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School Uniforms (Guidelines and Allowances) Bill

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This Bill Paper provides an overview of the School Uniforms (Guidelines and Allowances) Bill, as introduced to the Assembly on 18 February 2025. It compares similar provisions in Great Britain and the Republic of Ireland and also identifies a number of issues that may merit further consideration by the Committee.

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Executive Summary

- The cost of school uniforms has been recognised as placing a major financial strain on many parents in Northern Ireland.
- As a result, the Department of Education has introduced legislation to place their non-statutory uniform guidance on a statutory footing, compelling schools to comply with its key principles.
- The public consultation conducted in advance of the Bill identified high public support for placing existing guidance on a statutory footing, introducing a cap on the cost of school uniforms, and involving parents and pupils in setting new school uniform policies.
- The School Uniforms (Guidelines and Allowances) Bill is based on the outcomes of this consultation. It will compel the Department of Education to set school uniform guidelines, which will be placed on a statutory basis, and extends school uniform grant to pupils at independent schools.
- It provides specific principles that should be included in the statutory guidelines, including: provision addressing unfair cost aspects of school uniform policies; the comfort and practicality of clothing; affordability and accessibility (including uniform banks); and what is to be regarded as reasonable and what is not in terms of clothing from particular suppliers, manufacturers or particular items or sets of clothing. The Bill outlines the complaints process, which allows the Department to direct the school to rectify any failure to comply with the guidelines. The schools' complaints process should be exhausted in the first instance however.
- The Bill also states that the legislation does not apply to pre-school pupils but gives the Department the power to make regulations to extend the guidelines to pre-schools in the future.
- The policy context in Northern Ireland is then compared to other jurisdictions in the UK, and Ireland. At present, England and Wales have issued statutory guidance on the cost of school uniform, while Northern Ireland, the Republic of Ireland and Scotland have non-statutory guidance.
- The final two sections of this paper consider the potential financial implications of the Bill and present some issues that the Committee may wish to explore in further detail.

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1 Introduction

Back-to-school expenses have become an increasing financial concern across the United Kingdom and Ireland, with the cost of school uniforms a particular strain for parents in recent years. In Northern Ireland, 78% of parents said covering back-to-school costs was a financial burden in 2022, rising from 62% in 2021.¹ In a separate survey in 2024, 66% of parents in Northern Ireland cited school uniform costs as their primary financial concern relating to their children's attendance at school.²

The Department of Education (DE) recognises the impact of these costs and also importance of school uniforms in reducing social stigma, fostering a sense of community, and improving safeguarding.³ In the [consultation document](#) on this proposed legislation, DE notes that there is “overwhelming support” for school uniforms amongst all stakeholders, including pupils, parents, schools and political parties.

The purpose of the Bill is to make provision for binding guidelines on school uniform policies to be issued by the Department of Education and to extend eligibility for school clothing allowances payable by the Education Authority.

DE will, upon passage of the School Uniforms (Guidelines and Allowances) Bill, create statutory guidance on the cost of school uniforms, have the power to cap uniform prices, and extend criteria to make children in independent schools eligible for clothing allowances.

The cost of school uniforms is a concern across different jurisdictions in the UK and Ireland. In England and Wales, statutory guidance on the cost of school uniforms has been introduced, which directs schools to keep prices down. In

¹ Irish League of Credit Unions, [Rising costs of living impacting heavily on funding back to school costs for NI parents](#) (2022)

² Parentkind, [National Parent Survey \(2024\): Northern Ireland](#)

³ Department of Education, [Circular 2011/04 - Guidance to schools on school uniform policy](#) (re-issued 5 June 2018)

comparison, Scotland and the Republic of Ireland have non-statutory guidance for schools.

This paper opens with a summary of the existing student uniform policy in Northern Ireland. It provides an overview of the public consultation into making uniform guidelines statutory, before summarising the School Uniforms (Guidelines and Allowances) Bill and its impact on protected groups. It also contrasts the Northern Ireland approach to mitigating the costs of school uniform with those taken in England, Wales, Scotland and the Republic of Ireland.

1.1 Timeline of the development of the Bill

- February 2024: Pre-consultation exercise
- February-September 2024: Public consultation on school uniform policy
- November 2024: Minister for Education wrote to the Executive, setting out the principles of the Bill
- December 2024: The Executive reached agreement on the Bill.
- December 2024: The Department of Education published the results of public consultation on the Bill
- February 2025: First Stage introduction of Bill
- March 2025: Bill passed Second Stage and progressed to Committee Stage

2 Current school uniform policy in Northern Ireland

2.1 Current guidance

At present, school uniform policy is decided on a school-by-school basis,⁴ as day-to-day running of schools is in the hands of the principal, as directed by the Board of Governors.⁵

General guidelines on uniform policy are provided in “Guidance to Schools on School Uniform Policy”, a 15-page guidance circular (circular number 2011/04) produced by the Department of Education, issued in 2011 and updated in 2018.⁶

This guidance makes clear that a school’s uniform policy should:

- Be fair and reasonable, in both financial and practical terms
- Represent value for money for families

These principles are realised by asking schools to consider the cost incurred by:

- The inclusion of branded items in school uniform
- School uniform upkeep, particularly for items that require dry cleaning, such as blazers
- Clothing for PE, notably where specialised equipment or branded uniforms are deemed necessary.
- Single-supplier deals, as opposed to uniform items that can be purchased from a range of retailers.

Furthermore, the guidance encourages schools to engage with parents, pupils, and communities in a broad consultation before creating a new, or updating an existing uniform policy.⁷

⁴ Department of Education, [School uniform](#)

⁵ Department of Education, [Circular 2011/04 - Guidance to schools on school uniform policy](#) (re-issued 5 June 2018)

⁶ As cited immediately above

⁷ Department of Education, [Circular 2011/04 - Guidance to schools on school uniform policy](#) (re-issued 5 June 2018) p3

If parents are concerned about uniform costs they can raise their concerns initially through school complaints procedures, and then, if not resolved, by referring the matter to the Northern Ireland Public Services Ombudsman.

This guidance currently exists on a non-statutory basis and therefore lacks legal enforcement. DE does not monitor adherence to the guidance.⁸ Discussions have been underway since the last mandate about placing these guidelines on a statutory basis to minimise the financial burden on lower-income families.

As a measure of the interest in this issue, there have been 18 questions asked in the Assembly on school uniform affordability and accessibility since the Assembly returned in 2024, and 57 in total asked in the 2022-2027 mandate.⁹

2.2 School uniform grants

School uniform grants in Northern Ireland are available from the Education Authority (EA), typically once per school year, for families who receive certain benefits below certain income thresholds. Specifically, the criteria is similar to that for free school meals (FSM).¹⁰

The scheme is not intended, however, to cover the full cost of uniforms, as uniforms are not a legislative requirement.¹¹ As laid out in the guidance, it is for individual schools to decide whether they wish to have a uniform, and if so, the nature and style of the uniform.

⁸ AQW 3197/22-27

⁹ AIMS Portal [Northern Ireland Assembly Open Data](#) as of 23rd April 2025

¹⁰ Education Authority, [Apply for Free School Meals / Uniform Grants](#) (updated 15 January 2025)

¹¹ Department of Education, [Circular 2011/04 - Guidance to schools on school uniform policy](#) (re-issued 5 June 2018) p6

The level of assistance provided is set by the EA, and reviewed annually to increase in line with inflation.¹² The EA spends around £6 million each year on school uniform grants, which supports over 94,000 pupils.¹³

A 20% uplift was provided to existing uniform grant allowances by the Education Authority, to provide “immediate relief” for parents (in the words of the then Minister of Education, Michelle McIlveen) during the duration of the review into FSM and school uniform affordability, ahead of the 2022-2023 school year.¹⁴

The grants currently available are:¹⁵

Eligible student	Uniform	PE Kit	Total
Primary school pupil	£42.90	n/a	£42.90
Post-primary/special school pupil under 15 years old	£61.20	£26.40	£87.60
Post-primary/special school pupil over 15 years old	£67.20	£26.40	£93.60
PE kit for a post-primary/special school pupil	n/a	£26.40	£26.40

On 7th June 2024, the Education Minister introduced an interim change to eligibility to account for wage inflation and the transition of some legacy benefit claimants onto Universal Credit.¹⁶ This changed the net earning threshold from £14,000 to £15,000. It also sought to maintain the same number of eligible students for the 2024-2025 academic year as in the prior year.

