Valuable Assets: A General Formal Investigation into the Role and Status of Classroom Assistants in Scotland’s Primary Schools

A study for the Equal Opportunities Commission (Scotland)

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1. Research Purpose

Background

1.1 The Scottish Executive introduced classroom assistants to Scottish primary schools in 1998. The initiative was then expanded to 5000 classroom assistants in 2002. The aim was to lower the pupil-adult ratio in primary schools and raise standards of pupil attainment by allowing teachers’ relief from the non-teaching elements of their work and provide teachers more time to teach. These classroom assistants are intended to work under the direction of teachers and should not be involved in work that is the remit of teachers.

1.2 The initial policy documents signalled a number of duties and responsibilities of classroom assistants. From the initial and subsequent policy documents a number of duties and responsibilities for classroom assistants can be identified. Some of these tasks – the organisation and use of resources, the care and welfare of pupils and supporting the teacher - are distinct from teaching per se. However, the other, involving the encouraging and supporting of learning is more open to interpretation.

1.3 In 1998 the Scottish Office’s Classroom Assistants Working Group assumed that classroom assistants would work ‘at a range of levels’ but noted the need for sufficient money to be available to appropriately pay classroom assistants for the tasks being envisaged. The Working Group also noted the need for sufficient distinction to be made between the duties and responsibilities of classroom assistants and those of teachers.

1.4 Since that time, the classroom assistant initiative has been rolled out across Scotland with the job becoming embedded in schools. The subsequent development of classroom assistants was examined in 2005 when a pilot study was commissioned by the Equal Opportunities Commission (EOC) (Scotland). This evaluation provided evidence-based analysis of classroom assistants’ jobs, examining practice subsequent to policy. It indicated that the job had evolved. Importantly, it revealed that in freeing teachers’ time to teach classroom assistants jobs had ‘stretched’ beyond the intended tasks and into tasks that could be considered as being more the remit of teachers.

1.5 The pay of classroom assistants in 2005 varied across Scottish local authorities from £5.05 to £8.93 per hour. Typically these rates reflect local government pay scales and are considered equivalent to the lowest clerical grade (GS1 and GS2). However these pay rates are neither systematically applied to the duties and responsibilities of classroom assistants nor consistent across local authorities in Scotland. In addition, lacking a comprehensive pay evaluation, a ‘sticky floor’ has emerged, with classroom assistants jobs evolving and expanding but which has not been reflected in pay.

1.6 What is clear from the pilot is that there is a hierarchy of contribution to learning by classroom assistants stretching from ‘housekeeper’ to ‘para-educator’. What is not clear from the pilot is whether all classroom assistants are now doing all
of these tasks or whether there are different types of classroom assistants undertaking different tasks.

1.7 As a result of concerns raised by the findings from the pilot research, the EOC launched a General Formal Investigation (GFI) into the role and status of classroom assistants in Scottish primary schools. A programme of research was conducted as part of phase 1 of this GFI including an independent assessment of the relative value of the work of classroom assistants. This valuation confirmed the pilot study findings that classroom assistants covered a range of activities and responsibilities, such that ‘there were two, and possibly three, levels of demand among classroom assistant roles’. The findings from the research reported here complement the findings from the job evaluation assessment, providing the national picture of the job tasks being done by classroom assistants across Scotland.

Research Aims

1.8 The second piece of research in Phase 1, which is reported here, was intended to extend the evidence base with a Scotland-wide assessment of policy and practice. The aims and objectives of this research were as follows:

- To characterise classroom assistants, their motivations and perceptions of the job.
- To assess perceptions of the type, range and pattern of tasks undertaken by classroom assistants held by teachers and head-teachers with regard to supporting learning.
- To identify possible job variations by school and local authority.
- To identify whether different archetypes of classroom assistants exist specifically in relation to pay and grading.

1.9 The report next provides an outline of the research design followed by the research findings, shaped by the aims and objectives above. The final section summarises the research and raises a number of issues that need to be considered regarding the status and pay of classroom assistants.
2. Research Outline

2.1 The research reported here had two parts; the first part consisted of quantitative research, the second part of qualitative research:

**Part 1:** The quantitative research consisted of questionnaires tailored to classroom assistants, head-teachers and teachers. In total 4100 questionnaires were distributed, across a sample of 1000 primary schools, stratified by size and location. These questionnaires encompassed 1000 head-teachers, 1100 teachers and 2000 classroom assistants. Over 2000 responses were received giving a response rate of 49%. Responses from individual sub-groups were generally consistent: 53% head-teachers, 45% teachers and 49% classroom assistants. These questionnaires generated data on the perceptions of classroom assistants, head-teachers and teachers on the actual work done by classroom assistants.

