



Department of
Education
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Final analysis of School Uniform Consultation

December 2024

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1. Introduction

- 1.1 The Minister of Education is keen to ensure school uniforms are more affordable and plans to introduce statutory guidance so that school governing bodies will be required to review their school uniform policy and ensure costs are manageable for parents/carers.
- 1.2 On 20 June 2024 the Department launched a public consultation on the key principles underpinning a proposed School Uniforms Bill, which will strengthen the current non-statutory guidance and place it in law.
- 1.3 The consultation sought views on what should be contained within any statutory guidance, particularly around the cost and affordability of school uniforms, the use of branded items and single supplier arrangements. Views were also sought on the proposal to introduce cost control measures, such as a price cap.
- 1.4 The consultation closed on 27 September 2024. The consultation was hosted online and made available in both English and Irish versions. In addition, a children's easy read version was also made available. The Department received 3,444 responses to the online survey. A summary of the responses to the online consultation is outlined in **Part One** of this report.
- 1.5 The Department also consulted with a range of stakeholders including via the Education Authority's (EA) Youth Service (where a children's easy read version of the survey was used) and a summary of the comments and responses is outlined in **Part Two** of this report.

Context

- 1.6 In recent years, there have been growing concerns about the cost of school uniforms. A 2023 School Costs survey¹ found that school uniforms are the top expense for parents and carers in Northern Ireland – both in the primary and post-primary school sectors. In 2023, 78% of parents said that covering the costs of back to school overall is a financial burden (compared to 72% in 2022). The survey also showed that 65% of parents believe that schools do not do enough to keep the costs down. The survey further showed that 41% of parents in Northern Ireland go into debt due to back-to-school costs, with the largest expense for parents being school uniforms.
- 1.7 According to the 2024 Parentkind National Parent Survey² (NPS), 22% of Northern Irish parents struggle to afford the costs associated with sending their

¹ [2023 Irish League of Credit Unions \(ILCU\) survey on back to school costs](#)

² [Parentkind 2024 annual School Costs](#) 5,490 parents from across the United Kingdom, of which 303 are from Northern Ireland

child to school. Uniform costs top the lists of costs that are particularly concerning to parents in Northern Ireland. 66% of parents reported uniforms as their main cost concern, with 46% reporting school trips and 29% reporting concern over the cost of materials for certain classes. Parents in Northern Ireland are more concerned about school uniform and school donation costs than parents in the rest of the UK. The 2023 NPS showed that those most likely to be struggling with the cost of school are parents with a child eligible for Free School Meals (FSM), lower income parents, disabled parents and parents with a child with Special Educational Needs (SEN).

- 1.8 Departmental figures from 2022/23 show that 96, 319 (27.7%) of the school population in Northern Ireland were entitled to FSM.
- 1.9 The EA reported on 28 June 2024 (the highest point in the 2023/24 academic year) that 91,731 pupils received a uniform grant.
- 1.10 At a time of growing pressures on family budgets, the Department is extremely concerned that parents should not find the cost of a school uniform a significant outlay, nor should it deter them from applying for a particular school.

Current guidance

- 1.11 The current non-statutory guidance is contained in a Departmental Circular, which was most recently updated in 2018:
<https://www.education-ni.gov.uk/publications/circular-201104-guidance-schools-school-uniform-policy-revised-5-june-2018>
- 1.12 The aim of the proposed Bill on school uniforms is to strengthen and give statutory effect to the current guidance.
- 1.13 Whether to have a uniform and what it consists of is a matter for each individual school/ Board of Governors. Current guidance outlines that schools should ensure their uniform policy is fair and reasonable in practical and financial terms and should have regard to duties under relevant equality and other legislation. It further outlines that uniforms should be practical, comfortable and appropriate and represent value for money. The Department expects Boards of Governors to consider value for money, consumer choice of supplier and to give a high priority to cost considerations when designing a uniform.
- 1.14 With regard to uniform policy, current guidance states that schools should:
 - Consult widely on proposed policies and changes to established policies
 - Consider the effect the policy might have on various groups in the school
 - Consider the concerns of any groups about the policy
 - Consider the timeframe for introducing a new uniform policy

- Consider cost and availability of non-standard sizes
- Consider the cost of including branded items or unusual colours/shades
- Review cost of items of ongoing basis
- Consider cost of maintaining the items
- Consider how comfortable and practical the clothing is
- Consider the seasonable suitability/ flexibility during periods of extreme weather
- Consider how safety can be built in
- Keep records of consultation process
- Describe the policy and publicise it
- Consider carefully any request for an exemption
- Link the policy to other relevant policies e.g. discipline
- Choose a Physical Education (PE) uniform that is practical, comfortable and appropriate to the activity, and consider the cost of clothing for PE.

A legal requirement for schools to follow Departmental guidance on school uniforms in future

1.15 Schools are not, currently, legally required to follow the Department's guidance about school uniform policy. To ensure that all schools place affordability for parents at the heart of their school uniform policy, the Department consulted on making the guidance statutory. This means that legally every school to which the guidance applies would have to follow it. The online consultation reported over 77% of respondents in favour of this approach. The Minister of Education therefore intends to bring forward primary legislation to the Executive and the Assembly which would make the Departmental guidance statutory. This is a key next step in supporting parents/ carers in terms of the costs associated with school uniforms. It is intended that draft legislation be introduced in the Assembly in the coming weeks.

Consultation proposals

1.16 The public consultation document can be found at <https://www.education-ni.gov.uk/publications/school-uniform-policy-consultation>. It was published on the Department of Education (DE) Website and advertised/publicised via the Minister's media appearances and Departmental Social Media outlets such as Facebook and X (formerly Twitter). The overarching proposal is to strengthen the current non-statutory guidance by placing it in law to ensure that schools and governing bodies will have to adhere to the guidance when developing their school uniform policies. As stated above, a School Uniforms Bill will be introduced in the Assembly to give legal authority to the guidance and make it statutory. In seeking to strengthen the current guidance when it becomes statutory, the Department set out a number of proposals in the consultation document, underpinned by a set of key principles.

Key principles

1.17 The proposals in the document centre around 6 key principles, whereby school uniforms should be:

- Affordable
- Comfortable
- Sustainable

And school uniform policies should be:

- Developed in partnership with pupils and their parents/carers
- Published
- Regularly reviewed

1.18 The survey contained 25 questions seeking further information from consultees about how each key principle could be achieved. Respondents were asked to check a box indicating whether they agreed, disagreed or didn't know/were unsure of our proposals around each key principle. There was also provision for comments in 7 free text boxes.

The proposals

1.19 The overarching proposal is to strengthen the current guidance and place it on a statutory footing. In strengthening the guidance, the Department proposed a set of key principles (see 1.17) above. In seeking to achieve these key principles, the Department set out a number of proposals under each key principle as follows.

1.20 **Affordable:** The Department proposed to make it compulsory for Boards of Governors to demonstrate:

- How they have kept the costs of their uniforms as low as possible
- How they have considered costs in designing their uniform policy
- The costs of all the items which form part of the uniform
- That there is no significant cost differential between girls' and boys' uniforms
- That their school uniforms can be purchased from more than one supplier
- That certain items can be purchased from a variety of suppliers, including supermarkets or department stores.

1.21 In addition, the Department sought views on whether a method of cost control should be introduced, such as a cost cap.

1.22 **Comfortable:** The Department proposed to strengthen the guidance to state that schools must demonstrate in their published policy how their school uniform policy has taken account of the issues of comfort, flexibility and safety.

- 1.23 **Sustainable:** The Department proposed that all schools should consider establishing a uniform bank whereby items in good condition and PE branded kit either worn only for a short time or not worn at all can be donated to the bank and **can be provided free of charge or with a small charge.**
- 1.24 **Developed in partnership with pupils and the parents/carers:** The Department proposed that in strengthening the guidance, schools will need to show how they have identified key stakeholders and actively consulted with them. This engagement will need to be well documented.
- 1.25 **Published:** The Department proposed that it should be a legal requirement to publish details on the development of the uniform policy.
- 1.26 **Regularly reviewed:** The Department proposed to add to the current guidance that schools should review their school uniform policies at least every three years particularly with regard to the costs of the uniform.

Consultation responses

- 1.27 **This report is in two parts – Part One provides details of the responses to an online survey and Part Two provides details of those other organisations who submitted separate, written responses.**
- 1.28 A total of 3,444 responses were received via the online consultation survey hosted by Citizen Space. The highest number of responses were from parents/carers and the fewest were from “other organisations”. Specific consultation with children and young people was undertaken via the EA Youth Service which hosted a separate child friendly survey for pupils. The report from the EA Youth Service on their survey results is outlined in Part Two in addition to the EA’s Equality and Human Rights Service report, which is also outlined in Part Two.
- 1.29 Responses received from “other organisations” were from a wide range of groups such as: government departments, local councils, youth organisations, community forums, anti-poverty organisations, women’s’ organisations, churches and religious organisations, foodbanks, uniform banks, uniform retailers and manufacturers, disability groups, charity organisations, political parties, family centres and a trade union organisation.
- 1.30 In addition to the online survey and EA Youth Service survey, views of stakeholders were gathered via other means, namely email responses, reports from organisations and an event for manufacturers, suppliers and retailers. The total number of direct responses from organisations was 19. An analysis of these responses is set out in Part Two.

