



Axis Educational Trust (AET)

COMPANY HEALTH AND SAFETY POLICY STATEMENT

Based upon Health and Safety at Work Act 1974

This is the Health and Safety Policy Statement of **Axis Educational Trust**.

Axis Educational Trust is committed to providing a safe environment for workers, children or any other visitors to Axis Educational Trust centres. The safety procedures in operation are for the protection of people who work at or visit the organisation's premises and compliance with these procedures is mandatory.

Axis Educational Trust Statement of General Policy is to:

- Provide adequate control of the health & safety risks arising from our work activities
- Consult with our employees on matters affecting their health & safety
- Provide & maintain safe plant and equipment
- Provide information, instruction and supervision for employees
- Ensure all employees are competent to do their tasks and to provide them with adequate training
- Prevent accidents and cases of work related ill health
- Maintain safe and healthy working conditions
- Review and revise this policy as necessary at regular intervals

In order that the organisation can achieve these objectives, it is important that all Board Members, Managers, Officers, Employees and Sub-Contractors recognise their legal duty, whilst at work, to take reasonable care for the health and safety of themselves and of other persons. Employees should also co-operate fully with the organisation, or anyone else concerned, to ensure that their obligations towards Health and Safety are complied with.

HAKAN GOKCE, Chair
September 2024



Axis Educational Trust

ENVIRONMENTAL POLICY STATEMENT

This is the Environmental Policy Statement of Axis Educational Trust.

Axis Educational Trust recognises the importance of environmental issues and throughout its commercial and societal activities and operations is committed to fostering the preservation and protection of the environment. Axis Educational Trust is also committed to continually improving its environmental performance.

It is the policy of AET to:

- Minimise the extent of environmental impacts on operations within the organisations sphere of influence
- Conserve energy through minimising consumption and maximising efficiency
- Minimise the use of materials, which may be harmful to the environment
- Promote efficient purchasing, which will both minimise waste and allow materials to be recycled where appropriate
- Put in place procedures and support information that enables compliance with the law, regulations and codes of practice relating to the environmental issues
- Recognise and encourage the contribution every employee can make towards improving environmental performance

Reviewed by Hakan Gokce on 25 September 2024

Next Review Date: September 2025

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HEALTH AND SAFETY POLICIES AND PROCEDURES

The following document details health and safety policies and procedures specific to the Axis Educational Trust

Centre. Responsibilities

1. Overall responsibility for Health and Safety is that of Board of Trustees.
2. The day-to-day responsibility of ensuring this policy is put into practice is delegated to the Centre Managers.
3. In the absence of Centre Manager day-to day responsibility will be delegated to either of the Assistant Managers or Teachers.
4. All employees are personally responsible for health and safety within the Centre and should:
 - a. Co-operate with the Centre Manager/Assistant Manager on health and safety matters.
 - b. Take reasonable care of their own health and safety and that of the children in their care.
 - c. Not interfere with anything provided to safeguard their health and safety and that of the children in their care.
 - d. Report any concerns over health and safety to the Centre Manager.

Health and Safety Risks Assessments

1. The Centre manager will carry out regular risk assessments of the Centre.
2. The findings of the risk assessments will be reported to the Board of Trustees, who should take appropriate actions to rectify all faults.
3. The Board of Trustees will approve any action required to remove or control a risk.
4. The Centre manager will be responsible for ensuring that all actions are implemented.
5. The Board of Trustees will check that the implemented actions have removed and/or controlled the risk.
6. Risk assessments will be reviewed annually or when work activities change, whichever occurs first.

Safe Plant and Equipment

1. The Centre manager will be responsible for identifying all equipment needing maintenance.
2. The appropriate head of department will be responsible for ensuring effective maintenance procedures are drawn up.
3. The Centre manager will be responsible for ensuring all identified maintenance is implemented.
4. Any problems found with equipment should be reported to the Centre manager.
5. The purchaser will check that any new equipment meets health and safety standards before it is purchased.

