

Scottish Government
School uniform guidance: consultation
14 October 2022

Introduction

1. The NASUWT welcomes the opportunity to comment on uniform policy, including what should be included within guidance, the role that school uniform plays within day-to-day school life, how best to reduce the cost of school uniforms, and draft principles which could be incorporated into national guidance.
2. The NASUWT is the Teachers' Union, representing teachers and school leaders in all sectors of education.

General

3. The NASUWT, as a UK-wide union, is able to draw on experience from across the four nations. As such, the Union is aware that it has been routine practice for governments to have strongly encouraged schools to implement school uniform policies on grounds that uniforms can instil pride, support positive behaviour and discipline, protect children from social pressures to dress in a particular way, nurture cohesion and promote good relationships between pupils.¹

¹ Department for Children, Schools and Families (DCSF). (2007). *DCSF guidance to schools on school uniform and related policies*. Available at: (<https://webarchive.nationalarchives.gov.uk/20110113114640/http://www.teachernet.gov.uk/management/atoz/u/uniform/>)

4. The Union is in agreement that these assumed policy foundations should be reviewed and revised.
5. A move towards statutory guidance in Scotland is welcome, as this will not only strengthen the legal foundation but also enable Scotland to learn and develop, following recent legislative changes in England on the cost of school uniforms in 2021.²

Specific

Question 1 - What matters related to school uniform would you wish to be included within the guidance? Why?

6. The NASUWT is in agreement with the proposed matters intended to be considered within the scope of the guidance: affordability of school uniform; equalities considerations, aligned to protected characteristics; clothing and equipment for PE, physical activity and sport; and the use of exclusion as a compliance measure.
7. While many schools seek to minimise the cost of uniforms, it is clear that the current strategy, based on exhorting schools to behave reasonably, is not fully effective. We therefore also need arrangements at a local level for monitoring compliance with statutory requirements, to strengthen protections for families against unacceptable uniform policies.
8. The purpose of the aforementioned Department for Education (DfE) guidance published last year was to ensure that the cost of school uniforms is reasonable and represents the best value for money. The DfE guidance outlines the cost considerations which schools should consider when:
 - developing and implementing their uniform policies; and
 - managing their uniform supplier arrangements.

² <https://www.gov.uk/government/publications/cost-of-school-uniforms/cost-of-school-uniforms>.

It also covers:

- the provision of second-hand uniform;
- other support with the cost of school uniforms; and
- the information schools should provide to parents regarding their uniform requirements.

9. The NASUWT would anticipate the Scottish Government to also cover these considerations, although the Union would suggest the Scottish guidance goes further and, for example, sets out detailed provisions on the types of practices related to uniforms that schools should avoid, as well as stipulating clearly the range of legal powers available to ensure local authorities and others can enforce the guidance on uniforms.

Question 2 - What role does school uniform have in the ethos and culture of schools?

10. If we look at the Office of Fair Trading report on supply of school uniforms,³ which explored barriers to relaxing restrictions on the school uniform arrangements, it was noted that:

*'By far the most commonly cited reason was a concern about maintaining 'consistency of quality, colour and design'. While we understand that consistency is a concern for schools, we believe that they can achieve this objective without unduly restricting supply, for example, through setting out colour and style requirements in more detail but still allowing parents' choice about where they source the item. As noted above, consistency issues were also cited as the main reason for adopting such arrangements in the first place.'*⁴

11. Loss of school identity and restrictions causing division between wealthy and less wealthy students featured much less significantly in concerns cited.

³ Office of Fair Trading. (2012). *Supply of school uniforms: Report of findings by IFF Research*. Available at: (<https://dera.ioe.ac.uk/15859/>).

⁴ <https://dera.ioe.ac.uk/15859/1/OFT1436.pdf>

12. Indeed, if we look at the 2018 Scottish Government publication, *Developing a positive whole school ethos and culture: relationships, learning and behaviour*,⁵ the national narrative supporting school ethos is not centred around enforcing restrictive uniform policies; rather. it states:

“Climate” and ethos are key determinants in promoting social and emotional wellbeing and mental health for all in schools. This is described as “core values, attitudes, beliefs and culture of the school and classroom” and includes school “connectedness” and a feeling of being accepted, respected and bonded to the school environment. School climate can also be seen as incorporating three essential aspects - engagement, safety and environment. These aspects are seen as essential to maintaining positive relationships and social and emotional wellbeing.’

13. The NASUWT would suggest that the following points taken from the 2018 publication are far more instructive as to a school ethos than its uniform policy:

‘All local authorities and schools have a relationships and behaviour policy...use a wide range of universal and targeted approaches that promote a respectful and inclusive whole school ethos and promote positive relationships and behaviour, e.g. nurturing, restorative and solution oriented approaches.

‘Parents and carers are actively engaged in the development and implementation of policies and approaches to develop relationships and behaviour within a positive ethos and culture.

