individual’s human and civil rights, consisting either of a single or repeated act – or indeed prompted by an omission to act. The definition covers physical, verbal, emotional and psychological harm and exploitation, bullying, and also specific kinds of ‘transactions’ (e.g., grooming, sexual, financial, material) to which the individual has not given his or her consent. It also encompasses neglect, discriminatory abuse, institutional abuse and harm that may arise from online activities.

¹ The Care Act, 2014, <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

² For more detail on these definitions, please see ‘Ethical Assurance for Social Research in Government’ (Government Social Research Unit)

Common **signifiers of abuse**³ include: unexplained injuries, unexplained damage to personal items (e.g. torn clothes), weight loss, dehydration, lack of personal care, unpaid bills, critical/disrespectful carers, sudden loss of assets (e.g. financial or social), apparent engagement in unwanted sexual acts or exposure to explicit material without prior consent, excessive deference to suspected abusers, unexplained mood and/or behaviour changes, depression and social isolation.⁴

3. Scope and responsibilities

Scope

As researchers, our contact with children and adults at risk falls into the following key categories:

Recruitment

Initial contact (either written or over the telephone) with either the individual themselves, or a representative (e.g. parent/guardian/carer/other responsible adult) to discuss the nature and requirements of the research, establish the person's suitability and potentially arrange the details of their participation.

Fieldwork

The exact duration, location and requirements of fieldwork vary considerably from project to project. Occasionally, participants may meet researchers (either individually or as part of a group) at a professional research venue (e.g. a viewing facility). Individuals may be studied either in their own homes or familiar social spaces (e.g. pubs, cafes). We also undertake a lot of place-based research (e.g. community centres, care homes), where we may come into contact with numerous individuals. Research contact can last anything from a minute (*ad hoc* meetings in social spaces, telephone interviews) through to whole days.

We also conduct remote fieldwork (e.g. telephone interviews, online communities or forums). On occasion participants may also be asked to complete written or illustrative tasks (e.g. questionnaires, scrapbooks), be photographed, audio-recorded or filmed, or produce artefacts associated with the subject under discussion (e.g. paperwork). Consent is obtained for each of these elements in line with the policy described below.

At the end of this fieldwork contact, respondents may be incentivised for their participation – e.g. with cash, vouchers, or an in-kind donation (e.g. refreshments, charitable contribution).

Overview of responsibilities and key practices

As employers, we recognise that our responsibilities to our participants do not begin and end with the main period of research contact (fieldwork) – or indeed each individual project. Operationally, our safeguarding responsibilities span the following activities as a minimum:

- **Policies and procedures:** The principles outlined in this safeguarding policy are embedded in all our company policies and procedures, including those regarding Ethics, Data Protection, Information and Security, Health and Safety, Equal Opportunities, plus our Company Values. Both this and other policies are embedded at regular training sessions, with all new staff required to read and sign this document.

³ None of these signifiers should be taken in isolation as conclusive evidence that abuse has occurred.

⁴ Additional detail on this subject (e.g. examples of abuse, detailed signifiers of abuse) can be provided to employees upon request, and explained during relevant training sessions

