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## **School Uniform Guidance – Engagement and Consultation Analysis**

Draft Report v0.1

Welsh Government

January 2023

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## Glossary

<b>Acronym</b>	<b>Definition</b>
ALN	Additional Learning Needs
ASD	Autism spectrum disorder
FSM	Free School Meals
PTA	Parent Teacher Association

## **Executive Summary**

- i. Welsh Government commissioned Miller Research in Autumn 2022 to undertake an Engagement and Consultation Analysis exercise to support the recent consultation on “Changes to Statutory Guidance on School Uniform and Appearance Policies”.
- ii. This consultation ran between 18 October 2022 and 28 November 2022. The consultation sought views on questions related to the themes of affordability, access and availability, school logos, supplier arrangements, transparency for customers, comparability between uniform available from specialist school uniform providers and uniform from supermarkets, uniform exchange and reuse schemes, and Welsh language impact.
- iii. The formal consultation was supplemented by targeted engagement activities, including focus groups with priority groups of parents, school governors, teaching staff and children and young people. Interviews were also held with specialist school uniform suppliers and other stakeholders including Governors Cymru, Parentkind and the Welsh Youth Parliament.
- iv. This report presents the findings from all elements of the consultation and engagement process. This includes the 5,079 unique responses submitted to the consultation, supplemented by the evidence captured from the priority focus groups and interviews. Responses to the consultation have been independently analysed by Miller Research and collated to form the basis of this report.
- v. Below are the headline findings for each theme that were consistently highlighted within the responses. For clarity, where we have differentiated between the two sets of data<sup>1</sup>, those who submitted a response to the formal consultation are referred to as “formal consultation respondents” and those who participated in the qualitative focus groups and interviews are referred to as

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<sup>1</sup> I.e.: the 5,079 unique responses submitted to the consultation and the transcripts from the focus groups and interviews.

“stakeholders.” In many cases, however, the sentiments being reported came from both formal consultation respondents and stakeholders.

### *Theme 1 – Affordability*

- vi. In relation to the theme of affordability, there was virtual unanimous agreement on the importance of prioritizing affordability of school uniform across formal consultation respondents and stakeholders. Support was also mentioned for the importance of good quality uniforms, which provide greater value-for-money, as well as consistency, which helps to avoid peer pressure and bullying associated with clothing.
- vii. Stakeholders acknowledged that specialist providers and supermarkets provide very different offers – the former associated with better quality and higher cost, the latter being cheaper but less robust.
- viii. Other key issues mentioned in relation to affordability was some concern that mandatory logos adds additional and potentially unnecessary cost.
- ix. There was a considerable call from stakeholders for uniforms to be retained, given the value it has in ensuring equality.
- x. In addition, recommendations were made for schools to consult with parents and pupils when setting uniform policy and for Welsh Government to continue to offer grants for free school uniforms for lower income families.
- xi. Mixed views were shared by stakeholders on how far schools DO prioritise affordability – suggesting it is varied across Wales – but that schools are potentially becoming more conscious, given the current cost-of-living crisis.

### *Theme 2 – Access and Availability*

- xii. There was almost universal agreement amongst stakeholders and formal consultation respondents that access and availability should be prioritized.
- xiii. Formal consultation respondents expressed concerns with uniform suppliers, suggesting they can have monopolies and may not be located in close proximity to the schools they supply, requiring parents to travel to purchase uniform.
- xiv. Stakeholders called for uniform suppliers to offer easy access, for example by delivering to schools or attending open evenings when parents can place an order.
- xv. It was also commented that school uniform policies should enable parents to buy (non-branded) uniform from supermarkets, which can be more convenient.
- xvi. As with affordability, there was widespread recognition of the complexity around access and availability; whilst supermarkets offer convenience, they do not typically sell uniform all year round and generally only stock regular sizes. Specialist school uniform providers sell year-round and provide a more comprehensive range, although they may require parents to travel some distance to buy the uniform.
- xvii. Again, in keeping with the issue of cost and affordability, it was suggested that schools should give parents the choice over where to buy uniform – i.e.: specialist suppliers or supermarkets – based on what suits their situation best.
- xviii. Views on the extent to which governing bodies actually prioritise access and availability was very mixed; good practice examples have been provided across all stakeholder groups; however, parents and pupils cited instances where access was more challenging than was perhaps necessary.

### *Theme 3 – School Logos*



- xix. Most formal consultation respondents (56 per cent) agreed that logos should *not* be required on school uniforms, with just over a quarter disagreeing. However, opinions were mixed among all stakeholder groups with the exception of school uniform suppliers who agreed unanimously that it was important to have school logos.
- xx. Most formal consultation respondents tended to suggest that logos should feature on school uniforms, but they should be strictly limited to certain garments.
- xxi. Logos were felt by many stakeholders to be an important part of learner identity (for example when attending competitive events such as sports and debating, as mentioned by teaching staff), community spirit and pride. They can also help with identification and safeguarding, a point that was mentioned by governors, parents and school uniform suppliers. Logos were also felt to be an easy identifier between schools in close proximity to one another and with similar/the same colour uniform.
- xxii. Formal consultation respondents, parents and governors felt that the more items with a logo, the more expensive the overall uniform cost becomes. Many formal consultation respondents and stakeholders noted that logos do not facilitate learning.
- xxiii. A significant majority (65 per cent) of formal consultation respondents agreed that logos should be limited to one outer garment, however, views were not unanimous. About one in five respondents (21 per cent) disagreed with the idea that logos should be limited to one outer garment. The general feeling was that there are only a couple of key items that should have a logo: “marking that you are part of the school”.
- xxiv. Consultation responses were largely focused on the cost and unnecessary expense of adding logos to outer garments.
- xxv. It was suggested by some that ties or a standard colour scheme would be sufficient for promoting a sense of belonging to and pride in a learner’s school, which was considered important.

- xxvi. Even amongst those formal consultation respondents who disagreed with the idea of limiting logos to just one item of clothing, there was broad consensus that the requirement for logos on school uniforms should be limited as much as possible.
- xxvii. The key items of school uniform that stakeholders felt should include a logo were jumpers (noted by parents and school uniform suppliers), blazers (cited by governors, young people, school uniform suppliers), PE tops (suggested by governors, children and young people and other stakeholders) and ties (noted by governors only).
- xxviii. Items of school uniform that stakeholders felt should *not* include the logo included blazers (parents), polo shirts/shirts (governors), trousers (governors), skirts (young people), PE tops (teaching staff) and PE shorts (governors).
- xxix. School uniform suppliers listed several reasons for having logos on sportswear which included the prevalence (since the Covid-19 pandemic) of learners wearing PE kits for the entire day (thus making the better quality and robustness of uniform purchases from specialist suppliers more important) and the risk that the alternative could more expensive (such as sportswear from global brands).
- xxx. Most formal consultation respondents (67 per cent) agreed that logo badges that can be attached to garments at home should be provided free of charge to learners. The remaining third of respondents either disagreed or felt neutral on the topic.
- xxxi. There was general consensus amongst stakeholders that badges should be made available, but there was more nuance in their feedback around whether they should be free of charge. Many were concerned about who would fund this, cautioning against making schools pay. One parent suggested they should be means tested.
- xxxii. It was suggested that between 50 pence and £2 for a badge would be acceptable; teaching staff advocated selling them at cost price.
- xxxiii. For those who were in favour of logo badges, iron-on badges were preferred to sew-on badges by formal consultation respondents and

teaching staff, either because they are easier to apply or/and because they are cheaper to produce. Nonetheless, concerns about how badges would be distributed and the difficulty of being applied to clothing was a widely cited concern; the latter issue could lead to a lack of consistency among learners, potentially leading to bullying. This was echoed by parents, governors and children and young people.

- xxxiv. School uniform suppliers were unanimously against iron-on or sew-on logo badges, citing the difficulty of applying a badge by a domestic iron due to the lower temperature than an industrial iron; concerns about a lack of sewing skills amongst parents; the fact this would reduce consistency and (potentially) quality of school uniform as well as the risk of bullying as mentioned by other stakeholders.

#### *Theme 4 – Supplier Arrangements*

- xxxv. Nearly nine in ten formal consultation respondents felt that schools should avoid single supplier agreements.
- xxxvi. Parents suggested that in some instances it may not be up to the school to enter into a single supplier agreement, and the local authority might be dictating the decision of which supplier to use.
- xxxvii. Just over half of the parents reported that a single supplier arrangement was in place at their child(ren)'s school.
- xxxviii. The most commonly cited problem with this arrangement was that suppliers often sell out quickly, making it more challenging to buy uniform when it is needed. This issue was also mentioned by young people. School governors suggested that having two suppliers was more appropriate, giving parents the choice of where to buy uniform as well as introducing an element of competition over price.
- xxxix. School governors felt that a single supplier arrangement would be more appropriate if there was the opportunity for the contract to be retendered regularly.

- xl. School uniform suppliers cited several advantages of single supplier contracts, emphasising that single supplier contracts are “a very misunderstood concept”. Benefits mentioned included ensuring absolute consistency of uniform (in terms of colour shade and design) and providing a better and more comprehensive service following a rigorous competitive tendering process to appoint a single supplier. Suppliers also noted that these contracts support the local economy.
- xli. School uniform suppliers noted some disadvantages of single supplier contracts including the reduction of competition / choice for parents and placing the burden of responsibility on just one supplier. One specialist supplier suggested there is risk that suppliers in single supplier contracts may charge too much and undermine the entire sector.
- xlii. School uniform suppliers noted that single supplier contracts are uncommon in Wales, where the majority of schools have two or more suppliers.

*Theme 5 – Transparency for Customers*

- xliii. Nearly nine in ten formal consultation respondents responded categorically that schools should be transparent about any financial benefit they receive from uniform supplier arrangements. Most of the remaining tenth of respondents did not give an answer to this question, either because they were confused by what it was asking or felt the question was irrelevant because schools should not be receiving any financial benefit.
- xliv. Some consultation respondents were surprised or confused at the question, having been unaware of the possibility that financial benefit could result from such uniform supplier arrangements.
- xlv. While there was an overwhelming call for transparency, regulation and accountability, opinions about the ethics of potential financial benefit for schools varied.

- xlvi. No parents could recall being made aware of their child(ren)'s school having received any financial benefit from a uniform supplier contract and were also unsure whether it was commonplace in other schools.
- xlvii. Several school governors and school uniform suppliers cited ways in which schools benefit informally from suppliers such as receiving donated football kit and raffle prizes and discounted items for low-income families.
- xlviii. Some parents stated that if there was any financial profit for schools, they would like to know where it is allocated in the school budget.
- xlix. One supplier was aware of a minority of cases where it was agreed at the tender stage that the supplier would pay commission for every sale: "For a couple of schools it's an extra source of income ... about £800-900 a year in total commission."

*Theme 6 – Comparability to Supermarkets*

- I. Most formal consultation respondents and stakeholders agreed that schools should ensure uniforms from single-supplier arrangements are comparable in cost to high street retailers and supermarkets.
- li. Many emphasised the current disparity in price between garments from specialist school uniform suppliers and uniform from other retailers and the importance of affordability. Nonetheless, there was appreciation of the purchasing power and size of supermarket stores in comparison to specialist school uniform suppliers. A governor stated they would prefer to support a local business but acknowledged that they would most likely "never be able to beat the cost [of supermarkets] but could be competitive".
- lii. There was extensive discussion amongst stakeholders around quality and whether similar costs would be feasible for similar quality. School uniform suppliers emphasised the significant differences in quality between items from their sector and uniform from high street retailers and supermarkets.

- liii. A number of stakeholders emphasised that mass production and its associated cost savings should not be the solution. Rather, the focus should be on offering more sustainable items and reuse.
- liv. Although parents appreciated that suppliers offering more competitive prices would be beneficial to their customers, most were aware that this could create problems and/be unrealistic in practice.

*Theme 7 – Uniform Exchange and Recycling*

- iv. There was almost universal consensus that schools should operate uniform exchange or recycling schemes; only eight formal consultation respondents disagreed with the idea and 56 neither agreed nor disagreed that schools should operate a uniform exchange and/or recycling scheme.
- lvi. Advantages of such schemes identified by stakeholders and formal consultation respondents included:
  - Enabling access to better quality clothing at cheaper price (i.e.: second-hand uniform from specialist providers as opposed to new uniform from supermarkets)
  - Providing cost savings to parents and additional income to schools
  - Creating environmental benefits in terms of preventing clothes going to landfill – and as a driver, this is more socially acceptable than being unable to afford new school uniform.
- lvii. Disadvantages cited included:
  - Concern that schemes would add to schools' financial burden, workload, and capacity for storage.
  - The risk that they can be badly or insensitively handled by schools, exacerbating stigma and embarrassment for parents and learners.
  - Some uniform is simply too worn down to pass them on
  - Low levels of take-up of these schemes.

- lviii. Stigma around the use of second-hand clothing due to financial hardship was felt to remain a problem, but it was perceived as less of a problem when considered from an environmental perspective. It was suggested that exchange/recycling schemes should be framed in terms of sustainability and circularity and promoted as the "natural" or default option for everyone, as opposed to targeting schemes at families perceived as "in need."
- lix. There were differing views on whether participation in schemes should or should not be mandatory for all schools, and whether Welsh Government, local authorities, charities, or parent teacher associations (PTAs) should be responsible for running them.

#### *Theme 8 – Welsh Language Impact*

- lx. Most formal consultation respondents did not see school uniform guidance as relevant to the Welsh language.
- lxi. Responses were similar to both questions, centred around logos on uniform, with respondents recommending bilingual logos, or removing logos altogether to improve equality between the two languages.
- lxii. Respondents felt all guidance and information should be bilingual.
- lxiii. School uniform suppliers suggested that supporting specialist uniform suppliers could increase the availability of Welsh speaking jobs.

#### *Theme 9 - Final comments*

- lxiv. Many of the responses to this question repeated or emphasised aspects of previous questions to the consultation. A large number of formal consultation respondents underscored that uniforms should be high quality, affordable to parents and produced sustainably.
- lxv. A theme unaddressed in other questions but mentioned in the final comments was the Pupil Development Grant – Access<sup>2</sup>, which

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<sup>2</sup> <https://www.gov.wales/pupil-development-grant-access>

provides funding for lower income families to buy school uniform and other equipment associated with attending school. Some formal consultation respondents expressed appreciation for the grant, while others called for Welsh Government to expand the eligibility requirements, as many families who struggle to afford school uniform are unable to claim the funding under the current eligibility criteria.