¹² Department of Education, [Circular 2011/04 - Guidance to schools on school uniform policy](#) (re-issued 5 June 2018) p6

¹³ Department of Education, [Public Consultation Document - School Uniform Policy](#) (2024) p25

¹⁴ Department of Education, [McIlveen announces additional £1m to help with cost of school uniforms](#) (2022)

¹⁵ NI Direct, [School uniform and uniform grants](#)

¹⁶ Department of Education, [Interim change to eligibility criteria for free school meals and uniform grants](#) (2024)

DE is currently undertaking a review of the criteria for both FSM and the uniform grant, with a public consultation conducted between November 2024 to February 2025.¹⁷

2.3 Existing eligibility criteria for the School Clothing Allowance

Usually, a school pupil can get only one clothing allowance during the school year. The [Education Authority](#) (EA) sets out the eligibility criteria which the parent(s) or guardian(s) of pupils in full-time education need to fulfil to be entitled to the School Clothing Allowance. The EA does this by way of the 1986 Order, Article 60 as amended by the [Education Act \(Northern Ireland\) 2014](#).

The current criteria states parent(s) or guardian(s) are required to be in receipt of one of the following benefits:¹⁸

- Income Support
- Income Based Jobseeker's Allowance
- Income Related Employment and Support Allowance
- Guarantee Element of State Pension Credit
- Child Tax Credit or Working Tax Credit with an annual taxable income of £16,190 or less
- Universal Credit and have net household earnings not exceeding £15,000 per year.

Or

- If they are an Asylum Seeker supported by the Home Office Asylum Support Assessment Team (ASAT)
- If the child has a statement of special educational needs and is designated to require a special diet.

¹⁷ Department of Education, [Consultation Document for the Review of Free School Meals and Uniform Grant Eligibility Criteria](#) (2024)

¹⁸ <https://www.eani.org.uk/parents/pupil-applications-and-grants/free-school-meals-and-uniform-grants/apply-for-free-school>

Students can apply themselves if:¹⁹

- If the course they are studying is a full-time course, and
- They are receiving benefit in their own name

3 School uniform policy consultation

The Minister for Education launched a public consultation on school uniform policy on 20 June 2024, which ran until 27 September 2024.²⁰ This section provides an overview of the key findings.

The consultation sought opinions on:

- Making school uniform more affordable (including via a cap on uniform costs)
- Placing existing DE guidance on school uniform policy on a statutory footing.

The consultation was built on six key principles, which are intended to underpin the new statutory guidelines.²¹ These are:

1. School uniforms should be affordable
2. School uniforms should be comfortable
3. School uniforms should be sustainable
4. School uniform policy should be publicly published
5. School uniform policy should be regularly reviewed
6. School uniform policy should be developed in partnership with children, and parents/carers

The focus of the consultation was informed by earlier engagement with stakeholders, which identified concerns about the requirements for branded items, expensive PE kits, and little or no choice between suppliers of uniform

¹⁹ See footnote 7 immediately above

²⁰ Department of Education, [Written Ministerial Statement: School Uniform Policy Consultation](#), (2024)

²¹ Department of Education, [Views sought on School Uniform policy](#) (2024)

items.²² While concerns were raised from a number of quarters about uniform cost, DE reports that during consultation with schools, parents/carers and the major Northern Ireland political parties, there was broad support to maintain school uniforms in Northern Ireland's schools.²³

The public consultation closed in September, with approximately 7,500 responses received:

- 3,444 responses were received via the online consultation survey – with the largest proportion coming from parents/carers
- 4,008 responses from children and young people surveyed in the Education Authority Youth Service consultation

The online consultation produced a number of key findings:²⁴

- 77% of respondents to the online survey favoured placing school uniform guidelines on a statutory footing, allowing it to be enforced
- The six key principles (outlined above) were endorsed by 97% of respondents
- 92% of respondents agreed schools should demonstrate how they took costs into account when designing their uniform policy.
- 90% agreed costs should be published by schools, with 88% agreeing schools should explain any decision to use unusual colours or designs.
- 95% agreed schools should be required to provide more than one supplier for branded uniform items, and 94% believed any financial benefits to the school from a school-supplier arrangement should be made publicly available.

Specific uniform elements addressed included school crests and PE kits:

- School crests: 85% believed the crest should be able to be bought separately, and 83% believed these crests should be reusable.

²² Department of Education, [Written Ministerial Statement: School Uniform Policy Consultation](#), (2024)

²³ Department of Education, [PUBLIC CONSULTATION DOCUMENT - SCHOOL UNIFORM POLICY](#) (2024)

²⁴ Department of Education, [Final analysis of School Uniform Consultation](#) (2024)

- PE kits: 86% agreed branded sports kit should not be compulsory, and 89% believed team kits should be available for squad members to loan.

In terms of key policies:

- 88% of respondents supported introduction of a cost-control measure, such as a cap on the cost of school uniforms.
- 92% supported schools establishing a Uniform Bank to provide second hand uniform items.
- School engagement:
 - 73% supported schools engaging with pupils in uniform policy.
 - 87% supported schools engaging with parents in uniform policy.
- 77% supported the recommendation that schools should review uniform policies every three years.

As noted above, a survey for children and young people was designed by the Education Authority as part of the consultation (with an Irish-language version made available for Irish-medium schools and youth organisations). Key findings include:

- 91% of children and young people supported the six key principles for uniform policy.
 - 98% believed uniform should not be expensive
 - 65% agreed schools should tell them why colours and shapes of the uniform were chosen.
 - 56% believed a logo should be present on the uniform, even if it cost more money.
- 82% believed schools should provide sports kit on loan to pupils representing the school, and 64% supported policies allowing schools to provide “clothes to swap and share with others”.²⁵

²⁵ The review suggests this is likely due to the framing of the question, with children more likely to view second-hand clothes “sharing” as unhygienic, or stigmatized due to social pressure.

- 91% agreed schools should always consider student thoughts on uniform policy, and 85% believed parent thoughts should always be considered.

The Education Authority's Equality and Human Rights Service also provided a response, which was highlighted within DE's consultation report.²⁶ Key comments included:

- Some schools require overly specific items, notably branded PE kits, which can drive up costs, and create stigma for children who don't wear branded items.
- The EA recommends allowing female students to wear trousers in order to help tackle growing misogyny in schools, instances of upskirting and harassment, and to create a more inclusive environment for transgender and gender-questioning students.
- The EA endorses regular reviews of school uniform policy, with parents and pupils involved in design, implementation and evaluation.
- Finally, the EA endorses flexible uniform policies that meet needs of individual students, to attempt to reduce peer discrimination.

In the preamble of the consultation outcomes paper, DE states that they propose to make Boards of Governors report publicly (on the school's website) their uniform policy, how they arrived at this policy (including parent/carers/pupil involvement), what they have done to keep costs down, how they have minimised the cost-gap between gendered uniforms, and whether items are on single-supplier arrangements.²⁷

3.1 Impact on protected groups

²⁶ Education Authority - Equality & Human Rights Service, [General Points on School Uniform Policy Call for Views Consultation](#) (2024)

²⁷ [School Uniform Consultation report - FINAL 0.pdf](#)

DE undertook impact assessments (available on their website), as part of the consultation process to test the impact of the proposed legislation on protected rights and groups. The findings include:

Child Rights Impact Assessment²⁸

- According to the impact assessment (based on a consultation with 10 primary schools, 10 secondary schools and a special school and a series of focus groups with school staff, parents, and pupils), children should not be negatively affected by the legislation.
- Furthermore, there should be positive benefits for pupils with disabilities, due to the proposal that school uniforms should be flexible to meet disability-specific adaptations.

Equality and Human Rights Screening²⁹

- The policy will apply regardless of race, religion or political affiliation.
- Religious inclusivity should be promoted by these proposals, as they suggest schools provide flexibility in their uniform policy to reflect clothing worn as part of religious observance.
- Pupils should benefit regardless of age, but given school uniform is noted as more expensive for high school students, they and their parents may receive a greater benefit.
- School uniform has been shown in some research to be more expensive for girls than boys. DE suggests this can be resolved, by including language in the guidelines compelling schools to ensure no significant cost differential exists between school uniform by gender.

Rural Needs Impact Assessment

²⁸ Northern Ireland Commissioner for Children and Young People, [Child Rights Impact Assessment \(Consultation on School Uniform Policy\)](#) (2024)

²⁹ Department of Education, [Equality and Human Rights Policy Screening for Review of School Uniform](#) (2024)

- The assessment reports that the Bill is likely to have a positive impact on school pupils in rural areas.
- It may be that a single supplier is the most cost-effective option for parents in rural areas.³⁰ There is a presumption, however, that the process will be competitive.

4 Contents of the Bill

The Bill places a legal requirement on the Department of Education to publish new, legally binding guidelines on school uniform policies. It also extends eligibility for school clothing allowances to pupils attending independent schools.

