



MRS Post-Lockdown Covid-19 Guidance: Undertaking Safe Face-to-Face Mystery Shopping

Guidance for England, Northern Ireland, Scotland and Wales

1st September 2021

Introduction

The aim of this document is to provide an update on the current government advice from across the UK's four nations and to provide updated practical guidance for practitioners when undertaking face-to-face data collection with participants.

Context

This MRS guidance sets out the conditions for resumption of all types of face-to-face data collection activities.

The MRS guidance may change if government advice is modified.

Research practitioners are required to give priority to local guidance i.e. where research practice takes place.

MRS advice is based on our current understanding of Government guidance and support on COVID-19 which is subject to continuous development. MRS will update and publish accordingly, but it remains the responsibility of research practitioners to keep up to date.

It should be noted the MRS guidance does not replace government advice; it is meant to supplement the official sources with the addition of some research considerations. Remember to continue to check the up-to-date guidance on the relevant Government websites:

- [England](#)
- [Northern Ireland](#)
- [Scotland](#)
- [Wales](#)

New Covid-19 Requirements for the UK's Four Nations

England

From 19 July most coronavirus restrictions were removed in England and UK government social distancing guidance no longer applies.

Employers must still control the risks and review and [update their risk assessment](#). The following workplace controls remain unchanged:

- [adequate ventilation](#)
- [sufficient cleaning](#)
- [good hand hygiene](#)

Employers must continue to consult their workforce on health and safety matters, [talking to workers](#) and their representatives helps to reduce risk.

A summary of the UK Government guidance for England is available here: <https://www.gov.uk/coronavirus> and health and safety advice is available here: <https://www.hse.gov.uk/coronavirus/index.htm>

Northern Ireland

Although many coronavirus restrictions have eased, regulations and guidance remain in place to help stop the spread of COVID-19. These include:

- Current regulations require a minimum of one metre social distancing in retail and shopping centres, indoor hospitality settings and indoor visitor attractions.
- For outdoor venues, social distancing requirements are strongly advised. Where two metres is not viable, a minimum of one metre is recommended with consideration given to other risk mitigations. Risk mitigations should be detailed in risk assessments.
- When using public transport, one metre should be maintained, unless not possible, in which case other mitigations must be in place.
- The use of [face coverings](#) is mandatory on public transport, in taxis, private buses, coaches and on aircraft, in train and bus stations and in airports unless an exemption applies.
- Face coverings must be worn in hospitality venues if individuals leave a table (to pay/ to access toilet facilities), retail premises including indoor areas of shopping centres and indoor public spaces, unless exempt.

The guidance is available here: <https://www.nidirect.gov.uk/articles/coronavirus-covid-19-regulations-and-guidance-what-they-mean-you#toc-0>

Scotland

Scotland has moved out of the COVID-19 levels system, and is now beyond Level 0. The general advice is that everyone should continue to act carefully and remain cautious. There is no legal requirement for physical distancing and no limit on the numbers of people who can gather together to socialise.

Face coverings are a legal requirement in most indoor public places, indoor communal spaces including retail, restaurants, cafes, bars and public houses, and in workplaces and on public transport.

The Scotland guidance is available here: <https://www.gov.scot/coronavirus-covid-19/>

Wales

All of Wales is at alert level 0. Alert level 0 resulted in the following changes:

- Removal of legal restrictions on the number of people who can meet indoors, including in private homes, public places or at events
- All businesses and premises can open, including nightclubs
- People should still work from home wherever possible
- Face coverings will remain a legal requirement indoors, with the exception of hospitality premises. This will be kept under review.
- Physical social distancing is no longer required although it is still advised.

Most businesses, workplaces and other places are still likely to require some degree of physical distancing. There is still a legal requirement for such places to take reasonable measures to minimise the risk of exposure to coronavirus.

How to read the guidance and links to the MRS Code of Conduct

Scope

The following is MRS current guidance on undertaking face-to-face mystery shopping activities to avoid potential infection to research practitioners, participants and contractors.

The guidance provides mandatory requirements, interpretation and additional best practice. Members and Company Partners are reminded that this document is designed to complement the MRS Code of Conduct and should not be consulted in isolation.