Safe handling, storage and use of substances

1. The Centre manager will be responsible for identifying all substances used at the centre, which require a COSHH assessment (*Chemicals or Substances Hazardous to Health*).
2. The Centre manager will be responsible for undertaking COSHH assessments.
3. The Board of Trustees will be responsible for ensuring that all actions identified in the assessments are implemented.
4. The Centre manager will be responsible for ensuring that all relevant employees are informed about COSHH assessments.
5. All purchasers will check that new substances can be used safely before they are purchased.
6. Cleaning products will be stored in a cool environment, in a locked cupboard or shelf out of reach of children.
7. Assessments will be reviewed annually or when work activities change, whichever is sooner.

Information, Instruction and Supervision

1. The Health and Safety Law poster is displayed in the Centre office.
2. Health and Safety advice is available from the Centre manager, and Board of Trustees.
3. Supervision of part-time staff and trainees will be arranged, undertaken and monitored by the Centre manager.
4. Board of Trustees is responsible for ensuring that employees working at locations under the control of other employers are given relevant health and safety information.

Health and Safety training

1. Axis Educational Trust ensures all staff receive induction H&S training. This is refreshed annually.
2. The Centre manager will arrange any job specific training as required.
3. All Centre Managers and Session Supervisors undertake First Aid training prior to working unsupervised.
4. Staff training records will be kept centrally and updated by the Centre manager.
5. The Centre manager will identify, arrange and monitor any training requirements.

Accidents & First Aid

1. The first aid box is kept in the centre with a sign indicating its location; it contains a replenishment log.
2. The Managers will attend First Aid training every 3 years,
3. All accidents are recorded in the Accident Folder which is kept in the Centre and is updated by the Centre Director, Assistant Managers and Session Supervisors.
4. AET's Head of Ofsted & Safeguarding is responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) to HSE and to the enforcing authority (Ofsted/Care Inspectorate).

Monitoring

1. A daily Centre check will be conducted by the Centre manager, Assistant Managers or teacher.
2. The Centre manager is responsible for investigating accidents.
3. The Centre manager is responsible for investigating work related causes of sickness.
4. The Centre manager is responsible for acting on investigation to prevent recurrence.
5. The Centre manager is responsible for reporting incidents, accidents and near misses to AET's Head of Ofsted & Safeguarding.

Emergency Procedures

1. The Centre manager is responsible for ensuring the Fire Risk Assessment or Annual Reviews are undertaken and any actions implemented.
2. The Centre manager is responsible for checking escape routes.
3. The Centre manager is responsible for checking fire extinguishers weekly.
4. Annual servicing to the fire extinguishers will be carried out by the supplier.
5. Fire Alarms are tested weekly and Emergency Lighting is tested monthly.

No Smoking Policy

Smoking is forbidden anywhere on, or in close proximity to, the centre premises. It is the responsibility of the Centre manager to ensure that suitable signage is visible to the public, and that staff are aware of the company policy.

Reporting

Serious H&S incidents must be written up in an Incident or Accident Report in pen and reported centrally to AET's Head of Ofsted & Safeguarding. Records should always be made in pen, so they cannot be edited or erased. 4

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INFECTION CONTROL POLICY

Axis Educational Trust aims to promote the general wellbeing and health of all children and to ensure that the risk of infection is minimised amongst all children and staff.

We ensure that:

- All parents/guardians sign an agreement on registering that states they will not bring their children to the centre if they are unwell or infectious. If they have not attended school that day, they should not access the centre.
- Staff do not come into work if they are unwell and will inform management if they are feeling unwell during a shift.
- All incubation periods for illnesses are checked by staff through NHS Direct and using exclusion guidelines for schools.
- Good hygiene practice signs are displayed within the centre.
- Antibacterial hand gel is available on reception, and staff encourage visitors to use as they enter the centre.
- All bins contain bin liners.
- All staff actively encourage the children to regularly wash their hands to maintain good hygiene practice.
- Antibacterial soap and hand driers are provided in the toilet facilities.
- Tissues are provided in all areas of the centre.
- A water fountain or water dispenser with individual disposable cups are used for drinking water.
- Staff ensure the centre is cleaned daily; and equipment which is used by children on a regular basis is cleaned appropriately.
- During periods when children are present on site, visitors and staff are not allowed to bring food or animals into the centre, unless they require an assistance dog.
- Staff notify parents/guardians and Ofsted/Care Inspectorate if there is spread of infection in the centre amongst children or staff.
- In the event of having to dispose of clinical waste, we would consult the Environment Agency to comply with correct guidelines.