The Bill is divided into three parts and thirteen clauses. Part 1 (Clause 1-13) directs the contents of the new guidelines. Part 2 (Clause 14) extends clothing allowance to independent-school students. Part 3 (Clause 15-16) provides the time the Bill comes into operation, and the name of the Bill if enacted into law.

4.1 Part 1: Department to issue guidelines

Clause 1: Guidelines as to policies on school uniforms

The Bill compels DE to publish guidelines for the school uniform policies set by schools across Northern Ireland. These are to be reviewed (and reissued if altered) from time to time.

The guidelines set by DE may include, but are not limited to:

- General or specific factors schools should consider when writing uniform policy.
- Information to explain the reasoning for these elements to be included with the policy

³⁰ Department of Education, [*Rural Needs Impact Assessment \(Review of School Uniform Policy\)*](#) (2024)

- Who needs to be consulted when school uniform policy is being written by schools, or revised later.
- How often school uniform policy should be reviewed.
- Guidelines on transition arrangements between school uniform policies and saving arrangements – including the option to impose these systems.

Crucially, no subsequent language in the Bill limits what the Department of Education may put into the guidelines. Clauses 2-5 detail general issues the guidelines should address, but do not limit the outline suggested in Clause 1. This means the guidelines may go beyond the specifics in Clauses 2-5, based on the proposals in Clause 1.

Clause 2: Guidelines as to policies on school uniforms

A consistent theme in the public consultations and in the Bill as drafted has been the need to prevent unnecessary expense being placed onto parents. Clause 2 states that the new guidelines must address:

1. Unfair costs (defined in Clause 8)
2. The comfort and practicality of uniform for pupils
3. The affordability of uniform – ensuring clothing is good value for money
4. The accessibility of uniform – ensuring loaned items and clothing banks are available in schools

The guidelines may also address:

5. Whether it is reasonable for schools to require clothing from a specific supplier or manufacturer
6. Whether it is reasonable for schools to require individual items of clothing in a specific style – see Clause 9 for a definition.
7. Whether it is reasonable for schools to require branded clothing for specific activities or occasions (i.e. potentially PE).

It should be noted that, in the consultation and the associated impact assessments, reference was made to ensuring there was flexibility in school uniform options, to enable religious observance, and special items or

exceptions for children with disabilities. This terminology has not been reflected in this clause, or within the Bill. Some respondents to the consultation also raised the issue of the potential administrative burden and cost on smaller schools to maintain a uniform bank when there is likely to be established uniform banks in local community centres and churches.

Clause 3: Express limit on specific styles by guidelines

The new guidelines may limit the number of specific clothing items (in a particular style or branding) a school is allowed to enforce as part of its uniform policy (for example, limiting a school to one branded item such as a school tie or blazer).

This clause is subject to a commencement order.

Clause 4: Capping of expense as something for guidelines

The legislation would give the Department the power to fix the maximum cost (or overall price range) a uniform should reach. This includes the overall cost of a uniform set, or the cost of individual items. The guidance may include a statement advising schools to ensure the uniform outlined in their policy does not exceed these costs overall.

There has been some debate about the introduction of a price cap. Save the Children has called on DE to embed a cap in statutory guidance for school uniform policies, and recommends that the price cap be informed by an independent panel of advisors, including children, young people and parents.³¹ The Anti-Poverty Strategy Expert Advisory Panel also called for the introduction of a price cap.³²

DE has expressed some reticence about the introduction of a cap. In the Explanatory and Financial Memorandum that accompanies the Bill, DE states

³¹ Save the Children, [Uncapped Costs of School Uniforms are Causing Harm](#) (2023)

³² Anti-Poverty Strategy Co-Design Group, [Recommendations on the Development of an Anti-Poverty Strategy for Northern Ireland - A Position Paper from Members of the Anti-Poverty Strategy Co-Design Group](#) (2022) p21

that capping the prices retailers could charge would risk breaches to competition law and impact open competition.³³

In oral evidence to the Education Committee on the 5 March 2025,³⁴ DE officials state the commencement order provides time to consider the most effective means of capping costs, including who will be responsible for setting and reviewing the cap.³⁵ DE officials suggested in that session that any proposed market cap would be a short-term measure. Instead, a cap on the number of branded items, imposed on schools, rather than retailers, would be more viable – and would follow extensive consultation:³⁶

"We expect to conduct a further consultation on that detail to ensure that we learn from other jurisdictions, that we take on board advice from professional organisations, such as the Competition and Markets Authority (CMA), and that we fully consider any risks of unintended consequences that could emerge." ³⁷

This clause is subject to a commencement order.

Clause 5: Variety of schools and pupils under guidelines

The guidance may cover schools and pupils (as defined in Clause 10) in general. But the Department of Education may also direct specific instructions to specific groups of pupils or schools. These include:

- Pupils of a specific age/year group
- Pupils at a specific type of school
- Specific instructions for primary vs secondary school pupils
- Instruction for specific upcoming school terms/years

³³ Department of Education, [School Uniforms \(Guidelines and Allowances\) Bill- Explanatory and Financial Memorandum](#) (2025)

³⁴ Committee for Education, [Minutes of Proceedings 5 March 2025](#)

³⁵ Committee for Education, [School Uniforms \(Guidelines and Allowances\) Bill: Department of Education Oral Testimony](#) (2025), Page 2-3

³⁶ Committee for Education, [School Uniforms \(Guidelines and Allowances\) Bill: Department of Education Oral Testimony](#) (2025), Page 5-7

³⁷ As directly above

Clause 6: Duty of schools to adhere to guidelines

This Clause states that school managers must comply with the guidance set by DE, and make sure their staff comply with the guidance as well.

School managers must consider the guidance when setting and implementing a new uniform policy, whenever it is being reviewed, and when the school's uniform policy is being enforced by staff.

Once a uniform policy has been established at a school, the school manager must publish the uniform policy (and any additional information required to explain the policy, such as a justification for a single-supplier arrangement) on their website.

Clause 7: Directions on adherence to guidelines

DE may give directions to a school if they are found to be failing to comply with the guidelines, or if pupils are found to be disciplined or excluded from activities for breaking the school's uniform policy. DE should only act if one of the following occurs:

- A school is found by DE to be enforcing a uniform policy in breach of the guidelines or pupils are being disadvantaged or disciplined for breaching the uniform policy.
- DE upholds a complaint received from parents or carers about the school's uniform policy. The family must have exhausted the school's complaints procedure first, before DE acts.
- A report regarding the school is submitted to DE by the Education and Training Inspectorate, in line with the Education and Libraries (Northern Ireland) Order 1986.³⁸

Directions given to a school should follow discussion of the issue with school managers. DE shall have the right to set deadlines for the issue to be resolved,

³⁸ [*The Education and Libraries \(Northern Ireland\) Order 1986*](#), Article 102(6A)

and instruct schools to end or moderate their punishment of children breaching the school uniform policy at the school.

Directions given to schools (both grant-aided and independent) are enforceable under the powers provided by the Education and Libraries Act (Northern Ireland) Order 1986³⁹: *“It shall be the duty of a relevant authority to comply with any directions given to the authority under paragraph (1) and any such directions may be enforced by mandamus.”*

Mandamus here refers to a court order⁴⁰ which commands an entity or official to comply with their statutory duties.⁴¹

Clause 8: Meaning of unfair costs aspects

The Bill uses the phrase “unfair costs” to describe any element of school uniform that DE deems to be needlessly expensive. This can include:

- The cost of individual items, or the full set of school uniform
- Items being unreasonably expensive thanks to a limited choice of uniform suppliers.

When determining whether the bar of “excessive cost” has been reached, DE should in particular consider the role of branded and specific styles of clothing and the burden that school uniform costs place on lower-income households.

Clause 9: Meaning of clothing and styles

For the Bill’s purpose:

- Clothing includes footwear
- “Clothing of specific styles” includes clothes of a particular make/brand, or those with unique combinations of colours or fabrics, or those with specific badges or emblems.

³⁹ [The Education and Libraries \(Northern Ireland\) Order 1986](#), Article 101(6)

⁴⁰ Department of Education, [School Uniforms \(Guidelines and Allowances\) Bill - Explanatory and Financial Memorandum](#) (2025)

⁴¹ Cambridge English Dictionary, [Mandamus](#)

Clause 10: Schools and related expressions

For the Bill's purpose:

- “School” refers to a grant-aided or independent institution covered by the guidance, providing primary and/or secondary education.
- “Pupil” refers to a person receiving primary or secondary education at a school.
- A “school manager” refers to the authority responsible for managing the school. This includes the proprietor (in an independent school), or the Board of Governors (in a grant-maintained school). The Education Authority acts as school manager for controlled schools, a subset of grant-maintained schools.⁴²

Each above term is as defined in Article 2(2) of the Education and Libraries (Northern Ireland) Order 1986.⁴³

Clause 11: References to the Department

All references to the Department in the Bill refer to the Department of Education.