**Part 2:** The qualitative research mainly encompassed interviews with local authority Directors of Education (or equivalent) with policy responsibility for classroom assistants in that local authority. In some cases these interviews were supplemented with the additional participation of Human Resource Directors or equivalent. Sixteen local authorities were approached for their participation comprising half of all local authorities in Scotland, stratified by location, size and classroom assistants’ categorisation. Interviews were conducted in 14 of the 16 local authorities approached. In addition a representative from the Scottish Executive Education Department was also interviewed to gather background data on the initial implementation. These interviews provided information on the policy intentions related to the introduction and implementation of classroom assistant jobs in individual local authorities.

2.2 The research design and the research tools built on those used in the initial pilot study and were finalised in conjunction with the EOC.
3. Research Findings

The Characteristics of Classroom Assistants

3.1 Almost all, 99%, of classroom assistants in the survey were women; typically aged 31-50, with partners and children. Almost 80% of these children were of school-age. Only 8% were lone parents. The majority of classroom assistants (56%) are slightly older, 41-50, as are their children, the majority of whom attend secondary school.

3.2 Classroom assistants have a range of qualifications. Almost half, 44%, have Highers or A-levels. Beyond school-associated education a minority have further or higher education, some of which is related to education. For example, 16% have HNC/Ds and 17% have S/NVQs (9% and 11% education-related respectively). 23% have the newly developed SVQ for classroom assistants. Nearly half have a Professional Development Award (PDA), of which 37% was education-related. Less than 10% have a first degree and only 3% a higher degree (respectively 3% and 2% education-related).

3.3 Qualifications were accorded much less relevance than ‘personality’ as a requirement for doing the job. For classroom assistants (68%), teachers (76%) and head-teachers (84%), personality was perceived as the most important attribute in doing the job. This perception is underlined with only just over a third of classroom assistants, head-teachers and teachers thinking that classroom assistants should have prior qualifications before entering the job.

3.4 Typically classroom assistants do not have a second job and being a classroom assistant is not regarded as an entry level job but as a job in itself. Significantly, being a classroom assistant was typically not regarded as a route to becoming a teacher. In terms of their future intentions classroom assistants were split about whether they would continue in the job for the foreseeable future. Most were inclined to stay in the job short-term, but half of classroom assistant respondents had no long term career envisaged in education either as a teacher or undertaking other school-based jobs.

3.5 Classroom assistants gave the main reason for wanting to be a classroom assistant as a liking for working with children and having school-age children. In this respect classroom assistants might be described as either ‘labourers of love’, in that they make a positive choice because they like working with children; or ‘captives of love’, in that their employment opportunities are constrained by having children, such that they need to accommodate childcare and work.

3.6 In terms of recruitment there is an even split between formal and informal methods. The main method is through newspaper advertisements (36%) but the informal methods of word of mouth (18%) and being approached by the head-teacher (21%) are as important. All then go through the formal selection process.
3.7 The use of informal methods might indicate that schools are plugging skills gaps by encouraging particular applicants to apply for available jobs as a result of these individuals’ possessing particular skills such as art, music or ICT. This point was also recognised by a number of Directors of Education (DoE):

‘A lot of them have a great wealth of other skills that they bring, some are very creative and artistic and it’s just recognising the strengths of the individual[s] … so it’s about head-teachers finding out what the strengths are and sort of capitalising on that’.

‘ICT is a good example … sometimes you get a classroom assistant who comes along and they’ve got their ECDL or they’ve got some enhanced qualification, and they’re worth their weight in gold.’

‘… let’s say that you’re a classroom assistant who’s maybe got fairly good French or Spanish, you’re going to be quite useful when it comes to modern languages in primary six and primary seven.’

‘… some teachers have these skills and some don’t … if [classroom assistants] have got something extra, if they’ve got an additional string to their bow then you’re in business.’