2. PART ONE – Online consultation survey results

The results of the online consultation survey are set out in tables in **Annex 1**.

Table 1 sets out the percentage response rate of each category of respondent.

Table 2 sets out the quantitative data received from responses to the 25 questions in the online survey.

Table 3 sets out the main themes that emerged from the 7 free text comment boxes.

Table 4 relates to **Q14** and sets out responses specifically on a cost cap/other cost control methods.

Table 5 relates to **Q22** and sets out the responses to the options that should be a requirement to publish.

Table 6 relates to **Q23** and sets out additional comments specific to the review of a school's uniform policy.

Table 7 relates to **Q25** and sets out additional comments specific to the proposed plans for monitoring and evaluation.

Summary of Part One findings

- 2.1 The underpinning proposal consulted on was to give the Departmental guidance statutory effect. There was over 77% support for this.
- 2.2 The recent public consultation was based on six key principles, namely that school uniforms should be affordable, comfortable, sustainable with policies developed in partnership with pupils and their parents/carers, published and regularly reviewed. There was over 97% support for this.
- 2.3 The consultation sought views on what should be contained within any statutory guidance, particularly around the cost and affordability of school uniforms, the use of branded items and single supplier arrangements. 92% agreed it should be compulsory for schools to demonstrate how they have taken costs into account when designing their uniform, with 90% agreeing cost details should be published by schools and 88% agreeing that schools should explain any decision to use unusual colours or designs. 85% agreed that school crests should be available to buy separately and 83% that a crest should be reusable.
- 2.4 In relation to PE kit, 86% agreed that branded sports kit should not be a compulsory element and 71% that only when a child is representing the school – individually or as part of a team – should specific branded or school sports kit be required. 89% agreed that schools should aim to have team kits available for loan.

- 2.5 There was 95% support for all schools being required to list more than one supplier and 94% for schools publishing any financial or in-kind benefits derived from arrangements with suppliers or manufacturers.
- 2.6 There was 88% support for a cost control measure being introduced e.g. a cost cap. Other suggestions in this area included the banning of branded PE kit or blazers, ensuring competition via more than one supplier. Some concerns were expressed about unintended consequences such as prices rising to the level of a cap. 90% supported the Department having as a key consideration that schools should be encouraged to change practice in setting their uniform policies to ensure there is a competitive market.
- 2.7 There was 92% support for schools establishing a Uniform Bank. In terms of consultation, 73% supported engagement by schools with pupils and 87% with parents in developing uniform policies. There was 82% support for schools publishing information about this consultation, 81% support for publishing details on the development of a uniform policy and 89% support for schools demonstrating how their policy fulfils the conditions of comfort, flexibility and safety.
- 2.8 77% agreed that schools should review their uniform policies every 3 years and 79% agreed with monitoring and evaluation proposals e.g. the Education and Training Inspectorate reporting, an independent evaluation into the effectiveness of statutory guidance within 3 years.
- 2.9 There was also 68% support for additional banding in the uniform grant during the transition year from primary to post-primary/junior high to senior high in the Dickson plan area/entry to sixth form.

3. PART TWO – Written Responses to the Consultation

3.1 In addition to the online survey, the Department received a number of written responses either through:

- direct engagement with young people;
- a facilitated event for manufacturers, suppliers and retailers by Innovation and Consultancy Services (Department of Finance);
- separate response papers from organisations;
- emails from interested individuals.

Responses from organisations

3.2 The full response from each individual organisations is published on the departmental website at [Outcome of Consultation: School Uniform Policy | Department of Education](#). A summary of the key points from each of the 19 organisations is attached at **Annex 2**.

3.3 While some of the 19 standalone submissions provided responses to the survey questions, not all did. The responses from those submissions which did not reply in a format aligned to the survey questions were analysed to identify where they were providing information which indicated agreement, or otherwise, to the survey questions. The analysis from all responses is shown below:

| Question | Agree | Disagree | No comment |
|--|-------------------------|----------|------------|
| 1. Do you agree that schools should be legally required to comply with Departmental uniform guidance? | 73.7% | - | 26.3% |
| 2. Do you agree with these principles? | 78.9% | - | 21.1% |
| 3. Should any others be included? If yes, please state any additional principles. | See paragraph 3.4 below | - | - |
| 4. Do you agree that it should be compulsory for schools to demonstrate how they have taken costs into account when designing their uniform? | 63.2% | - | 36.8% |
| 5. Do you agree that it should be compulsory for schools to publish details of the costs of their uniform? | 47.4% | 10.5% | 42.1% |
| 6. Do you agree with our proposals that schools must review their uniform policy and explain their decision to use any unusual colours or designs? | 68.4% | - | 31.6% |
| 7. Do you agree that where a crest is considered necessary on a blazer or jumper that an option to purchase the crest alone should be available? | 63.2% | 5.3% | 31.6% |

| Question | Agree | Disagree | No comment |
|---|-------------------|----------|------------|
| 8. Do you agree that this crest should be reusable? | 47.4% | - | 52.6% |
| 9. Do you agree that branded sports kits should not be compulsory elements of a school PE kit? | 73.7% | - | 26.3% |
| 10. Do you agree that parents should only have to purchase specific branded or school sports kits when their child is chosen to represent the school, either as part of a team or individually? | 5.3% ³ | 36.8% | 57.9% |
| 11. Do you agree that schools should aim to have team kits available for loan for those representing the school? | 52.6% | 5.3% | 42.1% |
| 12. Do you agree that all schools should be required to list more than one supplier of their compulsory uniform items? | 57.9% | - | 42.1% |
| 13. Do you agree that any financial or in-kind benefits to schools from arrangements with suppliers or manufacturers should be published? | 42.1% | - | 57.9% |
| 14. Do you consider that a method of cost control should be introduced, for example, a cost cap? | 52.6% | 5.3% | 42.1% |
| 15. Do you agree that a key consideration in all actions taken by the Department should be to encourage schools to change their practice in setting uniform policies to ensure there is a competitive market for uniform items? | 36.8% | 5.3% | 57.9% |
| 16. Do you agree with the proposal to make it compulsory for schools to demonstrate how their school uniform policy fulfils the conditions of comfort, flexibility and safety? | 31.6% | 5.3% | 63.2% |
| 17. Do you agree that all schools should be required to establish a Uniform Bank? | 47.4% | 5.3% | 47.4% |
| 18. Do you agree that engagement with pupils on uniform policy should be mandatory? | 52.6% | 5.3% | 42.1% |
| 19. Do you agree that engagement with parents on uniform policy should be mandatory? | 68.4% | 5.3% | 26.3% |
| 20. Do you agree that schools should be required to publish details of stakeholder consultation on uniform policy? | 57.9% | - | 42.1% |
| 21. Do you agree that it should become a legal requirement to publish details on the development of the uniform policy? | 52.6% | 5.3% | 42.1% |

³ If DE set a price limit

| Question | Agree | Disagree | No comment |
|---|--------------------|----------|------------|
| 22.If yes, which of the following should be a requirement to publish? (tick all that apply) Details of all stakeholders consulted, Response to issues raised by stakeholders, Rationale for a specific design or colour (if it is not a standardised colour), A list of compulsory and optional items, Estimated costs, A list of suppliers, Other. If you have ticked "other", please specify in the text box below. | 26.3% ⁴ | - | 73.7% |
| 23.Do you agree with the proposal that schools should review their uniform policy every three years? | 63.2% | 5.3% | 31.6% |
| 24.Do you agree that an additional banding should be introduced (subject to available funding) for pupils entering Year 8 and Year 13 and also for Year 11 in the Dickson plan areas? | 42.1% | - | 57.9% |
| 25.Do you agree with the proposed plans for monitoring and evaluation? | 42.1% | - | 57.9% |

NB: Due to rounding, some totals may show as more than 100%

- 3.4 Question 3 in the consultation asked if any other principles should be considered in addition to affordability, comfort and sustainability. The most common principle raised was 'inclusive' by 26.3% of the 19 organisations. Other popular principles suggested were 'accessibility' (15.8%) and 'safety', 'gender neutral' and 'non-intrusive' (10.5%).

Responses from children and young people

Views expressed by young people came through:

- Responses to the online children's survey
- Engagement through youth groups
- Engagement with hard-to-reach pupils – Education Other Than At School (EOTAS)
- Engagement through school council networks and
- Northern Ireland Youth Assembly (which represents every section 75 group)

- 3.5 The Education Authority Youth Service (EAYS) developed an easy-read version of the consultation document on the school uniform policy proposals alongside young people, who created an accompanying video to explain the consultation and survey. An Irish language version of the consultation and survey was also created for Irish-medium schools and youth organisations.