Clause 12: No application to children below compulsory school age

This Bill does not, at present, apply to children below the compulsory school age (four) and therefore excludes children at pre-school or nursery.

Pre-schools and nurseries are not mentioned in the existing non-statutory guidance on school uniform⁴⁴, and school uniform grants are only available for children at primary and secondary-level education, once they have reached the compulsory school age.⁴⁵

⁴² Northern Ireland Assembly, [School Uniforms \(Guidelines and Allowances\) Bill- Explanatory and Financial Memorandum](#) (2024)

⁴³ [The Education and Libraries \(Northern Ireland\) Order 1986](#), Article 2(2)

⁴⁴ Department of Education, [Circular 2011/04 - Guidance to schools on school uniform policy](#) (re-issued 5 June 2018)

⁴⁵ Education Authority, [Frequently Asked Questions: Free School Meals/Uniform Grants](#) (2025)

Research on the prevalence of school uniforms policies in pre-schools appears to be scant, but a number of pre-schools do appear to produce branded items such as polo shirts and sweaters, from a brief review of supplier websites.

The exception of pre-schools from the statutory guidelines may be removed via Clause 13 below.

Clause 13: Power to extend application to pre-school education

The Bill gives the Department of Education the power to apply the provisions from Part 1 of the Bill to children in pre-school education, overriding Clause 12, via a resolution to be approved by the Assembly.

Pre-school education is defined as education provided for children between the age of two and the minimum compulsory school age, as laid out in the Education (Northern Ireland) Order 1998⁴⁶ – and includes both those institutions linked to primary schools, and those which are not.

4.2 Part 2: School clothing allowances

Clause 14: Extension of Article 60(1) of the 1986 Order

The uniform grant available to low-income families currently only applies to children at grant-aided schools. The Bill extends eligibility to children at independent schools, amending the Education and Libraries (Northern Ireland) Order 1986. DE anticipates that this will cost around £2,000 each year.⁴⁷

A list of independent schools in Northern Ireland, sourced from the DE website, with details of their ethos, enrolment numbers, and percentage of pupils with FSM entitlement (where publicly available) is provided in Appendix A.

4.3 Part 3: Commencement and short title

Clause 15: Commencement

⁴⁶ [Education \(Northern Ireland\) Order 1998](#), Article 17(8)

⁴⁷ Department of Education, [School Uniforms \(Guidelines and Allowances\) Bill - Explanatory and Financial Memorandum](#) (2025)

If passed, all clauses of the Act, bar Clause 3 and Clause 4 (which have the power to limit uniform styles on cost grounds, and cap uniform cost), come into operation the day it receives Royal Assent. The remaining clauses only activate upon instruction by the Department of Education, at a time of their choosing.

Clause 16: Short title

If passed, the Act will be known as the School Uniforms (Guidelines and Allowances) Act (Northern Ireland) 2025.

5 School uniform policy and provision across the UK and Ireland

The guidance governments provide on school uniform policy varies across the UK and Ireland, as does the availability and extent of school uniform grants.

This section provides an overview of school uniform guidance and uniform grants available in England, Scotland, Wales, and the Republic of Ireland before summarising government guidance on school uniform in each of these jurisdictions in a comparative table.

5.1 School uniform guidance

England

The responsibility for uniform and pupil appearance in English schools lies with school governors.⁴⁸ This includes whether to have a school uniform, the form and style of the uniform, and how to source items. It is not a requirement for schools to have a school uniform, but this is highly recommended by the Department for Education.⁴⁹

The Education (Guidance about Costs of School Uniforms) Act 2021 compels the Secretary of State for Education to issue statutory guidance to schools on

⁴⁸ Department for Education England, [Developing school uniform policy](#) (updated 2024)

⁴⁹ R Long, [School Uniform Costs in England. House of Commons Library Briefing 08414](#) (2025)

cost aspects of their uniform policy (both the inclusion of specific uniform items, and uniform supplier arrangements), and requires schools to follow the guidance when developing and implementing their uniform policy.⁵⁰

The statutory guidance should direct schools to provide options for second-hand school uniform, to give additional support with the cost of uniform, and keep parents updated with information on uniform requirements.

The statutory guidance subsequently published in November 2021⁵¹ seeks to ensure:

- Parents do not have to consider the cost of uniform when choosing which school to apply for.
- Schools should take the total cost of school uniform (including all items of clothing) into account when setting policy, keeping branded items to a minimum.
- The uniform policy should be published on the school's website and be easily understood.
- Uniform supplier arrangements should prioritise low cost and value for money (including quality, durability of items)
- Single supplier arrangements should be avoided unless a regular (once per every five years, at a minimum) tendering process can be arranged to allow suppliers to compete for the contract.
- Second hand uniforms should be available for parents to acquire, with information on second-hand uniforms clearly available on the school's website
- Schools must engage with parents and pupils when developing school uniform policy.

The guidance states that:

⁵⁰ [Education \(Guidance about Costs of School Uniforms\) Act 2021](#), section 1

⁵¹ Department for Education England, [Statutory guidance - Cost of School Uniforms](#) (2021)

“Cost and value for money for parents should be the most important consideration for governing boards when considering how school uniforms should be sourced”.⁵²

Disputes over uniform cost are to be resolved via the school’s complaints policy, and handled locally, rather than centrally by the Department for Education.

Most items should be generic, available from a range of retailers. Where the school requires a branded item, a written contract must be in place with the supplier, and the school must be able to prove they have obtained the best value for money from all available suppliers.

Schools were expected to comply with the new guidance by September 2022 (with temporary exceptions for schools with on-going, pre-existing contracts with suppliers).⁵³

Separate guidance has been provided by the Department for Education to aid school leaders in procuring school uniform supplies, and developing a written contract for single-supplier branded items.⁵⁴

In June 2023, the Children’s Society reported English parents were still paying high costs for uniforms, despite statutory guidelines.⁵⁵

The current UK government included a pledge in their 2024 election manifesto, to restrict the number of branded items English schools can include in their uniform and PE kit.⁵⁶ This is among the policies to be included in the proposed

⁵² Department for Education England, [Statutory guidance - Cost of School Uniforms](#) (2021)

⁵³ As cited immediately above

⁵⁴ Department for Education England, [Procuring school uniform supplies](#) (updated 2024)

⁵⁵ [‘Parents forgo holidays over school uniform costs’](#). BBC News, 28 June 2023

⁵⁶ Labour Party, [Election Manifesto 2024 “Change”](#) (2024)

Children's Wellbeing and Schools Bill⁵⁷ (currently at second reading in the House of Lords, having passed third reading in the House of Commons).⁵⁸

Wales

The Welsh Government introduced statutory guidance on school uniform in 2019 – the first government in the UK to do so.⁵⁹ The guidance recognised the financial burden purchasing school uniform can place on parents, notably on large families and those with low incomes. State schools are required to prioritise cost and affordability when introducing a uniform, or considering changes in requirements. Considerations include:⁶⁰

- Basic items and colours may be stipulated, but styles should not, so generic items can be purchased from a range of suppliers.
- High cost items like caps and blazers should be avoided.
- The necessity of logos should be considered, especially if required across numerous items of clothing. If logos are required they should be limited to a single item, which should be reasonably priced and widely available.
- Variation in colours/styles for different year groups should be avoided
- The cost and availability of non-standard sizes should be taken into consideration.
- Easily washable items should be prioritised.
- A tendering process should be considered for single-supplier items, to ensure value for money.