3.8 Typically most classroom assistants are in permanent employment with most working 25, 27.5 or 30 hours per week. Most (90%) work term time only, which is typically 39 weeks a year and almost 10% work more than term time.

The Work of Classroom Assistants

Job Descriptions and Job Titles

3.9 From the interviews with SEED and the DoEs there was clear recognition that classroom assistants are intended to free teachers’ time to teach. However the Scottish Office (now SEED) neither created national terms and conditions for classroom assistants nor provided detailed job descriptions. Instead local authorities were expected to determine pay in relation to the skills perceived to be required for the job, with national guidelines only informing more detailed job descriptions at the level of local authorities and schools. As one DoE said, ‘We took basically the national guidelines and altered them to suit specifically for ourselves and therefore we produced our own job specification, competencies and person specification for the post.’

3.10 Some local authorities since have consolidated posts. For example, in several authorities a number of posts including classroom assistants, auxiliaries and those responsible for special educational needs (SEN) have been amalgamated to become Pupil Support Assistants and Learning Support Assistants. In practice, however, even with job titles consolidated, tasks can still be specialised which can create a blurring between administrative and learning support activities previously undertaken by classroom assistants, auxiliaries and more specialised SENs. This point was recognised by a number of the DoE interviewees.

‘We eventually realised that we had pre-teachers’ agreement classroom assistants, teachers’ agreement classroom assistants, learning support auxiliaries and a whole host of people who were really in the school wearing different hats and a few years ago now we ran a best value
review on classroom assistants … basically the conclusion that we came to was that we should get rid of all these demarcations.’

3.11 In practice this policy has tended to ‘tidy’ the multiple support activities within schools but also seems to orientate these consolidated positions more towards the classroom:

‘… previously you may have had an individual purely working in the office and when you asked them to go and work in a classroom they would say “No, I’m the office auxiliary” but now what we can say is to them, “Well you’re a learning assistant, and whilst you did have your majority of your tasks within the office, this term we would need you to work in a classroom.”’

3.12 What classroom assistants do within and outwith the classroom therefore needs to be analysed. The quantitative data based on the survey data allows this analysis.

Tasks Undertaken by Classroom Assistants

3.13 Based on the descriptors of the tasks likely to be undertaken by classroom assistants in the SOEID implementation guidance, Annex E of the Teachers Agreement, the position paper from the General Teaching Council Scotland and the results of the pilot research, the work of classroom assistants was classified and analysed along four task clusters. These task clusters reflect a distinction between non-direct and direct contribution to learning as well as differing levels of complexity:

- The organisation and use of resources.
- The care and welfare of pupils.
- Supporting the teacher.
- Encouraging and supporting learning.

3.14 For each of these task clusters, four to seven questions were asked about activities identified from these documents. The evidence below outlines indicative findings. Each question had a rubric of answers running from ‘always’ to ‘never’.

The Organisation and Use of Resources

3.15 Respondents were asked the frequency with which they undertook the following activities. The responses indicate that the activity below is undertaken at least sometimes.

<table>
<thead>
<tr>
<th>Activities</th>
<th>Respondents</th>
<th>Classroom Assistants</th>
<th>Head-teachers</th>
<th>Teachers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparing classroom materials for use by pupils</td>
<td>99%</td>
<td>99%</td>
<td>98%</td>
<td></td>
</tr>
<tr>
<td>Routine administration</td>
<td>96%</td>
<td>93%</td>
<td>89%</td>
<td></td>
</tr>
<tr>
<td>Preparing and mounting displays</td>
<td>99%</td>
<td>99%</td>
<td>97%</td>
<td></td>
</tr>
</tbody>
</table>

3.16 There is consensus amongst respondents that classroom assistants undertake activities related to the organisation and use of resources. In addition, just over half of respondents (55% of classroom assistants; 55% of teachers and 56% of
head-teachers) believe that the importance of this task has remained the same over time. Finally, three quarters of classroom assistants stated that they are regularly unsupervised in this task, compared to just 49% of teachers and 55% of head-teachers.

The Care and Welfare of Pupils

3.17 Respondents were asked the frequency with which they undertook the following activities. The responses below indicate that the activity below is undertaken at least sometimes.