⁴ Agree that schools should publish all listed items

- 3.6 The survey, alongside the accompanying video, was distributed to all statutory youth services; to 1743 registered youth groups in the voluntary and community sector; all schools and Education Other Than at Schools (EOTAS) settings via C2k, the schools' IT network. In addition, schools/student council networks were asked to complete the online questionnaire. Students could respond to the questions in the survey by agreeing with a statement or abstaining from answering. All students were also provided with an email address which they could use to submit any additional comments.
- 3.7 The survey concluded that 91% of respondents agreed that schools should be made to follow the six key principles for uniform guidance, with 98% agreeing that uniforms should not cost too much money. 65% agreed that schools should tell them why they picked the colours and shape of the uniform, and 56% agreed that a logo should be on their uniform even if it cost more money.
- 3.8 82% agreed that schools should provide sports kits on loan to students who represent the school, and 31% agreed that is "ok if your school asks your parent or carer to buy PE kits that cost more money due to their brand e.g. Nike, Canterbury, O'Neills and Kukri".
- 3.9 In relation to uniform sharing or swapping schemes, the statement put to the young people was: "schools should have clothes to swap or share with others". 64% agreed, 34% abstained. The EAYS report states: "Less children and young people agreed with this statement in comparison to others. We can surmise that clothes swapping or sharing could be less desirable to young people, due to personal hygiene concerns, social standing, stigma, or social inequities".
- 3.10 91% agreed that schools should always listen to their thoughts on school uniforms, and 85% agreed that schools should always listen to their parent or carer about their thoughts on school uniforms. 77% agreed that a school should tell everyone how they have listened to others and 69% agreed that the Minister of Education should make schools tell everyone how they have listened to others.
- 3.11 Of the additional comments received, 11 young people suggested that schools could allow students to wear their own sports clothing for P.E. instead of a designated kit, and some suggested that polo shirts should replace formal shirts, and school trousers are uncomfortable. A few young people requested more non uniform days.
- 3.12 In addition to the EA conducting the engagement with children and young people on behalf of the Department, the EA's Equality and Human Rights Service also provided a response.

- 3.13 They noted that uniform items can be overly specific, including the requirement by some schools for branded PE kit, which drives up the cost compared to cheaper, generic options. The response noted that some children may be subjected to bullying-type behaviour if they do not wear 'branded' items.
- 3.14 The EA notes there are concerns around growing levels of misogyny in schools and instances of upskirting and sexual harassment towards schoolgirls. It suggests that there should be more flexibility in uniform policy noting that if all children are allowed to wear trousers it would support girls, who may find trousers more comfortable than skirts, and also those young people who are transgender or gender questioning.
- 3.15 The EA agrees with the consultation proposals that uniform policies should be reviewed at regular periods and consider both pupil and parent/carers feedback. It states that the views of children and young people should be central in policy design, implementation, and evaluation processes and that parents/carers views are hugely important.
- 3.16 The EA believes that creating more flexible school uniform policies, rather than having to adapt policies to meet the needs of individual students, may reduce levels of peer discrimination. It noted that through recent pupil engagement it was reported that, although the schools permit uniform adaptations, it often identifies young people as a target for peer discrimination.
- 3.17 There was also engagement with the Northern Ireland Youth Assembly, to gain insight from this body. The Northern Ireland Youth Assembly is made up of 90 young people aged 12–17 who are an entirely representative group i.e. from every constituency and from every section 75 group.
- 3.18 The Youth Assembly response supported the proposals consulted on and commented on a number of areas. They suggested additional principles should include 'modesty', 'seasonality' and that the inclusion of section 75 categories of young people should be involved in uniform design.
- 3.19 While the Youth Assembly did not specifically suggest 'inclusivity' as a principle, they commented on issues which other respondents have mentioned under this principle, namely, that children with sensory issues should not feel different from their peers and the option of one uniform to be worn by all pupils, noting that girls do not always feel comfortable in skirts at school.
- 3.20 They indicated that they support school uniforms and are broadly in favour of a price cap, although they recognise that there are advantages to not introducing the cap, at least at the start of any changes. They believe that any cost to administer a cost cap system should not be passed on to schools.

- 3.21 They suggest that, not only should schools report that they have engaged with all relevant parties, but also that they should be required to say how they engaged and this should be published.
- 3.22 Youth Assembly members would like the Department to consider a ban on schools suspending/excluding pupils for non-compliance with uniform policies and have also recommended that engagement with young people should be based on the Lundy principles⁵.

Response from uniform manufacturers, suppliers and retailers

- 3.23 The Department commissioned the Department of Finance's Innovation and Consultancy Services (ICS) to facilitate an event for manufacturers, suppliers and retailers of school uniforms. A request for those involved in the manufacture or supply and sale of school uniforms and who were interested in sharing their views on the consultation proposals was issued on the Department's social media accounts in August 2024, with the event taking place in September 2024.
- 3.24 The result of this engagement showed overall that retailers and suppliers were concerned with quality of lower cost items and reported that quality and sustainability go hand in hand. They suggested the removal of VAT or reduced VAT for school uniform items.
- 3.25 They raised that goods produced locally means more money remaining in the local economy and schools should give cognisance to the amount of money spent on uniform versus sports kits.
- 3.26 Attendees at the event were concerned that there was no definition of a "brand" – to some this meant sportswear brand not the school logo, for example. They considered that a reusable logo would be more expensive and that financial or in-kind benefits from arrangements with suppliers is often to the benefit of the school and pupils although some suggested greater transparency was required from schools regarding "kickbacks" and donations that may only be benefitting a small minority in the school e.g. free kits for teams or members of staff.
- 3.27 Participants were asked to identify the top recommendations they would make. In discussion they suggested that a contract with schools to supply the uniform is necessary; there should be a requirement for a timeline to change uniform or to phase implementation, recommending suppliers/retailers need a minimum of 2 years, ideally 3 years, to phase in changes. VAT should be removed from all

⁵ <https://www.qub.ac.uk/Research/case-studies/childrens-participation-lundy-model.html>.

school uniforms and the uniform grant should be increased. They also believed that suppliers/retailers should be compensated for extra stock or left over stock.

- 3.28 Attendees at the workshop recommended some schools could have better relationships /communication with retailers and that no incentives or exclusivity should be given to particular retailers over others.
- 3.29 They suggest that clothing must be fit for purpose and made to last as it is worn every day – “buy cheap, buy twice”. Feedback from the workshop was that if quality lowers, it will reduce the number/availability of uniforms for uniform banks.
- 3.30 They urged not to implement ‘non-uniform’ policies for either school uniform or P.E. uniform and finally they were concerned at the impact on local communities if spending was driven to large multi-national grocers.

Summary of Part Two findings

- 3.31 A range of issues were raised in the submissions from the 19 organisations. The most common issues raised were an increase to the Uniform Grant (52.6% of returns); concerns about branded uniform items (47.4%); unisex or gender-neutral uniforms/inclusivity (42.1%); equity/rights (36.8%); uniform policy developed in partnership with parents and pupils (31.6%) and issues relating to history and tradition (26.3%).
- 3.32 Other topics mentioned in more than one response included markers of success/transition (e.g. honours blazers), pupils with SEN and disagreeing with or urging caution against introducing a cap (21%); impact on workload on school leaders/governors; setting the Uniform Grant at the rate of any cap; focus on uniform banks should be sustainability; an independent body/panel to oversee the setting and management of any cap and disagreeing with sanctions on pupils for non-compliance with uniform policy (15.8%) and that uniform policy should consider weather conditions and the Department should be clear how non-compliance with statutory guidance will be dealt with (10.5%).
- 3.33 For those responses which raised the issue of inclusivity and gender-neutral uniforms, one of the main points raised was that while there are certain circumstances where there is currently flexibility in schools, for example for a child with a disability or sensory issue, prior agreement has to be in place with the school to do this. This adds delays and, as noted in some comments, can set the child apart from their peers, leading to peer discrimination. By having a more inclusive policy, with more flexibility on what pupils can wear, any stigma can be removed. It was also noted by some respondents that girls’ uniforms are more actively monitored than boys’ uniforms in some schools (e.g. measuring

skirt length) and that some girls may feel uncomfortable in skirts (e.g. due to 'upskirting') so allowing girls to have the option to wear trousers may increase their comfort.