- **Recruitment of employees:** We are a registered DBS-checking organisation. All new staff – including office-based/administrative employees – must obtain enhanced DBS clearance for working with children and adults at risk. This clearance must be refreshed every two years (minimum). In addition, two references (minimum) must be obtained for all new staff before they join the company.
- **Research design:** When designing research projects involving children and vulnerable audiences, due care must be taken to incorporate safeguarding considerations – including time to consult experts (either in the client organisation or beyond) on the specific audience being studied, associated risks and primary safeguarding concerns. These considerations must then inform the design of recruitment strategies, discussion guides, data capture materials and researcher briefings – ensuring that not only do fieldworkers conduct themselves in the proper manner to minimise potential personal and social harm, but (where appropriate and not restricted by anonymity/confidentiality agreements) they are prepared to respond to any allegations or clear signs of abuse, harm or exploitation having occurred. All researchers will have read and be briefed on the safeguarding policy in this document before they engage with research design.
- **Recruitment of participants and fieldwork preparation:** When contacting potential respondents, researchers must always prioritise the person (or people's) wishes above all other considerations – ensuring that key information is communicated clearly, that all questions are answered fully and honestly, and that clear lines of communication back to the research team are established in case of any further questions. The option for members of the client organisation to shadow or attend fieldwork will be discussed as needed with the respondent and will only be scheduled if they are entirely comfortable with their presence.
- **Fieldwork:** All researchers must abide strictly by the terms of this Safeguarding Policy while in personal contact with all respondents (including children and adults at risk) – aiming that no personal or social harm arises as a result of the research contact, and taking appropriate steps if they observe signs of abuse having occurred (while respecting any stated wish for confidentiality/anonymity in the case of adults at risk). This responsibility also takes into account our internal Ethics Policy, plus the Market Research Society Code of Conduct, the Government Social Research Unit's guidance on 'Ethical Assurance for Social Research in Government', and the guidelines of the Association of Social Anthropologists, the Social Research Association and the Association for Qualitative Research. Fieldworkers must also take responsibility for duly informing anyone shadowing the research (e.g. client representatives/stakeholders) of their safeguarding responsibilities – ensuring that all necessary steps have been taken in advance and that due oversight continues in the field.
- **Ongoing learning:** While we believe that this Safeguarding Policy is sufficiently robust for our core operations, we recognise that there is always more that can be done to improve our approach in the light of ongoing experiences. At the end of all projects, we reflect on the ethical and safeguarding considerations that have arisen – ensuring that necessary measures are put in place to address any concerns, and that important learnings are relayed to the team at large and/or incorporated into this policy.
- **Travel:** At no point during our contact with participants – including children and adults at risk – do we take responsibility for transporting them from place-to-place.

The updating, implementation and monitoring of this policy is overseen on a project-by-project basis by the assigned Project Manager, working in conjunction with both the Project Director and Managing Director.

4. Core standards

4.1 All researchers must have enhanced DBS clearance for working with children and adults at risk, obtained or updated within the last two years. In addition, all researchers must be signed up to updating system, whereby we can re-check their status at any point.

4.2 All researchers must agree to abide the Market Research Society Code of Conduct, the standards outlined in 'Ethical Assurance for Social Research in Government' (Government Social Research Unit), plus the guidelines of the Social Research Association, the Association of Social Anthropologists, and the Association for Qualitative Research.

4.3 All researchers working with children and adults at risk must agree to abide by the Revealing Reality Safeguarding Policy.

5. Overarching research practices

5.1 Stringency and care must be taken at all times around fulfilling the requirements of the Data Protection Act

5.2 During recruitment, researchers must aim for maximum impact with the minimum number of contacts – avoiding an overly complicated process and so minimising risk of respondent drop-out or any social/personal harm befalling the prospective respondent (see 5.9.2 for additional detail).

5.3 Careful use must be made of language and design in all materials and communication to ensure appropriateness and that the highest professional standards are communicated at all times

5.4 The research team must be named and contactable to build trust and add a 'friendly and approachable' face to the research. (All researchers must have phone contact with their respondents prior to interviews.)

5.5 Respondents must be contacted by whichever mode of communication puts them most at ease – whether phone, SMS, letter or email

5.6 Researchers must maximise the number of ways in which the respondent can verify the authenticity of the project:

5.6.1 Ensure that all members of the research team have photos and biographies on our website, populated LinkedIn profiles and carry photo ID.

5.6.2 Researchers must be prepared to speak to third-parties who have been named and nominated by respondents to verify the veracity of the research on the individual's behalf (e.g. a social worker, or a Citizens Advice Bureau advisor). Care must be taken to ensure the third-party has been given permission to speak to the research team and that no personal details will be handed over.

5.6.3 If necessary (and with prior consent from the client) researchers should include the details of a named individual at the client organisation who can be contacted to verify the legitimacy of the project

5.7 Researchers must provide absolute flexibility on how and where the interview is conducted – for example, the interview can be conducted in-home or at a place of the respondent's choosing. The respondent can be alone or accompanied by a friend/family member or a trusted intermediary/third party.