- lxvi. Conversely, a few respondents criticised Welsh Government for offering the grant because they believed the funding was being used inappropriately, as there is no scrutiny over how the money is spent by families who receive it.
- lxvii. Several governors mentioned the difficulty that parents of older children face over the additional cost of larger-sized uniform items due to the VAT added to 'adult' clothing and shoes above a certain size, even though they are being worn as school uniform.
- lxviii. Opinions were divided over school uniforms more generally. Those in favour of school uniform cited the benefits of promoting community, providing a level playing field for learners from different socio-economic backgrounds and preventing bullying, as well as improving behaviour within school and externally. On the other hand, some felt that uniforms are unnecessary, do not support learning, can lead to unnecessary punishment for children, and can be uncomfortable to wear.
- lxix. Of those critical of uniforms, quite a few formal consultation respondents referred to the challenges school uniforms can create for children with additional learning needs (ALN), autism spectrum disorder (ASD), or sensory issues, which can inhibit their ability to learn. Respondents were also concerned about the impact of current uniform guidance on diversity, including rules on afro hair and coloured hair. The gendered nature of uniforms was also mentioned, with some seeing gender-based guidance as discriminatory.



- lxx. All school governors mentioned how generic guidance provided by Welsh Government is useful, making it easier for each school to determine individual policies dependent on their own school context.

## **Introduction**

### *Overview*

- 1.1 Welsh Government commissioned Miller Research in Autumn 2022 to undertake an Engagement and Consultation Analysis exercise to support the recent consultation on “Changes to Statutory Guidance on School Uniform and Appearance Policies”.

### *Policy background*

- 1.2 The statutory guidance on school uniform and appearance policies is for governing bodies and head teachers to use when formulating, implementing or changing a school uniform and appearance policy. This recent consultation gathered stakeholder views to inform changes to the statutory guidance, specifically around the cost and affordability of school uniform.
- 1.3 There is no education legislation specifically covering the wearing of school uniform or other aspects of appearance such as hair colour and style and the wearing of jewellery and makeup. As part of its responsibility for the conduct of the school, however, a governing body can specify a uniform that pupils are required to wear and introduce other rules relating to appearance.
- 1.4 The powers for the Welsh Ministers to issue statutory guidance in this area are contained in a number of legislative provisions. The Welsh Government provides statutory guidance to schools and governing bodies on school uniform and appearance policies. The current guidance document can be found on the Welsh Government website<sup>3</sup>.
- 1.5 Governing bodies are expected to have regard for the Welsh Government statutory guidance when implementing or changing a school uniform and appearance policy.

### *Background to the consultation*

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<sup>3</sup> <https://www.gov.wales/sites/default/files/publications/2019-07/statutory-guidance-for-school-governing-bodies-on-school-uniform-and-appearance-policies.pdf>

- 1.6 The consultation on Changes to Statutory Guidance on School Uniform and Appearance Policies went live on 18 October 2022, supported by a communications campaign led by Welsh Government, and closed on 28 November 2022. The consultation sought views on questions related to the themes of affordability, access and availability, school logos, supplier arrangements, transparency for customers, comparability between uniform available from specialist school uniform providers and uniform from supermarkets, uniform exchange and reuse schemes, and Welsh language impact.
- 1.7 In advance of the consultation taking place, Welsh Government envisaged expected outcomes including that:
- School governing bodies will have regard to affordability when setting their school uniform and appearance policy and consider the financial impacts that their policy has on families.
  - School governing bodies will have regard to access and availability of uniform items when setting their school uniform and appearance policy.
  - School governing bodies review their existing uniform policy to ensure it is in line with any updated statutory guidance.
- 1.8 The formal consultation was supplemented by targeted engagement activities, including focus groups with priority groups of parents, school governors, teaching staff and children and young people. Interviews were also held with specialist school uniform suppliers and other stakeholders including Governors Cymru, Parentkind and the Welsh Youth Parliament.
- 1.9 This report presents the findings from all elements of the consultation and engagement process. This includes the 5,079 unique responses submitted to the consultation, supplemented by the evidence captured from the priority focus groups and interviews. Responses to the consultation have been independently analysed by Miller Research and collated to form the basis of this report.

## Overview of Responses

### *Summary*

- 1.10 In total, there were 5,079 unique individual responses submitted to the consultation, of which 126 responses submitted in Welsh. This was in addition to 25 separate correspondences received by email.
- 1.11 An average of 1,013 qualitative, follow-up comments per question were provided in response to the quantitative questions submitted to the consultation.
- 1.12 There were 4,021 responses which were complete and 1,058 partial responses. A significant majority of "partial" responses included an answer to almost every multiple choice (quantitative) question, typically leaving the qualitative questions and demographic questions blank.
- 1.13 Respondents whose submitted partial responses had an average qualitative response rate of 8.9 per cent, compared to 26.18 per cent for complete responses.
- 1.14 Almost all respondents either indicated that they live in Wales (circa 79 per cent) or provided no response to this question (almost 21 per cent). Only 14 respondents did not live in Wales.
- 1.15 Nine per cent of respondents reported having a business interest in Wales.
- 1.16 In addition to responses to the formal consultation, this report includes analysis from focus groups and one-to-one interviews carried out by Miller Research. Three parent focus groups (two in English, one in Welsh) were undertaken, alongside two focus groups with school governors, two groups with children and young people and a focus group with teaching staff. Six interviews were carried out with specialist school uniform suppliers as well as three interviews with other stakeholders (specifically representatives from Governors Cymru, Parentkind and Welsh Youth Parliament).
- 1.17 The questions that were asked in the formal consultation can be found in Annex A. The questions which were asked in the focus groups and

interviews are provided in Annex B. The two sets of questions are similar and follow the same themes but with more open, qualitative questions asked in the interviews and focus groups.

*Approach to analysing consultation responses*

- 1.18 Consultation responses were analysed question by question using a combination of Microsoft Excel, PowerBI, OpenAI software, and manual qualitative coding.
- 1.19 All categorical questions were analysed using Microsoft Excel Pivot Tables. All percentages are based on the total number of responses to the consultation, except those for Questions 14 and 15, which are based on the total number of responses to that specific question (due to a large number of non-responses for those questions).
- 1.20 Microsoft PowerBI was used to generate word clouds identifying frequently mentioned themes and phrases, which were then used as initial codes to organize responses. Responses in each category were then manually coded and analysed by researchers to produce a summary of responses.
- 1.21 OpenAI was also used to produce a summary of responses, and identify themes present across the responses. This was compared with researchers' individual summaries.

*Approach to analysing focus group and interview findings*

- 1.22 The feedback from focus groups and interviews has been analysed separately by stakeholder groups, i.e.: parents, governors, teaching staff, children and young people, specialist school uniform suppliers and other stakeholders.
- 1.23 Analysis was undertaken using digital whiteboards created in Miro<sup>4</sup>.

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<sup>4</sup> [www.miro.com](http://www.miro.com)

## Theme 1 – Affordability Analysis

*Consultation Question 1 – Do you agree that school governing bodies should prioritise affordability when setting their school uniform and appearance policy?*

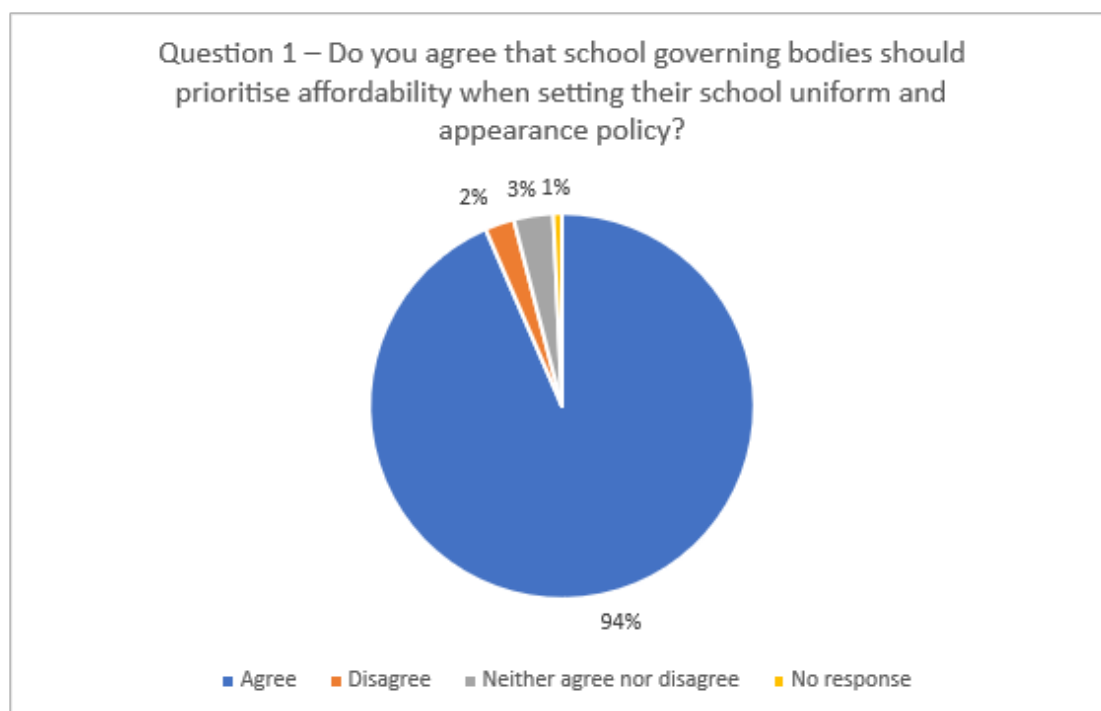
*Consultation Respondents*

- 1.24 A substantial majority of responses (94 per cent) agreed that school governing bodies should prioritise affordability when setting their school uniform and appearance policy.

**Table 1 – Responses to Question 1**

Response	Count	Percentage of Total
No response	37	1 per cent
Agree	4749	94 per cent
Disagree	125	2 per cent
Neither agree nor disagree	168	3 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 1 – Responses to Question 1**



- 1.25 Key themes identified in the responses include the high cost of school uniforms particularly within the context the cost-of-living crisis and the consequent need for greater affordability, flexibility and availability of affordable options. At the same time, respondents highlighted the importance of a consistent and appropriate dress code and the cost-effectiveness of good quality uniforms.
- 1.26 It was recommended that school uniform policies should be underpinned by an understanding of cost and affordability, prioritising value for money and quality and consistency over upfront cost. Importantly, the affordability of school uniforms should be balanced with environmental and ethical factors, such as sourcing from reputable and environmentally conscious producers and avoiding plastics that are damaging to the environment.
- 1.27 Many people agreed that the cost of school uniforms can be prohibitively high, especially for families with multiple children in school. It can be particularly difficult for low-income families to maintain uniforms and keep them clean, as they may not have the resources to wash them in time. Consequently, children may sometimes have to wear dirty uniforms to school if parents cannot afford a spare set. Some suggested that schools should consider ways to support families with the cost of uniforms, including vouchers or uniform grants. Offering specific affordable options would also help, including badges that can be sewn onto clothes purchased from other retailers, including supermarkets.
- 1.28 While supermarkets are often a more affordable option, they do not always provide the same level of quality or durability as specialist school uniform providers. The core issue around setting school uniform policy identified in many responses to this question is one of affordability versus quality. One problem cited by respondents is the fact that many schools have a single uniform supplier, which can result in overpriced clothing. Parents are often restricted to just one supplier to purchase expensive items that include a school logo, such as regular uniform and PE kit, and there is a feeling that the existing guidance requiring governing bodies to give due consideration to cost is often ignored.

- 1.29 Many people cited the cost of school uniform logos as an added expense that should be reduced or eliminated altogether. It was suggested that schools should provide plain uniforms in the school colours and offer badges with the school logo. It was also suggested that schools should provide grants for free school uniforms for those who are eligible. Additionally, it was suggested that schools should not require learners to wear expensive items with logos, such as blazers, and that plain items such as cardigans and jumpers are more appropriate. More detailed analysis on the topic of school uniform logos is provided in Theme 3.

*Engagement Question A - To what extent should school governing bodies prioritise affordability when setting their school uniform and appearance policy?*

*Parents*

- 1.30 There was a general agreement amongst all focus group members that affordability should be made a **high** priority.
- 1.31 It was mentioned that at present, attempting to source affordable uniform results in having to go to high street retailers and supermarkets that are not related in any way to the school.
- 1.32 Echoing this, participants also discussed how the school jumper is commonly the most 'expensive' part of a uniform as this needs to be sourced from the specific school suppliers.

*School governors*

- 1.33 Several governors felt that there were large discrepancies in household income within the school catchment area they serve, meaning that prioritising affordability is important. Furthermore, one governor raised that FSM (free school meals) proportion in schools should be considered when setting an individual uniform and appearance policy.



- 1.34 Several governors shared that they believe ultimately school is about learners achieving a good education – and whilst uniform is a good idea, they shared that it is not as important as education, therefore affordability should be the top priority for governing bodies.
- 1.35 One governor mentioned how uniform alleviates any peer pressure which some learners can feel around clothing and can help learners feeling equal, rather than enabling those who can afford it to wear (non-uniform) clothing from expensive brands.
- 1.36 Another governor mentioned that children grow out of items so quickly, and therefore affordability is important but should be balanced alongside the quality of items, to ensure they last at least until the child grows out of it.
- 1.37 In addition, at the primary school level, flexibility on items able to be worn should be a consideration, ensuring inclusivity is prioritised.

#### *Teaching staff*

- 1.38 Teaching staff expressed that affordability should be high priority when setting school uniform policy.
- 1.39 Staff discussed how the individual elements of the uniform collectively make the overall cost high, including blazers and uniformed sports kits.
- 1.40 It was highlighted that all schools will have at least one FSM pupil whose household struggles to afford the uniform, so the issue is relevant across all schools (even in more affluent areas) and should be considered accordingly.
- 1.41 Teaching staff explained that for this school year, an active emphasis had been placed on affordability within their school uniform policy.