Serious incidents must be written up in an Incident Report and reported centrally to AET's Head of Ofsted & Safeguarding. Records should always be made in pen, so they cannot be edited or erased.



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FIRE AND EVACUATION POLICIES & PROCEDURES

Management Responsibilities

It is the Centre Manager's overall responsibility to:

- Ensure all staff are familiar with AET's Fire Safety Policies and Procedures.
- Ensure all firefighting equipment on the premises is correct, sufficient and in good working order.
- Conduct fire alarm and emergency lighting tests, evacuation drills and training on a regular basis, and record in the Fire Log.

The Assistant Managers or teacher will assume responsibility when the Centre manager is absent. All staff maintain a day to day responsibility for fire safety. In the event of a fire procedures should be followed as outlined.

Staff Training

Axis Educational Trust ensures all staff receive induction fire training. This is refreshed annually, as well as conducting Fire Drills at least twice a year.

Fire Risk Assessment

Every centre has a Fire Risk Assessment conducted at its launch, which is reviewed on an annual basis by the Centre manager who acts as the competent person. Action points are set out clearly with a time frame to be completed.

Equipment

In accordance with the local authority Fire Inspector the centre is equipped with:

- Member and Staff & Visitors Sign in/out Logs
- CO2 and Hydro Spray Fire Extinguishers
- Emergency Exit signs
- Emergency Evacuation posters
- Fire Log
- First Aid box

Notification of Procedures to Parents/Guardians and Children

Parents/guardians receive the evacuation procedures in the event of a fire in the Membership Handbook.

Emergency Evacuation Procedure posters are displayed in the centre, including the Fire Meeting Point location. All fire related incidents must be written up in an Incident Report and reported centrally to the Facilities Manager. Records should always be made in pen, so they cannot be edited or erased.

Staff Ratios

Our high staff to child ratios allow us to safely and efficiently evacuate the centre as our staff are able to manage small groups of children, with one of the managers coordinating an evacuation.

Evacuation Exits and Routes

The managers will ensure these routes are always clear from obstruction, well-lit and lead directly to a point of safety with a clear path to the Evacuation Meeting Point.

Assisting Disabled Children or Staff in a Centre Evacuation

Upon enrolment at the centre, a Manager will discuss any additional needs a child may have with the parent/guardian, or with the staff member directly, and assess if extra procedures need to be put in place for them in the event of an evacuation.

Where applicable, a Personal Emergency Evacuation Plan (PEEP) will be developed by the manager in consultation with the parent/guardian or staff member. The plan will include details of the action to take in the event of an evacuation and will outline the requirements of the disabled person e.g. ability to independently reach the safety of a protected escape route or exit, or if require support from staff.

Should the centre be based on the second floor, and the lift is out of use in the event of an emergency evacuation, a disabled child or staff member will have access to an evacuation chair, which trained members of staff will use to safely evacuate the child out of the centre and to the Evacuation Meeting Point, as outlined in their PEEP.

Emergency Evacuation Procedures

IF YOU DISCOVER A FIRE

- Children:** Alert a member of staff
- Tutors:** Operate the fire alarm, at the nearest and safest point, by the appropriate method
Alert other staff to start evacuating themselves and their children
Do not take any unnecessary personal risks
Close any doors/ windows if it is safe for you to do so
Evacuate the building. Do not attempt to extinguish the fire unless trained to do so.

CALL THE FIRE BRIGADE

ON HEARING THE ALERT ALARM i.e. intermittent alarm

- Children:** Listen to your tutor
- Tutors:** Prepare to begin evacuation
Ensure children DO NOT leave the centre unaccompanied i.e. to find parents/guardians
Evacuate the premises calmly and safely

EVACUATION PROCEDURE

- Children:** Stay calm
Listen to your tutor
Stay with your tutor and follow their instructions
Evacuate via your nearest fire exit to the fire assembly point
- Tutors:** Evacuate children through the nearest fire exit in an orderly fashion
Take responsibility for the children in your area
Escort children to the fire assembly point
Do not let children leave unaccompanied
- Manager:** Collect the Member and Staff/Visitor Attendance Registers, Active Members List and a phone.
Conduct full and final check of premises to ensure empty i.e. toilet, storage rooms, Surf Club and proceed to fire assembly point