5.8 Participants must be made aware at recruitment stage if audio recording will be taking place

5.9 Two complementary consent policies must be employed at all times:

5.9.1 'Informed Consent' means researchers will fully explain the nature of the research before commencing fieldwork, answering any questions honestly and offering clarification wherever asked. This will include information about how/when confidentiality must be breached.

5.9.2 'Ongoing Consent' requires researchers to re-solicit participants' consent throughout the fieldwork and it is made clear that participants may withdraw their consent at any time – whereupon contact will be immediately ended

5.10 Separate consent must be obtained for any data collection beyond the core research requirement (e.g. photography and film)

5.11 Information sheets detailing background to the research (including focus, purpose and audience), and supplying the contact details of responsible individuals, must be left with all participants (and carers/responsible adults, where applicable) to ensure they are able to follow up any points of concern after the main period of research contact has ended.

6. Conducting fieldwork with adults at risk

6.1 Researchers must ensure that the language and content of all research materials and interactions be sensitive to the language, needs and feelings of the group involved in the research, without being patronising

6.2 From the beginning to the end of the research process, our foremost concern must be to listen to and respect the wishes of participants.

6.3 Research must be conducted in a safe and appropriate environment

6.4 While the researchers' role is not to provide advice or guidance, they can (if agreed with clients in advance) signpost respondents to resources or organisations who may be able to provide information, support or advice relating to any personal issue or behaviour

6.5 The highest standards of research ethics and principles must be upheld at all times. As such, we will seek to protect the anonymity and confidentiality of all respondents throughout our research. This means that, where participants have stated their desire to remain anonymous, and for their testimony to remain confidential, we must respect this wish above other concerns (including, but not in exceptional circumstances, potential disclosure of abuse) (see section 8. 10 for safeguarding guidelines).

6.6 Wherever possible, researchers must endeavour to obtain informed and ongoing consent for participation from the adult at risk who is the main focus of the research. Where the capacity to give this is in doubt (in line with legal criteria established within the Mental Capacity Act 2005)⁵, researchers must consult a carer or responsible adult associated with the person – both to assess the person's capacity to give consent, and also to inform them of the purpose of the research, and make an assessment of the adequacy (or not) of the person's consent-giving abilities

6.7 In cases where the primary individual cannot give written consent, consent may be audio-recorded by researchers

6.8 In instances where the primary respondent is willing to take part but unable to give written or verbal consent (for example, if they have had a stroke which has left them with profound physical disability and/aphasia), we may – in agreement with the client – solicit a carer or responsible adult's consent on the person's behalf (as well as a separate consent covering their own involvement). In these cases, the carer/responsible adult must oversee the

⁵ <https://www.gov.uk/make-decisions-for-someone/assessing-mental-capacity>

researcher/participant at all times. Where there is uncertainty, researchers must refer the case to the Ethics Board of the Market Research Society.

6.9 All participants' identities must be anonymised on completion of fieldwork, and only referred to by their pseudonyms thereafter. Clients must never know the 'real' identities of participants, and all internal traces of original identities must be securely stored and eventually destroyed. Techniques for anonymising participants' identities include:

6.9.1 Assigning a code name or number to respondents at the time of recruitment

6.9.2 Assigning pseudonyms for the key respondent and any close family members

6.9.3 Referring only to the respondent using generic language (e.g. 'A builder from Manchester')

7. Conducting fieldwork with children

7.1 Researchers must ensure that the consent of a parent or responsible adult (acting *in loco parentis*) is obtained before interviewing a child under 16; young people aged 16 and 17 may consent for themselves.

7.2 Researchers must ensure that the adult is given sufficient information about the nature of the project to enable them to provide *informed consent*.

7.3 Consent by the responsible adult⁶ provides the researcher with permission to invite the child/young person to participate in a project.

7.4 The child/young person must make their own choice regarding whether or not they want to take part in the research. Researchers must make every reasonable effort to verify that the young person understands purpose of the research and implications of participation.