#### *Children and young people*

- 1.42 Many of the children and young people interviewed highlighted how expensive school uniforms and reported that their parents were worried about money and the cost of school uniforms.
- 1.43 It was also suggested that there could be different school uniforms in summer and winter as learners complained that they were sometimes too hot or too cold.
- 1.44 Learners stated that that school uniform policy is decided by the leadership team who sometimes consults with learners, however, it was suggested that there should be more involvement with learners when setting or revisiting a school uniform policy.

*School uniform suppliers*

- 1.45 Suppliers of specialist school uniform agreed that affordability is very important; however, they stressed that this is about quality and value-for-money rather than the lowest price. They stated that high quality and longevity is particularly important for school uniforms as they are uniquely worn all day for roughly 190 days per year. As an example of the durability of specialist school uniform, one supplier cited research that suggested most learners will have (only) 2.5 blazers in their school career, on average. This was contrasted with having no school uniform at all, which suppliers said was always the less affordable option given that it would result in learners wanting numerous different items of clothing and, potentially, new clothing in accordance with current fashion on a regular basis.
- 1.46 It was suggested that the specialist school uniform suppliers cannot compete with supermarkets on price or availability of multi-buys because of the difference in quality. Some suppliers suggested that the perception that school uniforms are excessively expensive is because they are mandatory. However, they pointed out that because they are typically tied into contracts with schools, they are only able to raise prices in line with inflation.

*Other stakeholders*

- 1.47 There was consensus amongst other stakeholders that affordability should take precedence as cost of school uniform is increasingly a concern for parents.
- 1.48 Nonetheless, the ultimately priority is that children achieve a good education and issues around school uniform should not compromise this.
- 1.49 Other stakeholders expressed that it is important to look at “the wider picture” and carry out consultation with parents and other stakeholders when setting their school uniform and appearance policy ...which will probably reveal issues of affordability”.
- 1.50 Stakeholders recognized that affordability is complex:
- Parents want clothes that will last, and it was highlighted by stakeholders that supermarket school uniforms generally do not last well.
  - Children grow out of clothes very quickly, so durability is perhaps not so critical as it would be for adults’ clothes.
  - Overall, there was support for school uniform on the grounds that it can help to avoid peer pressure and bullying around clothing.

*Engagement Question B - To what extent do you think school governing bodies do prioritise affordability when setting their school uniform and appearance policy? What evidence is there of this?*

*Parents*

- 1.51 There was a **mixed response** from parents on this question, though there was generally more evidence which highlighted the ways in which governing bodies do not currently prioritise affordability.
- 1.52 The following evidence was given from parents, suggesting affordability **was** prioritised:

- Flexibility in uniform requirements, which was mentioned by three participants. This enabled parents to purchase uniform from high street retailers and supermarkets, or to use children’s existing clothing, reducing cost.
- Three participants also said that the presence of a recycling box meant that parents could source some uniform for their children without having to purchase new every year, however caveated this with the fact this is normally organised by parents or charities with limited involvement from the school.

1.53 The following evidence was given from parents to suggest affordability was **not** prioritised:

- For six participants, their child(ren)’s school had a strict uniform policy, and therefore they were not able to shop competitively for uniform. Three of these participants also mentioned that strict shoe policies are very costly, especially considering how many pairs children need as a result of growing out of them so quickly.
- Four participants mentioned that there was a monopoly when it comes to buying uniform, only being able to source it from a single supplier.
- Two respondents felt that the lack of standardisation across schools increased cost; this was sometimes the case if households had children in different schools.
- Additionally, persistent changes to dress codes, a discrepancy between boys’ and girls’ uniforms and changes in uniform between school years (specifically Year 11 and Sixth Form) were also mentioned as issues impacting cost.
- Lastly, one parent claimed spending nearly £450 to buy this year’s uniform. It was said that with households struggling already, this additional cost is “pushing them over the edge”.

*School Governors*

- 1.54 All governors felt they prioritise affordability in the current financial climate on their respective governing bodies.
- 1.55 Several governors mentioned the School Uniform Grant (now part of the Pupil Development Grant - Access<sup>5</sup>) as evidence that affordability is considered when governing bodies set their school uniform and appearance policy.
- 1.56 However, it was mentioned by some governors that there is no follow-up on or auditing of this grant to ensure parents have spent it on uniform. One governor felt that if families are struggling to pay for bills and food, they may prioritise this above spending the grant on uniform.
- 1.57 Some governors felt that they provide a lot of flexibility, offering several non-mandatory items with a logo in addition to the mandatory items that include a logo.
- 1.58 Other governors mentioned that the ability to purchase non-logo items from retailers including the supermarket was further evidence that consideration was made on affordability, prioritising the colour of the uniform over whether it includes a logo.

### *Teaching staff*

- 1.59 Teaching staff shared that their school had made an active decision to prioritise affordability when setting their policy this year but suggested that this had been a fairly recent decision made in relation to the cost-of-living crisis.
- 1.60 Changes of this kind included an increase in lenience and allowances made over learners not fully complying with school uniform policy. It was noted that this prioritisation of affordability involved having an understanding between all teaching staff that pupils from lower-income homes should not be challenged or ‘pulled up’ on for non-compliance.

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<sup>5</sup> <https://www.gov.wales/pupil-development-grant-access>

- 1.61 School staff also cited their increased emphasis on making second-hand uniforms more accessible to all pupils.

### *Children and young people*

- 1.62 Many of the children and young people consulted suggested that they would like to get rid of school uniforms and wear comfortable clothes instead, however they highlighted how it is useful to have a school uniform during P.E., given the expense of sportswear from international brands like Nike and Under Armour.
- 1.63 It was also reported that some learners have their blazers and ties stolen and it is therefore expensive to replace them.
- 1.64 Learners highlighted that they felt that governing bodies often prioritise smartness and appearance over affordability.

### *School uniform suppliers*

- 1.65 The views amongst suppliers were divided, although they generally agreed that schools are becoming more conscious of minimising cost and are becoming more professional and commercially aware when tendering for and awarding school uniform contracts with suppliers.
- 1.66 One supplier stated: "My overwhelming experience is that school governing bodies have a very responsible attitude towards uniform and costs."
- 1.67 Evidence in favour of this view was the offer of an all-inclusive bundle to schools which helps to keep costs down; affordability-conscious design such as the removal of additional cording on a school blazer, and governing bodies minimizing the number of compulsory branded items. For example, a recent survey found that the average number of mandatory items of clothing including a logo across schools in Wales was only 1.5.

- 1.68 It was suggested that schools will tailor their policy to local need:  
“governing bodies in inner city Swansea may make different decisions to those in, say Monmouth”.

*Other stakeholders*

- 1.69 Other stakeholders were less vocal in response to this question than they were in response to the previous one, primarily because they did not feel they were in a position to comment. There was an overall feeling that it is difficult to generalise as it depends on the individual school and governing body.
- 1.70 One stakeholder felt that a lot of governing bodies would be prioritising affordability – and increasingly so in the current cost-of-living crisis.
- 1.71 In answering this question, two stakeholders emphasised the importance of consulting with parents on all policies (including school uniform).

## Theme 2 – Access and Availability Analysis

*Consultation Question 2 – Do you agree that school governing bodies should ensure easy access and availability of uniform items when setting their school uniform and appearance policy?*

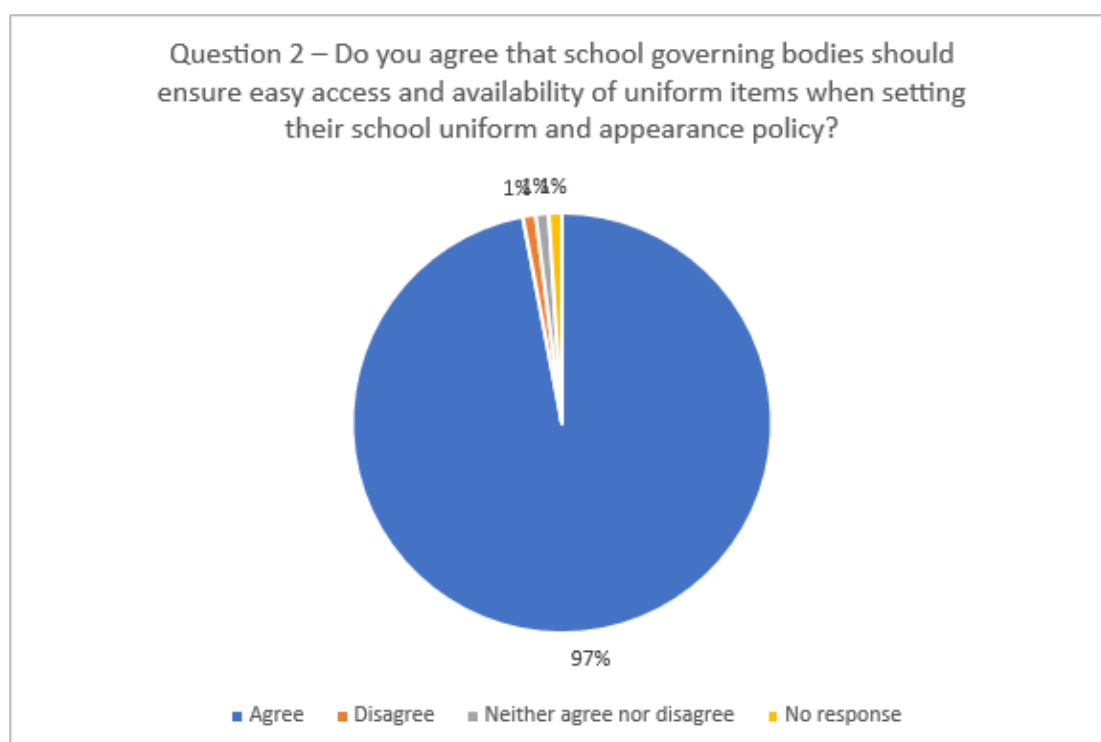
*Consultation Respondents*

- 1.72 Nearly all (97 per cent) of responses suggested that the accessibility and availability of school uniform items are important considerations when setting school uniform policies.

**Table 2 – Responses to Question 2**

Response	Count	Percentage of Total
-	49	1 percent
Agree	4927	97 percent
Disagree	28	1 percent
Neither agree nor disagree	75	1 percent
<b>Grand Total</b>	<b>5079</b>	<b>100 percent</b>

**Figure 2 – Responses to Question 2**





- 1.73 Many of the key themes raised in follow-up comments on this question tended to overlap with those mentioned in response to Question 1. In response to Question 2, many respondents expressed frustration at the inaccessibility of specialist school uniform suppliers. They highlighted the issue of one uniform supplier having a monopoly over the local market. The problem is particularly exacerbated if the supplier is located a significant distance away from the school. Some respondents also mentioned the importance of providing uniform options that are appropriate for children with disabilities.
- 1.74 It was recommended that schools should allow parents to purchase school uniform from a range of suppliers, including supermarkets, to facilitate easy access and wider availability. Allowing for more than one supplier has the potential to promote competition and prevent “price gouging”<sup>6</sup>. Others recommended that schools offer options for purchasing second-hand uniforms at different price levels. Selling good quality second-hand uniforms or facilitating uniform swaps would support families with the cost of uniforms. Some respondents also recommended that schools consider the accessibility of suppliers for families who may face mobility or financial constraints.
- 1.75 There is a feeling that schools should require a uniform that is comfortable and accessible for all learners, without stipulating items that can only be bought at a specialist shop. The colours should be general and the proportion of items that must bear the school logo should be kept to a minimum. The uniform should be simple and include trousers, polo shirts and jumpers, and a tie for secondary school learners.
- 1.76 While there was a general consensus that access to school uniforms should be made flexible and affordable, some respondents added that a standardized school uniform is important for creating a sense of shared aspiration and community among learners. In this sense, a uniform can

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<sup>6</sup> Increasing the prices of goods, services, or commodities to a level much higher than is considered reasonable or fair.

help to promote equality and a sense of pride and belonging among learners, with some respondents suggesting that uniforms have a positive impact on concentration and educational attainment.

*Engagement Question C - To what extent should school governing bodies ensure easy access and availability of uniform items when setting their school uniform and appearance policy?*

*Parents*

- 1.77 Once again, parents were in large agreement that this should be prioritised more highly than it is currently.
- 1.78 Three participants mentioned that there should be a swap shop or some sort of recycling scheme available in all schools.
- 1.79 One participant believed that schools should communicate and liaise with suppliers to ensure that there is sufficient provision of uniform all year round. It was thought that this could reduce the lack of availability that can be found at certain times of the school year.

*School governors*

- 1.80 Some governors commented that it should fall under the responsibility of governors to ensure that parents can access the supplier uniform shop.
- 1.81 One shared an experience of being a governor in England, where school uniform providers were invited to school open evenings so that parents were able to place an order without having to travel to the supplier's shop.
- 1.82 One governor commented that there were several considerations that should be considered when setting the policy as well as affordability, access and availability, including safety. This is the reason behind their recent move to clip on ties.
- 1.83 Another governor reported that it has been difficult encouraging children back to wearing school uniform since the COVID-19 pandemic, as pupils are now used to wearing PE kit or more casual clothing.

- 1.84 Other governors discussed the importance of schools adopting a generic colour, meaning parents had a multitude of options when considering buying their uniform outside of the school supplier.

*Teaching staff*

- 1.85 Teaching staff expressed that access and availability should be considered in line with affordability.
- 1.86 They also emphasised that it should be considered specifically in less-affluent areas and should be taken into account when designing uniform policy.
- 1.87 Staff discussed options for sourcing alternative uniform in supermarkets and suggested that schools should be open to encouraging and normalising this for parents.

*Children and young people*

- 1.88 Some young people reported that they had to drive to specific shops to buy uniforms up to 30 minutes' drive away, which is costly and time-consuming.
- 1.89 Many young people felt that schools should be more lenient with their school uniform policy on the grounds that some of the school uniform with logos are considerably more expensive than what can be bought from a supermarket.
- 1.90 It was also agreed by many that school uniform policies are too strict regarding hair dye and piercings, which does not make a difference to learning and can leave learners feeling belittled.

*School uniform suppliers*

- 1.91 As with affordability, suppliers felt that access and availability is a complex issue. Most suppliers focused on the relative advantages offered by suppliers when compared to supermarkets.