AT FIRE ASSEMBLY POINT

- Call an Attendance Register for members, staff and visitors on arrival at the assembly point.
- Notify the Fire Brigade if anyone is not accounted for.
- Await further instruction from Fire Brigade.
- Do not return to the building unless instructed to do so by the Fire Brigade.
- If you are not permitted to return to the centre, parents/guardians must sign next to the child's name on the Attendance Register before you can release them into their care.
- Notify Head Office – Parents/guardians can be informed via text message from the Member Admin Team in HO or staff phoning them directly.
- You can use the Active Members List to contact parents/guardians to collect their children.
- If you require further contact details you can call Head Office;
- Details of the evacuation must be recorded in the Fire Log on return to the centre.

COUNTER TERRORISM POLICY AND LOCKDOWN PROCEDURES

Policy Statement

This policy is to enable staff to recognise and report suspicious activity, and to understand what action should be taken in the unlikely event of such an incident.

Management Responsibilities

It is the Centre Manager's overall responsibility to:

- Ensure all centre staff undertake a radicalisation training module on the signs and symptoms of radicalisation, how to protect children from terrorism or extremism, and The Prevent Duty.
- Provide stability in the lives of children who may be at risk of radicalisation.
- Recognise that attending children can be vulnerable and exploited by others.
- Be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.
- Act as the first point of call for any child, staff, or parents/guardians who believe that a child or any staff member is at risk of radicalisation.

Making a Referral

AET's Head of Ofsted & Safeguarding, as the Senior Designated Safeguarding Officer will advise and act upon all suspicion, belief and evidence of all reported cases of radicalisation.

Staff may also contact the **Anti-Terrorist Hotline on 0800 789 321** for advice or to report suspicions or concerns.

Measures Taken to Aid the Prevention of Radicalisation

Staff Checks

- All staff are subject to vetting checks before they can commence work at Axis Educational Trust. For further details, refer to 'Staff Recruitment, Support and Training' within the Safeguarding Policy and Procedures.

Information Security

- For further information on filtering of websites containing radicalised or extreme material please refer to the ICT Security Management Policy.
- Confidential waste is disposed of safely and securely to prevent access to data.

Centre Security Measures

- External doors should not be propped open.
- If a staff member loses their keys or security alarm fob, the Facilities Manager must be informed immediately.
- Centre staff in stand-alone settings are trained how and when to use or reset their panic alarms which are linked to the Police.

Actions to be Taken in the Event of a Terrorist Threat or Attack

Suspicious Mail or Deliveries

Staff should be aware of any post that they receive to the centre. Deliveries could be explosive, incendiary, chemical, biological or radiological. If a suspicious parcel is found or received, the centre should be evacuated as per guidelines in the Emergency Evacuation Policies & Procedures, and a report made to the Police immediately.

Suspicious Items

Centre staff are best placed to identify an item which is 'not right'. In the result that a suspicious item is found, the centre should be evacuated as per guidelines in the Emergency Evacuation Policies & Procedures, and a report made to the Police immediately. The item must not be touched.

Bomb Threat

If a bomb threat is made against the centre, the centre should be evacuated as per guidelines in the Emergency Evacuation Policies & Procedures, and a report made to the Police immediately.

Lockdown Procedures

In the unlikely event that a centre evacuation will put children, staff and visitors at more risk from an impending attack, the centre will go into Lockdown, following the below procedures:

- If it is unsafe to leave the centre, grab a phone, find cover and HIDE
- Lock or barricade yourself and attending children into the centre toilet/storeroom/cupboard
- Remain still and silent – ensure mobile phones are silenced
- If possible, call 999 immediately
- Keep calm – this will help children in your care to do the same
- Don't look for the attacker - if you can see them, they might see you
- Be aware of your exits, should you need to escape quickly
- Await further instruction - the Police will evacuate you when it is safe to do so
- Follow any instructions issued to you by the Police

Incidents must be written up in an Incident Report and reported centrally to AET Learning's Head of Ofsted & Safeguarding. Records should always be made in pen, so they cannot be edited or erased.



Axis Educational Trust

ACCIDENT POLICY

Axis Educational Trust has a commitment to the safety and wellbeing of the children, staff, parents/guardians and visitors who come to our centres. Our Accident Policy is designed to ensure that any accident that takes place within one of our learning centres is dealt with appropriately. This policy works in conjunction with our Behaviour Management and Incident policies.

