WE CREATE TECH, INC.

Safeguarding Policy

Last updated: October 2026 | Approved by: Board of Directors | Next review: October 2027

1 Purpose and Scope

This policy explains how We Create Tech, Inc. (WCT) prevents, recognizes, reports, and responds to abuse, harassment, violence, and misconduct. It applies to all WCT programs, in person and virtual, including CreativX Lab, NextGen Tech Collective, TechRise, Dance Code Create, CreativX Sport, and WCT events. It applies to all staff, contractors, volunteers, board members, partner staff, and visiting guests.

2 Our Commitment

WCT has a zero-tolerance policy for abuse, neglect, exploitation, or misconduct toward any participant. Every young person and vulnerable adult in our programs deserves to learn, create, and play in a safe, respectful environment.

3 Definitions

- **Child or minor:** anyone under 18 years old.
- **Vulnerable adult:** anyone 18 or older who may be unable to protect themselves from harm, including some adaptive athletes and people with disabilities.
- **Abuse:** physical, emotional, or sexual abuse, neglect, exploitation, harassment, bullying, and hazing.
- **Adult in a WCT program:** any staff member, contractor, volunteer, board member, partner staff member, or guest age 18 or older.

4 Prevention

4.1 Screening

- Everyone with direct contact with minors or vulnerable adults completes a criminal background check, sex offender registry check, and reference check before starting. Background checks are renewed every two years.

4.2 Training

- All staff and volunteers complete safeguarding training before working with participants, including Georgia mandated reporter training.
- CreativX Sport staff complete U.S. Center for SafeSport Core training and disability awareness training.
- Refresher training is completed every year.

4.3 Code of Conduct

- No one-on-one private contact between an adult and a minor, in person or online.
- Communication with minors happens only through official WCT channels, with a parent or guardian copied when possible. No private messaging, personal social media connections, or gifts to individual minors.
- No alcohol, drugs, or tobacco at any WCT program.
- No photos or video of minors without parent or guardian consent (see Section 8).
- Physical contact is limited to what is appropriate, public, and necessary for safety or instruction.

4.4 Supervision

- At least two screened adults are present at every in-person program.
- Program spaces remain open and visible.
- No single adult transports a single minor.
- Virtual sessions use WCT accounts, include at least two adults, and are never held one-on-one with a minor.

4.5 Adaptive Sport Safeguards

- Staff ask for and receive consent before providing any physical assistance.

- Assistance follows each athlete's stated needs and the guidance of the athlete, their guardian, or the partner organization.

5 Recognizing Abuse

Adults in WCT programs watch for physical, behavioral, and environmental warning signs, such as unexplained injuries, sudden changes in behavior, withdrawal, fear of a particular person, or inappropriate attention from an adult. **When in doubt, report.**

6 Reporting

6.1 Internal Reporting

- Report any concern to the Safeguarding Lead the same day.
- Document what you saw or heard in writing, using the participant's own words where possible.
- Do not investigate, and do not confront the person involved.

> **Safeguarding Lead:** Romie Robertson, Director of Governance and Board Relations
> Contact: hello@wecreatetech.org | (770) 580-0837

6.2 External and Mandated Reporting

Under Georgia law (O.C.G.A. § 19-7-5), people who work or volunteer with organizations serving children, including WCT staff and volunteers, are mandated reporters of suspected child abuse or neglect. As a matter of WCT policy, every adult in a WCT program, including contractors, board members, and partner staff, must report suspected abuse or neglect, whether or not the law requires it. Reports to DFCS must be made immediately, and no later than 24 hours after an adult has reason to believe abuse or neglect occurred.

Situation	Report to
Imminent danger	Call 911 immediately
Suspected child abuse or neglect	Georgia Division of Family & Children Services (DFCS): 1-855-GACHILD

Situation	Report to
Sexual abuse of a minor	Georgia DFCS and local law enforcement
Abuse of a vulnerable adult	Georgia Adult Protective Services: 1-866-552-4464
Sport-related misconduct	U.S. Center for SafeSport

External reporting is not optional. It is required regardless of any internal process.

7 Response

When a concern is reported, the Safeguarding Lead will:

1. Make sure the participant is safe.
2. Contact the appropriate authorities.
3. Remove the person involved from contact with participants until the matter is resolved.
4. Notify the participant's parent or guardian when appropriate and safe to do so.
5. Document every action taken.
6. Connect the affected participant with support.
7. Review the incident with the Board and take disciplinary action, up to and including termination of the person's role with WCT.

8 Media, Photography and Consent

- Written consent from a parent or guardian is required before photographing, recording, or sharing images of minor participants.
- Participants age 18 or older give their own consent.
- WCT collects consent through its Media Release, which lets families choose each use separately. WCT also honors media releases signed through host partners that name WCT, such as the Best Buy Teen Tech Center.
- WCT does not publish a minor's full name, school, or contact information, and does not sell images or student work.

- Participants and families can withdraw consent at any time by emailing hello@wecreatetech.org. Withdrawal stops future use but cannot recall materials already printed or published.

9 Data Protection and Record Keeping

- WCT shares participant data only as described in its Privacy Policy: with service providers that process data on WCT's behalf and may use it only to provide services to WCT; with program partners, limited to what they need to run a program the participant joined; and as required by law or for safeguarding purposes. Any other sharing requires written consent from the participant (if 18 or older) or a parent or guardian. WCT never sells participant data or uses it for advertising.
- For participants under 13, personal information is collected from a parent, guardian, or partner school, not from the child.
- For evaluation, WCT uses participant codes instead of names, reports only aggregated results, and combines or withholds results for groups small enough to identify individuals.
- Participants never enter personal information into AI tools, and adults review AI tools before use with minors.
- Safeguarding reports are confidential, stored separately from program records, and shared only on a need-to-know basis.
- Records are kept only as long as needed for program, safeguarding, or legal purposes. Families may request access or deletion at hello@wecreatetech.org, and WCT responds within 30 days.

10 Youth Leadership Roles

Youth in leadership roles, including Youth Design Council members, are program participants first.

- A parent or guardian gives written permission for any minor in a leadership role.
- Council meetings and co-facilitated sessions follow the two-adult rule, with no one-on-one adult and youth contact.
- Communication with youth leaders happens through official WCT channels, with a parent or guardian copied for minors.
- Youth leaders never supervise other youth without an adult present.

- Youth leaders see only de-identified, aggregated evaluation data.
- Stipends for minors are paid as directed by a parent or guardian.
- Section 8 media consent rules apply to all youth leaders.

11 Partner Organizations

Partner organizations that deliver programs with WCT must acknowledge this policy and meet equivalent background check, training, and supervision standards.

12 Policy Review

The Board reviews this policy every year and after any incident or change in law.

13 Acknowledgment

All staff, contractors, volunteers, and board members must read and sign this policy before working with participants.

Name _____ Role _____

Signature _____ Date _____