- 1.92 These included: year-round availability, supply of a wide range of sizes, a variety of access options such as click and collect or delivery to school, and consistency in style. By contrast, they said that supermarkets only stock uniform at certain times of the year, tend to only offer the most common sizes, do-not sell the same product year-on-year and are free to raise prices as they are not tied to contracts.
- 1.93 One supplier felt governing bodies should give parents the option to buy from specialist suppliers or a supermarket: “Give parents the choice to buy cheap just for the year or buy [uniform from specialist supplier] and hand it down.”

*Other stakeholders*

- 1.94 Other stakeholders also emphasised the importance of choice, in particular when purchasing from specialist suppliers and/or supermarkets.
- 1.95 Transport costs was also identified as an issue, particularly with rising fuel costs: “It all adds to the cost – if you have to travel elsewhere [to a contracted supplier] and can’t just buy it from the local Sainsburys.” It was also noted that governing bodies need to recognise that buying uniform from a supermarket alongside a regular grocery shop can be more convenient for parents.
- 1.96 Again, several stakeholders emphasised the importance of governing bodies consulting with parents and pupils on an appropriate uniform policy: “It’s about having dialogue with whole school community – what is best for everyone, what is affordable and easy to obtain.” Other stakeholders also highlighted that governing bodies need to keep uniform as simple as possible to ensure easy access and availability.

*Engagement Question D - To what extent do you think school governing bodies do ensure access and availability of uniform items when setting their school uniform and appearance policy? What evidence is there of this?*

### *Parents*

- 1.97 Some parents had good experiences of access and availability at school; some specific examples of this included:
- One parent who was able to use a mobile app, making it easy to order and subsequently pay for uniform. Parents did not have to go and physically visit a store which saved them time and money, and the supplier can more easily manage demand.
  - Another mentioned that they had generally never struggled with availability of uniform themselves.
- 1.98 Other parents however had more negative experiences, these included:
- No availability of any sort of 'swap shop' or uniform recycling scheme, as mentioned by five individuals.
  - Only one specialist supplier contracted to the school, meaning that there is a monopoly and access can be more difficult for parents who may live on the opposite end of the catchment.
  - Two participants had found stock to be a problem at certain times in the year, meaning sometimes children were sent to school without uniform.
  - In order to secure everything in sufficient time, two participants mentioned that they had to order uniform for their children far in advance and therefore, risked their child growing out of the clothes before the term even begun.
  - One participant said that they found it difficult to even begin to source information on what uniform items needed to be purchased.
  - One participant said they were only able to buy directly from the school itself, with another claiming that timing of delivery to the school was not ideal.

### *School governors*

- 1.99 One governor shared that there are two shops for their school – one situated on the high street in the town and the other the neighbouring town.
- 1.100 They reported there was a difference in pricing in both shops, with the shop that is more conveniently situated being more expensive.
- 1.101 Another governor mentioned how their primary school enforces the colour of the uniform rather than the inclusion of a logo. This was so all pupils were able to feel part of the school regardless of whether their uniform was purchased from the supermarket or from the school supplier.

#### *Teaching staff*

- 1.102 Teaching staff provided examples of actions they were taking in their school to make uniform more accessible. These included:
- Providing information on how to buy uniform in induction packs for new starters.
  - Offering the option to source the school logo badge separately.
  - Making second-hand uniform easy to access and ensuring that everyone is aware of it. They also expressed that it was important to ensure that the clothes rail or 'stock' is located discretely in the school, to minimise embarrassment to parents and learners.

#### *Children and young people*

- 1.103 Young people highlighted that lots of learners wear hand-me-downs from older versions of the uniform in order to save money. This is often not in line with the current uniform policy, however. It was suggested that schools could be more flexible when introducing a new uniform policy and should not penalise learners during an extended period of transition.
- 1.104 Some children and young people said that some shops have a hand-me-down or exchange schemes that allow learners to purchase cheaper versions of school uniforms. Nonetheless, lots of people are apparently

unaware of this scheme. They also highlighted how many learners feel embarrassed wearing second-hand clothes.

- 1.105 One learner with ASD complained that the school shirts can be itchy and uncomfortable and others in the group suggested that many ASD learners struggle with the uniform.

#### *School uniform suppliers*

- 1.106 The majority of suppliers felt that governing bodies do consider access and availability of uniform items; one noted “they are pretty good [at ensuring access and availability] in my experience.” Evidence of this that was cited included:

- The fact that some primary schools choose to make badged items of uniform entirely optional – enabling parents to buy uniform from anywhere.
- Working with contracted suppliers to provide bundles of uniform: “there are really good way to make it easier for parents ... they can buy the non-branded items too, blouses, trousers etc.”
- Approaching local suppliers first when going out to tender for a contract.
- Contracting specialist providers who can provide outsized school-wear: “What if your child is six foot four and aged 11? Or if they have dwarfism? The supplier will ensure that child doesn’t feel any different.”

- 1.107 Only one supplier provided a more mixed response and noted that they were not aware of any schools that had consciously reduced the number of compulsory branded items, in the interests of widening access and availability.

#### *Other stakeholders*

1.108 Other stakeholders had very little to say on this matter. Two interviewees stated that they did not know how far governing bodies ensure access and availability of uniform items when setting their school uniform and appearance policy. One stakeholder felt that it is not possible to generalise and that it probably varies between schools.



### Theme 3 – School Logos Analysis

*Consultation Question 3 - Do you agree that logos should not be required on school uniforms?*

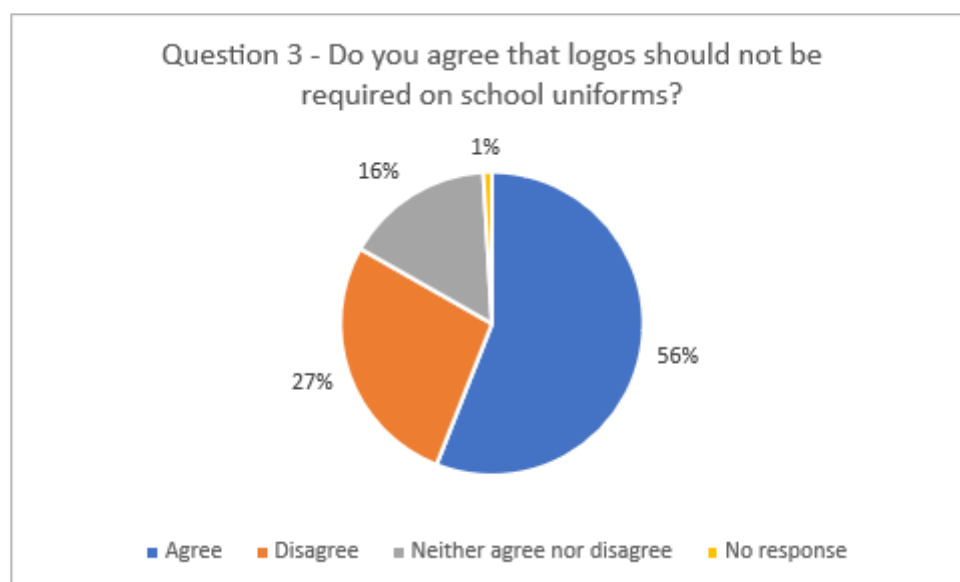
*Consultation Respondents*

1.109 Views on logos were mixed. Most respondents (56 per cent) agreed that logos should not be required on school uniforms, with just over a quarter (27 per cent) disagreeing.

**Table 3 – Responses to Question 3**

Response	Count	Percentage of Total
-	47	1 per cent
Agree	2843	56 per cent
Disagree	1384	27 per cent
Neither agree nor disagree	805	16 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 3 – Responses to Question 3**



1.110 Those respondents who disagreed in response to this question – by implication, feeling that logos *should* be required – were more likely to elaborate on their opinion. Most of these respondents tended to suggest that logos should feature on school uniforms, but they should be strictly limited to certain garments. School uniform logos were felt by some to be

an important part of learner identity and foster a sense of pride and community spirit; however, the requirement for logos should be limited in order to keep costs down. To ensure overall affordability, parents should be given options to buy from a variety of retailers, including supermarkets. Iron-on logos or sew-on patches can then provide a more cost-effective alternative to embroidered logos, which must be purchased from specialist suppliers.

- 1.111 Some believe that logos provide a sense of belonging. It was noted that logos can help with identification and safeguarding, particularly during school trips. However, others argue that logos drive up the price of uniforms and are not essential for children's learning. The cost of school uniform is unaffordable for many families and the requirement to purchase logoed items of clothing is an unnecessary burden which can lead to stigma, shame, and bullying. Even the youngest learners can identify classmates with less money based on them not having logos on their clothing.
- 1.112 Many learners from lower-income families are not eligible for the Pupil Deprivation Grant-Access grant, yet still find the cost of branded school uniform unaffordable. School staff and parents expressed the need for more help with the costs of uniform, and for a top-up of the Pupil Deprivation Grant-Access grant be made available in the middle of the year to help with the cost of additional items. It was suggested that schools should have a 'second hand swap-shop' of branded uniforms to reduce waste and expense.

*Engagement Question E - How important is it to have school logos on school uniforms? Why do you say that? What are the relative advantages/disadvantages of having a school logo?*

*Parents*

- 1.113 Four parents categorically believed logos were important. In contrast, five parents felt strongly that logos were not important. The remainder had more mixed views.

1.114 One parent was unsure of their importance, but regardless thought they should be available at a fair price.

1.115 Advantages of logos mentioned were:

- The belief that a logo help learners feel more of a 'team'.
- The suggestion that a school logo was good for the wider community of the school.

1.116 Disadvantages cited included:

- The added cost and feeling that logos are not essential to the school experience.
- The risk of creating divisions between those who have logos and others who have not.
- Many schools now wear blazers, and four participants thought it would be an additional and large expense to buy customised versions (for example when compared to jumpers with logos on them).

1.117 One individual mentioned that ties could be used as an identifier instead of logos and could prove more cost effective.

### *School governors*

1.118 Governors shared that the advantages of having logos on school uniforms were:

- It gives the school an identity.
- Logos ensure that learners from each school are easily identifiable, should there be any issues in the community.
- One governor also felt that some children are proud of wearing uniform including their school logo and it adds to the community feel of the school.
- Another advantage shared was that some families do not have the money for pupils to wear their own clothes every day – with it working out cheaper to have uniform.

1.119 Disadvantages of logos were also discussed:

- Governors were concerned about the huge cost implication if every item of uniform were to have a logo. One governor cited a school where there were separate branded PE socks for football and rugby, suggesting this had been excessive.
- Governors also felt that non-logo items are oftentimes cheaper than those with logos.

1.120 Some governors mentioned that whether clothing has a logo or not does not have an effect on educational attainment and therefore is not important, instead being something that is “nice to have”.

#### *Teaching staff*

1.121 Teaching staff expressed mixed opinions on this topic and could see advantages and disadvantages for the role of school logos:

- Staff liked the identity of logos (and uniforms in general) for positively representing the school at events (e.g.: competitive events like sports and debating) and to ensure learners are identifiable on school trips.
- In terms of uniforms more generally, staff suggested these were important for promoting equality across the school population and minimising the opportunity for bullying.
- However, one staff member also pointed out that uniforms can be representative and distinguishable through colour scheme alone (without the need for a logo).

#### *Children and young people*

1.122 It was also suggested by some young people that school logos were helpful on school trips as it would help to identify learners if someone was lost.

- 1.123 However, several learners suggested that school uniform would look smart without the logo and were therefore unnecessary.
- 1.124 Many argued that they felt no sense of pride in wearing the school logo.
- 1.125 Some young people suggested that a lanyard could be used instead of a logo.

#### *School uniform suppliers*

- 1.126 Suppliers unanimously felt that it was important to have school logos.
- 1.127 Key advantages of logos include:
- Identification – for example in instances of truanting or anti-social behaviour.
  - Safeguarding – particularly for primary aged pupils and when out on trips.
  - Logos are synonymous with better quality uniform bought from specialist suppliers: “the logo guarantees they will buy the uniform from the supplier.” “Key point is that the logo is not what makes the uniform – logo is part of it, what makes the uniform is the identical nature of the outer garment – blazer or sweater.”
  - Logos help to create an identify and sense of community, something that is important for all stakeholders.
  - Logos also ensure uniformity: “The badge creates a levelling aspect to it ... if have prescribed garment, everyone wears the same.”
  - Badges/logos are not expensive – costing around £2-£2.50 each.
- 1.128 Suppliers identified no disadvantages of having a logo.

#### *Other stakeholders*

1.129 Other stakeholders held a range of opinions on the importance of school logos.

1.130 Key advantages cited included:

- The fact they can create an identity, something that is particularly important for schools close to other schools, perhaps with similar/the same colour uniforms.
- They help provide a level of scrutiny: “schools will consider their reputation and how pupils behave out of school.”
- Stakeholders suggested that logos can also provide a sense of ownership and belonging, especially if learners have been involved in designing the logo.
- Logos can also fulfil a safety element, for example during school trips where easy identification of learners is essential.
- They create uniformity by ensuring all learners wear the same.

1.131 One stakeholder who felt logos were not important questioned the main purpose of logos in the first place.

1.132 The main disadvantage cited was the additional expense of an embroidered logo.

*Consultation Question 4 – Do you agree that logos should be limited to one outer garment, for example a jumper, cardigan or blazer?*

*Consultation Respondents*

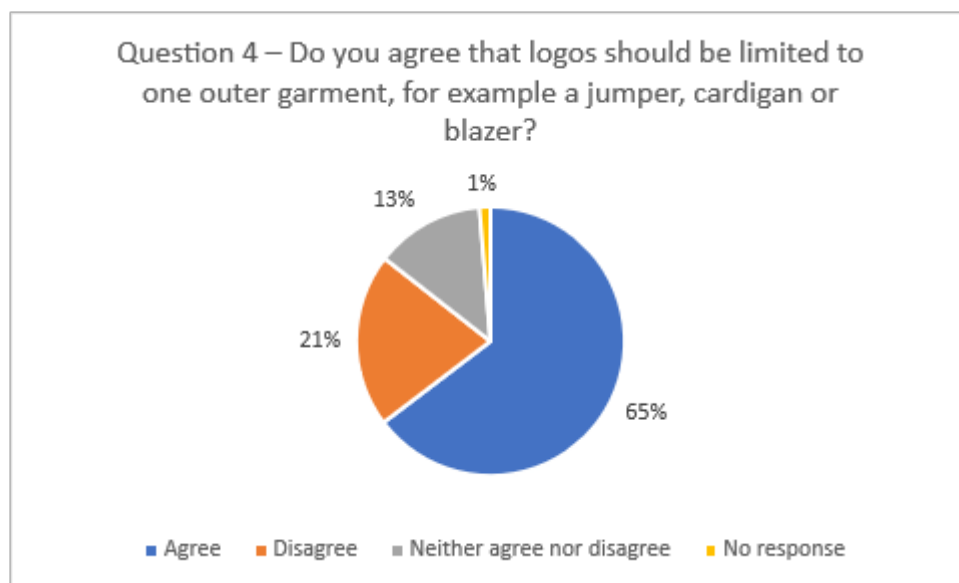
1.133 A significant majority (65 per cent) of respondents agreed with the proposal to limit logos to one outer garment, such as a jumper, cardigan, or blazer. About one in five respondents (21 per cent) disagreed.