7.5 Wherever possible, the consent of the parent or responsible adult AND the child must be verifiable, for example in the form of a signature on a paper consent form. Where this is not possible, the researcher must make every reasonable effort to obtain a secure and verifiable form of consent.

7.6 Care must be taken to ensure that children or young people are protected from any contentious, disturbing or distressing subjects, stimulus or areas of questioning for their age group.

7.7 Special care must be taken when interviewing young people about issues which could upset or worry the child, where issues risk creating tension between the child and their parents (or other relationships), where issues relate to potentially sensitive family situations or have a racial, religious or political angle.

7.8 If there is a valid or important research justification for covering any of these sensitive subjects in a research project, it is essential that a full explanation is given to the responsible adult and that their full consent is obtained. Steps must also be taken to ensure that the child/young person is not worried, confused or misled by the questioning.

7.9 Where full and informed consent from a responsible adult has been granted and the child/young person has agreed to participate in the research, it is not necessary for the responsible adult to be present during the interview/fieldwork.

⁶ 'Responsible adult' is the person with responsibility for the child/young person's safety and welfare at the time of the research. This is most typically the parent or guardian, but could also be a school teacher. It is not a person who have limited or specific responsibility for the child, such as a lifeguard or youth worker

7.10 Parents or responsible adults and young people must be informed of the nature and value of any incentives being offered to the child at the time consent is being sought.

7.10.1 Any incentives must be suitable and acceptable for the age of the child/young person and fitting for the task required.

7.10.2 Researchers must take reasonable precautions to ensure that incentives or vouchers are not used for the purchase of inappropriate age-restricted products and/or age-inappropriate products (for example, ensuring the parent is aware of the incentive awarded).

7.11 Parents and children must be informed of any recording, monitoring or observation of the interview/fieldwork. The child must be reminded of his or her right to withdraw from a research project at any stage, to withhold their answers to particular questions or withdraw data pertaining to specific area or subject matters.

7.12 Researchers must ensure that the language and content of all research materials and interactions be sensitive to the language, needs and feelings of the age group involved in the research, without being patronising.

7.13 Research must be conducted in a safe and appropriate environment. Care must be taken to avoid any physical contact with the child. The researcher must never ask or encourage a child or young person, either directly or indirectly, to engage in any risky, inappropriate or illegal behaviour.

7.14 If it becomes clear that participation in fieldwork is directly or indirectly leading to risky behaviours that would not under normal circumstances be taking place, fieldwork must be terminated, support given to the respondent and their parent/guardian (and/or other appropriate authorities) informed.

7.15 In reference to 'support', while the researchers' role is not to provide advice or guidance, they can (if agreed with the client in advance) signpost the respondent to resources or organisations who may be able to provide information, support or advice relating to any personal issue or behaviour.

7.16 Any disclosure of a confidential nature which may be potentially harmful, or engender the risk of subsequent harm⁷ occurring to the child or young person must be dealt with in a sensitive and responsible manner. Where a child discloses that they have been harmed or that they are at risk of abuse, or the interview suspects this is the case then the researcher should follow the Safeguarding Policy (Section 8).

8. Safeguarding policy

8.1 At Revealing Reality we are committed to the protection of children and adults at risk from harm, social or personal, arising from the research process, and we recognise the potential role we have to play in supporting safeguarding processes within the local communities where our research takes place.

8.2 We also believe that the highest standards of research ethics and principles must be upheld at all times. As such, we will seek to protect the anonymity and confidentiality of all respondents throughout our research.

8.3 An exception to this is, in line with The Children Act (2004), where a child discloses information that gives the researcher reasonable cause to suspect a child is suffering, or likely to

⁷ This includes physical, mental, ethical and emotional harm.

suffer, significant harm. In these instances, the researcher must inform the Project Manager / Managing Director and follow this Safeguarding Policy.