Pre Existing Injuries

An Accident Record should also be made if a child comes to a centre with an existing injury, enquiries should be made as to how and when it was obtained.

Accidents on the Premises

Axis Educational Trust will notify Ofsted/Care Inspectorate of a serious injury or death to any child in our care or an adult on our premises.

Each Axis Educational Trust Centre has a First Aider, First Aid Box and Accident Record Folder.

Where an accident takes place within an Axis Educational Trust centre it will be reported on an Accident Record and stored in the Accident Folder. The following will be recorded:

1. date, time and location of accident occurrence
2. name of the person(s) injured.
3. name(s) of the staff reporting the accident.
4. circumstances of the accident: type of accident, how it happened and what furniture/equipment/people were involved.
5. a description of any injury sustained (type, size and location on the body). A note should also be made if no visible injury or wound is visible.
6. what actions were taken and by whom e.g. First Aid administered, ambulance called etc
7. the signature of 2 members of staff, the First Aider and a witness to the event.
8. the signature of the parent/guardian collecting the child or of the adult to whom the accident happened.

A copy of the accident report should be given to the parent/guardian of the child involved or to the adult to whom the accident happened.

If a child has had an accident and has permission to leave the centre by themselves and is not being collected by a parent/guardian, the Centre manager, Assistant manager or teacher in charge will telephone the parent/guardian and notify them of the accident, explaining that it has been recorded in the Accident Record Folder. The staff member should make sure the parent/guardian signs the record confirming they have been notified the next time they come into the centre. If the child has been involved in an accident, and the staff do not feel it is appropriate for the child to leave on their own, they will call the parent/guardian and ask them to collect the child.

Serious Accidents or those requiring hospitalisation must be written up and reported centrally to AET's Head of Ofsted & Safeguarding. Records should always be made in pen, so they cannot be edited or erased.

AET's Head of Ofsted & Safeguarding is responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) to HSE and to the enforcing authority, and Ofsted/Care Inspectorate.

Axis Educational Trust

INCIDENT POLICY

Axis Educational Trust has a commitment to the safety and wellbeing of children under the care of Axis Educational Trust centre staff. Our Incident Policy is designed to protect the children, staff, parents/guardians and visitors to Axis Educational Trust centres and ensure that any incident is dealt with appropriately. This policy works in conjunction with our Behaviour Management and Accident Policies.

Axis Educational Trust defines an 'incident' as any incident causing concern for the welfare of staff, child, parent/guardian or visitor that is not accidental. This may or may not have resulted in an injury, and includes any situation where:

- it is necessary to restrain a child physically due to severe or dangerous behaviour
- an individual attempts to or actually causes deliberate harm to another person
- an individual verbally abuses another person
- a child attempts to escape from the premises or actually escapes from the premises
- a child is removed without authorisation from the centre
- any type of safeguarding incident or concern occurring inside or outside of the centre
- theft, burglary or vandalism
- centre closure

This above list is not exhaustive – refer to the Incident Folder for further examples of what should be recorded.

Where an incident takes place in an Axis Educational Trust centre the situation will be recorded in our Incident Folder. The following details will be recorded:

1. date, time and location the incident happened
2. child's full name, age and address
3. full name of the member(s) of staff or others involved and their home address
4. an account of the incident by a member of staff, any children involved, and any witnesses
5. how the incident was handled
6. the outcome of the investigation
7. the signature of two members of staff (the member of staff involved and another as a witness)
8. the signature of the parent/guardian upon collection (as long as the allegation is not regarding them)
9. whether the incident required reporting to Children's Social Care/LADO or enforcing authorities such as Ofsted/Care Inspectorate, and the Police.

Axis Educational Trust staff will notify the parents/guardians of the children involved in the incident when they come to collect them, or telephone them immediately, depending on the severity of the incident. **If staff feel that a child may be at additional risk from harm, they may not share this information with the parent/guardian, and instead contact the relevant external authority for advice and guidance on how best to escalate a concern.** Axis Educational Trust staff will review the child's behaviour with the parent/guardian and the child and agree the best course of action. Axis Educational Trust reserves the right to exclude a child from an Axis Educational Trust centre at any time. Parents/guardians are informed of this right in the Membership Handbook they are given when they join Axis Educational Trust.