The MRS Covid-19 guidance does not take precedence over national law. Members and Company Partners responsible for international projects shall take its provisions as a minimum requirement and fulfil any other responsibilities set down in law or by nationally agreed standards.

As specified in the MRS Code, it is the responsibility of research practitioners to keep abreast of any legislation which could affect research and to ensure that all those involved in a project are aware of and agree to abide by the MRS Code of Conduct.

This guidance is not legal advice and should not be relied upon as such. Specific legal advice should be taken in relation to any specific issues.

Principles of the Guidance

- Research is a business activity, not a social activity.
- Research practitioners have a responsibility to protect participants and the reputation of the profession.
- Research practitioners must undertake risk assessments of any proposed face-to-face mystery shopping exercise before beginning the activity.
- When face-to-face mystery shopping is undertaken it can only be undertaken in those locations that remain open as a result of Covid-19 restrictions.

Interpretation of Requirements

When requirements use the word "must" these are mandatory requirements and is a principle or practice that applies the MRS Code of Conduct, which Members and Company Partners are obliged to follow.

The requirements which use the phrase "should" describe implementation and denotes a recommended practice.

"May" or "can" refer to the ability to do something, the possibility of something, as well as granting permission.

MRS Code of Conduct

The following MRS Code of Conduct (2019) rules, which are extracted from the *Business and Professional Ethics* section of the Code, are the fundamental rules from which this guidance has been created:

Rule 6: Members must act honestly in their professional activities.

Rule 7: Members must take reasonable action to ensure that others do not breach or cause a breach of this Code.

Rule 8: Members must not act in a way which might bring discredit on the profession, MRS or its Members.

Rule 9: Members must take all reasonable precautions to ensure that participants are not harmed or adversely affected by their professional activities and ensure that there are measures in place to guard against potential harm.

The rules regarding vulnerable participants are also essential:

Rule 23. Members must take reasonable steps to assess, identify and consider the particular needs of vulnerable people involved in their professional activities.

Rule 24. When working with vulnerable people, Members must ensure that such individuals are capable of making informed decisions and are not unfairly pressured to cooperate with a request to participate and that they are given an opportunity to decline to take part.

In addition, the following data collection rule is key to the guidance, particularly point 28 (a):

Rule 28: Members must take reasonable action when undertaking data collection to ensure all of the following:

- a) that data collection processes are fit for purpose and clients have been advised accordingly;*
- b) that the design and content of data collection processes are appropriate for the audience being analysed;*
- c) that participants are able to provide information in a way that reflects the view they want to express, including don't know/prefer not to say;*
- d) that participants are not led toward a particular point of view;*
- e) that responses and/or data collected are capable of being interpreted in an unambiguous way;*
- f) that any potential use of the personal data is revealed;*
- g) that personal data collected and/or processed is limited to what is relevant; and*
- h) that personal data is stored and transmitted by secure means and only accessible to authorised individuals*

Finally, the MRS Code of Conduct consent rule 31 also applies, noting in particular that health data is defined as special category data within the Data Protection Act 2018 and GDPR and the requirements of this legislation must be adhered to when such data is being collected.

Rule 31: If consent is the legal basis for the data collection, Members must ensure that participants are provided with appropriate information to allow informed consent to be given, at the point that they agree to participate. Informed consent requires the following information to be provided:

- a) the name of the organisation(s) or individual responsible for data collection;*
- b) the general subject of the data collection;*
- c) the purpose of the data collection;*
- d) the type of data collected, particularly special category and/or criminal convictions data;*
- e) the right to withdraw at any time;*
- f) whether the data collection is to be recorded and/or observed;*
- g) who is likely to have access to live or recorded information;*
- h) the likely length in minutes of the data collection;*
- i) any costs likely to be incurred by a participant;*

- j) *the use of automated decision making (if used)*
- k) *transfer of data to a third country;*
- l) *retention periods or criteria used to determine retention periods;*
- m) *the right to complain*
- n) *an assurance that the activity is being conducted in accordance with the MRS Code of Conduct and the Data Protection Act 2018 and/or local data protection legislation for non-UK activities.*

MRS Guideline: Conducting Mystery Shopping

The requirements of the [MRS Guideline: Conducting Mystery Shopping](#) (March 2020) must also be referred for more general requirements when undertaking any form of mystery shopping.