8.4 Regarding adults, to our knowledge Revealing Reality have no statutory responsibility to disclose safeguarding concerns for adults and we would opt to prioritise our commitments to confidentiality in all but the most serious cases. However, we recognise that there are situations in which case the risk of harm to an adult respondent (or others) is significant and clear enough that a public interest test favours the breaching of confidentiality to trigger safeguarding actions (see 8.6)

8.5 Assigned Project Managers are responsible for safeguarding on a project-by-project basis, reporting directly to both Project Directors and the Managing Director about any concerns that may arise. The Managing Director will provide personal oversight of any issues that arise during a project, as well as organising advice and support to other staff, liaising with other staff, working with other agencies, processing any concerns about alleged or perceived abuse, and dealing with any allegations made against employees.

Safeguarding guidelines for research with adults

8.6 Regarding the disclosure of information that leads the researcher to have reasonable cause to suspect the adult is at significant and immediate risk to themselves or others, researchers must initially be guided by the participants' wishes regarding his or her anonymity, and their desire (or otherwise) for their testimony to remain confidential. If they wish their statements to remain confidential, then the researcher must respect this and not disclose what they have been told to a third party.

8.7 If for some reason the researcher perceives this arrangement to be significantly detrimental to the individual – e.g., they have reason to believe the person is in greater danger than they realise, or they believe that the person lacks the capacity to make accurate statements about their wishes (e.g., in line with the Mental Incapacity Act 2005) – then the case may be referred, in confidence, to the relevant Local Authority's Safeguarding Adults Board/Safeguarding Hotline.

8.8 Where disclosures relate to criminal activity, researchers will also consider legal obligations to report crimes; in the UK these cover child protection offences (physical or sexual abuse of minors)⁸ and crimes covered by prevention of terrorism legislation (Terrorism Act 2000). These exemptions relate to circumstances both where a researcher might uncover that a participant is a **victim** or **perpetrator** of these crimes.

8.9 An additional exemption applies for research conducted in Northern Ireland where the law states that all individuals are bound to report illegal activity: there it is a criminal offence to fail to disclose any arrestable offence to the police under Section 5(1) of the Criminal Law Act 1967.

Safeguarding guidelines for research with children

8.10 If the researcher and/or the Project Manager has reasonable cause to suspect that a child they have come into contact with during the research, either directly or indirectly, is suffering or is likely to suffer significant harm a referral must be made the appropriate authority without delay and in order that the child can be protected if necessary. This is likely to be local social services via their first contact line, but could also be the police. Researchers are likely to seek advice as to appropriate authority to make a referral to by contacting the [NSPCC safeguarding helpline](#) (without disclosing any identifiable confidential data).

⁸ Working Together to Safeguard Children, This statutory guidance covers those working with children in a professional or care capacity, not intended for research contexts – however opt to follow the same protocols.

8.11 Revealing Reality have developed an assessment approach to 'reasonable cause to suspect a child is suffering or likely to suffer **significant harm**' based on consultation with various Local Authorities' safeguarding protocols.

8.12 There are no absolute criteria on which to rely when judging what constitutes **significant harm**. Consideration of the severity of the ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. It is important to consider age and context. Babies, young children and adolescents are particularly vulnerable and at increased risk especially when there is a parental history of domestic abuse, substance misuse and mental ill-health. Therefore, significant harm could occur where there is a single event, such as a violent assault. More often, significant harm is identified when there have been a number of events which have compromised the child's physical and psychological wellbeing: for example, a child whose health and development suffers through neglect⁹.

8.13 Depending on the subject matter of the research and the vulnerability of children likely to be engaged in the project, additional risk assessment criteria may be developed to assist the Project Manager/Project Director identify situations and evaluate whether safeguarding actions must be taken (see appendix A)

8.14 If it is suspected that a child's health or development is being impaired or there is a high risk of impairment (such as, malnourishment or socialisation) without intervention, the researcher and/or Project Manager must make a referral according to procedures set out by the relevant Local Safeguarding Children's Board.

8.15 If a professional intermediary (e.g., a Local Authority) has been involved in the commissioning, recruitment or set up of the research, the researcher should, while respecting the child's confidentiality, seek to ascertain the level of any involved intermediary's awareness of the child's needs and if in any doubt that the child's needs are not being met the researcher and/or Project Manager must make a referral according to procedures set out by the relevant Local Safeguarding Children's Board.