- 3.34 Several responses raised concerns about branded uniform items. A number of respondents indicated that branded items cost more than generic options. Some responses suggested that a limit should be set on the number of branded items in a school's uniform and others suggested that PE kits should be entirely non-branded to avoid any potential two-tiered uniform system where children from some households will be able to afford the branded uniform while other children might not. It was also noted in some responses that if parents were required to purchase branded PE kit if their child was representing the school in sport, that this could impact on participation by some pupils – if schools require branded kit for sports competitions, it was suggested that the schools should provide the items on loan.
- 3.35 A number of responses suggested that, in order to remove any stigma which may be attached to wearing a pre-loved uniform, the focus on uniform banks should be on sustainability and being environmentally friendly. It was also noted that all children are deserving of new items of clothing and uniform banks should not be viewed as a long-term solution for families who struggle with affordability issues.
- 3.36 Some responses noted that in some areas there are a number of successful uniform banks, or similar schemes, run by local organisations other than schools e.g. councils or voluntary/community organisations. It may be more advantageous for some schools to adopt a joined-up approach to the use and management of uniform banks rather than requiring every school to have one.
- 3.37 Where respondents raised equity and rights as an issue, it was most often in relation to the same issues raised under the topic of inclusivity and gender-neutral uniforms. It was also noted that there can be additional costs associated with school uniforms for children with special needs or disabilities and that uniforms for girls should not cost more than those for their male peers.
- 3.38 It was raised by several respondents that consultation on uniform policy should take place with parents and pupils, with some responses indicating that pupils should be at the centre of uniform policies, with their comfort and agency being of paramount importance. Others were of the view that the existing mechanisms of Boards of Governors and school student councils would be sufficient for parental and pupil input.
- 3.39 There were also words of caution raised by some respondents on how any consultation process would be managed. While they agreed that the views of

parents and young people should be taken into consideration, they are unclear how much weight those views should be given in making decisions on uniform policy. Examples given included that it may be the case that some parents view their child's school uniform as a 'social status marker' and are content with the costs, even if this excludes others from attending the school.

- 3.40 Similarly, for those respondents who mentioned history and/or tradition, the vast majority were concerned that some schools may assert that their uniform is part of their 'historic identity' and insist on retaining unusual colours or styles, even if it results in higher cost uniforms.
- 3.41 Some responses also mentioned that markers of achievement or success in some schools could be expensive ('honours' blazers were mentioned in more than one response) and where schools have a system in place to recognise either achievement or transition between school years, that lower cost alternatives should be considered (e.g. ties).
- 3.42 While the majority of respondents agreed with the introduction of a cost cap, a number of responses either disagreed with, or raised concerns about, the introduction of a cap. Reasons given included the administrative burden for schools, the complexity of setting and overseeing a cap, the potential for unintended consequences resulting in the costs of some uniforms rising and the suggestion of other ways to reduce costs without the need for a cap (e.g. reducing unusual colours and limiting the number of branded items permitted). Some responses also believed that any cost cap should be set and overseen by an independent body or panel.
- 3.43 A small number of responses highlighted the need for any statutory guidance to be very clear on requirements and any acceptable deviations, so that schools and/or governors can be sure they are not breaching legislation in the setting of their uniform policy. A need for clarity on how the Department will deal with instances of non-compliance was also raised by a small number of respondents.
- 3.44 Other issues raised in the responses included:
- the potential to review VAT on school wear items;
 - the need for a transition period at any point when a school is making changes to its uniform;
 - the fact that schools and suppliers are subject to competition law;
 - the need for a tendering process where there are single supplier arrangements in place;
 - the view that the uniform grant should increase and possibly align with any cost cap introduced;

- the opportunity to learn lessons from approaches in other countries;
- the suggestion that uniform policy and consultation in schools should be linked to children's ages/curriculum stages;
- the need for uniform policy to give consideration to weather conditions;
- general consideration of comfort and how it aligns with children's ability to take part in play activities and active travel; and
- the need for the Department to actively monitor the implementation of any statutory guidance.

3.45 While the organisations that provided written responses did not provide comment on all of the proposals in the consultation, in the instances where they did the majority of those who commented agreed with the proposals put forward. The only instance where this was not the case was question 10: "Do you agree that parents should only have to purchase specific branded or school sports kits when their child is chosen to represent the school, either as part of a team or individually?". On this topic, the consensus from respondents was that schools that require branded team kit should provide it on loan to those who represent their school.

3.46 Similarly, the young people who replied to the child-friendly version of the survey, were supportive of the proposals in the consultation.

3.47 Manufacturers, suppliers and retailers of uniforms highlighted that quality and cost both need to be considered when applying the principles of affordability and sustainability. They also pointed to the need for a transition period to phase in any changes to provide parents, schools and suppliers/retailers time to adapt.

4. PART THREE – Conclusion

- 4.1 Overall, there was strong support for all of the Departmental proposals in relation to school uniform policy from the majority of stakeholders who responded to the consultation.
- 4.2 The underpinning proposal consulted on was to give the Departmental guidance statutory effect. There was strong support for this from across the range of stakeholders who responded.
- 4.3 The other major issue being consulted on was the introduction of a cost control measure. While there was majority support for this proposal, there were a number of respondents who raised concerns about the implications of such a measure being a cap, not least the impact that such a step could have on the workload of school leaders and governors and the risk that a price cap could have the unintended consequence of causing the prices of some uniforms to rise. It will be important going forward to take into account the issues raised by stakeholders during this consultation and consider how best any cost control measure could work in practice.
- 4.4 The Department would like to thank all those who took the time to respond to this consultation. The information provided will be vital in the development of the legislation and updated guidance to ensure school uniform policies place affordability at their centre.

Annex 1

TABLE 1

| Option | Total | Percent |
|--------------------------------------|-------|---------|
| Parent/Carer | 3063 | 88.94% |
| Pupil | 75 | 2.18% |
| Representative of a school | 111 | 3.22% |
| Representative of other organisation | 57 | 1.66% |
| Other | 138 | 4.01% |
| Not Answered | 0 | 0.00% |

*3444 respondents replied to the online survey

TABLE 2 – Quantitative data

| | Question | Yes | No | Don't know/ not sure |
|----|---|--------------------|--------|-------------------------|
| 1 | Do you agree that schools should be legally required to comply with Departmental uniform guidance? | 77.2% | 10.5% | 12.25% |
| 2 | Do you agree with these (key) principles? | 97.18% | 1.97% | 0.84% |
| 3 | Should any others be included? | See table 3 | | |
| 4 | Do you agree that it should be compulsory for schools to demonstrate how they have taken costs into account when designing their uniform? | 92.71% | 4.5% | 2.79% |
| 5 | Do you think that it should be compulsory for schools to publish details of the costs of their uniforms? | 92.19% | 6.16% | 3.66% |
| 6 | Do you agree with our proposals that schools must review their uniform policy and explain their decision to use any unusual colours or designs? | 88.10% | 8.54% | 3.37% |
| 7 | Do you agree that where a crest is considered necessary on a blazer or jumper that an option to purchase the crest alone should be available? | 85.10% | 10.25% | 4.65% |
| 8 | Do you agree that this crest should be reusable? | 82.93% | 8.51% | 8.57% |
| 9 | Do you agree that branded sports kits should not be compulsory elements of a school PE kit? | 86.44% | 10.83% | 2.73% |
| 10 | Do you agree that parents should only have to purchase specific branded or school sports kits when their child is chosen to represent the school, either as part of a team or individually? | 70.67% | 22.94% | 6.39% |

| | Question | Yes | No | Don't know/ not sure |
|----|---|--------------------|--------|-------------------------|
| 11 | Do you agree that schools should aim to have team kits available for loan for those representing the school? | 89.08% | 6.33% | 4.59% |
| 12 | Do you agree that all schools should be required to list more than one supplier of their compulsory uniform items? | 95.12% | 3.16% | 1.71% |
| 13 | Do you agree that any financial or in-kind benefits to schools from arrangements with suppliers or manufacturers should be published? | 93.73% | 3.22% | 3.05% |
| 14 | Do you consider that a method of cost control should be introduced, for example, a cost cap? | 88.27% | 5.23% | 6.50% |
| 15 | Do you agree that a key consideration in all actions taken by the Department should be to encourage schools to change their practice in setting uniform policies to ensure there is a competitive market for uniform items? | 90.21% | 3.98% | 5.81% |
| 16 | Do you agree with the proposal to make it compulsory for schools to demonstrate how their school uniform policy fulfils the conditions of comfort, flexibility and safety? | 88.59% | 7.52% | 3.89% |
| 17 | Do you agree that all schools should be required to establish a Uniform Bank? | 91.81% | 4.79% | 3.40% |
| 18 | Do you agree that engagement with pupils on uniform policy should be mandatory? | 73.11% | 16.81% | 10.08% |
| 19 | Do you agree that engagement with parents on uniform policy should be mandatory? | 84.67% | 10.31% | 5.05% |
| 20 | Do you agree that schools should be required to publish details of stakeholder consultation on uniform policy? | 82.17% | 9.38% | 8.45% |
| 21 | Do you agree that it should become a legal requirement to publish details on the development of the uniform policy? | 80.52% | 11.53% | 7.96% |
| 22 | If yes, which of the following should be a requirement to publish? (tick all that apply) | See table 5 | | |
| 23 | Do you agree with the proposal that schools should review their uniform policy every three years? | 77.32% | 15.04% | 7.64% |
| 24 | Do you agree that an additional banding should be introduced (subject to available funding) for pupils entering Year 8 and Year 13 and also for Year 11 in the Dickson plan areas? | 68% | 8.57% | 23.43% |

| | Question | Yes | No | Don't know/ not sure |
|----|---|--------|-------|-------------------------|
| 25 | Do you agree with the proposed plans for monitoring and evaluation? | 78.89% | 9.26% | 11.85% |

* all questions received 3444 responses apart from Q3 which received 955. The data from Q3 is included in the text box analysis in **table 3**

Free text online responses

In addition to the 25 questions in the consultation survey, 7 free text boxes were available for respondents to elaborate on their views or to provide comments.

