

Response to Call for Evidence on School Uniform Policy

Introduction to CARE

1. CARE (Christian Action Research and Education) is a well-established mainstream Christian charity providing resources and helping to bring Christian insight and experience to matters of public policy and practical caring initiatives. CARE campaigns for families struggling to cope across the UK.

Need for Legislative Change: The Cost of uniforms

2. School uniforms are an important aspect of school ethos and contribute to building community within a school. The Children's Society report 'The Wrong Blazer' noted that *"School uniforms can play a vital part in contributing to the ethos of a school, particularly in 'poverty-proofing' classrooms from the demands of latest trends. However, needlessly high costs, particularly when school governing bodies require parents to buy exclusive or branded items, undermine the equalising quality of school uniform. Instead, expensive uniform requirements place an unnecessary burden on parents and children"*¹
3. CARE is generally supportive of a Board of Governors having autonomy to set the ethos and management policy for individual schools. It is important for schools to be free to make management decisions that best meet the needs of pupils in their school, for that reason CARE is reluctant for Government to intervene directly in day-to-day school management. However, it is clear, that school uniforms have become expensive for most families and despite non-statutory guidance having been issued by the Department, schools have often ignored this guidance and have not done enough to keep uniform costs to a minimum. For this reason, CARE supports the broad principles of the Bill.
4. Research by various organisations across Northern Ireland consistently highlight the concerns of parents struggling to cope with the spiralling annual cost of uniforms. In 2021 the Northern Ireland Parental Engagement Group surveyed 1500 parents, 94% of those who responded were concerned with the costs of uniforms, with 75% of respondents stating that the increased costs had affected health and wellbeing.² A survey in 2023 found that 99% of the public want the Government to act on tackling uniform cost.³
5. The annual Irish League of Credit Unions school uniform research found that the cost of uniforms for 2024 is increasing, and more people are being plunged into debt to pay for their children's schooling. They found that the total back to school spend in 2024 stands at £918 for primary school parents and £1,086 for secondary school parents. This is an increase of £81 for primary school parents and £97 for secondary school parents when compared to the same survey in 2023. 40% of parents surveyed stated that they have cut back on some back-to-school essentials just to cover the uniform cost.⁴
6. If parents are falling into significant debt year-on-year to pay for school uniforms, it is clear that the current system of voluntary guidance is not working. The style, type and functionality of school uniforms has changed very little in the last 50 years. The only major change to uniform policy over the past number of years is the increase in mandatory branded sportswear and limiting suppliers. Parents should not be struggling to resource their children for school. **CARE welcomes the Bills key aim of placing guidance on a statutory footing.**

¹ The Children's Society 'The Wrong Blazer' June 2020 page 1

² Scope NI 'Why NI's entire approach to school uniforms should change' 28th October 2021

³ Save the Children 'Uncapped Costs of Uniforms is Causing Harm' June 2023

⁴ ICLU 'research shows 79% of parents in NI under pressure due to schooling costs' 10th July 2024

The Effect of Expensive Uniforms

7. High costs of mandatory school uniform have long been recognised as a source of unnecessary financial and emotional stress for families across the UK.⁵ Research shows that families are often forced to cut back on food and heating to pay for schooling, with many families having to delay paying essential bills and take on debt just to keep their kids in school.⁶ Some families have been forced to turn doorstep lenders or payday loan companies to meet the costs, merely compounding the issue.⁷ Research from the University of York recorded the experience of Andrea, a lone parent with two children living in Northern Ireland she told researchers: *“With ever increasing cost as regards food, electricity and gas I am struggling now with a brand-new uniform for my eldest child. Again, due to Universal Credit poverty strikes again... It’s just money, money, money in already stressful and difficult times.”*⁸
8. The effect of not having the correct uniform can be devastating for children. Not following a uniform policy can result in punitive or exclusionary measures. For many children in poverty, the uniform policy has not been followed because the family cannot afford the expensive branded clothing. According to The Children’s Society, *“wearing the wrong uniform can lead to children being bullied, feeling left out or even being excluded from school, through no fault of their own”*.⁹ They estimate that nearly half a million children in England have been sent home from school because costs meant they were wearing incorrect uniform.¹⁰ Save the Children found that 10% of children have been excluded from lessons in Northern Ireland for having the wrong uniform.¹¹ **Consideration should be given to ensuring that children cannot be punished or suspended from school for a breach of uniform policy.**
9. The uniform policy currently set by Governors often exacerbates the difficulties faced by parents. For many schools restrict suppliers, demand exclusive badged uniform/blazers or insist on expensive branded sportswear. This restricts a family’s ability to shop around and dramatically increases costs. Families should not be placed into debt to ensure their children can go to school. **CARE recommends that provisions be placed in the Bill to ensure that schools demonstrate that their uniform policy is affordable.**

⁵ Lancashire Post [‘UK households are struggling with the growing cost of school uniform, new research reveals’](#) 7th August 2023

⁶ Dr Maddy Power et al (2022) [‘COVID realities: families on low incomes during the pandemic’](#) University of York