A review of this guidance was conducted in 2022, with a public consultation launched in October 2022⁶¹, focusing on availability, affordability, the inclusion

⁵⁷ The Education Hub, Department for Education England, [Children's Wellbeing and Schools Bill: saving parents money on school uniform costs](#) (2025)

⁵⁸ UK Parliament, [Children's Wellbeing and Schools Bill](#) (2025)

⁵⁹ Welsh Government, [Statutory guidance for school governing bodies on school uniform and appearance policies Education, Wales \(2019, No. 21\)](#) (2019)

⁶⁰ As cited immediately above

⁶¹ Welsh Government, [Changes to statutory guidance on school uniform and appearance policies](#) (2022)

of logos on uniform, second-hand or recycling provision for uniform, and supplier arrangements. Over half (56%) of respondents agreed school logos should not be required on uniforms, almost 90% of respondents opposed single-supplier arrangements, and near-universal support was identified for uniform exchange and recycling schemes.⁶²

Drawing on the results of the consultation, the statutory guidance was reissued in May 2023. The updated guidance highlighted that branded items should not be compulsory and schools should ensure they had systems to allow pupils to acquire second-hand uniforms. Additionally, where single-supplier contracts were unavoidable, tendering competitions should be run at least once every five years to allow multiple suppliers to compete for the contract.⁶³

[Schools are also advised](#) to consult current and prospective pupils, and parent/carers, with specific inclusion of families from lower socio-economic backgrounds when introducing or revising school uniform policies. Complaints about uniform, including availability, or the cost of purchasing from specific suppliers, should be raised through school governing bodies, via school-specific complaints procedures.⁶⁴

Despite the reissued guidance, Children in Wales published a report in June 2024 highlighting ongoing cost issues for families regarding school uniforms.⁶⁵

Scotland

The Scottish Government issued non-statutory guidance on school uniform costs in September 2024.⁶⁶ This follows a public consultation between May-October 2022 to determine the principles and scope of the guidance, the role

⁶² Welsh Government, [“Make uniforms cheaper” says Education Minister](#) (2023)

⁶³ Welsh Government, [School uniform and appearance: policy guidance for governing bodies \(WG23-17\)](#) (updated 2023) para 4

⁶⁴ Welsh Government, [Statutory guidance for school governing bodies on school uniform and appearance policies Education, Wales \(2019, No. 21\)](#) (2019)

⁶⁵ Children in Wales, [Supporting Change School Uniforms](#) (2024)

⁶⁶ Scottish Government, [School uniform and clothing in Scotland](#) (2024)

uniform plays in school ethos and culture, and to consider the options available to schools to lower uniform costs.⁶⁷

Key principles include:

- Prioritising wellbeing, comfort of pupils, and including gender-neutral options.
- Branded items and blazers should not be compulsory, promoted or encouraged by schools.
- Reducing the number of items required across the school week, to promote sustainability and affordability of uniform.
- Promoting uptake of the School Clothing Grant among eligible families.

Secondary schools are encouraged to align uniform policy with their associated primary schools, so generic items such as shirts, polo shirts, trousers and skirts may continue to be worn.

Specific guidance is given to ensure flexibility is present for protected or vulnerable groups. This includes:

- Exceptions to jewellery bans, in line with religious observance.
- Permitting students to wear religion-specific items such as turbans or headscarves, and disincentivising school uniform policies from including compulsory such as caps, which may interfere with wearing these items.
- Students who are pregnant should benefit from flexible clothing policies that adapt to needs as their pregnancy develops and supports breastfeeding.
- Exceptions to specific items, for pupils with disabilities – including allowing these students to wear uniforms of different materials, or styles, for accessibility and comfort.
- Permitting students who are transgender or gender-questioning to wear clothes that align with their gender identity.

⁶⁷ Scottish Government, [School uniform guidance: consultation](#) (2022)

The Scottish Government has committed to placing the policy on a statutory basis, but this has not yet occurred, and no mention of placing the advice on a statutory basis was included when the guidance was published in 2024.

Republic of Ireland

The Department of Education and Skills issued non-statutory guidance in 2017, which outlined cost-effective principles schools should use to keeping financial expenditure down – including measures on which to base their uniform policy.⁶⁸

These include:

- Ensuring all elements of school uniform can be purchased from multiple retailers.
- If a uniform includes a crest it should be “iron-on” or “sew-on”.
- Generic, rather than branded items should be used wherever possible.
- If an exclusive supply arrangement exists, regular tendering processes are recommended.

Schools are guided to consult parents on cost reduction initiatives once every three years and school management boards should conduct an annual, publicly available review of compulsory purchases required by parents.

In 2019, the then Minister for Education and Skills drew attention to the Government’s work to tackle back-to-school costs, including through the Student and Parent Charter Bill – specifically through provisions in the legislation to require more parent-school interaction⁶⁹:

"[Schools will be required to] consult with students and parents and invite them to offer feedback on issues such as costs and suggest changes to help reduce expenses."

⁶⁸ Department of Education and Skills, [Circular 0032/2017 Measures to be adopted by schools to reduce the cost of school uniforms and other costs](#) (2017)

⁶⁹ [Education \(Student and Parent Charter\) Bill 2019](#)

The Education (Student and Parent Charter) Bill has passed all stages through Seanad Éireann, and passed Second Stage in Dáil Éireann in July 2021. The Bill remains at Stage Three in the Dáil, while officials in the Department of Education and Youth consult with stakeholders.⁷⁰

Legislation specifically to address the cost of school uniform was proposed during the last Dáil session. The Education (Affordable School Uniforms) Bill 2022, was a Private Members Bill, introduced in July 2022, which sought to compel the Minister for Education to make regulations directing implementation of an affordable school uniform policy in schools. It lapsed when the Dáil dissolved for the 2024 general election.⁷¹ No similar legislation has been introduced in the current session of the Dáil.

5.2 School uniform grants

In **England**, the power to provide discretionary grants for parents or carers struggling with uniform costs lies with councils, and not all provide this service.⁷² The values of these annual grants varies significantly between regions, from £20 (North Lincolnshire)⁷³ to £170 (Wandsworth)⁷⁴. Eligibility varies from case to case, and parents are advised to contact their local council for appropriate local schemes.⁷⁵ Schools may run their own schemes to assist parents financially.⁷⁶

In **Wales**, the School Essentials Grant is an annual payment available to children of compulsory school age, in families on lower income which qualify for

⁷⁰ Dáil Éireann Written Question [45118/23](#)

⁷¹ [Education \(Affordable School Uniforms\) Bill 2022](#)

⁷² The Education Hub (Department for Education), [School uniform: How much does it cost and what financial support is available](#) (2023)

⁷³ North Lincolnshire Council, [School clothing grants](#)

⁷⁴ Wandsworth Council, [School Uniform Support Scheme 2024](#)

⁷⁵ Gov.uk, [School Uniform](#)

⁷⁶ Department for Education England, [Statutory guidance - Cost of School Uniforms](#) (2021)

specific benefits.⁷⁷ These families can apply for £125 per pupil, or £200 per pupil if they are entering year 7, to assist with the cost of moving to secondary school. Asylum-seeking children are eligible for the grant, as are all children in care, regardless of whether they are FSM-eligible.⁷⁸

The grant can be used to pay for uniform (including coats, and shoes), classroom essentials (stationary, school bags) and school activities like school trips.⁷⁹

In **Scotland**, financial assistance can be obtained via an annual school clothing grant (typically received in cash) – which is maintained and operated by local councils. Eligibility and total sums available varies between council areas, but families should receive a minimum of £120 per primary school child, and £150 per secondary school child.⁸⁰

Families in receipt of particular benefits are also eligible for the School Age Payment, (a component of the Best Start Grant program) which provides them an additional £314.45 to assist prepare a child for Primary 1.⁸¹ This payment may be spent on clothing, stationary or school trips.⁸²

In the **Republic of Ireland**, families eligible under means-testing for the Back to School Clothing and Footwear Allowance, can receive a one-off payment each autumn, at the start of the school year, to help pay for school uniform.⁸³

The scheme operates from the 1st of June to 30th of September each year, and is open to families receiving specific social welfare benefits, and those signed

⁷⁷ Welsh Government, [School Essentials Grant: help with school costs](#)

⁷⁸ Welsh Government, [Don't miss out on help with school essentials](#) (2024)

⁷⁹ Welsh Government, [Don't miss out on help with school essentials](#) (2024)

⁸⁰ Scottish Government, [Help with school clothing costs](#) (2022)

⁸¹ As cited immediately above

⁸² Scottish Government, [Best Start Grant and Best Start Foods](#) (2024)

⁸³ Irish Government, [Back to School Clothing and Footwear Allowance](#) (updated 2024)

up to specific employment, education or training schemes.⁸⁴ For all applicants, total household income must be below a specific threshold (which increases with inflation, and the number of children in the household).⁸⁵ The allowance for 2024 was €160⁸⁶ per child aged 4-11, and €285⁸⁷ per child or young person aged 12-22. Those between 18-22 must be in full-time, secondary-stage (high school equivalent) education in order to be eligible.⁸⁸

Typical grants in Scotland, Wales and the Republic of Ireland are higher per annum than the sums available in Northern Ireland. The sharp variation between English regions makes a comparison more difficult.

5.3 Summary of school uniform guidance and grants in the UK and the Republic of Ireland

A number of differences exist between Northern Ireland and these other jurisdictions, as summarised (at a high level) in the table below.