**Table 4 – Responses to Question 4**

Response	Count	Percentage of Total
-	67	1 per cent
Agree	3285	65 per cent

Disagree	1060	21 per cent
Neither agree nor disagree	667	13 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 4 – Responses to Question 4**



- 1.134 Responses were largely focused on the cost and unnecessary expense of adding logos to outer garments. The requirement to have a school logo on sports kits was felt to be particularly unnecessary, and it is generally unfeasible (on financial grounds) for parents to purchase multiple items with logos for growing children.
- 1.135 The main themes within the responses included the need for cost-effective uniforms whilst still promoting a sense of belonging and pride in the school. Others argue that logos should be eliminated altogether, or that schools should give parents the freedom to choose. It was repeatedly suggested that school ties are sufficient for identifying a school. The responses suggest that there should be a limit on the extent to which a school uniform is branded, and there was considerable agreement that setting a standard colour scheme is an affordable way of ensuring that all learners have a uniform that is appropriate for school.

- 1.136 Those who disagreed with the proposal to limit logos to one outer garment tended to cite the seasonal changes in weather and temperature as a reason for branding more than one item of clothing. For example, jackets and jumpers would be worn (and therefore the logo would be visible) during the colder months, whereas it would be preferable to have logos on shirts or polo shirts as well, given that jackets and jumpers are less likely to be worn in the summer months.
- 1.137 It is important to note that even amongst those respondents who formally disagreed with the proposal, there was broad consensus that the requirement for logos on school uniforms should be limited as much as possible.

*Engagement Question F - Are there any particular items of school clothing that you think should / should not include a logo?*

*Parents*

- 1.138 Five participants believed that logos should be on jumpers.
- 1.139 One parent thought that logos should also be on polo shirts.
- 1.140 Four participants believed that logos should not be required on blazers as they are expensive, therefore adding additional and unnecessary cost.

*School governors*

- 1.141 Governors felt the most important items of school clothing that should include a logo were:
- School blazers
  - Jumpers
  - PE tops
  - Ties
- 1.142 Some governors felt that other items such as polo shirts, shirts, trousers and PE shorts did not need to include a logo.



- 1.143 One governor suggested it was important to consider changes in season and temperature and what this means for school uniform. For example, in their school, they have branded jumpers and polo shirts, which means that learners are still wearing the school logo (on the polo shirt) in the summer when it is too warm to wear a jumper.

*Teaching staff*

Teaching staff generally agreed that school logos should not be required for sports kits, on the grounds that it incurs additional and unnecessary expense.

*Children and young people*

- 1.144 Young people suggested that it was sometimes valuable to have PE kit that includes a logo, for example during sports matches to show what school you are representing.
- 1.145 It was also suggested that the school logo should be on blazers (where they are smart and fully visible on a breast pocket) but not on other items (for example skirts and trousers) where they can become 'lost' in the folds of the fabric and look untidy.

*School uniform suppliers*

- 1.146 All suppliers felt that blazers and jumpers should have a logo. The general feeling was that there are only a couple of key items that should have a logo: "marking that you are part of the school".
- 1.147 Views on the appropriateness of having logos on school sportswear was more mixed. It was noted that many schools, particularly secondary, have unique PE kits with specific colouring and style making logos for identification unnecessary. It was also commented that requiring a logo on PE kits would result in an additional mandatory item for parents to buy.

1.148 Suppliers in favour of having logos on sportswear stated that it would mean that PE kits are purchased from specialist suppliers who will provide better quality garments.

1.149 Furthermore, it was noted that there is a risk that the alternative could be more expensive: “It’s very hard to find sportswear from supermarkets ... if you remove school specific sportswear, kids will choose Nike and Under Armour garments – would triple price for the parents.” Additionally, it was suggested that since the Covid-19 pandemic learners have had to wear PE kits for the entire day, making kids with logos more important, for reasons of identification and safeguarding as already discussed earlier in this section.

*Other stakeholders*

1.150 Amongst other stakeholders in favour of logos, the general consensus was that only one logo is needed, specifically on an outer garment such as a blazer or sweater.

1.151 One stakeholder suggested that logos could be purchased separately and ironed on to the garment. It was also mentioned that logos should only be required on sportswear for learners who play for school teams – but again, this should be an iron-on logo.

*Consultation Question 5 – Do you agree that iron-on or sew-on logo badges should be provided for learners, free of charge?*

*Consultation Respondents*

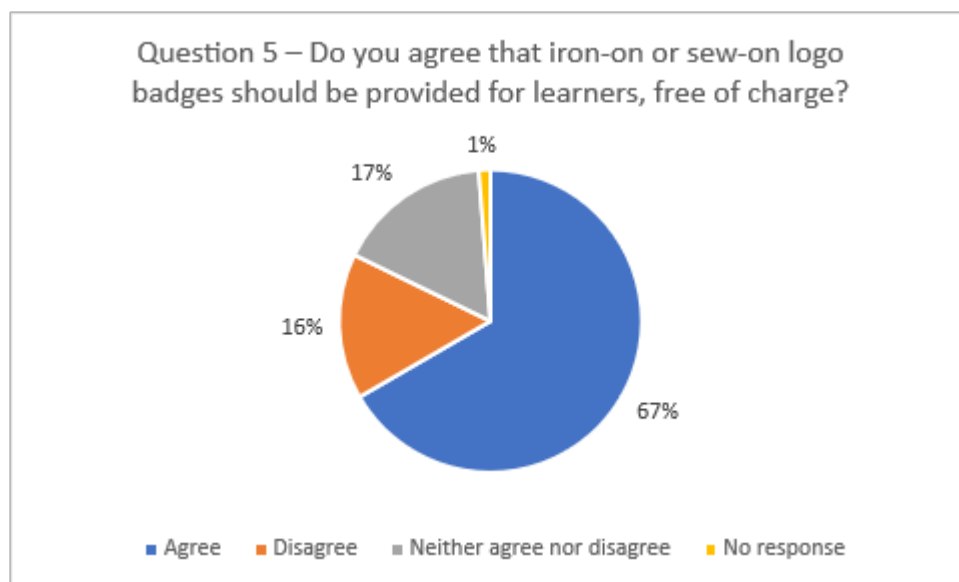
1.152 Most respondents (67 per cent) agreed that logo badges should be provided free of charge to learners. The other one-third of respondents either disagreed or felt neutral on the topic.

**Table 5 – Responses to Question 5**

Response	Count	Percentage of Total
-	63	1 per cent

Agree	3385	67 per cent
Disagree	790	16 per cent
Neither agree nor disagree	841	17 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 5 – Responses to Question 5**



- 1.153 The majority of respondents agreed that badges should be made available to families, but there was some nuance around the question of whether they should be free of charge. There were concerns about who would fund the provision of iron-on or sew-on logo badges for learners. Many respondents argued that it would be unfair for schools to have to use their already strained budgets to provide these badges and suggested that a nominal fee could be charged to cover the cost of manufacture, and that the money should go back into the school funds.
- 1.154 There was a general preference for iron-on badges over sew-on badges, because they are easier to apply and/or cheaper to produce. The question of how the badges would be distributed and applied to clothing was a widely cited concern, however; there is the potential for iron-on or sew-on badges to be applied unevenly or not to adhere properly to certain types of fabric, leading to a lack of uniformity among learners and potentially creating a catalyst for bullying. It was suggested that a metal pin would be

better as it is reusable and transferable; amongst respondents who suggested this, a charge of between 50 pence and £2 for a badge was considered acceptable. It was also suggested by some that to mitigate expense and hassle associated with iron-on or sew-on logo badges, it would be best to scrap logos altogether and instead adhere to a standard plain uniform/dress code.

*Engagement Question G - To what extent do you think iron-on or sew-on logo badges are a viable alternative to the traditional embroidered logo? Should these be provided for pupils free of charge, in your opinion?*

*Parents*

- 1.155 Six parents liked the idea of a sew-on or iron-on logo but mentioned that it should be optional, and that the logo should be easy to apply.
- 1.156 Two parents stated that they would personally rather buy the uniform with the badge already attached.
- 1.157 One parent did not like the idea, on the grounds that “it won’t be smart.”
- 1.158 One parent thought that a sew-on or iron-on logo would be appropriate for PE kits but not for other parts of the uniform.
- 1.159 A key advantage of a sew-on or iron-on logos is that they would create an industry for small business owners to produce the badges.
- 1.160 Conversely, it was suggested that iron on logos were just “something else for parents to think about”.
- 1.161 Some parents expressed concerns that the idea could lead to bullying if badged were badly attached and could create problems if there are distinctions between learners with ‘proper’ uniform (i.e.: with an embroidered logo) and those whose parents attached a logo themselves.
- 1.162 One parent believed that badges should be a means tested benefit, dependent on family income, whilst two others thought that a discounted or free badge should be a universal benefit.

*School governors*

- 1.163 None of the governors considered iron on or sew on logo badges a viable alternative to the traditional embroidered logo, on the grounds that they are not realistic and would not work: “our parents wouldn’t do it”
- 1.164 Governors were concerned about the difficulty of both sewing or ironing on a badge, which would be an added expectation of parents / guardians of learners.
- 1.165 Nonetheless, one governor cited their experience of a school in England, where there was the option to purchase a plain black blazer and sew the badge on, and “there was no stigma” for doing so.
- 1.166 Another governor suggested promoting the uniform shop and second-hand options as an alternative to including iron-on or sew-on options.

*Teaching staff*

- 1.167 Teaching staff generally favoured the provision of iron-on logos.
- 1.168 Some staff reported that they were already considering this as an alternative option in their school but were unclear on how much it might cost for parents.
- 1.169 Their understanding was that the school would sell the badges at cost-price. This would keep them as affordable as possible for parents to purchase.
- 1.170 Staff were hopeful that this would enable families to meet the rest of the uniform standards, making the overall ‘package’ more affordable at the outset.

*Children and young people*

- 1.171 Many of the young people thought that offering iron or sew-on badges was a good idea as it would mean that the uniform is cheaper, although they also noted that it would be dependent on sewing abilities of parents.

1.172 Other learners were concerned that iron-on or sew-on logo badges could easily fall off.

1.173 Another concern expressed by learners was that the school logo could easily be added to inappropriate clothing that is not in line with the school uniform policy.

#### *School uniform suppliers*

1.174 Suppliers were unanimously against iron-on or sew-on logo badges.

1.175 The main shortcomings of iron-on or sew-on logo badges identified included:

- Domestic irons do not create enough heat to iron on a logo properly “it comes off and leaves a glue mark.”
- It would allow for a wide variety of garments to be bought and worn, thus removing the consistency and equality of a school uniform: “having a “blue jumper” and putting a logo on it does not make it a uniform.”
- Related to the above, this creates the risk of bullying and questions like: “where did you get your blazer?”
- A widespread lack of sewing skills amongst parents, resulting in irregular placement of the logos or alternative ways of attaching them: “I’ve seen they applied with Sellotape, staples, in the wrong place – it leads to bullying, and it’s not cost effective.”
- There is still a cost to an iron-on logo, commonly borne by the school.

#### *Other stakeholders*

1.176 Conversely, where other stakeholders expressed an opinion on this issue, all considered iron-on, or sew-on logo badges a viable alternative to the traditional embroidered logo. Two stakeholders felt it makes it cheaper for parents. One stakeholder suggested that this enables a school to change

their logo without changing the whole uniform as the existing sewn-on badge can simply be removed and replaced.

- 1.177 It was also suggested that iron-on or sew-on logos enables parents to buy pre-loved or hand-me-downs from learners in other schools that have the same colour uniform.
- 1.178 In responding to this question, one stakeholder expressed criticism of school uniform entirely, stating: “uniform should be the last thing that is prioritised – when everything else is going on. Should be prioritizing getting pupils into school!”

*Consultation Question 6 – Do you agree that logos should not be required on school sportswear and other school equipment?*

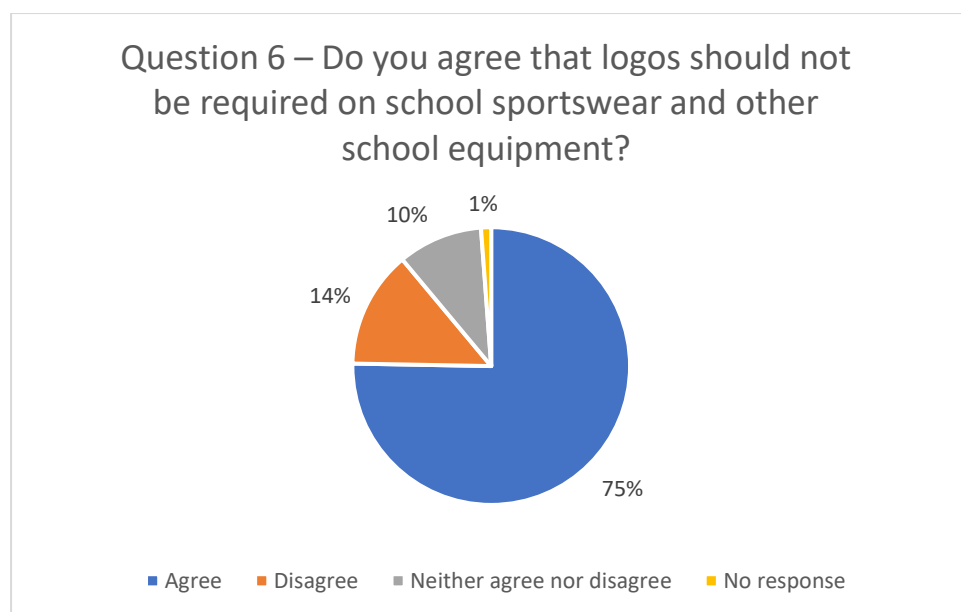
*Consultation Respondents*

- 1.179 Three-quarters of respondents (75 per cent) agree that school logos should not be required on school sportswear, while 14 per cent disagree. One in ten respondents were ambivalent on this issue.