Table 3 below illustrates the main themes and issues to come out of the comments received.

TABLE 3

| Main themes emerging from comments in the 7 free text boxes | No of responses |
|---|-----------------|
| Branding and logos | 619 |
| Current uniform policies are out of touch with modern society | 360 |
| Equity/rights | 269 |
| Adaptions/flexibility for SEN, sensory and disability concerns | 267 |
| Unisex/ genderless uniform. | 239 |
| Uniform grant | 195 |
| Consideration should be given to the weather | 186 |
| Uniform tradition/ pride in representing school | 160 |
| Rules too strict/pupils should not be punished for non-compliance | 129 |
| Safety/ safeguarding considerations | 73 |

* figures reflect responses from all 7 free text boxes. Some respondents provided more than 1 comment.

The main reasons given for the comments received can be summarised as:

Branding and logos

- uniforms should be generic and available in a wide range of stores;
- branding is unnecessary and increases the cost of a uniform;
- opposition to expensive branded PE uniforms;
- concerns over 'kickbacks'/ benefits received by schools who enter into contracts with a single branded PE kit company;
- logos should be kept to a minimum.

Some respondents commented on quality and sustainability regarding branded items:

- cheaper items are often made by unethical sources;
- branded items are often better quality and harder wearing.

Out of touch with modern society

- formal uniforms are outdated and unnecessary. Some described them as archaic and in need of modernization;
- the rationale for uniforms preparing children for the world of work is no longer relevant. In modern society workwear is not as formal as it once was for many occupations and professions – including teachers;
- there is a need for schools to be more progressive when considering their uniforms.

Equity/rights

- pupils have the right to be comfortable in their uniform, and are happier and more focused to learn when comfortable;
- gender equality rights should be considered (mostly relating to the right for girls to be able to wear trousers);
- diversity and the need to consider the rights of those from different cultures and religions to adapt their uniform;
- the human right to an education – socially deprived pupils should not face barriers to education due not being able to afford some branded items/full uniform.

Adaptions for SEN, sensory, disability needs

- reasonable adjustments under the Disability Discrimination Act 1995 need to be considered regarding uniforms and disabled children;
- consideration for pupils with sensory issues. Formal shoes and tights were specifically mentioned as uncomfortable to deal with for children with sensory issues;
- leniency or adaptions for children with special educational needs and the associated need to normalise these so children are not singled out;
- need for adaptions for disabled pupils, who may have medical equipment such as insulin pumps or stoma bags.

Unisex/genderless uniform

- girls should have the option to wear trousers/should not be forced to wear skirts;
- trousers are more comfortable than skirts;
- skirts limit physical activity and play;
- a unisex uniform makes it easier to pass the clothes to others regardless of gender;
- girls should be able to wear what makes them feel safe/risk of upskirting;
- need to consider comfort in terms of menstruation.

Uniform grant

- concern that the threshold for the grant is too low;
- the grant does not cover the cost of a full uniform;
- low-income families and the “working poor” need more help;
- a grant should be available for SEN children who require adaptations to their uniform and attend a mainstream school;
- vouchers should be issued instead of money.

Weather considerations

- blazers are impractical and do not protect from cold or wet weather;
- concerns over discomfort and overheating due to some schools insisting on pupils wearing blazers indoors;
- seasonal adaptations for uniforms.

Uniform tradition/pride in representing the school

- uniform is important to a school's identity and creates a sense of community;
- uniforms are an important part of a school's tradition and can be worn with pride;
- some concern that schools will be able to justify expensive uniform choices for the reason of tradition.

Rules are too strict around uniforms/punishment for non-compliance

- no child should be excluded from class/participation in sports due to financial pressures;
- uniforms should be affordable to all, and no child should suffer or be disciplined because they cannot afford the correct uniform;
- concern that children are unnecessarily being punished from uniform infringements due to trying to keep dry/warm or comfortable;
- students should be allowed to express themselves without punishment;
- concern that certain schools are pricing uniforms so highly that the resulting in a barrier to some socioeconomic groups attending that school.

Safety/safeguarding concerns

- dark colours are dangerous and hard to see;
- high visibility/florescent strips should be added to uniforms;
- issues around upskirting and the sexualisation of girls;
- health issues if pupils become too warm/cold;
- health issues due to materials used in some uniforms;
- ties are unnecessary and a potential safety hazard for children;
- uniforms make children from the same school easily identifiable.

In relation to **Q14**, additional comments specific to cost control methods were received and are summarised in **Table 4** below.

TABLE 4

| Comments on cost control/cap | No of responses |
|------------------------------|-----------------|
| Support cap on cost | 215 |
| Do not support cap on cost | 55 |
| Additional comments | 266 |
| Non branding | 119 |
| Supplier issues | 127 |
| Unintended consequences | 58 |
| PE kit issue | 130 |
| Blazer issue | 85 |

* 736 responses. Some respondents supplied more than 1 comment

The main suggestions for methods of cost control other than a cap were:

- remove the need for blazers;
- ban branded PE kits;
- generic uniform items will help to reduce cost;
- increase competitive pricing by having a range of shops where uniforms can be purchased.

The main unintended consequences cited were:

- prices would rise to the maximum limit of the cap;
- there is the risk of a drop in quality, meaning uniforms would have to be replaced more regularly, defeating the purpose of attempting to reduce costs;
- there would be issues in maintaining and monitoring the cap. Inflation would regularly need to be taken into account;
- a cap would encourage unethical production of uniforms;
- a potential negative impact on uniform suppliers, particularly small local companies.

In relation to Q22, **Table 5** sets out the responses to the options that should be a legal requirement for a school to publish.

TABLE 5

| Legal requirement for a school to publish | |
|--|---------------|
| Details of all stakeholders consulted | 60.51% |
| Response to issues raised by stakeholders | 57.81% |
| Rationale for a specific design or colour (if it is not a standardised colour) | 65.04% |
| A list of compulsory and optional items | 78.72% |
| Estimated costs | 80.49% |
| A list of suppliers | 78.60% |
| Other | 5.40% |
| Not answered | 15.51% |

* 2910 responses

In relation to **Q23**, additional comments specific to the review of a school's uniform policy were received and are summarised in **Table 6** below.

TABLE 6

| Proposal for schools to review uniform policy | No of responses |
|---|-----------------|
| 3 years is too infrequent | 59 |
| 3 years is too frequent | 164 |
| Administrative burden on schools/ support required for schools | 201 |
| Consideration to be given to retailer's lead-in times | 11 |
| Arrangements with suppliers rather than uniform policies should be reviewed | 11 |
| Affordability | 118 |
| Sustainability | 78 |

* 487 responses. Some respondents supplied more than one comment

In relation to **Q25**, additional comments specific to the proposed plans for monitoring and evaluation were received and are summarised in **Table 7** below.

TABLE 7

| Monitoring and evaluation | No of responses |
|---|-----------------|
| Schools have other priorities | 166 |
| Departmental time is better spent on educational matters | 36 |
| Uniform policies should be set centrally with schools required to comply | 11 |
| A complaints procedure, including to the Department should be published | 22 |
| Reporting every 3 years is too frequent | 47 |
| Reporting should be more frequent | 19 |
| Information from schools should be published | 24 |
| Details of consultation with parents/pupils on uniforms should be published | 14 |

* 286 responses. Some respondents supplied more than 1 comment.