	Northern Ireland	Great Britain and the Republic of Ireland
Means-tested uniform grant	£42.90 for primary school. £61.20 for post-primary pupil <15, £67.20 for post-primary pupils >15. Additional £26.40 available for PE kit.	England: £0-170 p.a., by local authority Wales: £125 p.a., £200 for final year of primary school. Scotland: minimum of £120 for primary, £150 for secondary school pupils, one-off £314.45 payment at start of primary school. Republic of Ireland: €160 for children aged 4-11, €285 for those aged 12-22.
Is uniform guidance currently on a statutory basis?	Subject to current bill	England: Yes, since 2021 Wales: Yes, since 2019 Scotland: No, government committed to do so in future Republic of Ireland: No

⁸⁴ Irish Government, [Operational Guidelines: Back to School Clothing and Footwear Scheme](#) (updated 2024)

⁸⁵ As cited immediately above

⁸⁶ Equivalent to £134

⁸⁷ Equivalent to £238

⁸⁸ Irish Government, [Back to School Clothing and Footwear Allowance](#) (updated 2024)

Key uniform guideline principles	Bill states that affordability, comfort, value for money all key priorities.	England: To ensure cost does not affect choice of school, and parents have receive decent value for money in uniform. Wales: To ensure equality between sexes, religious and ethnic background, for disabled pupils and to keep costs down. Scotland: Creating an inclusive, welcoming and equitable environment. Republic of Ireland: To reduce costs across the school sector.
Cap on uniform price?	Subject to current Bill and commencement order.	England: Under consideration in current Bill (cap on number of branded items). Wales: Not at present Scotland: Not at present Republic of Ireland: Not at present
Duration between mandatory reviews of single-supplier agreements	Unspecified in existing uniform guidance circular, and legislation.	England, Wales, Scotland: five years Republic of Ireland: three years
Number of branded items	No limit in guidance circular or proposed legislation	England: Proposed cap of three items Wales: Branded items “are not be compulsory” Scotland: Branded items advised against Republic of Ireland: only “sew-on/iron-on” crests to be used in uniforms
PE kit	As per guidance circular, schools should be mindful of cost, body image issues for pupils.	England: should be practical, comfortable, affordable Wales: Schools should focus on flexible kit Scotland: Schools should not expect pupils to wear branded kit. Republic of Ireland: Not mentioned in guidelines.
Equality and inclusion	Schools should promote harmony and equality between different groups, per the guidance circular. Circular also asks schools to consider indirect discrimination that puts those of specific races/genders/religion/belief at disadvantage. <u>Topic not mentioned in Bill as written.</u>	England: Schools should respect protected groups attire, but may restrict wear of some religious items for cohesion/good order in schools. Wales: Schools must permit religious attire and make accommodations for disabled pupils Scotland: Schools should reflect religious or disability status of students, should discourage wearing of football colours and other sectarian signifiers

		Republic of Ireland: Not mentioned in existing guidance
Gender-neutral uniform policy	Schools encouraged to use shorts/skorts rather than skirts in PE to include girls in activities. <u>Topic not mentioned in Bill as written.</u>	England: Girls uniforms should not be significantly more expensive than boys, to avoid legal charges of sex discrimination. Wales: Schools should have a gender-neutral uniform policy, making exceptions for religious observance. Scotland: gender neutral options should be included, promoting culture of equality. Republic of Ireland: Not mentioned in existing guidance ⁸⁹

6 Review of potential Bill costs

This section of the paper reviews some potential “public purse” implications for Northern Ireland that would emerge from the Bill if enacted as introduced, as stated in the Bill’s accompanying [Explanatory and Financial Memorandum](#) (EFM).

This section has been prepared at the request of the Committee for Education, by the Public Finance Scrutiny Unit within the Finance and Economics Research Team. To provide context, it begins with an overview of the challenging public finance position in the United Kingdom, and in Northern

⁸⁹ **Northern Ireland:** Department of Education, *Circular 2011/04 - Guidance to schools on school uniform policy* (re-issued 5 June 2018) p3

Department of Education, *School Uniforms (Guidelines and Allowances) Bill* (2025)

Ireland: Uniform guidance: Department of Education and Skills, *Circular 0032/2017 Measures to be adopted by schools to reduce the cost of school uniforms and other costs* (2017)

Scotland: Uniform guidance Scottish Government, *School uniform and clothing in Scotland* (2024)

Wales: Uniform guidance Welsh Government, *School uniform and appearance: policy guidance for governing bodies (WG23-17)* (updated 2023) para 4

England: Labour commitment on branded items: The Education Hub, Department for Education England, *Children’s Wellbeing and Schools Bill: saving parents money on school uniform costs* (2025)

English Uniform guidance Department for Education England, *Statutory guidance - Cost of School Uniforms* (2021)

Ireland in particular, for 2025/26 and beyond, which those considering the Bill may wish to note.

6.1 Budgetary context

A number of factors have impacted the Northern Ireland Executive Budget for years, which ultimately has informed the Executive's allocation to each Northern Ireland Department, including that to DE. Those factors more recently include:

- During 2024, ongoing work across Northern Ireland Departments to facilitate the Executive's implementation of the December 2023 political agreement and related February 2024 funding package – such as the [Interim Fiscal Framework](#), the [Budget Sustainability Plan](#) and the accompanying [Budget Improvement Plan Roadmap](#), as well as the establishment of [Interim Transformation Board](#). Generally speaking, all aim to improve the public finances in Northern Ireland, but have to do that when there are numerous competing priorities and demands for limited funding.
- In August 2024, the Department of Finance (DoF) undertook a 2025-28 Budget Information Gathering Exercise, requesting returns from all Northern Ireland Departments, which marked the start of the planning stage in the 2025/26 Northern Ireland Executive Budget cycle. It found that “Departments identified a reported £767 million of unfunded pressures”,⁹⁰ as [reported](#) to the Assembly on 23 September 2024.
- In October 2024, the [Chancellor's Autumn Budget 2024](#) set out some of the multi-year competing pressures facing the United Kingdom Government, potentially adversely impacting the Government's spending power in certain areas, along with other

⁹⁰ [Northern Ireland Assembly Official Report - 23 September 2024](#)

decisions relating to social security - see RalSe Briefing Paper 47/24 entitled “[Chancellor’s Autumn Budget 2024: initial considerations for Northern Ireland](#)”.

- In December 2024, Northern Ireland Departmental bids for 2025/26 [resource and capital](#) expenditure exceeded the [Northern Ireland Budget](#) allocated by the United Kingdom Government to the Executive.
- Later that month, the [2025/26 Draft Executive Budget](#) and accompanying [Written Statement](#) by the Minister for Finance highlighted ongoing “pay and inflationary pressures” and “growing demands” on public services.
- On 26 March 2025, the [Chancellor’s 2025 Spring Statement](#) updated the House of Commons on the United Kingdom economy and public finances, and was accompanied an Economic and Fiscal Forecast from the [Office for Budget Responsibility](#) (OBR). Her Statement also announced a number of policy decisions, which included reforms to the welfare system, increased defence spending and a £3.25 billion (b) “[Transformation Fund](#)” to reform public services. However, as DoF officials explained during an Assembly Finance Committee [meeting](#) on 1 April 2025:⁹¹
.... on the allocations out of that fund, it will depend on which Whitehall departments get allocations from it so we don’t get it on the £3.25 billion, we’ll get it on the allocations.
- On 3 April 2025, the Executive agreed the [2025/25 Executive Budget](#), which the Finance Minister described as “set[ting] out a direction of travel” which “clearly prioritises its Programme for Government priorities”.⁹² Subsequently, DoF published its [2025-26 Budget Factsheet](#) setting out the Executive’s spending plans for the one year period from 1 April 2025 to 31 March 2026.

⁹¹ [Northern Ireland Assembly Official Report - 1 April 2025](#)

⁹² [Ministerial Statement – Public Expenditure Final Budget 2025-26 – 3 April 2025](#)

- Since then that context has significantly changed. On 4 April 2025, the American President announced substantial trade tariffs, which were followed with plummeting stock markets across the globe, a collapsing American bond market and an international trade war arising between the US and China.

Potential scrutiny points

1. How will the DE ensure the proposals are affordable in light of ongoing pressures faced across the Executive?
2. How have the DE factored the potential costs arising from the proposals into the Department's spending plans given DE's budget allocation for 2025/26?
3. How will the DE ensure that the Bill's provisions, if enacted, would be implemented in a sustainable way that would comply with the Executive's agreed Budget Sustainability Plan?

