

**Proposal: The Department proposes to place the current non-statutory guidance in law. This will ensure that schools and their governing boards in Northern Ireland will comply with the guidance when developing their school uniform policies. This will require a School Uniform Bill to be passed by the Assembly to give legal authority to the guidance and make it statutory.**

**1. Do you agree that schools should be legally required to comply with Departmental uniform guidance? Yes or no.**

**If you have answered no, please outline your reasons below.**

**No.**

Whilst RCN agree that schools should be legally required to comply with Departmental guidance, our concern is that “guidance” alone may not go far enough. Save the Children November 2023 report entitled “Uncapped Costs of School Uniforms are Causing Harm” states “The current Department of Education guidance is being ignored by schools” and this is despite guidance to keep cost to a minimum and ensure availability from numerous retailers. They add “parents continue to report excessive costs and limited suppliers”. Our concern at RCN is that Save the Children also state that the Department of Education are already regularly in communication to school leaders with reminders to keep costs low and yet, mandatory lists “remain unaffordable for many families and branded and logoed items continue to increase in number, driving up the price and pushing many families to the brink.”

[https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped\\_Costs\\_of\\_School\\_Uniforms\\_are\\_Causing\\_Harm.pdf](https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf)

RCN believe that Legislation is therefore required to ensure schools follow guidance issued by the Department. Without same, the guidance still allows schools full autonomy on decision making, allowing schools to justify their positions and there is no accountability should a school not comply with guidance.

We look to the reason people struggle in the first place to afford school uniforms and it is the level of poverty in Northern Ireland. Our Rural Advice Sector Colleagues as well as rural residents advise us that often people go without essentials such as food to cover the costs of a school uniform.

We need to be addressing the levels of poverty with accountability from the top downwards. Rural Communities already have higher additional costs in terms of travel and more limited resources in terms of shops, we would suggest looking at the guidance in the round, taking into account not just the cost of a uniform, but the cost of a school day.

**2. Strengthened Guidance**

**Key Principles**

**Our key principles underpinning the proposed guidance on uniforms are identified below:**

**School uniforms should be;  
affordable;  
comfortable; and  
sustainable;**

**School Uniform policies should be;  
developed in partnership with pupils and their parents/carers;  
published; and  
regularly reviewed.**

**Do you agree with these principles?**

Yes.

In relation to affordability, we note that, on the whole, female uniforms cost more than male. RCN suggest a same cost approach regardless of gender.

In terms of sustainable, we would add that the quality of the uniform should be such that it is capable of being washed multiple times and still passed down for other children to use or passed to a uniform bank. There is so much waste in terms of clothing and if clothing were of sufficient quality, it would more easily facilitate uniform banks. As it stands, Rural parents advise that the quality of the uniforms they are being supplied with is very poor- losing their colour and shape after just a few washes. This in turn forces parents to have to purchase more items throughout the school year and it cannot be passed to a uniform bank.

**3. Should any others be included? Yes or no. If yes, please state any additional principles.**

School uniforms should also be “attainable” – they should not be so bespoke as to cause them to be solely accessible from single retailers. The interchangeability of a badge on a blazer should be sufficient to enable universality of clothing. If this were to be enabled, it would support parents to buy much cheaper variations of school clothing rather than bespoke expensive blazers/ equipment which are used to justify excessive costs.

**Affordability**

**We propose that the guidance will be strengthened to make it compulsory for Boards of Governors to demonstrate:**

- **how they have kept the costs of their uniforms as low as possible;**
- **how they have considered costs in designing their uniform policy;**
- **the costs of all the items which form part of the uniform;**
- **that there is no significant cost differential between girls’ and boys’ uniforms;**
- **that their school uniforms can be purchased from more than one supplier; and**

- that certain items (eg socks; trousers; shirts; blouses and skirts) can be purchased from a variety of suppliers, including supermarkets or department stores.