Annex 2

| | Organisation | Comments |
|---|--|---|
| 1 | Fermanagh & Omagh District Council (FODC) | <ul style="list-style-type: none"> • Should have only 1 PE kit to cover all sports • A cost cap would be a useful guide, especially on branded PE kits • Schools should be supported so that adhering to proposals doesn't put pressure on their existing resources |
| 2 | Retail NI Retail NI is Northern Ireland's only locally based retail and wholesale business organisation which provides professional advice and gives a voice to the independent sector at the Northern Ireland Assembly and Westminster. | <ul style="list-style-type: none"> • Retailers should be involved in the consultation process which schools have on their uniform • Review period for uniform policy should be longer than 3 years • Uniform grant ages should align with VAT exemption ages • Lead in times with a three-year transition period to manage introduction of proposals effectively • Phased Implementation with sportswear being the primary focus • Removal of VAT on all school wear items • An Increase in the Uniform Grant |
| 3 | Trussell The Trussell organisation supports a network of food banks providing emergency food and support to people facing hardship and campaign for change to end the need for food banks in the UK. | <ul style="list-style-type: none"> • Legislation is required to enforce school uniform guidance • Accessibility should be a key principle • Affordability should take into account family circumstance as well as income • All crests should be iron on, to reduce stigma otherwise if only those on low income use them • Branded items should be kept to a minimum- any cap should focus on this • There should be a maximum cap on the cost of school uniforms. School Uniform Grants should replicate the amount of that cost, and consideration should be given to a top-up grant halfway through the school year • Emblemed or Uniform specific PE Kits should cease • Uniform banks should focus on the sustainability element, rather than cost, to reduce any stigma • Female uniforms shouldn't cost more than male counterparts |
| 4 | Alliance Party | <ul style="list-style-type: none"> • Any guidance to schools should be clear and avoid loosely defined terms (reference to guidance in England not having desired effect) • Key principles- add inclusive (SEN children, allow full access to the curriculum and active |

| | Organisation | Comments |
|--|--------------|--|
| | | <p>travel, be non-gender, seasonally appropriate), accessible (a wide variety of retailers) and safe</p> <ul style="list-style-type: none"> • Schools should be supported and empowered to work with pupils and their parents/carers, with clear guidance issued on how this can be done in a meaningful and collaborative way • Engagement should be with all pupils and parents/carers • Agree with transition periods in schools where legacy and new uniforms co-exist • There should be a clear definition in guidance of what constitutes unusual colour or design • Rationale to use branded items or unusual colour/design should focus on needs of the child and access to curriculum, rather than preserving tradition • Schools should state how often PE kit items will be worn/used and parents could decide what they want to buy depending on child's needs/level of participation- more flexible approach needed • Should have tendering competitions in the case of single suppliers • Any cost cap should be set by an independent person/body annually • Preference is for a price cap but, if Dept doesn't think this is feasible, any solution should be regularly reviewed and monitored for effectiveness • Any introduction of a cap should be preceded by a detailed and specific consultation on how it would operate – the introduction of statutory guidance should not be delayed because of this • A review of any new guidance/legislation should be presented to the Assembly within 3 years of its introduction • The Uniform Grant (UG) should be fixed at the same rate as any cost cap • Guidance on uniform policy should be based on the different stages of curriculum (KS1, KS2, etc) • Uniform Banks should focus on the sustainability element – reduce any stigma from using them • Engagement with parents and pupils should be meaningful and thorough – not just a 'tick box' exercise. Any divergence by a school from the |

| | Organisation | Comments |
|---|--|---|
| | | <p>engagement results should have a clear rationale provided.</p> <ul style="list-style-type: none"> • Need to be mindful that a 3 year review of policy is not seen as changing uniform policy every 3 years • Should consider having an enhanced UG for SEN pupils and extending UG to cover nursery age children • Should be clear on how compliance will be monitored and non-compliance dealt with • Lessons should be learned from approaches in other countries and the introduction of statutory guidance in England |
| 5 | <p>Women's Policy Group (WPG)</p> <p>The WPG is a group of policy experts and practitioners who advocate collectively for women and girls by promoting gender equality through an intersectional feminist lens.</p> | <ul style="list-style-type: none"> • School uniforms perform a useful social function • Uniform policy should focus on the agency of students, rather than the control of schools • 'Emphatic' that statutory requirement should be to offer a range of uniform options to all students – would most benefit trans/non-gender conforming students but cis-gendered male and female students would also benefit from a range of options • Comfort is subjective and should be defined by pupils- not schools and/or parents • Some schools 'over police' uniform policies/infractions and no pupil should be excluded for breach of uniform • The Department should end some practices e.g. skirt measuring and insisting full uniform worn even when outside school grounds • Uniform costs can be standardised across all schools • Parents should be able to challenge decisions to retain unusual colours/designs – 'tradition' or 'history' should not be seen as adequate justification by schools if it reduces costs or accessibility options • Schools should be compelled to explain uniform variations which are seen as markers of achievement or status as they can be very expensive e.g. honours blazers • Schools should be discouraged from using branded PE kits in any way – even if there are lower priced options available alongside branded it would create a two-tier system |

| | Organisation | Comments |
|---|---|--|
| | | <ul style="list-style-type: none"> • Policies should not be gendered in practice e.g. some schools stop girls wearing PE kits to school for reasons of 'decorum' • Parental views shouldn't veto the voice of the pupil on uniform policy • Recommends clear guidance on the stakeholders who should be consulted on uniform policy • WPG calls for increase in uniform grant • Recommend a mandatory, gender-neutral uniform policy which prioritizes flexibility and agency while ensuring affordability and sustainability |
| 6 | <p>Competition & Markets Authority (CMA)</p> <p>The CMA is the UK's principal competition and consumer authority. It is an independent non-ministerial UK government department. Its responsibilities include carrying out investigations into mergers and markets and enforcing competition and consumer law. The CMA helps people, businesses and the UK economy by promoting competitive markets and tackling unfair behaviour.</p> | <ul style="list-style-type: none"> • Both schools and their suppliers are subject to competition law. Where schools appoint uniform suppliers or retailers, especially where exclusivity arrangements are put in place, they need to ensure they have taken steps to comply with the law • Strongly recommend that schools periodically test the market by reviewing their current commercial arrangements with suppliers and retailers – would expect that any exclusivity arrangement should not last more than five years without it being subject to some form of competition • The CMA supports measures that reduce the total number of branded items and degree of branding across a school's uniform – this could be by ruling out specific elements of school uniform from branding or by placing limits on the number of branded items across a school uniform • Where the school itself is the retailer to pupils and their families, guidance should be clear that the school should not seek to charge excessive prices and should use its own role as purchaser to drive a better deal for pupils, parents and carers • There is no direct mechanism for transparency on financial or in-kind benefits to reduce the impact of these arrangements on prices • The case for mandatory engagement with parents/pupils will depend on the extent to which it adds to existing demands on the time and resources of schools • It is important that consultation with parents/carers is not used by schools as a |

| | Organisation | Comments |
|--|--------------|---|
| | | <p>justification not to follow any statutory guidance e.g. if a majority (or more engaged minority) were content with a non-compliant policy that increased costs for all parents/carers, potentially making school uniform unaffordable for some</p> <ul style="list-style-type: none"> • CMA notes that price caps do not address the underlying cause of why a particular market is leading to high prices. Instead, they address the 'symptom' of high prices. CMA highlights the risks of unintended consequences of a cap: <ul style="list-style-type: none"> – Setting the price cap at the right level – if set too low and it may impact the quality of goods and setting it too high may mean prices rise higher than they would have otherwise; – Dynamic impacts – a mechanism will be required to adjust prices over time, which can be challenging to create and maintain, and may lead to higher prices and worse outcomes over time than without the cap; – Lack of compliance – if compliance with the cap is not achieved across the market, this undermines the objective of the cap and introduces further distortions to competition between suppliers; – Price leakage – in some cases suppliers may be able to technically meet the requirements of a price cap while finding ways to re-introduce further costs to buyers that fall outside of the price cap; – Differentiated products – for a product that is not relatively consistent across suppliers, a single price cap might reduce choice or lead to pockets of bad outcomes e.g. suppliers choosing not to serve specific geographic areas; – Resource and capacity – policymakers will need to ensure they have the appropriate skills and resource to effectively design, monitor and adapt a price cap over time; – Avoiding increased use of exclusive suppliers- some schools may decide that the easiest way to ensure compliance with a cost cap is to have an exclusive supply contract (if this is permitted), with one firm providing all items of compulsory school uniform. Such an outcome would reduce the |

| | Organisation | Comments |
|---|--|---|
| | | <p>level of competition between suppliers and undermine the policy objective to reduce prices; and</p> <ul style="list-style-type: none"> – Ensuring compliance with the cap – DE would need to identify an appropriate mechanism to monitor and enforce a cost cap and provide clarity to schools on what they need to demonstrate in order to be confident that they are complying with the cost cap. • The proposed cost cap is intended to play a similar role to statutory guidance, by influencing the decisions that schools make that affect the cost of school uniforms • The CMA proposes the potential for a cost cap as a transitional measure. In this scenario, the Department could consider whether a cost cap could be used as a temporary or ‘one-off’ measure, requiring all schools to bring the price of their school uniforms below a certain level, before relying on the statutory guidance to provide an ongoing boundary for school decision making. • CMA encourages DE to consult its counterparts in other nations, particularly for learnings on achieving compliance with statutory guidance |
| 7 | <p>Northern Ireland Human Rights Commission (NIHRC)</p> <p>The Northern Ireland Human Rights Commission (NIHRC) is a national human rights institution, funded by United Kingdom government, but is an independent public body that operates in full accordance with the UN Paris Principles.</p> <p>Established on the basis of the Belfast (Good Friday) Agreement, they play a central role in supporting a society that, as it rebuilds following conflict,</p> | <ul style="list-style-type: none"> • Recommends that DE adopt a human rights based approach to the development, implementation and monitoring of the updated statutory guidance (further details of the relevant Articles are in the written response) • The revised statutory guidance on school uniforms SHOULD make explicit reference to the ‘best interests’ principle • Recommends the revised statutory guidance on school uniforms makes explicit reference to the evolving capacity of children and young people to ensure their views on school uniform policy are given due weight in accordance with their age and maturity • Recommends DE supports schools and governing bodies to improve the collection of data in relation to the statutory guidance, including disaggregation by S75 and other characteristics • UG should be sufficient, proportional to costs and include targeted measures for children identified as particularly disadvantaged |