⁵ <https://www.gov.scot/publications/developing-positive-whole-school-ethos-culture-relationships-learning-behaviour/pages/1/>

‘Children and young people will be given opportunities to participate actively in policy making and approaches to develop relationships and behaviour within a positive ethos and culture.’

14. While school uniform can support a school ethos or culture, it cannot be said to drive it.

Question 3 - Following on from Question 2, are there any particular items of school uniform which are central to that? If so, why?

15. Teachers in Scotland are increasingly seeing the devastating effects of the cost of living crisis on pupils, with rising numbers of children and young people coming to school hungry and without the uniform and equipment they need to learn.

16. Teachers have told the Union that they are providing money, food and clothing to help children and families dealing with the deepening cost of living crisis. Sixty-five per cent of members responding to an NASUWT survey (in September 2022) said more of their pupils were coming to school hungry. Fifty-eight per cent said more pupils did not have the equipment they needed for their lessons and 55% said more of their pupils’ families were unable to afford school uniform. Fifty-seven per cent said more pupils were wearing dirty or damaged clothes and half said more pupils did not have footwear that was appropriate for school.

17. Teachers indicated that the impact of the financial hardship facing families is negatively affecting pupils’ behaviour, energy and concentration.

18. Sixty-seven per cent of teachers said they had given food or clothing to their pupils, with a further 68% saying food or clothing had been given by colleagues or their school. Twenty-seven per cent said they had helped a pupil’s family get access to a foodbank. Twenty-three per cent had lent or

given money to pupils and 31% had seen money lent or given to pupils by colleagues or their school.

19. The cost of living crisis is harming pupils' education, learning and development. It is outrageous that we should be seeing more and more families who are struggling or unable to feed, clothe or keep a roof over their children's heads. The financial worry and anxiety that many parents are already experiencing is also being felt by children and is likely to have a negative impact on their education.

20. What is most important is that pupils are able to come to school in clean, warm, well-fitting clothes which enable them to concentrate on learning: this will most positively impact on their learning and the school's ethos.

Question 4 - What can schools do within their policies to support the aim of reducing costs of school uniform?

21. The NASUWT believes it is important that schools respond to both pupil and parents' experiences of schools' uniform policies, as well as engaging with staff. This process of consultation needs to be embedded within local policies.

22. The NASUWT has conducted a number of surveys of parents on the cost of education. Each year, a major cost factor which emerged was the cost of school uniform. A survey of parents carried out by the NASUWT over the summer of 2019 was undertaken to learn more about their experiences of schools' uniform policies. The survey received 1,000 responses and found that:

- 42% of parents said they were required to purchase most items of uniform from the school itself or from particular suppliers, with 14% saying all of their children's uniforms had to be purchased this way;
- nearly four in ten respondents (38%) said they had spent between £101 and £200 per child on school uniform in the last year, with over a quarter (26%) reporting that they had spent between £201 and £300;

- over a third (36%) of parents said they were required to purchase most items of PE clothing from the school itself or from particular suppliers, while 26% reported they were required to purchase all of their children's PE clothing this way;
- over a quarter (28%) of parents said they had spent between £26 and £50 per child on PE clothing and footwear in the last year, with nearly as many (24%) saying they had paid between £51 and £75, and 22% between £76 and £100;
- some parents reported being required to purchase branded blazers at over £90, socks at £15 a pair, skirts at £57, hats at nearly £28 and jumpers at more than £20 each; and
- parents reported entire uniforms being changed by schools or otherwise making items impossible to pass down to younger siblings and demands to purchase multiple pieces of PE clothing and equipment for different sports, much of which was only used a few times.

23. Parents responding to the survey also made the following observations about their experiences:

“My daughter's uniform is extortionate. Over £90 for a blazer that can only be dry cleaned and is unwearable after 18 months.”

“Some of the PE clothes are never used. I really objected to having to buy football boots for 12 lessons in total.”

“Although my daughter's school has a reasonable uniform policy, I notice some of the primary schools' uniforms include coats with school logos as well as bags. This is at enormous extra expense to families in lower income. A cynic would say this is to exclude/put off parents on lower incomes.”

“Children who do not have the correct kit face detentions, even if it's due to parent finances.”

“The cost of uniform is used as a form of selection in my town. The poor kids go to the school where you can buy the entire uniform from Tesco for £10. The rich kids go to the school where just a PE t-shirt costs £13.”

“It costs me well over £700 a year for my three children, which is the cost of a week away. The price has drastically increased in recent years and I struggle massively with purchasing uniform.”

“My daughter’s uniform from designated suppliers alone (not trousers and shirts) comes to £311 each. This is before shoes, trainers etc. I dread to think how those on lower incomes cope, especially as the uniform is often outgrown and not worn out.”

“The uniform does look lovely, but I object to everything being needed to be bought from the school shop.”

“Prices are high and quality is poor.”

“It’s too much. I understand schools want children in uniform, but plain polo shirts are about £2 each. The ones with a logo are £15!”