⁷ The Big issue [‘School uniform costs are pushing struggling families deeper into poverty’](#) April 2021

⁸ Dr G Page et al (2021) [‘Uniform mistakes: The costs of going back to school’](#) University of York page 4

⁹ *Op cite p I*

¹⁰ *Op Cite p I*

¹¹ Save the Children [‘Uncapped Costs of Uniforms is Causing Harm’](#) June 2023

The Bill Provisions

Content of Guidance

10. CARE broadly agrees with the power given to the Department in clauses 1 and 2. While it is important that statutory guidance is put in place, it is essential that individual schools and communities are afforded flexibility to implement a policy that best suits their needs, based on the criteria set down by the Department. While clause 1 sets out provisions for the Department to include groups who must be consulted, parents and pupils should be named as statutory consultees in the Bill. A school community functions best when Governors, parents and pupils are working together. To include parents and pupils (as well as other consultees the Department sees fit) ensures that uniform policy will be more readily accepted and adopted.
11. The Bill allows for the Department to reissue guidance following consultation. The lack of a timetable for review is concerning. Given almost 1,000 schools will be subject to the guidance, it is inevitable that the guidance will not work for every school and will need to be adapted. **CARE recommends that a statutory timetable for mandatory review be included in clause 1, with the Department retaining the power to review and reissue at any time. The Bill should include a provision that the Department is required to review the guidance every 3 years and report to the Assembly on its implementation.**
12. Clause 2 gives the Department wide discretion in setting guidance on cost and suppliers. CARE is concerned that wide discretion in respect of cost may lead to very little change. Clauses 2 and 3 need to be more robust. There should be an obligation placed on a school to issue a school uniform policy which is affordable. Schools should be required, by the Bill, to publish a fully costed breakdown of the uniform required under their individual school policy and be able to demonstrate that the uniform can be purchased from multiple outlets or high street suppliers within the limit of the Departmental uniform grant. The Bill should expressly prevent schools from entering into exclusive deals with one retailer and should require a school to demonstrate the uniform can be purchased in any high street store.
13. CARE is particularly concerned with the cost of PE Kits. While clause 3 seeks to limit the number of items or sets of uniform a school requires, CARE is concerned that in practice very little will change. In England, statutory guidance, similar to that proposed in this Bill, was issued in 2021. Evidence shows that schools have not limited PE wear and have failed to reduce the amount of branded and logo items.¹² Schools, who often get incentives from companies to use branded wear¹³, will not change unless they are forced to do so. Evidence from England highlights that guidance is not enough. Clauses 2 and 3 should explicitly state that branded wear, or single suppliers are not permitted, except in exceptional circumstances.

Clause 4- Capping the Cost of Uniform

14. Clause 4 allows the Department to set a uniform cap. This should not be an optional extra for the guidance or something that is in the Department's discretion. Setting a cap is fundamental to keeping cost down. **CARE recommends that the Bill should establish an independent expert panel that is tasked to set a cap annually. The annual cap should be set in November of each year, by the panel, which will apply to uniform policies put in place for the following September.** If an annual cap is not set, evidence from across the UK highlights that schools will not limit their costs.

¹² The Guardian '[Branded UK school uniforms cost more than double high-street prices, analysis reveals](#)' 31st August 2024

¹³ BBCNI '[One in four post-primary schools benefit from PE kit deals](#)' 9th August 2022

15. To ensure that schools comply with a cap and the uniform policy ensures that parents can buy the required uniform within the cap limits, **clause 4 should require the school manager to publish an annual report demonstrating that the school uniform, as mandated by the school policy, can be purchased within the established limit.** This report should set out where clothing can be purchased and the price paid, clearly demonstrating that the policy is compliant with the cap.

Part 2 – School Clothing Allowances

16. If any school uniform policy is to be effective for families struggling to cope, the cost of a school uniform must not exceed the value of the school uniform grant. It seems unlikely that the current rate of grant offered by the Education Authority would even come close to covering the cost of school uniforms.
17. The current rates of grant payable across the UK and Ireland are:

	Scotland	Wales	England	Ireland	Northern Ireland
Primary	£120	£125 (years 1,3&5)	£0 - £150	€160	£42.90
Post primary	£150	£200 (year 8) £125 (years 9-12)	£0- £150 ¹⁴	€285	£87.60 (<15) £93.60 (15+)

18. It is clear, that the uniform grant in Northern Ireland is woefully inadequate. School uniforms for the 2024 school year averaged around £1,000 (see paragraph 5 above). Parents in receipt of the grant would need to find £900 to ensure their child meets current uniform policy in the average school. This is simply not sustainable. Even the limits set in other parts of these islands is not enough to meet the cost. Families cannot be allowed to fall into debt or be forced to take out high interest loans just to pay for school uniforms.
19. **CARE recommends that the Bill be amended to make any uniform grant payable, equal to the uniform cap set an independent expert panel (see paragraph 14).** This should be paid to all families in receipt of universal credit.

¹⁴ In England it is a matter for each local authority. Of the 149 local authorities that provide education services 27 offer a uniform grant. Grants range from £25 to £150