<table>
<thead>
<tr>
<th>Activities</th>
<th>Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supervising non-teaching areas</td>
<td>97% 94% 94%</td>
</tr>
<tr>
<td>Provide comfort and care for minor accidents, upsets, etc.</td>
<td>99% 96% 98%</td>
</tr>
<tr>
<td>Escorting pupils within and outwith school premises</td>
<td>97% 97% 96%</td>
</tr>
</tbody>
</table>

3.18 Again there is consensus across all respondents that classroom assistants undertake activities related to the care and welfare of pupils. Sixty-four per cent of classroom assistants believed the importance of this task has remained the same, a view shared by teachers (65%) and head-teachers (75%). Lastly, 81% of classroom assistants stated they are regularly unsupervised in this task, though lower figures were stated by teachers (62%) and head-teachers (66%).

Supporting the Teacher

3.19 Respondents were asked the frequency with which they undertook the following activities. The responses below indicate that the activity below is undertaken at least sometimes.

<table>
<thead>
<tr>
<th>Activities</th>
<th>Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discuss learning activities with the teacher to understand what needs to be done</td>
<td>98% 100% 99%</td>
</tr>
<tr>
<td>Discuss with the teacher how pupils coped with the learning activities.</td>
<td>98% 99% 99%</td>
</tr>
<tr>
<td>Maintain discipline by encouraging good pupil behaviour and interaction in the classroom</td>
<td>99% 98% 97%</td>
</tr>
</tbody>
</table>

3.20 Again there is consensus across all respondents that classroom assistants undertake activities related to supporting the teacher. Overall classroom assistants and head-teachers split 50/50 between whether the importance of this task had remained the same or had increased over time, whilst 71% of teachers suggested these activities have increased. Lastly, nearly half (47%) of classroom assistants stated they are regularly unsupervised in this task, though again teachers (27%) and head-teachers (28%) offered lower figures.

Encouraging and Supporting Learning

3.21 This task cluster is the one which would indicate potential role stretch and a blurring between non-teaching and teaching activities. Respondents were
asked the frequency with which they undertake the following activities and responses indicate that the activity is undertaken at least sometimes.

<table>
<thead>
<tr>
<th>Activities</th>
<th>Respondents</th>
<th>Classroom Assistants</th>
<th>Head-teachers</th>
<th>Teachers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide learning support to individuals or groups of pupils</td>
<td></td>
<td>99%</td>
<td>90%</td>
<td>95%</td>
</tr>
<tr>
<td>Teaching new concepts</td>
<td></td>
<td>59%</td>
<td>24%</td>
<td>28%</td>
</tr>
<tr>
<td>Setting learning tasks</td>
<td></td>
<td>56%</td>
<td>32%</td>
<td>26%</td>
</tr>
<tr>
<td>Planning the curriculum for pupils</td>
<td></td>
<td>13%</td>
<td>13%</td>
<td>10%</td>
</tr>
<tr>
<td>Assessing the learning and development of pupils</td>
<td></td>
<td>67%</td>
<td>57%</td>
<td>60%</td>
</tr>
</tbody>
</table>

3.22 As the table indicates there is consensus amongst respondents on some activities but divergence on others. Even when there is divergence, for example with teaching new concepts, roughly a quarter of teachers and head teachers acknowledge that classroom assistants undertake this activity. What is most significant is that there is consensus amongst all respondents that a small but significant minority (10%+) are involved in planning the curriculum. Overall at least 50% of all respondents believe that classroom assistants’ task of encouraging and supporting of learning has increased over time. Lastly, 50% of classroom assistants stated they are regularly unsupervised in this task, though teachers’ (24%) and head-teachers’ (20%) figures are again lower.

3.23 Activities related to the tasks of the organisation and use of resources, the care and welfare of pupils and supporting the teacher largely reflect the intent of the classroom assistant implementation guidance and are clearly undertaken by virtually all classroom assistants, as acknowledged by all respondents. Most respondents suggested that the importance of these activities has remained the same, with again a large measure of agreement on this point between classroom assistants, teachers and head-teachers. For the first two task cluster the majority of classroom assistants also report that they work unsupervised, which is not surprising given that these tasks should be able to be carried out following ‘short induction’ and ‘straightforward guidance’ from teachers. Supervision increases with the third task cluster – supporting the teacher. It was expected by the Scottish Office in 1999 that performing this task would require additional training or classroom assistants having previous training, qualifications and experience.