8.16 Throughout any suspected safeguarding issue, the researcher must ensure that any disclosure of a confidential nature, which may be potentially harmful to the child or young person, must be dealt with in a sensitive and responsible manner.

⁹ [Northamptonshire Safeguarding Children Partnership \(NSCP\) Thresholds Guidance 2018](#)

8.17 Overview of our step-by-step child safeguarding actions:



9. Dealing with allegations of personal or social harm

9.1 In the event that a research respondent (or a representative thereof) has concerns about any personal or social harm that has arisen in the course of our research contact with them, enquiries must in the first instance be directed to the designated Project Manager – whose details will have been left with the respondent (or their representative) as part of the Information Sheet handed over on completion of fieldwork.

9.2 Should the Project Manager receive such a complaint, he or she must pass it on immediately to the Managing Director.

9.3 We will acknowledge – and aim to address – all such enquiries within 24 hours of receipt, encouraging correspondents to submit their concerns in writing if possible. In cases where, for whatever reason, the complainant does not wish to submit a written complaint, the Managing Director will listen to all concerns and produce a summary of the complaint – which the complainant will be asked to acknowledge as a fair and accurate representation of the matter. In the interests of fairness and confidentiality, we will ask that the complainant designates a single contact to engage with all future communication regarding the complaint.

9.4 Upon receipt of a formal complaint, the Managing Director will contact the relevant client (protecting respondent confidentiality where necessary) to advise them of the respondent's concerns before conducting an initial review – liaising with the researcher(s) in question to formulate a response within five working days.

9.5 Should this initial response prove unsatisfactory or the severity of the complaint warrant it, the Managing Director will assess the validity of the complaint by collecting spoken and written evidence from all relevant parties and, where justified, investigating the causes of the shortcomings in question. This data will be assessed according to our internal policies, plus the external guidelines and codes of conduct which we follow in across our work.

9.6 In instances where there remains ambiguity about the appropriateness of conduct, referrals may be made to the Ethics Board of the Market Research Society.

9.7 The resultant insights will then be presented to the complainant in writing and, where appropriate, verbally. We aim to address all formal complaints in this way within 10 working days of escalation.

Use of research data for communications purposes

10.1 All data submitted to Revealing Reality shall be kept confidential and anonymous unless specific consent is given for external sharing

10.2. Fully anonymised case studies, quotes and non-identifiable photographs can be included in reports & presentations, so long as respondent consent remains in places and no personally identifiable information (PII) present

10.3 For projects where identifiable photographs or video will be used in reporting, respondents should be made aware of the purposes of the research and give additional consent for their data to be used in this way

10.4. If research data is to be shared with clients or commissioning organisations, respondents should be made aware of this and give their informed consent for this to happen (in addition to their consent to participate in research)

10.5. If clients intend to use respondent data for communication purposes (e.g. social media) additional consent must be obtained from respondents in advance of any external publication.

10.6 Even where full consent for the public sharing of information has been obtained, it is best practice to revisit respondents before publication in order to ensure they are still happy with the consent arrangements given the current communication plans

Safeguarding of researchers

11.1 All Researchers are at no obligation at any point to carry out or continue an interview if they feel unsafe or at risk. If the respondent or the location of the interview is deemed to be unacceptably dangerous in advance of the interview, interviews will be carried out with supervision in place. The fieldwork monitor will also schedule calls to check in on the researcher throughout the interview.

11.2 Researchers must diligently follow our 'checking in and checking out' policy, notifying when they enter and leave the interview/fieldwork. This is closely monitored by an assigned member of the operations team ('fieldwork monitor') based in the office, who has access to the specific location and respondent contact details. If the researcher has not 'checked out' and cannot be contacted within 30 minutes from assigned interview end time, the fieldwork monitor will attempt to reach the researcher via phone; attempt to reach the respondent via phone and ask to speak to the researcher; failing that they will contact the police.

11.3 All Researchers have pre-booked travel and access to a company credit card to make sure they are never unable to get back home. Researchers are briefed to never accept lifts from respondents.

11.4 All Researchers within a team attend a fieldwork briefing before any fieldwork takes place, where safeguarding policies for the staff and respondents are spoken through in detail.