4. Do you agree that it should be compulsory for schools to demonstrate how they have taken costs into account when designing their uniform? Yes or no

Yes

5. Do you agree that it should be compulsory for schools to publish details of the costs of their uniform? Yes or no

Yes

### **Designing a uniform**

We propose that schools must review their uniform policy and consider if unusual colours/designs are necessary. If a school insists on the need for an unusual colour/design it should explain why that needs to be the case. If not, it should begin the process of standardising the colour, through time avoiding unusual colours; and aim to have a more standardised basic uniform which can be bought in a variety of shops. Schools that continue to make it compulsory to have unusual, coloured uniforms or unusual designs will need to show how costs of these differ from widely available colours/designs (e.g. blue/grey/black; non pleated skirts) and what action they are taking to reduce the costs to parents. We would propose that any changes to uniforms would be phased in over a number of years to avoid additional costs to parents/carers.

We are also proposing that where a crest is considered necessary on a blazer or jumper by the school that an option to purchase the crest alone should be available and that it can be reusable.

6. Do you agree with our proposals that schools must review their uniform policy and explain their decision to use any unusual colours or designs? Yes or no

Yes

7. Do you agree that where a crest is considered necessary on a blazer or jumper that an option to purchase the crest alone should be available? Yes or no

Yes

8. Do you agree that this crest should be reusable? Yes or no

Yes

### **PE Kit**

We are proposing a generic PE kit. This kit should not be from a branded sportswear company unless it can be proven to be cheaper or more cost effective and that market

competition rules have been adhered to. Where pupils are representing their schools in different sports and a specific kit different to the generic PE kit is to be worn, we propose that schools should state clearly when and why the item is needed (e.g. the child has been picked for a specific school team), when and where these items can be purchased and how much the items are likely to cost. In addition, schools should make every effort to hold a stock of team items that can be loaned to pupils representing their school.

**9. Do you agree that branded sports kits should not be compulsory elements of a school PE kit? Yes or no**

Yes

**10. Do you agree that parents should only have to purchase specific branded or school sports kits when their child is chosen to represent the school, either as part of a team or individually? Yes or no**

No

**11. Do you agree that schools should aim to have team kits available for loan for those representing the school? Yes or no**

Yes

#### **Single Supplier Arrangements**

We propose that parents are given a wider range of suppliers to shop with. If a school decides that school uniform items can only be purchased from specific school uniform suppliers or if the school itself is the supplier, then the reason for this must be clearly set out.

Schools will be required to demonstrate how their costs have been arrived at and to publish on the school website the costs of all the items which form part of the uniform.

It will be compulsory for schools and their governing boards to ensure that their school uniforms can be purchased from a range of suppliers including supermarkets and department stores, unless the school can justify the decision to only have one supplier, has completed a tendering process and can ensure it is in line with competition law.

If a school benefits financially or in kind by directing pupils to buy specific items from certain companies (e.g. branded sportswear), we are proposing that such arrangements should be transparent on the school website.

**12. Do you agree that all schools should be required to list more than one supplier of their compulsory uniform items? Yes or no**

Yes

**13. Do you agree that any financial or in-kind benefits to schools from arrangements with suppliers or manufacturers should be published? Yes or no**

Yes

### **Cost Control (Price Cap)**

**While there is no cap on the costs of uniforms in any of the other three countries of the UK, there is increasing discussion in Northern Ireland about the possibility of introducing such a cap here. A cap would set an upper cost limit for school uniform items. Any such cap would be placed on schools, who would therefore have to design their uniform requirements to make sure that the total cost did not go above that cap.**

**14. Do you consider that a method of cost control should be introduced, for example, a cost cap? If you would like to provide more details, please do so**

RCN welcome the idea of a cost cap for uniforms as a means of addressing poverty and bringing down the overall cost of a school day. Our Rural Advice Sector Colleagues as well as rural residents advise us that often people go without essentials such as food to cover the costs of a school uniform. Save the Children November 2023 report entitled “Uncapped Costs of School Uniforms are Causing Harm” states 6 in 10 families struggled to cover the cost of school uniforms and PE kits, with a third having to borrow money.

In addition, families are struggling in rural communities with the new system of Universal Credit. Since the commencement of managed migration, in particular those moving from Working Tax Credits to Universal Credit, we see many Rural Families no longer entitled to Free School Meals. A particular concern rurally is self-employed people in industries such as farming, agriculture or trade (all seasonally dependent) are not transitioning well to UC and high numbers are not surviving on the benefit past 3 assessment periods. Research carried out at Community Advice Fermanagh and published as part of the All Island Social Security Conference 2024 [2024 Conference Presentations – All-Island Social Security Network \(aissn.blog\)](#) confirm this to be a serious issue. As a result of not having free school meal entitlement, the cost of the school day, to include uniform costs, has risen significantly in rural communities.