**Table 6 – Responses to Question 6**

<b>Response</b>	<b>Count</b>	<b>Percentage of Total</b>
-	60	1 per cent
Agree	3824	75 per cent
Disagree	693	14 per cent
Neither agree nor disagree	502	10 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 6 – Responses to Question 6**



- 1.180 The main theme in these responses was that logos on school sportswear and other equipment are unnecessary and can be a significant financial burden on parents. Many respondents expressed frustration that logos are required on sportswear items that may be worn only within the school grounds, and that garments and logos must be replaced when items are lost or outgrown. Some respondents suggest that a simple colour guide for sportswear would be sufficient.
- 1.181 Many of the responses to Question 6 were emotive, and words such as "ridiculous," "waste of time," "excess," and "expense" are repeatedly used to express frustration and annoyance with the requirement for logos on school sportswear and equipment. Overall, the language used in the responses suggests that there is a high level of discontent with some of the current requirements.
- 1.182 The responses suggest that logos on sportswear are unnecessary unless the child is representing the school in competitive sports matches. The need for learners to be identifiable when representing the school in competitive sports matches was highlighted. However, it would be more inclusive and affordable to allow pupils to wear plain coloured sportswear for regular PE lessons.

#### Theme 4 – Supplier Arrangements



*Question 7 - Many schools enter into single supplier arrangements with a school uniform supplier. This means that there is no choice about where branded uniform items are bought. Do you agree that schools should avoid single-supplier agreements with suppliers of branded school uniforms?*

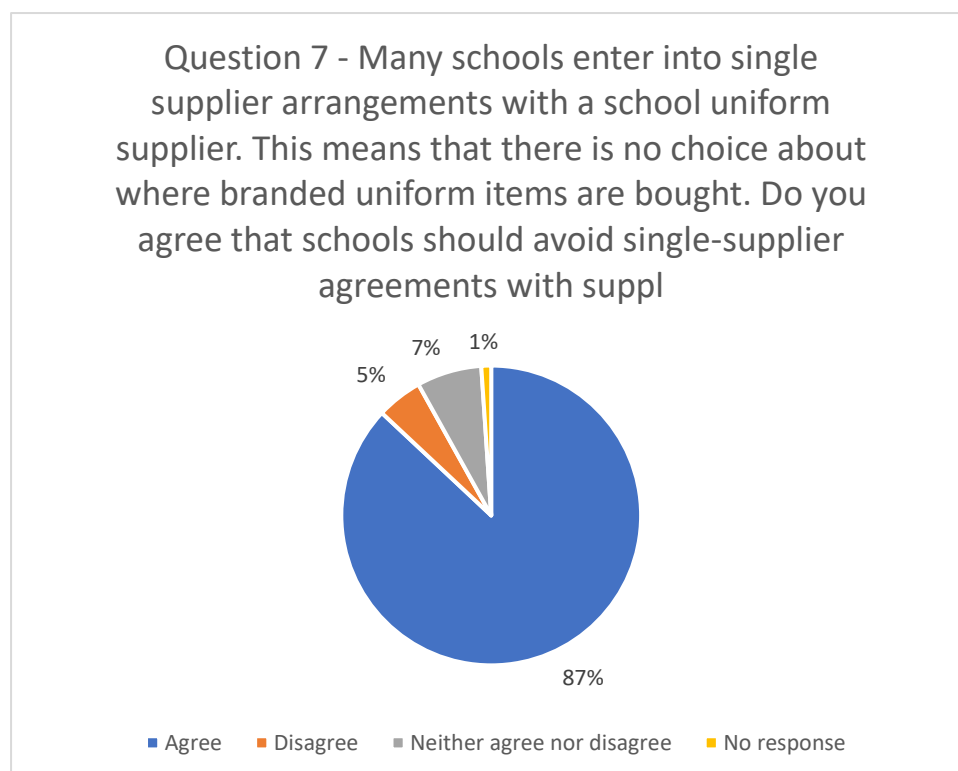
*Consultation Respondents*

1.183 The overwhelming majority of respondents (87 per cent) agree that schools should avoid single-supplier agreements with suppliers of branded school uniforms, while only five per cent disagree.

**Table 7 – Responses to Question 7**

Response	Count	Percentage of Total
-	54	1 per cent
Agree	4418	87 per cent
Disagree	251	5 per cent
Neither agree nor disagree	356	7 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 7 – Responses to Question 7**



- 1.184 The general consensus was that single-supplier agreements lead to monopolies and exploitative pricing by suppliers. Many believe that these agreements are primarily driven by profit and do not serve the best interests of parents and learners. Some respondents also suggest that single-supplier agreements should be avoided, as they can lead to issues around availability and quality. It was suggested that it is important to ensure that there is competition between suppliers to keep costs as low as possible. Parents should have the choice to purchase school uniforms from a variety of suppliers, including supermarkets, to ensure that they are able to source uniforms according to their financial circumstances.
- 1.185 It was also noted that iron-on or sew-on logos could reduce the level of dependency on a single supplier. However, it is also important to ensure that the quality of the uniform is of a high standard.
- 1.186 In the case of schools entering into supplier agreements, schools should consider the accessibility of the supplier, and whether they are able to provide clothing at affordable rates. If not, the school needs to subsidise higher cost clothing. Schools should also be able to negotiate lower prices with single suppliers and should provide basic uniform packages at a set price.
- 1.187 Some respondents suggested that Welsh Government should actively prevent schools from entering into unfair arrangements with suppliers that exploit customers and should enforce action against schools that do so. In a similar vein, it was argued that local authorities should use their procurement departments to negotiate favourable rates with a select few local companies and ensure that the uniforms are affordable and accessible to all. In some instances, respondents expressed explicitly that "monopolies" should not be allowed. It was suggested that, above all, schools should prioritise school uniform swap shops to reduce the environmental impact and costs of having to purchase new uniforms.
- 1.188 The few respondents who disagreed with the proposal cited the importance of supporting local businesses as opposed to large corporate supermarkets as a reason why schools *should* enter into specific supplier

agreements. Some people argued that having a single supplier can ensure consistency of colour, material, etc. Furthermore, it was felt that as long as the supplier provides clothing at affordable rates, or the school subsidises higher cost clothing, single-supplier agreements should not be an issue. The consensus amongst this group of respondents, however, was that schools should ideally enter into agreements with at least two or three retailers. It was recommended that there should be a robust and competitive tender to select a uniform provider or uniform providers, but this should be at the point of selection and not distribution.

*Engagement Question H / I - How appropriate / common is it for schools to enter into single supplier arrangements with a school uniform supplier? Prompt if necessary: This means that there is no choice about where uniform items are bought. What are the relative advantages/disadvantages of having single supplier arrangements with a school uniform supplier?*

- 1.189 N.B. Engagement Questions H and I have been combined during the analysis process as stakeholders offered similar opinions when asked both questions. Engagement Question H focused upon how appropriate single supplier arrangements are, whereas Engagement Question I focused upon how common it is for schools to have single supplier arrangements with a school uniform supplier.

#### *Parents*

- 1.190 Six parents did not have a single supplier agreement in their child(ren)'s school, whereas seven parents shared that they had a single supplier agreement. The remainder were unsure of the situation in their child(ren)'s school.
- 1.191 One parent stated they did not like the idea of a single supplier agreement.

- 1.192 Another believed that schools should operate as other industries, ensuring there is not a monopoly and safeguarding competitiveness.
- 1.193 Parents acknowledged that in some instances it may not be up to the school, and the local authority may be the ones dictating the decision of which supplier to use.
- 1.194 No advantages of single supplier agreement were mentioned by parents.
- 1.195 Disadvantages identified by parents included:
- Suppliers often sell out quickly and with only one supplier this makes uniform harder to obtain.
  - Single supplier agreements led to garments being more expensive, given the lack of competitiveness.
  - Concerns about single suppliers offering slow delivery, poor quality, a lack of choice, limited opening hours and a short timeframe for ordering clothes.

*School governors*

- 1.196 School governors felt that a single supplier arrangement would be more appropriate if there was the opportunity for the contract to be retendered at regular intervals.
- 1.197 Some mentioned how having two suppliers was more appropriate, giving parents the choice of where to buy uniform as well as introducing an element of competition over price. This was felt to be especially relevant in secondary schools where the catchment area of the school is larger.
- 1.198 One advantage of single supplier arrangements is that it commonly means that the supplier will deliver uniform directly into the school, which is convenient for parents.
- 1.199 Nonetheless, in keeping with the feedback from other stakeholders, governors expressed concerns that such arrangement could result in suppliers having a monopoly. Furthermore, it was suggested that there could be instances where the single supplier runs out of stock of a

particular size, meaning parents could not purchase the uniform their child requires.

*Teaching staff*

1.200 No opinions were shared by teaching staff in regard to this question.

*Children and young people*

1.201 Many young people identified the financial risk of having only one school uniform supplier, highlighting that if prices were to increase, they would have no choice but to use that supplier.

1.202 Learners also expressed concern that in their experience “school uniform shops” often did not have enough stock or the required sizing, meaning that had to return to the shop at a later date or buy uniform that is not from the official supplier.

*School uniform suppliers*

1.203 Suppliers reported that single supplier contracts are uncommon in Wales, where the majority of schools have two or more suppliers. One respondent stated that “probably less than five per cent of schools in Wales have a single supplier”. This can be dependent upon geographic location and availability of specialist uniform suppliers; for example, in areas such as Mold there is only one supplier locally, whereas in areas like Swansea there are lots of suppliers, making it more feasible for schools to contract with multiple suppliers.

1.204 School uniform suppliers were generally in favour of single supplier contracts stating that accountability on one supplier leads to a better, more comprehensive service with appropriate investment. Additionally, it enables suppliers to build a relationship with the school and parents and in turn to provide targeted support to those in need. It was suggested that that single supplier contracts are “a very misunderstood concept”.

- 1.205 The single supplier can also provide continuity in colour and style, as well as ensuring that uniforms are ethically sourced and (in many cases) made from recycled materials.
- 1.206 Suppliers also noted that single supplier relationships are beneficial for the local community as specialist school uniform suppliers are independent, (often) local businesses providing local jobs. Additionally, the guaranteed sales associated with a single supplier relationship enables suppliers to give back to the school through discounted or free uniforms; in many instances, this reciprocation is often a “part of a tender process”.
- 1.207 Nonetheless, suppliers were keen to stress that these advantages are dependent on a rigorous competitive tendering process to appoint a single supplier.
- 1.208 Suppliers noted that single supplier contracts can risk reducing competition or choice for parents and also place a burden of responsibility for meeting demand on just one supplier.
- 1.209 One supplier suggested there is risk that a minority of specialist suppliers in single supplier contracts may charge too much and undermine the entire sector.

#### *Other stakeholders*

- 1.210 There appeared to be limited awareness of this issue amongst other stakeholders. None of the stakeholders were aware of how common it is for schools to enter into single supplier arrangements with a school uniform supplier.
- 1.211 It was however suggested that single-supplier arrangements could be appropriate if the supplier can provide good value for money and availability. Others considered it inappropriate and felt that parents should be given a choice of more than one supplier. One stakeholder felt this issue should be decided on an individual basis by the school.



## Theme 5 – Transparency for Customers Analysis

*Question 8 – Do you agree that schools should be transparent in demonstrating that any benefit of a financial agreement they have with a school uniform supplier is being passed on to the customer?*

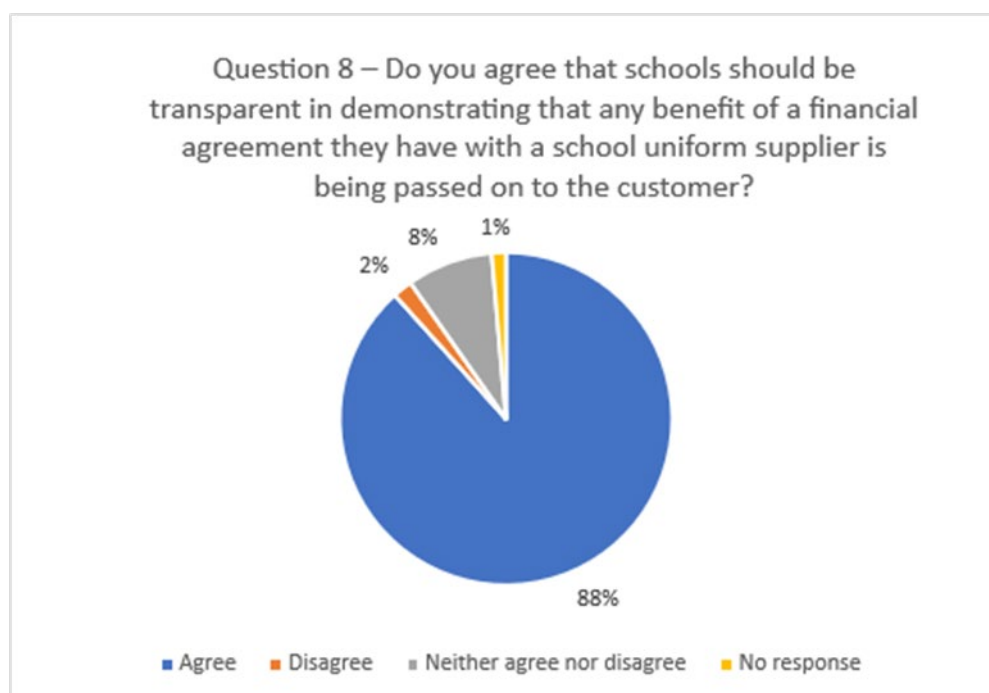
*Consultation Respondents*

- 1.212 Nearly nine in ten respondents (88 per cent) believed that schools should be transparent in demonstrating that any benefit of a financial agreement they have with a school uniform supplier is passed on to the customer. Only two per cent of respondents overtly disagreed.