If the child is leaving the centre on their own, the Centre manager, Assistant manager or teacher will telephone the parent/guardian to notify them of the incident and that it has been recorded in the Incident Folder.

Serious incidents must be written up in an Incident Report and reported centrally to AET's Head of Ofsted & Safeguarding. Records should always be made in pen, so they cannot be edited or erased.

Axis Educational Trust

POLICY FOR THE STORAGE, HANDLING & ADMINISTRATION OF MEDICINE/TREATMENT

Axis Educational Trust is committed to bringing educational opportunities and benefits to as many children as possible including those with disabilities, special additional needs, special educational needs, and medical needs.

Whilst Axis Educational Trust has a general policy of not administering any medication to children whilst they are in an Axis Educational Trust centre, Axis Educational Trust recognises that certain children, in certain circumstances, might require the administration of a specific medication or treatment in a life-threatening situation. This includes children with life threatening allergies.

In such situations with the following information and written permission from the child's parents/guardians, a First Aid trained member of staff will administer the necessary medication or treatment.

Should staff need to administer the necessary medication or treatment to a child in an emergency or life-threatening situation, the parent/guardian are required to provide:

- **A full written description of the medication/treatment required** on an 'Emergency Medication and Treatment Permission Form' to include: type, name and strength of medication, how the medication should be stored, the dose required, the time and location that medication should be administered and any other relevant information.
- **A relevant medical history for the child** in question with the following information: the name of the child's GP with the address and telephone number of their GP's surgery.
- **Signed parental/guardian consent** on the 'Emergency Medication and Treatment Permission Form', giving permission for a First Aid trained member of staff to administer the named medication or treatment should the need arise. The completed form must be stored in the First Aid & Medicine Folder for easy access.
- **Any medication required** as per the child's medical needs. The parent/guardian is responsible for providing in-date medication and the disposal of out of date medication. Medication must be stored out of reach from children in the centre Medicine Box and must be clearly labelled with the child's name and dosage required in a zip lock bag along with a copy of the completed 'Emergency Medication and Treatment Permission Form'.
- **Any medication provided by the parent/guardian must be signed in/out of the centre using a Handling Medication Form.** Parent/guardians should be advised where possible to provide spare medication to be kept permanently on site, and recorded on the Long Term Storage of Medicine Tracker.

In addition, should the administration of the named medication/treatment require specific training:

- The parent/guardian should either give all First Aid training members of staff the necessary training or arrange for the necessary training to be given.
- A record of these training events will be kept. It is the parent/guardian's responsibility to ensure that full-time staff are kept up to date with the relevant training to administer the child's medication or treatment in a life-threatening situation.
- When any new First Aid trained member of staff joins the centre team, the Centre manager will notify the relevant parent/guardian to arrange for the new member of staff to be appropriately trained.

Axis Educational Trust will:

- Keep an up to date list of children with severe allergies or life-threatening medical conditions, on display in the office, so all staff know which children are at risk.
- Ensure the safe storage of such medicines or life-saving equipment in a clean hygienic storage box in the office out of reach of children. A small fridge can be supplied if medicine requires refrigeration.
- Ensure each medicine is clearly labelled with the child's name and dosage requirements.
- Ensure Emergency Medication and Treatment Permission Forms are kept in the First Aid & Medicine Folder for easy access. A copy should be stored with the medication in the Medicine Box, and will be referred to before any medication is given. A copy may be kept in the child's file.
- Contact the parent/guardian of the child should any life-threatening situation arise.
- Ensure that any medication administered is recorded on an Individual Administration of Medicine Form with the following information:
 1. The date and time the medication has been administered
 2. The full name of the child being given the medication
 3. Information about the child's medical condition and confirmation that staff have permission to administer medication
 4. The medication administered: name, type, dosage and method of administration
 5. Any notes of observations
 6. The full name and signature of the staff member administering the medication
 7. The parent/guardian should also sign the record on collecting the child.

Axis Educational Trust will give the parent/guardian a record of any medication administered to reduce the risk of overdose.

Serious incidents and accidents must be written up in an Incident or Accident Report and reported centrally to AET 's Head of Ofsted & Safeguarding. Records should always be made in pen, so they cannot be edited or erased.