11.5 If the fieldwork is exploring sensitive topics that could have an impact on the researcher, the following processes are in place to mitigate and manage:

- All researchers understand the topic that they have 'opted in' to conduct fieldwork on.
- Researchers are experienced at working on research involving vulnerable groups.

- Regular check-in sessions will be booked to take place between the research team to monitor staff welfare
- Researchers have agreed to report any issues directly to the Project Director and ask for support when and if required. In the first instance, support will be provided through a counselling service.
- Researchers can be offered counselling/clinical support if it is deemed desirable by both the researcher in question and the Project Director

Appendix A: Risk assessment for Drivers of Harm to Children (Ofcom)

The below table outlines a range of issues that have been identified as likely and/or possible to be disclosed while this research project. They have been broadly categorised as low, medium and high risk of immediate harm to a child, drawing on safeguarding threshold documents from various Local Authorities.¹⁰¹¹

In any case where a safeguarding action is required, the steps outlined in 8.17 of the Safeguarding Policy will be followed.

| Risk of harm ¹² | Likelihood | Examples | Required actions |
|---|---|--|---|
| Likely to have low risk of immediate significant harm | Likely to be experienced by many / most children in the sample | <ul style="list-style-type: none"> • Fake news or misinformation • Exposure to content that may negatively shape body image (e.g., heavily edited or filtered content) • Scams and phishing • Compulsive behaviour; spending excessive time online | No safeguarding actions required |
| Likely to have medium risk of immediate significant harm | Likely to be experienced by some children in the sample | <ul style="list-style-type: none"> • Exposure to hateful content online • Exposure to pornography • Cyber bullying • Pro-self-harm content • Pro-anorexia content | Default would be no safeguarding action required, unless child is: Evidently suffering significant harm and/or very young (e.g., age 11 and under) and/or has additional vulnerabilities such as a disability or health condition and/or the parent/responsible adult is unaware of the exposure to risk |
| Likely to have high risk of immediate significant harm | Likely to be experienced by none / very few children in the sample | <ul style="list-style-type: none"> • Sharing of nudes / CSAM¹³ • Sexual harassment¹⁴ • Child sex abuse • Grooming • Radicalisation | Default would be safeguarding action , unless: Child is no longer at risk / experience is historic and/or parent or responsible adult is aware and taking action, e.g., involvement of social services |

¹⁰ [Northamptonshire Safeguarding Children Partnership \(NSCP\) Thresholds Guidance 2018](#)

¹¹ [Safer Children York Safeguarding thresholds document 2020](#)

¹² Several examples within each category could, in certain circumstances, be considered a higher risk issue and therefore trigger a safeguarding action. E.g. if exposure to porn appeared to be part of an abusive or coercive scenario (exposed to by an adult), this would be considered high risk of harm and appropriately responded to.

¹³ Sharing nudes/CSAM may warrant being classified as 'medium risk' but this depends on the context. Where it is the result of: coercion, control, manipulation, shared as a result of grooming, it is likely to fall into the 'high risk of immediate significant harm' category. But where it is part of a relationship with another child or a forms part of consensual flirting it would be considered to be 'medium risk of immediate significant harm'. Therefore the categorisation of the level of harm associated with it will be highly dependent on the context.

¹⁴ As with sharing nudes/ CSAM, the categorisation of the level of harm will depend on the context in which it occurs.

Safeguarding scenarios – worked examples

Example 1: Child explaining that they had received a nude image

During an interview with a 13 year old girl the respondent told us that she had been sent a nude image by a stranger she had been talking with on Instagram. She had been 12 at the time and explained that she didn't know how old the individual was but was clear that he knew how old she had been. She had blocked and reported the individual. She said at the time she had been disgusted and shocked but wasn't upset about it. She hadn't told her parents but had spoken about it with her friends.

At the end of the interview, the researcher gave the respondent an information sheet which included links to relevant support services should she feel like she needed additional help.

Following the interview, this incident was discussed with the project director. As the respondent wasn't upset by the incident and it had happened a while ago, her parents weren't contacted about it. As she had also dealt with it by reporting the incident and blocking the individual, we felt confident that she was not at immediate risk of harm.