RCN suggest that a cap be introduced and that any subsidy or grant towards the cost of a uniform should match this cap.

**15. Do you agree that a key consideration in all actions taken by the Department should be to encourage schools to change their practice in setting uniform policies to ensure there is a competitive market for uniform items? Yes or no**

**Yes**

**Comfort**

**We propose to strengthen this guidance to state that schools must demonstrate in their published policy how their uniform policy has taken account of each of the issues of comfort, flexibility and safety.**

**Comfort is a key factor for any item of clothing but particularly for school uniforms. Ensuring children and young people are able to focus on their education without concern about what to wear each day, or how a uniform fits and feels, is important.**

**Feeling safe and secure is an important element of comfort.**

**In designing its uniform, schools should be more innovative and consider (in consultation with pupils) what the uniform should consist of. For example, schools could consider if there is still a need to have ankle length skirts or pinafores which can add to the cost and restrict where parents can buy. In addition, schools could consider the need for a blazer, could a navy or black coat which could double up as an outdoor coat meet the uniform requirements? There are many ways schools could reduce the costs of their uniforms by being more creative and modern in their designs.**

**16. Do you agree with the proposal to make it compulsory for schools to demonstrate how their school uniform policy fulfils the conditions of comfort, flexibility and safety? Yes or no**

Yes

### **Uniform Banks**

**We propose that all schools should consider establishing Uniform Banks, whereby items in good condition and PE branded kit either worn only for a short time or not worn at all can be donated to the bank and can be provided free of charge, or with a small charge, to any pupil who requires the item.**

**17. Do you agree that all schools should be required to establish a Uniform Bank? Yes or no**

Yes

**School uniforms should be developed in partnership with pupils and their parents/carers**

**We propose that schools will have to show how they have identified key stakeholders and actively consulted with them. This engagement will need to be documented.**

**18. Do you agree that engagement with pupils on uniform policy should be mandatory?**

**Yes or no**

Yes

**19. Do you agree that engagement with parents on uniform policy should be mandatory? Yes or no**

Yes

**20. Do you agree that schools should be required to publish details of stakeholder consultation on uniform policy? Yes or no**

Yes

### **Publish a school's uniform policy**

**We propose that schools will be required to demonstrate how and why their uniform has been designed as it has, including compulsory items of uniform and optional items, and that they should publish those details on the school website.**

**21. Do you agree that it should become a legal requirement to publish details on the development of the uniform policy? Yes or no**

Yes

**22. If yes, which of the following should be a requirement to publish? (tick all that apply):**

**Details of all stakeholders consulted** Yes

**Response to issues raised by stakeholders** yes

**Rationale for a specific design or colour (if it is not a standardised colour)** yes

**A list of compulsory and optional items** yes

**Estimated costs** yes

**A list of suppliers** yes

### **Other – please list**

We recognise that a lot of Rural Schools and indeed schools generally are already providing policy information on essential school items as well as a list of providers. This is to be commended. We are advised that most schools have a local provider option and an online provider option. RCN suggest that these options are essential for rural communities because of additional travel costs. We also wish to see more competition in the market to help drive down costs. In rural towns, there is usually one local provider and they have essentially a monopoly over the market because of this and this adds to higher prices.

In recognition of the need to publish reasons why a specific design or colour is required, RCN suggest further guidance or more stringent guidance may be necessary. There is a mentality amongst some schools that pupils will be “lucky” to attend there, this then feeds into their

mentality around what their presentation must look like as pupils represent the school. We can be proud of a school heritage without bringing finance into it. Our concern is that this mentality could for example be used as justification for a particular unusual colour scheme or pleated skirt over normal skirt for example. In the same way, tradition and the item being considered synonymous with a particular school can also continue to be used as justification. This can be off putting to parents who simply cannot afford the school items and leaves parents in a position where they could potentially choose another school over it.

RCN also suggest creating a requirement that schools publish how they are actively engaging in a uniform bank with the focus being on environmental issues e.g. reducing carbon footprint and welcoming ideas of reusing and recycling clothing. This helps reduce and remove stigma associated with attending Uniform Banks especially in small rural communities where everyone knows everyone, and it can be hard to anonymously attend a Uniform Bank.