3.24 In addition there seems to be evidence that some classroom assistants are exceeding the initial policy intent of the duties and responsibilities for classroom assistants, as indicated in the Scottish Office implementation guidance. Evidence for this role stretch comes within the fourth task cluster of encouraging and supporting learning. It is evident to some extent with teaching new concepts and assessing learning but seems particularly the case with planning the curriculum. The latter two activities at least should be duties of teachers according to the Teachers Agreement (phrased in Annex B as ‘developing the school curriculum’ and ‘assessing recording and reporting on the work of pupils’). Whilst there is a significant divergence of opinion about some of these activities between classroom assistants on the one hand and teachers and head-teachers on the other, there is consensus amongst all respondents that a small but significant percentage of classroom assistants are
teaching new concepts, setting learning tasks, assessing pupils’ learning and planning the curriculum. In other words, some classroom assistants’ roles are being stretched so far that they are blurring into teaching.

**Explanations for ‘Role Stretch’**

3.25 In our pilot study we identified a range of activities being undertaken by classroom assistants with a potential differentiation between classroom assistant roles, based on a hierarchy of tasks. This finding was confirmed in the independent job evaluation. Furthermore, based on the 11 jobs evaluated, it was also suggested that a distinction could be made between classroom assistants jobs that are less demanding (n=6), more demanding (n=4), and most demanding (n=1).

3.26 From these two pieces of research it is clear that some but not all classroom assistants jobs have ‘stretched’ to include more activities than were initially intended and, in doing more, blurring the boundary between non-teaching and teaching roles.

3.27 Recognition of the potentially differing roles leads to the obvious question of whether this role differentiation is sustained across Scotland and what explains it? The evaluation study conducted by Hastings *et al.* suggested that local authorities may be the key independent variable, as if ‘some authorities had allowed greater job development than others’. However Hastings *et al.* also acknowledge that the sample of classroom assistants is too small to generalise. Our data, the second part of the GFI, allows a Scotland-wide analysis that incorporates a number of possible variables, including:

- Local authority policy
- Individual school practices
- Personal characteristics of the classroom assistants

**Local Authority Policy**

3.28 The results from the questionnaires point to big differences between local authorities but with no real identifiable pattern by type of local authority by size, type or location. For example there was no difference in teaching new concepts or planning the curriculum across local authorities but rural/island local authority classroom assistants were more likely to assess learning but more likely to be supervised. The results thus reveal different outcomes in different local authorities but suggest that this outcome is not driven by local authority policy. Instead it might be an outcome of individual school or classroom practice. This possibility was acknowledged by a number of DoE interviewees:

‘We’ve stuck to [clear demarcation between teaching and classroom assistant roles] as a principle. In practice, I couldn’t vouch for individual classroom teachers, individual classroom assistants not straying at times over that fine line.’

‘I think that classroom assistants may be being asked to do more than they should be … I’ve no doubt some of them occasionally certainly do more than is expected of them.’
3.29 Thus although a demarcation between non-teaching and teaching roles is intended by policy, practice seems to be different.

**Individual School Practices**

3.30 The questionnaire allowed analysis of practices in individual schools across the four task clusters. Using the distinction of school size, with the demarcation of whether schools were above or below average pupil roll, there was little variation by size of school in terms of classroom assistants contribution to learning, though classroom assistants in the smallest schools (<50 pupils) were more likely to do so on some variables, principally teaching new concepts and assessing learning. These findings echo those of the pilot study in which there was evidence that the role differed across local authorities, across schools within the same authority and across classrooms within the same school.12

**Personal Characteristics**

3.31 With an overwhelming percentage of female classroom assistants, differential treatment between the sexes could not be assessed. Instead personal characteristics were considered on two dimensions - qualifications and skills brought to the job. With regard to the former there was no significant difference between those classroom assistants with degrees and those without in terms of level of contribution to learning, though degree-holders were more likely to work without supervision. Those classroom assistants with PDAs were marginally more likely to plan the curriculum and assess learning and to regularly work unsupervised with that supervision lessening over time.