“I spend upwards of £200 on my two boys’ uniform, aged just 5 and 6. More thought needs to be given to costs for families who may be struggling.”

“Also, shirts with badges on prevent purchases from the high street - the badge on a shirt/jumper isn’t really necessary.”

“Being a parent of a child that starts school this year, the school uniform was very expensive as I had to buy everything new and a lot of items from a special supplier. For somebody who does not even earn minimum wage, it is too expensive.”

“I think it would be much cheaper if I could buy unbranded items. A navy jumper in Asda is £4, but I have to buy one with a badge at £24. I have three children and if I buy two jumpers each that's £144!”

“Buying a school uniform is like buying for your kids’ Christmas presents only without the fun, excitement or pleasure. It requires a lot of saving and having to choose between taking the kids away for a day or two or buying school uniform...well there isn’t a choice.”

“My child required trainers, football boots, two types of socks, a swimsuit, two pairs of shorts, a reversible rugby top, a t-shirt and a gum shield.”

24. It is clear that concerns continue to be expressed about the cost of uniforms as well as practices which limit the number of outlets from which school uniforms can be purchased, leading to unreasonable financial burdens on parents. Schools need to listen and respond to concerns raised by pupils, parents and teachers.

Question 5 - Do you feel these draft principles are appropriate and, if you would change any of them, please set out what your alternative wording would be.

25. The NASUWT welcomes the following draft principles that the national school uniform policy should incorporate:

- *be informed by the views of children and young people;*
- *apply to education authority, grant-aided and independent schools;*
- *seek to reduce the cost of school uniform for families;*
- *support equity in relation to school uniform;*
- *promote equality, including recognising specific matters relating to religion and belief, disability, sex and gender;*
- *apply to all uniform uses, including PE and senior phase;*

- *recognise the need for practicality, including in relation to seasonal needs;*
- *reflect sustainable approaches to school uniform; and*
- *continue the position of no legal requirement upon pupils to wear school uniform.*

26. In particular, it is important that schemes for remission of cost should cover children eligible for free school meals, and children whose parents are entitled to the maximum level of working tax credit. Schemes should also be administered discreetly so that no parent is embarrassed to ask for help; this should be widely publicised and clearly explained in admissions or other literature provided by the school. The Union notes that within the current system there is a significant amount of inconsistency across local authorities, creating a postcode lottery for learners in terms of their entitlement for support, which is unsatisfactory:

'In Scotland, the eligibility criteria for clothing grants vary across the 32 authorities. Unlike for free school meals, it is up to each local authority to decide on the criteria. However, the six criteria related to social security benefits and income levels in the free school meals eligibility criteria are mirrored, if not identical, in the clothing grant criteria. One of the free school meals criteria that is missing on 13 local authority websites is for 16- to 18-year-olds who may qualify based on their own circumstances. While 10 local authorities state that 16–18-year-olds are eligible to claim the grant in their own right, 9 authorities state they must claim for the Education Maintenance Allowance instead. Fourteen local authorities have criteria for the clothing grant which are more generous than free school meals criteria, for example allowing a higher income level. Furthermore, there are 15 authorities that added extra ways to qualify beyond the free school meals criteria (up from 9 authorities in 2021-22). On a less positive note, two authorities' webpages state that asylum seekers are not eligible. Just one authority refers to the statutory duty to ensure that pupils have adequate clothing to attend school and another

authority refers to the list of criteria not being exhaustive. An unintended consequence of universal school meals in Primary 1 to 5 could be a reduction in the number who apply for school clothing grant as they are often applied for at the same time.’⁶

27. The following draft principles are less clear and need further detail or explanation:

- *consider appropriate response for persistent non-wearing of uniform, recognising ethos and culture of promoting attendance and reducing absence;*
- *recognise and builds upon current good practice within schools; and*
- *does not introduce unnecessary barriers to school uniform policy and practices.*

28. For example, if recognising good practice means that schools should look to use their own purchasing power to buy in bulk and pass on savings to parents, this would be welcome, but it would be better stated explicitly.

29. While PE is referenced, other trips or activities are not referenced at all, including dress-down days or one-off events like Christmas jumper day: it would be helpful if these were explicitly covered in the guidance. School arrangements or policies which appear prima facie can be undermined by requirements for clothes or equipment for costly school visits or other activities, unless arrangements are put in place to ensure that parents and carers on low incomes can afford them.

30. The Union would also like to see reference to choice within the guidance. Evidence suggests that uniform is more accessible to all where the uniform chosen is widely available in high street shops and other retail

⁶https://aura.abdn.ac.uk/bitstream/handle/2164/19088/Shanks_School_Clothing_Grant_policy_briefing_2022.pdf;jsessionid=81C0408B78AEC83C1215745F53F11CC5?sequence=2.

outlets and internet suppliers, rather than from an expensive sole supplier. Schools should not seek to operate as sole suppliers in order to raise additional funds through the sale of new school uniforms.

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