Relevant Definitions

Client: *A client includes any individual, organisation, department or division, including any belonging to the same organisation as an MRS Member, which is responsible for commissioning or applying the results from a project.*

Clinically extremely vulnerable individuals¹: *individuals who have specific underlying health conditions that make them extremely vulnerable to severe illness if they contact Covid-19. For current UK Government definition see: <https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk/who-is-at-high-risk-from-coronavirus-clinically-extremely-vulnerable/>*

Consent: *means any freely given, specific, informed and unambiguous indication of a participant's wishes by a statement or by a clear affirmative action, which signifies agreement to the processing of their personal data.*

Face coverings: *a non-surgical (or other medical grade) mask for facial covering of the mouth and nose, that is made of cloth or other textiles, and through which an individual can breathe e.g., a scarf. See government guidance on facial coverings, e.g. England has [Face coverings: when to wear one, exemptions, and how to make your own.](#)*

Face-to-face Mystery Shopping: *the use of research practitioners trained to experience and measure any customer service process, by acting as potential customers within physical environments e.g. in shops, restaurants, hotels, car showrooms as opposed to via other mediums such as telephone or online (see mystery shopping definition for further detail).*

Mystery shopping: *the use of research practitioners trained to experience and measure any customer service process, by acting as potential customers and in some way reporting back on their experiences in a detailed and objective way for research and/or other purposes. It differs from other data collection techniques in that researcher practitioners do not declare their presence and participants are unaware at the time of the interaction that it is in any way different from a normal customer contact.*

Participant: *is any individual or organisation from or about whom data is collected.*

PPE: *protective equipment which protects users against health and safety risks. It can include items such as safety helmets, face masks, gloves, eye protection, high-visibility clothing, safety footwear, etc.*

¹ Alternative terms used by the devolved governments include 'extremely high risk' or 'extremely vulnerable'.

Protected Characteristics²: *the groups protected from discrimination in the workplace as defined by the Equality Act 2010. It is against the law to discriminate against anyone because of age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race, religion or belief, sex or sexual orientation.*

Research: *is the collection, use, or analysis of information about individuals or organisations intended to establish facts, acquire knowledge or reach conclusions. It uses techniques of the applied social, behavioural and data sciences, statistical principles and theory, to generate insights and support decision-making by providers of goods and services, governments, non-profit organisations and the general public.*

Research Practitioners: *includes all individuals within the research supply-chain e.g. researchers, moderators, interviewers, recruiters, mystery shoppers, contractors, freelancers and temporary workers.*

Social Distancing (can be called 'physical distancing'): *limiting face-to-face contact with other individuals by means of keeping space between people. [Note: The distance requirements for social distancing vary between countries.]*

Vulnerable people: *Vulnerable people means individuals whose permanent or temporary personal circumstances and/or characteristics mean that they are less able to protect or represent their interests (see [MRS Best Practice Guide on Research Participant Vulnerability](#)).*

Codeline

The MRS Standards Team are continuing to review and update the MRS guidance as and when required.

If you have any queries about the MRS Code or any of the [MRS' Covid-19 guidance](#) please contact the MRS Standards Team via the MRS Codeline service (codeline@mrs.org.uk).

Before the Commencement of Mystery Shopping Projects

Research Practitioners: General

1. If research practitioners begin to feel unwell and/or have been in contact with anyone who has been unwell and/or is feeling unwell they must self-isolate and work from home (if the individuals are fit to do so and their role enables home working).

Research Design: General

2. Research practitioners must undertake a risk assessment of any proposed mystery shopping exercise before beginning any activity.
3. Research practitioners must use and adhere to the appropriate government safe working guidance depending upon the environment/s in which face-to-face mystery shopping is to take place. The current list of safe working guidance is:

[England](#)
[Northern Ireland](#)
[Scotland](#)
[Wales](#)

² See the UK Government website for more details: <https://www.gov.uk/discrimination-your-rights>

4. Research practitioners must follow relevant government guidance such as the UK Health & Safety Executive (HSE) guidance on Covid-19: <https://www.hse.gov.uk/coronavirus/index.htm> and the HSE interactive tools: <https://www.hse.gov.uk/simple-health-safety/risk/index.htm>

Note: More information about risk assessments is available in the MRS Research Policy and Standards Webinar - Undertaking Risk Assessments available here: <https://www.mrs.org.uk/resources/webinars>.