6.2 Potential "public purse" implications of the Bill

This sub-section draws on the Bill as introduced, the accompanying EFM, and the related consultation on the policy proposals, as well as the DE officials' evidence to the Committee and the Assembly debate at second stage, to look more closely at key potential "public purse" implications arising from the introduced Bill. In particular, it looks at:

- Paragraphs 31 and 32 of the EFM accompanying the Bill as introduced
- Consultation on the Bill's proposals, including the DE consultation document and replies received to same
- Some "knowns" and apparent "unknowns" at the time writing, which could raise reasonably foreseeable potential financial implications.

Paragraphs 31 and 32 of the EFM accompanying the Bill as introduced

Financial effects of these legislative proposals are considered at paragraphs 31 and 32 of the EFM accompanying the introduced Bill. Paragraph 31 included limited information regarding the potential financial effects of the Bill. What it did include was the following:

It is anticipated that it may cost around an additional £2k per annum to provide pupils attending independent schools with access to the clothing allowance. There should not be any further additional expense incurred⁹³

Paragraph 32 of the EFM further added:

As the non-statutory Departmental guidance has been in place since 2004⁹⁴ schools should be familiar with the advice within it. This includes the need to consider affordability, consult with appropriate stakeholders such as parents and pupils, and the majority of the matters that will become statutory requirements once the Bill comes into operation. This should benefit parents/carers.⁹⁵

The subsections that follow explore the above-stated effects in greater detail.

Proposed changes to existing School Clothing Allowances

Part 2 of the [School Uniform \(Guidelines and Allowances\) Bill](#), as introduced, provides for:⁹⁶

Extension of Article 60(1) of the 1986 Order

14. In the Education and Libraries (Northern Ireland) Order 1986—

(a) in the title of Article 60, for "grant-aided" substitute "certain", and

(b) in paragraph (1) of Article 60, after "grant-aided school" insert ", independent school".

⁹³ School Uniforms (Guidelines and Allowances) Bill [EFM - As Introduced](#) (accessed 27 March 2025)

⁹⁴ Please note that the actual year of publication of the guidelines is 2011 not 2004: [Circular 2011/04 - Guidance to schools on school uniform policy \(revised 5 June 2018\) | Department of Education](#)

⁹⁵ See footnote 92 immediately above

⁹⁶ [School Uniforms \(Guidelines and Allowances\) Bill – As Introduced](#) (Accessed 15 April 2025)

Article 60 of the [Education and Libraries \(Northern Ireland\) Order 1986](#) (the 1986 Order) currently provides for:

60. Subject to a scheme which shall be framed by [the Authority] and approved by the Department, where it appears to [the Authority] that a pupil at a grant-aided school or institution of further education, being a pupil of such description as is specified in the scheme, is unable by reason of the inadequacy or unsuitability of his clothing to take full advantage of the education provided at the school or institution, [the Authority] shall provide such pupil with or contribute towards the cost of the provision of such clothing as is specified in the scheme and is in the opinion of [the Authority] necessary to ensure that he is adequately and suitably clad.

Proposed School Clothing Allowances extension – DE identified implications for the “public purse”

Paragraph 31 of the EFM suggests that the proposed extension of School Clothing Allowances to independent schools would incur a cost of £2,000 per year for the public finances, if enacted as stated. There are currently 13 independent schools in Northern Ireland (a list of the current independent schools in Northern Ireland can be found at Appendix 1 of this Paper).

The proposed cost per year is based on the current levels of allowance available and eligibility criteria for the existing Clothing Allowance Scheme. Therefore, potential public finance implications would vary year-on-year as the number of pupils eligible to receive the School Uniform Allowance will change due to a number of circumstances. These include:

- The number of eligible pupils starting and finishing school each year
- The potential for family circumstances to change, with the impact that pupils move in and out of the eligibility criteria
- A change in UK Government policy in terms of welfare support and those who may be able to receive it, thereby affecting those who may be eligible for certain welfare support
- A change in the levels of funding available under the School Clothing Allowance Scheme

- The number of independent schools operating in Northern Ireland.

Potential scrutiny point

4. What analysis has the DE and/or the EA carried out to ascertain future estimated costs of extending the School Uniform Allowance to those who would be eligible?

6.3 Consultation on the Bill's proposals: financial implications

Section 3 above outlined the DE consultation process prior to the Bill's introduction.

It should be noted that the DE consultation document did not pose any direct questions to respondents on potential financial implications arising from the proposals. Moreover, none of the responses received during that exercise and reported in the [consultation response document](#) explicitly addressed the impact of the proposed Bill on Northern Ireland Executive finances.

6.4 Other potential costs arising

The EFM stated "[t]here should not be any further additional expense incurred", apart from the additional £2,000 to extend the School Uniform Allowance to independent schools.

However, other provisions of the Bill could incur implementation-related costs, if enacted as introduced. Some of those reasonably foreseeable potential costs are considered below.

Clause 1 of the introduced Bill requires:⁹⁷

(1) The Department of Education—

(a) must—

⁹⁷ [School Uniforms \(Guidelines and Allowances\) Bill – As Introduced](#) (Accessed 15 April 2025)

(i) issue guidelines about school uniform policies applying at schools, and

(ii) review such guidelines from time to time, and

(b) may reissue such guidelines (and must do so if they are revised following review)

As such, if enacted as stated, DE would incur resource costs to produce and review the noted guidelines. However, the DE [public consultation document on School Uniform Policy](#) noted:⁹⁸

To support schools, the Department of Education (DE) published guidance on uniforms in 2004, with a revised version issuing in 2018

Moreover, the EFM does not mention any costs that could be incurred in relation to the above, potentially suggesting that there would be capacity within existing Departmental resources to produce such guidelines – both the original and the revised. That raises the following question about potential workload increase, which could necessitate additional staff to meet the Bill’s specified requirements.

Potential scrutiny points

5. What methodology did DE and/or EA apply – including underlying assumptions - to ascertain any resource requirements that the Department and/or EA would need, to meet the additional that would arise from the Bill, if enacted as introduced?

Potential introduction of a “cost cap”

⁹⁸ [Department of Education - Public Consultation Document: School Uniform Policy](#) (20 June 2024)

Clause 4 of the introduced Bill empowers DE to place a cap on the permitted cost of school uniforms, stating:⁹⁹

Capping of expense as something for guidelines

4. Guidelines under this Chapter may include provision—

(a) fixing monetary amounts (as maximums or ranges) in relation to—

(i) particular items or sets of clothing, or

(ii) all items or sets of clothing needed by individual pupils, and

(b) containing a statement to the effect that school uniform policies are to be designed so as not to envisage or give rise to expenditure which exceeds such amounts as (in each instance) so fixed.

This Clause, as stated, would “come into operation on such day or days as the Department of Education may by order appoint”¹⁰⁰ by way of [commencement order](#). The DE School Uniform Consultation report (published 12 December 2024) noted significant support for such a cap among those consulted. The report stated “there was 88% support for a cost control measure being introduced a cost cap”.¹⁰¹

Enforcement of the statutory guidelines and potential introduction of a “cost cap” raised questions during the consultation as to how non-compliance would be addressed. The Competitions and Markets Authority (CMA) noted in its [written response](#) that “enforcement action is costly and time consuming for all parties”.¹⁰² In highlighting the risks and implications of a price cap, the CMA considered the potential of non-compliance, stating:

⁹⁹ [School Uniforms \(Guidelines and Allowances\) Bill – As Introduced](#) (Accessed 15 April 2025)

¹⁰⁰ See footnote 97 immediately above

¹⁰¹ [School Uniform Consultation Report](#) – Published 12 December 2024

¹⁰² [CMA response to NI school uniforms consultation](#) – September 2024 (Accessed 16 April 2025)

Policymakers will also be responsible for setting up effective oversight, compliance and enforcement mechanisms. 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.

On 5 March 2025, DE officials briefed the Education Committee, [advising](#) on various aspects of the Bill, as introduced. In response to a Committee member's question, officials addressed potential competition law issues that could arise from such a cap, stating:¹⁰³

We also previously took legal advice, which was clear that we needed to be careful not to get into the territory of competition law. A charging cap would therefore not be placed on retailers, and that is where the situation becomes particularly complex. Certain costs, such as local National Insurance increases and so on, are outside their control, so the cap would be not on the retailers but on the schools.

Achieving that balance is driven by a desire to get the legislation right and to allow for unintended consequences that may arise

As the above highlights, the DE officials noted that the Bill's intent is to decrease the cost of school uniforms, but acknowledged "risks" that would arise from the approaches under DE consideration for purposes of producing the subsequent guidelines. While officials explained that DE endeavours to minimise such risks - an unknown factor at present - an issue remains about potential financial implications that could arise from the guidelines' provisions, including any concerning a potential cap. For example, if the cap would be (legally) challenged, that subsequently would have financial implications for the Department (and/or EA) due to the resources that would be required to contest or more generally address any such challenges.