### **Regular review of a school's uniform policy**

**We propose to add to the current guidance that schools should review their school uniform policies at least every three years, particularly with regard to costs of the uniform. This does not mean that a new uniform should be introduced at each review point. Should any changes to the uniform policy be required following the review, a transitional period will continue to be required for current pupils.**

**23. Do you agree with the proposal that schools should review their uniform policy every three years? Yes or no. If you have answered no, please outline your reasons below.**

No.

Reviewing a policy and involving parents and children every 3 years seems onerous and unnecessary - unless there is a particular issue or cost barrier. It also runs the risk of creating other unnecessary purchases or items.

RCN suggest a review system where perhaps a questionnaire is sent out regarding the uniform every 3 years and if, from the findings, it looks like a review is warranted, then it can proceed on that basis. Results should be published.

### **Increasing the number of bands of provision of the School Uniform Grant**

**Costs of school uniforms are usually higher for pupils in transition years when a full uniform, rather than just some items, are required to be bought, for example, when transferring from primary to post primary education.**

**While it is for the Education Authority to determine the amount of the grant to be paid, based on the availability of funding, we propose that the bandings for school uniforms should include a band for pupils as they move into Year 8 or Year 13 (sixth form), when uniform costs for families may be higher. For families with children attending schools operating the Dickson plan\*, Year 11 would also be included. This would provide additional**



grant for families at these key transition points when children are either changing schools or entering sixth form.

**24. Do you agree that an additional banding should be introduced (subject to available funding) for pupils entering Year 8 and Year 13 and also for Year 11 in the Dickson plan areas?**

\* The Dickson Plan (sometimes known as 14+) operates in some post primary schools within the Controlled Sector in the Craigavon Area. Children transfer at age 11 years from Primary School to a Controlled Junior High School. At the end of Key Stage 3 (age 14 years) after 3 years attendance pupils then transfer to a Senior High School within the Craigavon Area or to another post primary school outside the Dickson Plan to complete their compulsory education in Key Stage 4. Pupils are selected for admission to Senior High Schools in accordance with the admissions criteria established by each school's Board of Governors.

**Yes or no or don't know**

Yes

#### **Monitoring and Evaluation**

**Schools will be legally required to adhere to statutory guidance. It is important to have in place effective arrangements for monitoring and evaluation. It is therefore proposed:**

- **that schools will be required to complete a return to the Department every three years demonstrating how they have followed the guidance.**
- **that the Education and Training Inspectorate may identify highly effective practices and/or specific areas for action relating to the implementation of the statutory guidance; and**
- **we will commission a specific independent evaluation into the effectiveness of the statutory guidance within three years of its implementation.**

**25. Do you agree with the proposed plans for monitoring and evaluation? Yes or no. if no say why.**

yes

RCN support that schools should be legally required to adhere to Departmental guidance. See previous answers regarding accountability.

#### **26. Further comments**

Currently, aid is very minimal and does not, in fact, cover the cost of a uniform. Aid is also in the form of a one-off payment at the start of a school year. Children grow throughout the year and parents advise the quality of clothing has become an issue in that it is not lasting through to June. Consideration should be given to the amount of aid granted as well as when it is granted.

Aid is also currently subject to means testing in that one either needs to be on means tested benefits or fit into the UC earnings threshold, which is currently sitting £15,000. Whilst this

threshold has seen a temporary increase for the year 2024, it is still lower than the Tax Credit Threshold and this has had a serious impact on rural communities.

Rural Communities tend to have workers in lower paying jobs, and they may have earnings just over this earnings threshold meaning they lose out of this vital support. RCN note that in rural communities work is scarcer and the pay disparity is very clear. Mean NI wages are lowest in the rural areas of Causeway Coast and Glens and Mid-Ulster and the biggest decrease in mean wage is in the Fermanagh & Omagh District Council area as per the latest Annual Earnings Survey [Employee earnings in Northern Ireland \(nisra.gov.uk\)](https://www.nisra.gov.uk) This tips those rural families into further financial crisis as they not only struggle to afford uniforms but the cost of a school day.

The Department need to be mindful of rural proofing their guidance and additional guidelines may be required for rural settings. RCN are happy to consult further on this with the Department.