**Table 8 – Responses to Question 8**

Response	Count	Percentage of Total
-	70	1 per cent
Agree	4487	88 per cent
Disagree	97	2 per cent
Neither agree nor disagree	425	8 per cent
Grand Total	5079	100 per cent

**Figure 8 – Responses to Question 8**



- 1.213 Respondents strongly emphasised the importance of transparency over any financial benefit. Some respondents expressed a desire for financial



transparency but were open to the idea of schools supplementing their budget via such benefit, while a significant number felt that schools should not be benefitting from these agreements at all.

- 1.214 There was a recognition by some that schools are struggling financially and a feeling that some financial gain would be acceptable if it was spent in a way that benefits pupils, though many felt this should be strictly regulated to ensure accountability. Some expressed confidence that any money was being spent wisely and for the benefit of the pupils. Other respondents indicated that their schools did not benefit from any existing agreements.
- 1.215 On the other hand, many felt strongly that schools should not benefit or profit from such deals, especially without families' knowledge, and saw this as profiting "off the backs" of parents and disadvantaged families. The cost-of-living crisis and inflation were mentioned, including the costs of driving to suppliers located far away from families' homes and the utility costs involved in using washers and dryers to enable children to manage with fewer uniform pieces. Some felt that financial benefit for the school must be balanced against affordability of uniform for struggling families. Some explained their view that all funds should go back into the sale of clothes to bring uniform prices down or to fund the uniform costs of those who cannot afford to purchase them.
- 1.216 There was also a large group of respondents which disagreed with the concept of single supplier agreements on principle, seeing it as a form of anti-competitive practice and an inhibitor of parental choice. Some who were against these type of agreements in general explained that transparency should not be necessary because the agreements should not exist in the first place. At least one respondent felt this should be the responsibility of Welsh Government, not of schools.
- 1.217 Many respondents were surprised at this question, having not considered potential financial benefit to schools from single supplier arrangements. Some interpreted the question as discussing a potential financial benefit to families, indicating that they were not aware of one. No responses

explicitly disagreed with the sentiment that schools should be transparent in demonstrating that any financial benefits they receive from school uniform suppliers are passed on to the customer, though some expressed uncertainty or scepticism about the usefulness of such agreements, as explained above.

*Engagement Questions J / K - How important / common is it that schools are transparent in demonstrating that any benefit of a financial agreement they have with a school uniform supplier is being passed on to the customer?*

- 1.218 N.B. Engagement Questions J and K have been combined during the analysis process as stakeholders offered similar opinions when asked both questions. Engagement Question J focused upon how important transparency of schools is with regard to any financial benefit, whereas Engagement Question K focused upon how common it is for schools to be transparent.

#### *Parents*

- 1.219 All parents felt it was important that schools are transparent in demonstrating any financial benefit they have with a school uniform supplier is being passed on to the customer in some way.
- 1.220 Three participants stated that if there was a profit of some sort, they would like to know where it is allocated in the school budget.
- 1.221 Other parents felt that transparency was important, but that in principle they were happy for the school to benefit financially.
- 1.222 One parent was unsure as to why schools would *not* disclose this information.
- 1.223 One participant stated that they received the school uniform directly from the school so would be advantageous to know whether there are any financial benefits.

- 1.224 None of the parents taking part in the focus groups could recall receiving information about their school benefiting financially from a uniform supplier contract and were unsure whether it was commonplace in other schools.
- 1.225 One participant mentioned an instance of one school changing the school tie every year, which they believed was financially motivated on the part of the school.
- 1.226 One participant thought they could probably find out whether and how their school benefited financially but had not explicitly been told this information. Another parent stated that they would not necessarily believe what their child's school claimed to be the nature of any financial benefit they have with their school uniform supplier.

#### *School governors*

- 1.227 Governors had limited awareness of this issue although provided examples of other businesses providing in-kind or monetary support to their local school.
- 1.228 One governor cited an example of a school in England within close proximity to Manchester Airport, whereby the airport funded every Year 7 pupil with a blazer and school tie. They mentioned that the partnership was initially set up because the school was located in an area with high levels of deprivation. The governor suggested that similar initiatives could be explored in Wales but was aware that not every school has a large business situated nearby that could or would offer funding.
- 1.229 Governors suggested that more common examples of private sector support involved local businesses sponsoring school football teams, paying for their kit, for instance.
- 1.230 Two governors noted that they were unaware of any benefit their school received from their school uniform supplier but suggested their school business manager may be better informed on the matter.

#### *Teaching staff*

- 1.231 Teaching staff were unaware of ways in which schools financially benefit from contracts with suppliers.
- 1.232 Nonetheless, they felt that schools would actively minimise the expense associated with uniform for learners and parents – for example by exploring options offer iron-on or sew on logos.

*Children and young people*

- 1.233 No young people who participated in the focus groups could share any information in response to this question.

*School uniform suppliers*

- 1.234 One supplier queried the rationale for this question: “I don’t think there is rationale for this being a concern – there were schools in the past that had commission process for uniform, but it doesn’t happen now.”
- 1.235 Nonetheless, suppliers considered it very important for schools to be transparent over any financial matters: “Schools should communicate ... they have become businesses ... they need to ensure transparency over what they’re doing.”
- 1.236 One supplier was aware of a minority of cases where it was agreed at the tender stage that supplier would pay commission for every sale: “For a couple of schools it’s an extra source of income ... about £800-900 a year in total commission.”
- 1.237 Whilst the majority of suppliers were unaware of a direct monetary benefit to schools linked to a contract for uniform supply, several cited ways in which schools benefit informally from suppliers, for example:
- Sponsoring school dramas or offering raffle prizes
  - Donating football kit
- 1.238 Suppliers may also offer benefits to parents – often as part of their contract – for example discounted items of low-income families, discounted prices as certain times of the year or free delivery to schools.

- 1.239 The general consensus was that schools were transparent about any benefits – formal or informal – associated with contracts with specialist school uniform suppliers.

*Other stakeholders*

- 1.240 None of the other stakeholders were aware of schools receiving a financial benefit through contracts with school uniform suppliers, nor were they aware of how common it is that schools are transparent in demonstrating that any benefit of a financial agreement they have with a school uniform supplier is being passed on to the customer.
- 1.241 However, all stakeholders felt that transparency was essential. With some interviewees stating “Sounds important but don't really know anything about this” and another interviewee emphasising that schools “should be transparent about anything to do with money.”

**Theme 6 – Comparable to Supermarkets Analysis**

*Question 9 – Do you agree that if schools enter into an agreement with a school uniform supplier, they should ensure that the costs of using this supplier are similar to the costs of school uniforms available from high street retailers or supermarkets?*

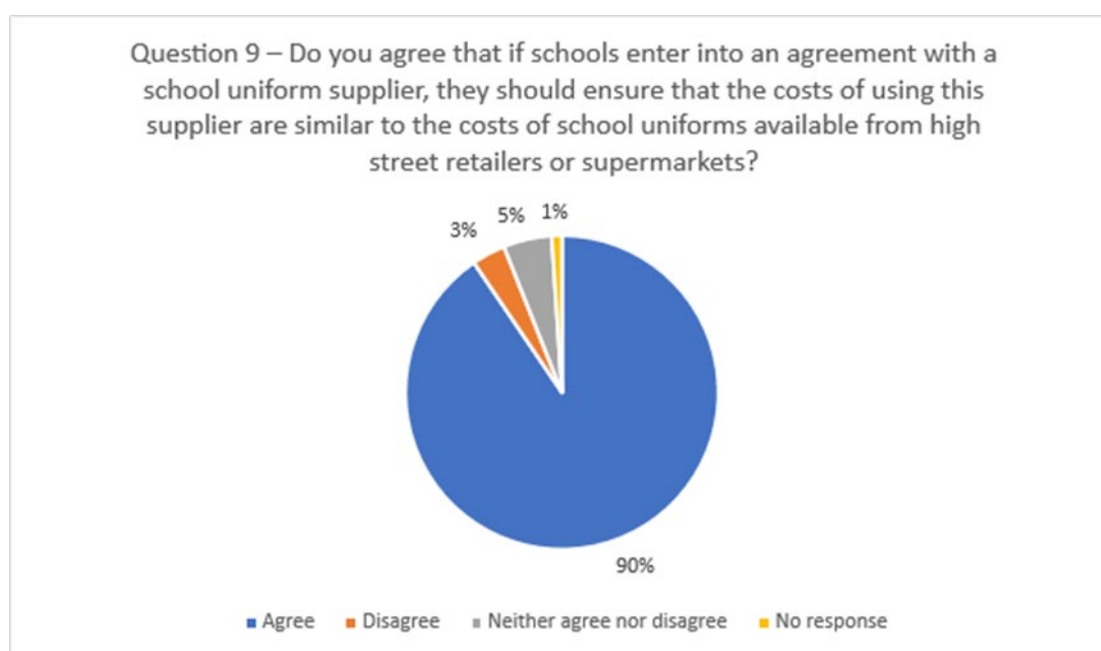
*Consultation Respondents*

1.242 The vast majority of respondents (90 per cent) agree that schools should ensure uniforms from a single-supplier arrangements are comparable in cost to high street retailers and supermarkets.

**Table 9 – Responses to Question 9**

Response	Count	Percentage of Total
No response	53	1 per cent
Agree	4596	90 per cent
Disagree	176	3 per cent
Neither agree nor disagree	254	5 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 9 – Responses to Question 9**



1.243 Many respondents were critical of the current system, which they viewed as being driven by profit and not providing families with the best value. Many responses referenced the current disparity in price between supermarkets and high street retailers, and specialist uniform suppliers. Affordability was seen as very important. A large number of respondents doubted whether the proposed solution of ensuring similar costs would be possible, however. With the purchasing power and size of stores like Aldi

and Tesco, many believed uniform suppliers would be unlikely to provide uniforms at competitive prices.

- 1.244 There was some concern about the impacts on the local economy and independent suppliers, with the potential for supermarkets to price them out of the market. Some felt the question misunderstands how the business of school uniforms works and that comparing independent suppliers with high street retailers is unfair. A minority of respondents indicated that they were happy to support independent, local suppliers even if the price was higher.
- 1.245 A number of responses emphasised that mass production and its associated cost savings should not be the solution, even for those who disagree with single suppliers. Rather, the focus should be on more sustainable items and circularity of use and reuse. Many hoped to be able to pass uniform items down from older to younger siblings, requiring lasting quality.
- 1.246 There was extensive reference to quality and whether similar costs would be feasible for similar quality, although views differed. Many believed that uniform suppliers provided better quality items, meaning learners would go through more pieces of uniform purchased from supermarkets. Conversely, others said uniform purchased from suppliers was the same or lower than the quality of similar items purchased at supermarkets. Many viewed the price disparity between different types of suppliers as solely attributable to the addition of a logo, saying the price difference should only amount to the cost of attaching the logo. Many suggested that including a logo on garments items was not worth the extra cost. That said, some said they would be willing to pay a small amount extra to a dedicated supplier if the uniform items had logos attached.
- 1.247 Many emphasized that uniforms should be able to be purchased from any store of parents' choice. On this point, a minority of respondents expressed frustration that some school uniform suppliers offer a more limited range of sizes and do not cater to as many body types as high street retailers and supermarkets.

- 1.248 On the other hand, others noted that supermarkets did not stock uniforms all year round, where uniform suppliers have more consistent availability. Others felt that purchasing cheaper uniform pieces from supermarkets and high street retailers was important, as it enables families to afford multiple items of each type of clothing. The convenience of supermarkets was also mentioned in the context of transport challenges, in terms of both time and fuel costs.
- 1.249 Some concerns were expressed about the potential implications of allowing uniform from multiple retailers, with this resulting in heterogeneous clothing items from different retailers. Some respondents felt that the solution would be to further support families with uniform costs, rather than for them to purchase uniforms from anywhere.

*Engagement Question L - How important is it that schools ensure that the cost of uniform available through single supplier agreements is similar to the cost of school uniforms available from high street retailers or supermarkets? To what extent is this the case?*

*Parents*

- 1.250 Although parents appreciated that a more competitive pricing arrangement would be beneficial, most were aware of the problems that would arise if this were attempted.
- 1.251 Four respondents mentioned that there is a clear difference in price between high street retailers and school suppliers. However, this price difference is oftentimes accompanied by a difference in quality, such as fading jumpers.
- 1.252 Two participants believed that small suppliers would never be able to realistically compete with supermarkets due to differences in their supply chains and levels of stock.
- 1.253 Another participant stated that some things were affordable, however items such as skirts and blazers were expensive, very much depending on the school requirements.



- 1.254 Additionally, one participant thought prices should be kept consistent and similar at schools across the country.
- 1.255 One parent thought that this could be an opportunity to support the local community/ economy if done well.

*School governors*

- 1.256 School governors were not sure where supplier agreements originated from, however pointed out that large supermarkets have the advantage of being able to order large amounts of stock offering competitive pricing structures. Local suppliers, however, are not able to work on the same scale or have the same buying power as supermarkets which sell generic uniform.
- 1.257 One governor mentioned this was quite important and something that they would explore in more detail for their school.
- 1.258 Another governor mentioned that they would want to support local business; they acknowledged that they would most likely “never be able to beat the cost [of supermarkets] but could be competitive”.
- 1.259 One school governor mentioned how the cost of the school blazers has already increased in the past year by £5, presumably due to inflation.

*Teaching staff*

- 1.260 No teaching staff who participated in the focus groups could share any information in response to this question.

*Children and young people*

- 1.261 Many young people explained that supermarkets often provide a cheaper alternative for school uniforms compared with the official suppliers, which is of increasing concern with the cost-of-living crisis.
- 1.262 However, some learners also noted that the quality of uniform purchased from specialist suppliers tends to be higher than supermarket garments meaning that they last longer.

### *School uniform suppliers*

1.263 All suppliers felt that ensure that uniform available through single supplier agreements is similar to the cost of uniforms available from supermarkets is not a possible option given significant differences in quality between them:

- “It’s like comparing apples and pears”
- “They are just completely different products – like comparing a Kia with a Mercedes.”