¹⁰³ [Northern Ireland Assembly Official Report - Education Committee - 5 March 2025](#)

Potential issues of non-compliance and enforcement of guidelines

Issues concerning compliance were frequently mentioned in the consultation responses received by the DE about the Bill's proposals. Similarly, issues also have been raised in Northern Ireland Assembly, both in plenary and committee deliberations.

In this area, one option considered by DE when responding to the consultation was the establishment of an independent body to manage and enforce the cost cap. However, in Northern Ireland Assembly on 3 March 2025 the Education Minister explained that this option had been suggested, but the Minister informed the Assembly that: ¹⁰⁴

I know that some Members have suggested that an independent body would be needed to set and manage such a cap, but that would bring with it an additional cost for which my Department has no budget.

Therefore, it seems that the role of enforcement is likely to fall to DE. In the 5 March 2025 briefing to the Committee, DE officials explained that DE has the legal authority to direct schools to comply with the guidelines under [Article 101](#) of the 1986 Order; and that they were working with officials from the [Education and Training Inspectorate](#) (ETI) within DE, to ensure guideline compliance would be part of the school inspection process. The DE official stated: ¹⁰⁵

There will need to be monitoring of compliance, initially, to see whether it is being adhered to by schools. We have had some conversations already with colleagues in ETI about building in questions for parents and pupils when they are inspecting a school on the parent/pupil viewpoint on the cost of the uniform, as well as the consultation process that was undergone by schools.

¹⁰⁴ [Northern Ireland Assembly Official Report - 3 March 2025](#)

¹⁰⁵ See footnote 102 immediately above

But officials also reiterated:¹⁰⁶

Ultimately, we do have the power to direct a school, and that has legal enforceability.

While it is clear the capacity to perform this enforcement role exists within the DE already, it is possible that the guidelines' implementation could increase workload in this area, and therefore could require additional resource to address any issues arising. Given so, it is not possible at the time of writing to estimate any potential public purse implications arising from non-compliance and enforcement of the guidelines.

Potential scrutiny points

6. To date, what progress has been made between DE and ETI officials to specify monitoring compliance as part of the school inspection process that would be specified in the guidelines that would be introduced under this Bill, as introduced?

7 Potential areas for further consideration

This Bill provides for statutory guidelines for school uniform to be created. While the proposed legislation is intended to enable DE to produce this guidance, the Committee may wish to consider whether they have been provided with sufficient detail on what the content of these proposed guidelines will be. Additionally, members may wish to review the principles underpinning the proposed legislation and whether it contains sufficient detail on how the new guidance will be implemented.

The Committee may therefore wish to consider the areas highlighted below at the current time (i.e. should any of these issues be addressed in the legislation?) or if and when the guidance is placed in front of it.

¹⁰⁶ See footnote 102

General considerations

- What is the timeframe for the production of the guidelines?
- How long will the Committee have to consider and comment on the guidelines once developed?
- What are the likely timings of a consultation on a potential price cap?
- What will be the implications of using the mechanism of a commencement order?
- How did DE calculate the cost of £2,000 for the financial impact of the Bill?
- What is the rationale for extending school clothing allowances to the independent sector?
- Should the guidance and the grant be extended to nursery schools?
- Has the Committee received sufficient detail from the Department on the likely financial implications of the Bill as outlined in Section 6?

Are there any issues of equality and inclusion that merit further exploration?

- The Equality Screening emphasised uniform flexibility – to ensure the needs of pupils with disabilities, and those with specific religious requirements and attire are met. It suggests the Bill will provide benefits for religious expression. How will this be addressed by DE in the statutory guidance? Should there be specific principles on uniform flexibility and inclusivity (religious and disability-related) included in the Bill? Would it be useful to have a principle relating to “dignity”?
- There have been calls for gender neutral uniforms, especially around the right of girls to wear trousers. Should this be addressed explicitly here?
- The Equality Screening asserts that higher school uniform costs for female pupils can be addressed by the statutory guidelines. How will this be achieved, given DE’s intention to place any potential cost cap on schools, rather than uniform manufacturers?

What will be the likely impacts on schools?

- Will there be sufficient clarity in the guidelines for schools? Is there a risk that the guidelines might appear subjective and/or open to interpretation?

- Who are the “community” stakeholders that schools should consult – in addition to parents and pupils? What burden is this likely to place on schools?
- What are the anticipated transition periods for schools?
- A reporting mechanism for schools is described in the consultation report. What are the reporting requirements that DE plans to require of schools?
- How often should a school be required to review its policy? Or DE to review its guidance?

How will parental concerns be addressed?

- Is the existing complaints procedure sufficient, and does it provide parents with a real avenue to contest a uniform policy which is not aligned with the new guidelines?
- How will the impact of the Act be monitored, considering ongoing parental concerns about cost? How will the lessons from England and Wales after implementation of statutory guidelines on school uniform policy be learnt?

What will be the impact on suppliers and manufacturers?

- In the consultation report, suppliers voiced fears that local suppliers would be in competition with large national supermarkets? Is this of concern to the Department?
- What should be the lead-in times for any changes for suppliers?
- Is there a tension between quality, cost and sustainability?
- Should single-point contracts be permitted? What will be the impact on schools in rural areas if not?

How will DE oversee the introduction and enforcement of the policy?

- How will the implementation of new uniform guidelines be evaluated by DE?
- The Bill mentions transition periods, between existing and new uniform policies at schools. How long does the Department intend that a school should be given to transition uniform policies?

- How will value for money be achieved? Will schools be required, as in Wales, to publish evidence of the cost-saving steps taken by school managers, including when endorsing single/limited-supplier relationships?
- What length of time between reviews of the uniform policy is appropriate? Does the three year review period in the Republic of Ireland, or the five year review period in United Kingdom jurisdictions make more sense?

Appendix 1: Independent Schools in Northern Ireland

School	Location	Ethos	School enrollment	FSM	Fees per year	Data
Bangor Independent Christian School	BANGOR, County Down	Free Presbyterian (Presbytery Education Board)	10 (2023-2024)	<5%	Not publicly available	Apr-24
Buddy Bear Trust Conductive Education Independent School	DUNGANNON, County Tyrone	Buddy Bear Trust (inclusive education for children with cerebral palsy and motor neuron disorders)	26 (2020-2021)	Not publicly available	Fees paid by Education Authority, rather than parent	Dec-20
Camphill School Glencraig	HOLYWOOD, County Down	Camphill Community	13 (2022-2023)	100% (2022-2023)	Not publicly available	Dec-22
Hollywood Rudolf Steiner Independent School	HOLYWOOD, County Down	Steiner Waldorf School	85 (2019-2020)	Not publicly available	Class 1 - 7 per term: £2,148 fees (excl VAT) Class 8 – 11 per term: £2,197 fees (excl VAT)	Jan-20
Kilskeery Independent Christian School	OMAGH, County Tyrone	Free Presbyterian (Presbytery Education Board)	10 (2022-2023)	<5%	Not publicly available	Dec-22
Mourne Independent Christian School	KILKEEL, County Down	Free Presbyterian (Presbytery Education Board)	26 (2022-2023)	Not publicly available	Not publicly available	Jun-23
OneSchool Global UK Knockloughrim Campus	MAGHERAFELT, County Londonderry	OneSchool Global (Plymouth Brethren Christian Church)	80 (2022-2023)	Not publicly available	Day fees per term: £1,388 (excl VAT)	Jan-23
OneSchool Global UK Newry Campus	NEWRY, County Armagh	OneSchool Global (Plymouth Brethren Christian Church)	21 (2022-2023)	Not publicly available	Day fees per term: £1,388 (excl VAT)	Jan-23
Newtownabbey Independent Christian school	NEWTOWNABBEY, County Antrim	Free Presbyterian (Presbytery Education Board)	40 (2023-2024)	7.5% (2023-2024)	£177 per term	Jan-24

Portadown Independent Christian School	CRAIGAVON, County Armagh	Free Presbyterian (Presbytery Education Board)	81 (2023-2024)	14.3% (2023-2024)	£1,200 per school year	Feb-24
Rockport School	CRAIGAVAD, County Down	Round Square (network built on Kurt Hahn's concept)	287 (2022-2023)	Not publicly available	Boarding fees per term: £7,680 to £10,990 (ex VAT) Day fees per term: £1,765 to £6,775 (excl VAT)	May-23
Sensations Nest	Belfast, County Down	SEN-specific education (registered charity)	<5 (2020-2021)	Not publicly available	Not publicly available	Nov-20
Harmony Christian School	BALLYNAHINCH, County Down	New Testament Pentecostal Church	14 (2019-2020)	Not publicly available	Not publicly available	Sep-19