5. When designing face-to-face mystery shopping projects research practitioners must discuss with clients (whether internal or external) the outcome of any risk assessments and agree any mitigations to be undertaken including adapting the research design to reduce Covid-19 risks, exposure and infection. As part of this discussion, research practitioners must determine whether face-to-face mystery shopping is the most appropriate method.
6. When designing face-to-face mystery shopping a key consideration will be the use of facial coverings and gloves by research practitioners. Research practitioners must discuss with clients the range of body coverings and equipment available and agree an approach, which will depend upon the outcomes of any initial risk assessment, including considerations such as:
 - The mystery shopping approach being used
 - The environment where the research is to take place
 - Whether social distancing is feasible
 - The profile of participants e.g. age, health, demographics
 - The potential impact on mystery shopping outcomes e.g. customer service assessment if verbal communication is impaired
 - The potential impact on the quality of the mystery shopping data gathered if communication is impaired
7. Once it has been agreed that a face-to-face mystery shopping approach will be undertaken the research practitioners must discuss and agree with clients liabilities for risks identified and actions taken to ensure that identified risks and liabilities form part of the contract for mystery shopping projects.

Research Practitioners: Mystery Shopping Practitioners

Once requirements 1-7 have been undertaken, and it has been determined that a face-to-face mystery shopping approach is the most appropriate the following requirements apply:

8. Research practitioners who are clinically extremely vulnerable may be considered to undertake face-to-face mystery shopping activities if the individuals wish to be considered for such activities and a risk assessment has been undertaken which determines whether they are suitable to be considered.
9. Research practitioners must include appropriate considerations when conducting risk assessments to consider whether clinically extremely vulnerable individuals are suitable for face-to-face mystery shopping. Considerations may include:
 - The shielding status where the clinically extremely vulnerable individuals are located: each of the four nations has different guidance on shielding e.g., England's guidance is available [here](#).
 - Whether doses of a vaccine has been received.
 - The general health of the clinically extremely vulnerable individuals.

- The status of the clinically extremely vulnerable individuals' households e.g. are other members of their household at high risk.
 - The nature of the face-to-face mystery shopping being undertaken.
 - The length of time any face-to-face mystery shopping activities may take, particularly how long clinically extremely vulnerable individuals may be exposed to other individuals.
 - The location face-to-face mystery shopping and the risk of maintaining social distancing and/or risk of exposure.
 - The availability of lower risk research practitioners.
 - The availability of alternative mystery shopping opportunities for clinically extremely vulnerable individuals using other methodologies e.g. telephone.
10. Before eligible research practitioners are selected for face-to-face mystery shopping projects Covid-19 screener questions must be asked to determine if any research practitioners are infected and/or are at risk of infection. Screeners must include appropriate considerations, which will depend on the outcome of any initial risk assessments, such as:
- Whether practitioners have received a Covid-19 vaccine
 - Current state of health of research practitioners and their immediate households
 - Whether research practitioners and/or members of their immediate household have been diagnosed and/or tested for Covid-19
 - Whether research practitioners are self-isolating, shielding or caring for individuals vulnerable to Covid-19 within their household
 - Current emotional health and personal confidence of research practitioners to undertake mystery shopping projects
 - The use and impact of contact tracking apps on research practitioners' activities
 - The needs of those with protected characteristics
 - Any specific research practitioners' concerns regarding face-to-face mystery shopping
11. Research practitioners who respond to screener questions which indicate a state of health and/or circumstances which are unsuitable for face-to-face mystery shopping and/or a high risk of Covid-19 infection must not be selected for face-to-face mystery shopping until such time as there is evidence that they are no longer infected with Covid-19 and/or a state of health/circumstances which is suitable for such activity.
12. The Covid-19 screener questions, which include the collection of special category health data (both physical and mental health), must only be collected with the informed consent of research practitioners (see MRS Code of Conduct rule 31).
13. When recording the responses to screener questions no inferences and/or formal records must be made regarding the health of research practitioners without their informed consent.
14. Research practitioners who have been diagnosed with Covid-19, if well enough to work, may be used for other mystery shopping projects and/or data collection such as telephone or online activities.
15. Before research practitioners undertake any face-to-face mystery shopping projects, they must be trained on how to undertake such activity in post-lockdown conditions. Training must include appropriate considerations, which will depend on the outcome of any initial risk assessments, such as:

- Understanding the government safe working requirements and following updates for any particular work environment where face-to-face mystery shopping is being undertaken
- Understanding the potential risks of undertaking any given mystery shopping project
- When and where mystery shopping can safely take place
- Locations, times and circumstances to avoid when undertaking face-to-face data mystery shopping
- Undertaking agile risk assessments when in environments where circumstances may change
- Considering the needs of those with protected characteristics, such as those who are hearing or visually impaired
- Considering the needs of those with complex educational and/or health needs
- Wearing of face coverings and gloves, how to ensure maximum effectiveness and when the use of face coverings and gloves may be appropriate³ (for example [see UK government guidance on when to wear one and how to make one](#))
- Avoiding physical contact and touching of faces particularly noses, eyes and mouths
- Determining social distancing requirements
- Removal and discarding of any cleansing materials e.g. sanitary wipes, tissues, etc used during mystery shopping projects
- The use and potential impact of contact tracking apps on mystery shopping activities

Travel To and From Face-to-face Mystery Shopping Projects

16. Research practitioners must consider the amount of travel required to undertake face-to-face mystery shopping projects and introduce approaches which minimise the amount of travel required e.g. localise mystery shopping to specific areas where possible.
17. Research practitioners when travelling for face-to-face mystery shopping projects, must plan ahead or avoid busy public transport times and routes.
18. Research practitioners must follow any lockdown travel restrictions which may apply to each of the UK's four nations. Research practitioners must be familiar with the advice for each of the nations in which they travel if face-to-face data mystery shopping requires travel between the four nation borders e.g. research on the borders.
19. Research practitioners should limit travel for face-to-face mystery shopping purposes unless absolutely necessary for the purposes of the project.

Overnight Stays

20. Research practitioners should not stay overnight anywhere other than their primary residences except for business purposes. Research practitioners should make appropriate plans to minimise such overnight stays.

Vehicle Sharing

21. Research practitioners should reduce, where possible, the amount of vehicle sharing they undertake when travelling to and from face-to-face mystery shopping projects.

³ Whilst in some instances, gloves are recommended for face-to-face data collection activities, this recommendation is due to the nature of activities undertaken in the course of face-to-face data collection and is not an appropriate alternative, in this context, to handwashing and sanitising.

22. Research practitioners who share vehicles with colleagues (e.g. car share) to travel for face-to-face mystery shopping must follow the appropriate Government guidance on vehicle sharing e.g. the [Scottish Government's advice on travelling safely](#) and the UK Government's [guidance private cars and other vehicles](#).

During Face-to-face Mystery Shopping Projects

There are some Covid-19 requirements and considerations which apply to all types of face-to-face mystery shopping projects, whilst others are specific to the type of project environment.

In this section the guidance applies irrespective of the type of mystery shopping data collection.

23. When undertaking face-to-face mystery shopping research practitioners must wear a face covering in those areas where this is mandated and in any locations where it is not possible to maintain the required social distance. The facial covering requirements are different for each of the four nations and research practitioners must be aware of the rules in the locations in which they operate.
24. Research practitioners must endeavour to follow social distancing rules when undertaking face-to-face mystery shopping. The social distancing requirements are different for each of the four nations and research practitioners must be aware of the rules in the locations in which they operate.

Note: In some environments social distancing may not be possible e.g., in transit environments. In these circumstances research practitioners must use best efforts to adhere to social distancing and take appropriate steps such as avoiding busy periods, relocating to new locations, etc., if maintaining social distancing is challenging.