| | Organisation | Comments |
|---|--|---|
| | respects and upholds human rights standards and responsibilities. | <ul style="list-style-type: none"> Uniform policies should be inclusive and not discriminate/disadvantage directly or indirectly e.g. on basis of disability, religion/race DE may wish to clarify that it is the responsibility of schools/governing bodies to develop human rights compliant policies and that, when challenged, it is ultimately for the courts to determine whether an interference is justified, based on the particular circumstances of that case Schools should <u>ensure</u> that team kits are available for loan |
| 8 | <p>Women's Regional Consortium (WRC)</p> <p>The Women's Regional Consortium is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs. It consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.</p> | <ul style="list-style-type: none"> Recommends additional principle – flexibility. View this as a move towards more child centric policies and should address gender neutral options, allow for changes in weather, accommodate sensory and SEN needs and child-centred approach to appearance policies Strongly disagree with sanctions for non-uniform compliance Schools should avoid variation in colours and design for different year groups – expensive for parents and limits the ability to hand down school uniform to younger siblings Some schools have uniform variations for 'internal transitions' e.g. moving from junior to senior school, or focus in music. Where these exist, they should be centred around something easily affordable e.g. a tie rather than a special blazer Believe branded items should not be compulsory or could be limited to just one item of school uniform particularly smaller and more easily replaceable items such as a school tie Believe there is a need to go further than simply making branded sports kits non-compulsory. Would like to see stronger requirements on schools to avoid the use of branded sports kits completely- otherwise could see a two-tier system being created and lead to stigmatising those who can't afford branded items Boys and girls should be treated the same in terms of what they are able to wear for PE and these policies should not include the policing of girl's bodies Would prefer not to see special arrangements with suppliers or manufacturers being allowed especially where this results in a singular |

| | Organisation | Comments |
|----|--|--|
| | | <p>specialist uniform supplier as this results in increased prices</p> <ul style="list-style-type: none"> • Should be some checks on the quality of items donated to uniform banks as items that are in poor condition/badly worn could further stigmatise children • Care must be taken to ensure that parents are not given a veto over school uniform policy – school uniform policies should be child-centred • Believe that the current rate of the UG is insufficient even when children are not in transition years |
| 9 | <p>Parentkind</p> <p>Parentkind is a national charity representing parent views on their child's learning to local, regional and national governments and agencies.</p> | <ul style="list-style-type: none"> • Recommends DE look to England and Wales as, despite statutory guidance being in place, both nations have, or plan to introduce, additional cost control measures to tackle the issue as placing the guidance on a statutory footing alone has not achieved change for families • Urges caution around the use of a price cap as there is a risk that this may encourage schools to set prices close to the cap via exclusive arrangements with providers • Believes it would be more effective (than a cap) to focus on measures that increase transparency around costs (e.g. publishing uniform costs), increase market competition (e.g. limiting exclusive contracts, making it easier for multiple retailers to provide school uniform) or limit the number of branded uniform items • Recommends a PTA in every school • Recommends parental engagement in uniform policy including stating the protection parents have if schools don't comply with statutory guidance, parents' role in monitoring/evaluating impact of statutory guidance and embed parental engagement in Delivery Plans for the Children and Young People's strategy • Recommends transparency around uniform costs and actions to limit costs including DE publishing uniform costs for all schools |
| 10 | <p>Governing Bodies Association (GBA)</p> <p>The Governing Bodies Association (GBA) is the sectoral body</p> | <ul style="list-style-type: none"> • Does not believe that a cap will increase affordability or accessibility given the unintended adverse implications outlined in the consultation document • A cap would place unnecessary and additional administrative burden on schools and is likely to |

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| | representing the Boards of Governors (Managing Authorities) of the 50 Voluntary Grammar schools in Northern Ireland. | <p>create problems in the longer-term due to inflation and legislative restrictions e.g. there may not be the political will to adjust a cap</p> <ul style="list-style-type: none"> • If governors are at risk of breaching legislation, the guidance must clearly outline what justifications are acceptable • Believes 'appropriateness' should also be included as a key guiding principle to ensure the safeguarding of children and young people. GBA believes if a policy is too flexible, and without prescription, it may result in the wearing of clothing which is "not sufficiently modest or appropriate and uncomfortable" • Believes that the proposal schools should be required to establish a uniform bank may not be a sensible approach when there are very successful, well-known schemes run by other local organisations e.g. councils. May wish to adopt a joined-up approach to the use and management of uniform banks and similar scheme • GBA believes that if schools are required to carry out a statutory, comprehensive consultation process on a regular basis it will create additional workload for school principals and governors • Believes that a more appropriate and effective consultation approach would be to have the option to seek views through already existing mechanisms, such as student councils and parent governors, and to have due regard for these views • The review process should not be unnecessarily bureaucratic and governors should retain a certain level of autonomy in this regard • GBA feels that strong guiding principles should be in place but also flexibility, to allow schools to "tailor their policy to their own context and traditions in a justifiable manner" |
| 11 | Children in Northern Ireland (CiNI) Children in Northern Ireland is the regional umbrella organisation for the children's sector in Northern Ireland. | <ul style="list-style-type: none"> • Reducing the cost of school uniforms for families, would act as an important equaliser for children • Recommends increasing the rate of uniform grant • Recommends introducing legislation to put school uniform guidance on a statutory footing |

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| | | <ul style="list-style-type: none"> • Recommends legislating for a cap on the total costs for school uniforms • Additional principles – simplicity and/or minimalism. Believes it would add weight to the comments around avoiding 'unnecessary items' • Believes that the language/terms regarding unusual colours and designs could be strengthened, to avoid a scenario where schools continue to justify expensive items, or single supplier arrangements for basic items, based on the need or desire to maintain a unique identity • CiNI sought the views of their Gets Active Youth Advisory Group, comprised of young people from across Northern Ireland that conduct peer research and advocate on behalf of children impacted by poverty and the cost-of living crisis (results in submission from CiNI). The most significant findings were: <ul style="list-style-type: none"> – Children being excluded from education and other activities because of their uniform (e.g. wrong items) after they have explained their family cannot afford it; – Less stigma associated with second-hand/recycled uniform items; – Clear support for moves towards gender neutral uniforms; and – How uncomfortable items can impact learning, especially the experience of children with special educational needs and sensory conditions. • CiNI welcomes the focus on sustainability in the consultation document and supports the proposals for schools to establish uniform banks. |
| 12 | Catholic Schools' Trustee Service (CSTS) The Catholic Schools' Trustee Service (CSTS) is the sectoral body for the Catholic School sector. | <ul style="list-style-type: none"> • CSTS sees great value in the ability of practical, affordable uniforms to generate a sense of community connection and belonging while also removing the challenges of competing with fashion trends for young people • Believes that while DE guidance advises that schools consider value for money issues, such consideration is limited or that the perspective around value for money considers quality rather than cost • Believes the views of parents and young people should be taken into consideration but they are not sure how much weight those views should |

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| | | <p>be given in making decisions on uniform policy. Believes it may even be the case that some parents view the 'high quality, high cost' uniform as a social status marker and are content with the costs, even if this excludes others</p> <ul style="list-style-type: none"> • Regarding demonstrating affordability, CSTS considers it is important to be clear how affordability will be measured • Believes that it will be very difficult for schools to be able to determine uniform costs, especially when they have multiple suppliers and also if some offer short term discounts • Of the view that some schools have long standing uniforms which have become part of their 'historic identity' and it is unlikely that simply reviewing their policy will result in the removal of unique/specific colours within their uniform; even though they are aware this adds to costs • Would be concerned with suggestion parents buy branded kits for children representing school – could put some off participating. Schools should supply kits instead • Significant elements of all uniforms should be generic products available across a range of retailers • Believes that publication of financial or in-kind benefits should only be done above a certain financial threshold (no amount specified in the CSTS submission) • Believes that a cost cap, while potentially desirable, needs to be considered carefully as it could potentially encourage suppliers to see the cap as the optimum price point hence increasing some prices. Also, if it is set too low it could encourage less sustainable and unethical supply sourcing • CSTS believes that a focus on the minimum number of items which can be required (rather than a price cap) might be a helpful consideration • Regarding demonstrating comfort, flexibility and safety – CSTS unsure how schools could do this and thinks it could become an onerous task • Uniform banks – some schools may be too small for this to be feasible. CSTS thinks it's possible that having recycled uniforms available in locations other than the school, e.g. |