Example 2: Child explaining she had been sent a nude by a 23 year old man when she was 15

During a remote interview a respondent who was 17 at the time of the interview explained that she had been sent a nude by a 23 year old man on Snapchat who she had been speaking to. He then threatened her with physical violence when she didn't send an image back to him. He knew her location due to the location settings on Snapchat at the time. She spoke with her parents and the police got involved.

While an upsetting experience for her, 2 years had passed since the incident and her parents and the police had both been involved so this didn't result in a safeguarding concern.

This same respondent also disclosed in the interview that her father was physically violent towards her and her older sister.

She explained that this was no longer happening as he had moved out 3 months before the interview was conducted and she no longer saw him out of her own choice. The respondent also explained that her school were aware of the issues she had at home and had offered her support.

At the end of the interview, the researcher gave the respondent an information sheet which included links to relevant support services should she feel like she needed additional help.

This was also flagged and discussed with the project director, and the decision was made not to take safeguarding action given the involvement of responsible adults (her school).

Example 3: Respondent receiving a nude in an interview

During an interview with an 18 year old girl, the respondent in question said she had been sent a nude on Snapchat by someone she didn't know (during the interview). She was unfazed by this as she said it was a normal occurrence for nudes to be sent. She deleted the image and blocked the sender.

She regularly spoke with her mum about the nudes she was sent as she found it amusing and therefore it seemed clear that she wasn't at risk of harm from receiving the nude image and therefore we didn't have a safeguarding concern.

At the end of the interview, the researcher gave the respondent an information sheet which included links to relevant support services should she feel like she needed additional help.

Risk assessment for the Revealing Reality team coming into possession of a nude image of a minor (CSAM)

Risk severity: **High**, given that the material in question would be illegal and the act of the Revealing Reality team coming into possession of this material, even accidentally, would technically constitute a crime.

Risk likelihood given mitigations: **Low**, we have taken a number of measures to avoid this situation occurring and have a track record of conducting similar research without this event occurring.

Mitigations:

- We brief respondents about our safeguarding policy at multiple touchpoints to make them aware that if they were to share material including nude imagery of a minor (of themselves or another child) this would constitute a crime and we would have to take action, including contacting the police
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- As we discussed in the interview, any inappropriate content with people under the age of 18 (especially images) may lead to the researcher having to report the incident and breaking participant confidentiality (you can find more details about this on the consent form and information sheet). Feel free to contact one of the research team if you have any questions about this. **Actions:**
- All screen record and screenshots shared with Revealing Reality will be sent by the respondent to a dedicated smartphone owned by Revealing Reality, via WhatsApp (end-to-end encrypted so that only the sender and recipient can ever access media data)
- Only the named researchers on the team will have access to this password protected phone, and while not in use it will be stored in a combination locked safe on office premises
- Researchers will review screen record and screenshots within 48-hours of receipt on the phone (no duplicates of the data will be made prior to review)
- Should the researcher identify visual media (image or video) containing CSAM they will immediately report it to the project director and note down the file name in question
- The project director will take personal responsibility for the phone (no other researchers will have access to it from this point)
- The project director will take appropriate action, which will include:
 - Following the Revealing Reality safeguarding policy, which may involve triggering a safeguarding action if the child is believed to be in immediate risk of harm (see safeguarding policy which can be seen in 8.10 to 8.17).
 - Contact the police and seek advice, which based on guidance is likely to involve advice on the secure deletion of the data and any potential safeguarding actions required. The police must, by law, record all sexting incidents on their crime system but as of January 2016, they can decide not to take further action against the young person if it is not in the public interest. This will be at the discretion of the police¹⁵.
 - Inform CEOP (Child Exploitation and Online Protection Command) if there is reason to be concerned that a child has been groomed or sexually abused online
- The project director will oversee the secure deletion of the data concerned, according to our DPIA protocols (including multiple passes to ensure data is permanently deleted).

¹⁵ <https://childlawadvice.org.uk/information-pages/sexting/>