25. In circumstances where social distancing may not be possible during mystery shopping, research practitioners must endeavour to ensure there is enough space to undertake their face-to-face mystery shopping activities safely, where possible adhering to social distancing requirements and not causing obstruction to other individuals, the possibility of contact and/or not meeting social distancing requirements with other individuals in the vicinity of any given project.
26. Research practitioners must check whether additional restrictions apply in their area, particularly if working close to any of the four nations' borders.
27. Research practitioners must follow any other local lockdown restrictions which could be imposed in specific areas and/or locations.
28. When research practitioners undertake any face-to-face mystery shopping, they must:
- a) Familiarise themselves with any potential Covid-19 environmental/circumstantial risks of undertaking mystery shopping projects e.g. busy peak times in mystery shopping locations when social distancing may be difficult
 - b) Position themselves in a location where they are able to adhere to social distancing requirements with other customers, staff, etc
 - c) Take steps to reduce risk of exposure to infection if working in an environment where social distancing may not be possible e.g. public transport
 - d) Consider changing mystery shopping environments where social distancing is challenging e.g. if a bus is crowded, getting off the bus and waiting for another quieter bus to complete a journey
 - e) Avoid people who look visibly unwell

- f) Carry tissues, sanitary wipes and/or other types of personal cleaning aids and throw away in a bin any cleaning aids after use
- g) Avoid touching their nose, mouth or eyes
- h) Avoid any physical contact
- i) Consider the appropriateness of wearing of face coverings and gloves e.g. understand those environments where facial coverings are required, etc.

In-store Face-to-face Mystery Shopping

- 29. Before commencing any in-store face-to-face mystery shopping activities research practitioners must ensure adherence (where appropriate) with the appropriate government safe working documents. For example relevant documents for in-store face-to-face mystery shopping in England includes: [Events and attractions, Hotels and guest accommodation, Restaurants, pubs, bars, nightclubs and takeaway services](#), and [Shops, branches and close contact services](#) guidance, or equivalent guidance in the country where face-to-face mystery shopping is being undertaken.
- 30. Research practitioners must adhere to any additional safe working Covid-19 guidance which applies to any in-store environment, e.g. specific retailers or shopping centre guidance, the requirement to wear facial coverings in retail outlets, etc.
- 31. Research practitioners must endeavour to ensure there is enough space to undertake in-store face-to-face mystery shopping safely, where possible adhering to social distancing requirements and not causing obstruction to other individuals in the vicinity and/or the possibility of contact and/or not meeting social distancing requirements with other individuals in the vicinity.

In Transit

- 32. Before commencing any in-transit face-to-face mystery shopping activities research practitioners must ensure adherence (where appropriate) with the appropriate government safe working documents. For example relevant documents for in-transit includes: [Coronavirus \(Covid-19\): safer travel guidance for passengers](#) or equivalent guidance in the country where face-to-face data mystery shopping is being undertaken.
- 33. Research practitioners must adhere to any additional safe working Covid-19 guidance which applies to any in-transit environment, e.g. specific transport owner's corporate guidance, wearing facial coverings on Transport for London, etc.
- 34. Research practitioners must endeavour to ensure there is enough space to undertake in-transit face-to-face mystery shopping safely, where possible standing or sitting in adherence with social distancing requirements and not causing obstruction to other individuals in the vicinity and/or the possibility of contact and/or not meeting social distancing requirements with other individuals in the vicinity.

In Venues

- 35. Before commencing any in-hall/venue face-to-face mystery shopping activities research practitioners must ensure adherence (where appropriate) with the appropriate government guidance on venues. For example in England the guidance: [Events and attractions, Office, factories and labs](#) and [Hotel and guest accommodation](#) or equivalent guidance in the country where face-to-face mystery shopping data collection is being undertaken.

36. Research practitioners must adhere to any additional safe working Covid-19 guidance which applies to in-venues environment e.g. specific venue owner's corporate guidance, wearing of facial coverings (if required), etc.
37. Research practitioners must endeavour to ensure there is enough space to undertake in-venue face-to-face mystery shopping safely, where possible standing or sitting in adherence with social distancing requirements and not causing obstruction to other individuals in the vicinity and/or the possibility of contact and/or not meeting social distancing requirements with other individuals in the vicinity.

Support for Research Practitioners

[The Market Research Benevolent Association](#) (MRBA) exists to provide financial support and advice to practitioners who work or have worked in any aspect of research and are based in the UK. Research practitioners should provide details of the MRBA to any research practitioners who are experiencing financial difficulties due to Covid-19 and are not being supported by other means.