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| | | <p>'preloved' shops/charity locations may be less stigmatising for families than going to a school directly</p> <ul style="list-style-type: none"> • Believes that the UG needs to be significantly increased and suggests as a first stage in this process a significant increase in the value of the grant, to those at transition stages to a new school • CSTS believes it is important that the outcome must be on ensuring the most disadvantaged families are the focus so that any uniform cost barrier is reduced and removes one of the many barriers they face in relation to equality of access to all schools |
| 13 | <p>Foyle Network Foundation (Foyle Foodbank)</p> <p>Foyle Network Foundation (Foyle Foodbank) are part of a nationwide network of food banks who provide emergency food and support to people facing hardship, and campaign for change to end the need for food banks in the UK.</p> | <ul style="list-style-type: none"> • Feels DE should consider all proposals within the consultation in line with the values established by the Foundation – Children, families and young people who are facing hardship should feel dignified, respected and empowered – especially within their school community • Additional key principle – accessibility e.g. for children with additional needs/sensory issues. Should ensure a child centred approach is taken and that reasonable adjustments need to be considered for any child that has a genuine reason for not being able to wear the uniform • Emphasised that the number of branded items drives the cost of uniforms – one of the biggest concerns that face the families the foundation supports • Encourages the Department to work with schools in ensuring that female pupils have the option of wearing trousers as well as skirts (aligns with comfort & sustainability principles, gives pupils autonomy and is a more cost effective option for parents) • Colours should be standardised across schools and year groups • Should ensure that there's no way to distinguish between blazers with embroidered crests or those with iron on/sew on crest – would remove any stigma • The use of re-usable crests and creation of uniform banks should focus on sustainability/environmental issues rather than affordability – removes any stigma attached to their use |

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| | | <ul style="list-style-type: none"> Schools should lend kit for any child representing the school at sport PE kits should not be 'initialised' – removes opportunity to re-use/recycle The values of dignity, respect and empowerment should be considered throughout the proposal to loan team kits for school competitions ie ensure children aren't stigmatised because they can't afford a branded PE kit Parents should be able to apply for a grant or schools should provide scholarships to cover the price of PE kits The UG should match any cap introduced on branded items Uniform banks should not be seen as long term solutions for families that struggle with affordability issues – all children are deserving of new uniforms/items of clothing The Foundation believes that uniform banks should be open all year round, in order to normalise their usage and promote the service as a sustainable option available for all students |
| 14 | Act Now NI Act Now is a new people-powered campaigning community in Northern Ireland. It is a partnership between Uplift and 38Degrees and enables people to take coordinated action together, to make Northern Ireland a better, fairer, more equal place for everyone. | <ul style="list-style-type: none"> 240 parents/guardians surveyed 84.5% of those surveyed said their child's school required branded sports kit or use a particular supplier for their uniform 73.1% said school uniform costs caused them hardship Petition of 562 people (some from outside NI) calling for legislation to prevent schools requiring branded school uniform items and using single suppliers for their uniforms. Also calling for the introduction of a price cap on school uniform requirements |
| 15 | UNISON UNISON is the leading trade union in Northern Ireland. In relation to education, UNISON not only seeks to protect and promote the rights of its members, but also advocates for the rights of children to a high-quality education which | <ul style="list-style-type: none"> Additional principles – gender neutrality, inclusivity and non-intrusive (e.g. hairstyles or stopping children being cool in summer/warm in winter) Schools should be compelled to explain uniform variations which are seen as markers of achievement or status as they can be very expensive e.g. honours blazers – it also makes it difficult to hand down uniforms to younger siblings |

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| | develops their personality, talents, and abilities to the fullest, in line with the standards set under the UN Convention on the Rights of the Child. | <ul style="list-style-type: none"> • PE kits should be entirely non-branded to avoid any potential two-tiered uniform system where children from some households will be able to afford the branded uniform while other children might not • The argument that PE kits made by large sportswear companies may be of better quality and last longer may be true, however, this is not adequate justification for their use, particularly among younger ages when children and young people are growing and so they outgrow clothing much quicker • Policies should not be gendered in practice e.g. some schools stop girls wearing PE kits to school for reasons of 'decorum' • Parents shouldn't have to buy branded kits for children representing school – school should provide the kit on loan – otherwise it's a deterrent for participation • Financial benefits or benefits in kind should not be permitted between schools and suppliers as it compromises the fairness and integrity of any uniform policy • Recommends that a price cap should be informed by an independent advice panel including children, young people and parents • View that pupils should be at the centre of uniform policies, with their comfort and agency being of paramount importance • DE should provide clarity on who is considered a stakeholder in the consultation process for schools on their uniform policy to minimise inconsistent practices in developing the policy • Believes it is important that uniform policy should ensure the right of transgender pupils to wear the uniform that they are most comfortable with |
| 16 | Equality Commission (ECNI) The Equality Commission Northern Ireland is a non-departmental public body established by the Northern Ireland Act 1998. Its powers and duties derive from a | <ul style="list-style-type: none"> • Highlights that any policy on school uniforms should be cognisant of the different needs of pupils from across the equality grounds • Notes that whilst socio-economic disadvantage is not a specified ground under the equality legislation in Northern Ireland, the barriers and inequalities experienced by equality groups can be exacerbated by poverty and social exclusion • Highlights the need to monitor on a rolling basis to ensure understanding of, and adherence to each policy and consider if the policy overall, |

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| | number of statutes which have been enacted over the last decades, providing protection against discrimination on the grounds of age, disability, race, religion and political opinion, sex and sexual orientation. It also has responsibilities arising from the Northern Ireland Act 1998 in respect of the statutory equality and good relations duties which apply to public authorities. | <p>and in each school, is delivering the intended impact</p> <ul style="list-style-type: none"> Concerned there are no Section 75 monitoring arrangements outlined in the equality screening and no indication of how gaps in data will be addressed Gaps in data that DE has identified in the equality screening form should be addressed so that the Department will have the necessary information/data moving forward |
| 17 | <p>Children's Law Centre (CLC)</p> <p>The Children's Law Centre (CLC) is an independent charitable organisation which works towards a society where all children can participate, are valued, have their rights respected and guaranteed without discrimination and where every child can achieve their full potential.</p> | <ul style="list-style-type: none"> Key principle – inclusivity CLC suggests a dress code is introduced, consisting of basic items in standard colours, that are widely available at a low cost which would mitigate the costs of the school day, aligning more closely to the School Uniform Grant Suggests that the guidance includes a direction that school uniform, including PE uniform, does not change from one year to the next unnecessarily CLC is aware of children being sent home or restricted from school activities/trips if correct uniform is not worn. It is CLC's view these are potentially unlawful exclusions as well as a breach of the child's right to an education Schools should have 1 PE kit, rather than different kits for different sports CLC recommends there should be a clear message within the guidance that outlines that children and young people should not be excluded from lessons, trips or other educational opportunities for not having all the correct uniform items CLC recommends ANY price cap should be informed by an independent advice panel which includes children, young people, and parents Notes that uniform banks should not be seen as a solution for high cost uniforms |

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| | | <ul style="list-style-type: none"> • Queries how DE will enforce non-compliance/ low compliance with the guidance |
| 18 | <p>Northern Ireland Commissioner for Children and Young People (NICCY)</p> <p>The Office of the Commissioner for Children and Young People (NICCY) was set up by The Commissioner for Children and Young People (Northern Ireland) Order 2003. Its role is to keep under review the adequacy and effectiveness of law, practice, and services relating to the rights and best interests of children and young people by relevant authorities.</p> | <ul style="list-style-type: none"> • Suggests additional principles – functional (should allow pupils to be active during the school day and undertake all activities required, including travelling to and from school) and promotes equality & inclusion (providing the same set of options to all pupils was important to allow them to choose the uniform elements they wanted to wear) • NICCY believes that parents should only be required to buy non-branded PE kits and schools should provide kits for those representing the school • NYP (NICCY Youth Panel) members talked about children from low-income families not trying to get onto school teams, in recognition of the pressures buying team kits would put on their parents • Believes that schools must be entirely transparent, and should not use school uniform policy to raise additional income from parents • NICCY's view is unless a cost cap is introduced, any assessments of affordability will be purely subjective • Believes uniform grant should be raised to reflect cost of school uniforms and match any price cap • NYP members said that, if consultation with young people is done in a meaningful way, it could potentially make a big difference to young people in the schools, and get buy in for the decisions made |
| 19 | <p>Carers NI</p> <p>Carers NI is Northern Ireland's membership body for unpaid carers. They represent and support the over 220,000 people who provide unpaid care for ill, older or disabled family members or friends</p> | <ul style="list-style-type: none"> • Carers NI agrees with the principles, the introduction of statutory guidance and a cap • States there are additional costs associated with uniforms for children with special needs or disabilities • They urge Minister to ensure there is adequate provision within school uniform policies and UG for children with special needs or disabilities. |