3.32 The biggest difference was in relation to additional skills. Using music and language as proxies, classroom assistants who had these additional skills were more likely to be engaged in higher level learning activities than those without such skills and were also more likely to work unsupervised and for their supervision to be lessening over time. The data from the questionnaires seems to point then to the individual characteristics of the classroom assistants as being the main explanation for role stretch, a point that was also alluded to by a number of the DoE interviewees, for example:

‘... it varies depending upon the individual relationships [between teachers and classroom assistants] ... the way in which they play their role is dependent upon the skills of the individual. Now if you were to describe maybe what you might think of as a baseline skill level, most of the classroom assistants we have are able to perform well above that. Where that happens I think teachers take advantage of the skills that they have. And when that happens they are probably aware that the distinction is blurred.’
4. Summary and Implications

4.1 Classroom assistants undertake a range of tasks that, following national guidelines, can be clustered under four headings. All classroom assistants are involved in three of these task clusters - the organisation and use of resources, the care and welfare of pupils and supporting the teacher. These tasks are clearly compatible with the initial policy remit.

4.2 A small but significant group of classroom assistants appear to be working beyond the policy remit, being involved in higher level learning activities, for example planning the curriculum. Developing the school curriculum is, according to Annex B of the Teachers Agreement, the duty of qualified teachers. That boundary overspill can and is occurring is noted by DoEs, as one commented:

‘… the kind of involvement that might include sitting with a child and helping them with a task prescribed by the teacher or hearing their reading, these are things where I would admit that there’s a potential for overlap [with teaching] but if you’re alert to it you manage it. And you’ve got to keep self evaluating on it, that you’re not encroaching, that you’re not crossing boundaries. How successfully we do that, I wouldn’t want to sign a guarantee that said we don’t ever cross the boundary but we’re aware of the boundary and we respect it.’

4.3 It is clear that this boundary is being transgressed. However for this group of classroom assistants there is a ‘double whammy,’ for their work is unrecognised and so also undervalued.

4.4 The lack of recognition appears to arise because the boundary crossing does not feature as formal national or local authority policy or school practice but as an outcome of informality within schools and classrooms as certain classroom assistants skills are recognised and deployed. Typical examples are classroom assistants with ICT, arts and music skills, and it seems to be these classroom assistants who have greater involvement in the higher level learning activities.

4.5 There are different approaches to this situation. In England the status of Teaching Assistants deploying similar skills is different, being both recognised and valued. A small number of classroom assistants in Scotland appear to be para-educators - a job with some notable similar tasks to that of the Higher Level Teaching Assistant (HLTA) in England. HLTAs are enhanced teaching assistants who have professional training to a level below qualified teacher status and carry out a range of tasks traditionally associated with teaching, including teaching classes under supervision. The training offered to HLTAs allows them to be independent operators who are able to undertake a range of learning and teaching functions. As a result it is argued that HLTAs are full participants in the processes of learning and teaching, and have the skills that underpin these activities such as planning and evaluating pupils’ progress.\(^\text{13}\) However this model is likely to be heavily resisted in Scotland according to the SEED and DoE respondents.

4.6 Although the fact that some classroom assistants’ work is stretching and crossing the boundary might be resisted, it does need to be recognised and all
classroom assistant jobs need to be properly valued. This situation might have been avoided. Our research findings indicate that the warnings of the Scottish Office’s Classroom Assistants Working Group in 1998 - that sufficient money be available to appropriately pay classroom assistants for the range of tasks being envisaged and that sufficient distinction be made between the jobs of teachers and classroom assistants - appear not to have been heeded, and both have now become real issues that need to be addressed.
Endnotes


2 Classroom Assistants Working Group, Scottish Office, minutes of the meeting held 8 September 1998.


5 Depending on the local authority those providing support in the classroom could have a job title other than Classroom Assistant, such as Pupil Support Assistant, School Support Assistant or Learning Assistant. Ninety-six per cent of respondents described their job title in these terms.

6 For example, in a number of local authorities the term classroom assistant is not used and alternative terms included learning assistants, schools support assistants, general support for learning assistants and learning support assistants.


8 The lack of clarity noted earlier in the document is further complicated by a re-issued and also revised Annex B guidance on the duties and responsibilities of classroom assistants issued by the Scottish Executive in November 2005. This re-issue redraws and regroups these duties in a way that is different to the original implantation guidance in 1999.

9 SOEID op cit.

10 Scottish Executive op cit.

11 Hastings et al. op cit., p. 6.

12 SCER, op cit.