1.264 It was also suggested that people were unrealistic when considering the alternative to uniform bought from specialist suppliers:

- “People are often quite disparaging of the blazer as it is the single most expensive item. But if you bought a coat, would probably be more as it will probably be branded.”
- “The alternative is not necessarily cheaper.”

### *Other stakeholders*

1.265 Most stakeholders felt that it was critical that the cost of uniform available through single supplier agreements is similar to the cost of school uniforms available from high street retailers or supermarkets. One interviewee stated that this issue was: “Very important – [price] has to be competitive.”

1.266 None of the other stakeholders were aware of how common it is that suppliers offer uniform at similar cost to uniform available from high street retailers or supermarkets. One suspected it was unlikely to be very common but did not know for sure.

## Theme 7 – Uniform Exchange / Recycling Analysis

*Question 10 – Do you agree that schools should operate a uniform exchange and/or recycling scheme available to families?*

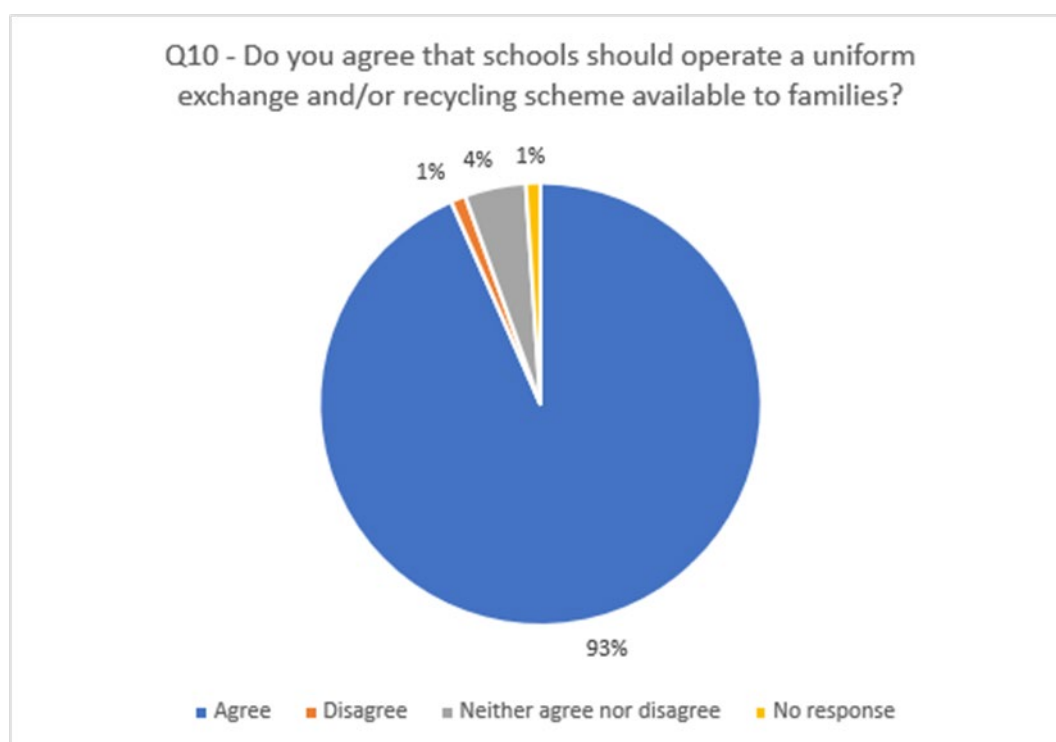
*Consultation Respondents*

1.267 The overwhelming majority of respondents (93 per cent) think schools should operate uniform exchange or recycling schemes. Only one per cent of respondents disagreed.

**Table 10 – Responses to Question 10**

Response	Count	Percentage of Total
No response	54	1 per cent
Agree	4743	93 per cent
Disagree	55	1 per cent
Neither agree nor disagree	227	4 per cent
<b>Grand Total</b>	<b>5079</b>	<b>100 per cent</b>

**Figure 10 – Responses to Question 10**



- 1.268 The predominant theme from responses was enthusiasm for re-use and exchange schemes. Many believed this would benefit parents and families via cost savings and saw it as important for the environment. Many respondents provided detailed opinions about how schemes should be run.
- 1.269 Respondents drew on their own experiences with existing schemes run at schools, churches, and community organisations. Views of these schemes were overwhelmingly positive, with respondents stating that it helped them to save on uniform costs but still access the kit needed. These schemes are used for regular uniform purchasing at the beginning of the school year, but also when children damage, lose, or grow out of uniform items. That said, there were also responses that said existing recycling and exchange schemes were rarely used due to stigma or low levels of socio-economic disadvantage in their local area - i.e., in places where the perception is that parents do not struggle to afford school uniform.
- 1.270 Stigma against the purchase and wearing of second-hand clothing was thought to remain a persistent problem. While some respondents indicated that they have no problem buying second-hand, this was often associated with issues of reducing waste and behaving in an environmentally responsible manner. The concept of not being able to afford to buy new uniforms was seen as embarrassing or shameful by some respondents, leading to potential challenges related to uniform exchange, as some parents and children might not be comfortable wearing pre-worn items.
- 1.271 One solution to issues of stigma that was commonly suggested related to how a scheme is framed and marketed. Many respondents argued that such a scheme should be promoted on the basis of sustainability and circularity, rather than in relation to cost and financial hardship. Strategic communications should aim make recycling and exchange schemes the “natural” or default option to reduce waste. To reduce stigma, one respondent underscored the importance of language, preferring terms like “pre-loved” and “new to you” over “second-hand.” Presenting the offer as

a uniform “shop” rather than a donation bin and offering everyone access to the scheme instead of restricting it to only those perceived as “in need” were other ideas of ways to reduce stigma suggested by respondents.

- 1.272 That said, other respondents felt that schemes should be run discretely, so parents can take advantage of them relatively anonymously. Regardless of how the scheme is run, communications need to be clear so that families understand the details of the scheme.
- 1.273 While there was significant support for the concept of exchange and recycling schemes, a number of respondents also expressed concerns about the impact such schemes would have on over-stretched and under-resourced schools. Schools’ storage capacity and the workload of school staff were specified as potential issues that schemes might exacerbate. Various respondents suggested that these schemes could be run or financially supported by Welsh Government, local authorities, third sector organisations, uniform suppliers, or PTAs.
- 1.274 Suggestions varied as to whether the scheme should be run from within the school building or whether it should be located elsewhere in the community. Several responses outlined the importance of providing settings with clear advice on best practice related to exchange and recycling schemes, and there was no consensus about whether or not it should be mandatory for schools to operate or participate in recycling or exchange schemes. One response suggested that Welsh Government should praise schools who already participate in this type of scheme, rather than taking a punitive approach or mandating that all schools implement the same measures.
- 1.275 In terms of how the schemes should be run, ideas varied. Some respondents argued that uniform should be free, with a respondent suggesting that all children receive at least one uniform entirely for free, with that stock returned and given to the next year group. Others said charging a small amount of money (e.g., £1 per item) could support the management of a scheme and offering a “pay what you can afford model” could help destigmatize the scheme’s use by parents and families.

Rewarding parents with a small fee that could be recovered if they donate their children's uniforms back to the recycling or exchange scheme was also proposed as a way to incentivize participation. Lastly, it was suggested that schools with the same colour scheme could jointly operate a recycling or exchange scheme for non-logo garments to provide a greater variety of items from which families could choose.

- 1.276 Additionally, some respondents felt that effective recycling schemes would only be possible when uniform garments are of high quality, otherwise they will not last long enough to be passed onto others. It was suggested that this would not be possible if uniforms that are made available for reuse are purchased from major retailers. I
- 1.277 Other concerns respondents expressed about exchange and recycling schemes included the following.
- The potential for schemes to result in poor quality garments in a limited range of sizes being offered.
  - Suggestions that the presence of names and year groups on garments inhibits the viability of uniforms to be reused.
  - Concerns about cleanliness, especially as a result of Covid-19.
  - Arguments that recycling and exchange of uniform already occurs through other venues such as Facebook Marketplace. Conversely others emphasised the importance of seeing second-hand clothing and uniform pieces in-person to assess their quality, leading some parents to dislike online platforms like Facebook Marketplace.
  - The belief that affordability should be prioritised so that new uniforms can be purchased by all families, thus rendering these schemes unnecessary.
  - A similar belief that the emphasis should be on flexibility of uniform policy rather than uniform exchange.
  - Discussion of the consequences of ineffective schemes. When uniforms donated for exchange schemes go unused,

some say they all end up at charity shops – though not all charity shops accept school uniform, leaving some to wonder what to do with old garments.

*Engagement Question M - How important is it that schools operate a uniform exchange and/or recycling scheme? What are the advantages of uniform exchange and/or recycling schemes? Are there any disadvantages? How common is it for schools to operate a uniform exchange and/or recycling scheme?*

*Parents*

- 1.278 All parents believed that offering a recycling box or uniform exchange was important, with four participants mentioning that it was beneficial due to cost but also for environmental reasons.
- 1.279 It was agreed, despite some participants having not heard of it, that the presence of recycling/ redistribution schemes were commonplace in **some** schools and, the following comments were made:
- There is now generally less stigma attached to using second-hand uniform, due to the cost-of-living crisis.
  - The advertising of the scheme in some schools is poor, meaning if they are available many parents are not aware of its presence or how to access the scheme.
  - Despite their existence in some schools, many are organised by charities or parents so it would be advantageous if there was allocated resource by the government to relieve this pressure.
  - In one area, social media is utilised as opposed to using a box or scheme at the school.
- 1.280 Advantages of such schemes cited by parents include:
- The environmental benefits associated with seeing schemes as recycling, rather than 'charity'.

- The opportunity for creating a ‘virtuous circle’, whether the more common schemes become, the less stigma associated with them.

1.281 Disadvantages included:

- The additional pressure on schools/ staff to organise the service.
- The fact that many parents do not visit their child(ren)’s schools (especially at secondary level) and therefore do not have a chance to physically visit a box, therefore a digitalised version could be more inclusive.
- A feeling that some parents may still feel embarrassed at giving their children second-hand uniform.
- The reality that some uniform is simply too worn down to pass on.

*School governors*

1.282 School governors were in unanimous agreement that it is important that schools offer opportunities to purchase second-hand uniform in some sort of capacity.

1.283 One governor mentioned that as a result of the Covid-19 pandemic and learners not being in school, in some cases uniform has never been worn and learners have either grown out of the uniform or left the school. Therefore, there is an opportunity to pass on effectively unworn items of uniform.

1.284 One governor mentioned that there is sometimes a tradition associated with handing down uniform in the community.

1.285 Another governor mentioned that some parents already seek out uniform from lost property, therefore behaviour could easily be pivoted to consider obtaining second-hand uniform as the norm and create a broader adoption.



- 1.286 Several governors noted that if administered by the PTA, a pre-loved uniform ‘shop’ could have financial and environmental benefits for the school.
- 1.287 Nonetheless, despite these strengths and opportunities associated with uniform exchange and reuse schemes, it was suggested that many learners (even if not their parents) have a stigma against second-hand uniform. This was seen as being more common within secondary school as learners get older and more aware of fashion and social cues.
- 1.288 All governors stated that there was some form of uniform exchange or reuse scheme in their schools.

*Teaching staff*

- 1.289 Teaching staff linked this question to the theme of access and availability, with one staff member mentioning that it is part of their school’s commitment to prioritise reuse schemes as part of their uniform policy.
- 1.290 Another staff member saw the inclusion of such schemes “as common sense”, with another saying, “as a mum, I’m certainly not ashamed to save”.
- 1.291 The main disadvantage or challenge associated with exchange or reuse schemes included how anonymity might be a concern for some; one teacher suggested that it would be important to prevent embarrassment and suggested this could be overcome by providing an online request form or placing a clothes rail in a discreet location.

*Children and young people*

- 1.292 Many young people said that second hand uniforms were advantageous as they provided free or cheaper clothing options.
- 1.293 Some responses also suggested that second hand clothing is becoming more acceptable with apps such as Depop and Vinted being used much more. One learner stated, 'If people started selling second hand clothing, it would be much more acceptable than it was ten years ago'.

- 1.294 However, many learners still said that there was a stigma around second-hand clothes and were worried they would be bullied by peers for wearing them. Some learners suggested that name calling may be a problem, suggesting that learners wearing second hand clothes may be called 'cheap'. One learner also mentioned that people may be worried of spreading infection and catching viruses like Covid-19 through wearing second hand clothing.
- 1.295 Others highlighted that although it is important for schools to have 'hand-me-down schemes', some clothes may get rejected due to minor faults in the uniform and would therefore end up as waste.
- 1.296 Learners were also asked: "Is there a reason why it is less common to have recycling schemes in secondary school?"
- 1.297 Several said that although second-hand clothes are generally cheaper, many people would feel uncomfortable wearing them due to the stigma of having to buy second hand. There were also concerns about bullying and how those wearing second-hand clothes may be more likely to be targeted.
- 1.298 Although some schools have uniform recycling schemes, it was suggested that not many learners know about them.
- 1.299 Some learners explained that there would be less stigma associated with second-hand uniforms in primary schools were learners are less concerned about their image.

#### *School uniform suppliers*

- 1.300 Suppliers unanimously agreed that uniform exchange or "pre-loved" schemes are very important and provide an essential service, particularly as uniforms tend to remain the same year on year.
- 1.301 They stated that these schemes are financially advantageous for parents as a cheaper option and provided additional environmental benefits by avoiding or delaying landfill, or recycling. However, some suppliers noted

that there was considerable work in running a scheme effectively, adding that they were commonly reliant on voluntary PTAs. They also suggested that schemes were often run insensitively without consideration of the potential stigma involved in buying a “pre-loved” uniform.

- 1.302 Suppliers expressed mixed views on the prevalence of uniform exchange / reuse schemes. One felt that they were fairly common while another felt that the concept was quite a new concept with “only a few schools” taking it on.
- 1.303 There was awareness amongst some suppliers of specialist uniform suppliers running uniform reuse schemes in partnership with schools, while one of the suppliers ran a scheme themselves: “we collect, launder, fix and press and package them – then offer them back on website at half price.” This is advantageous as being able to purchase good quality pre-loved uniform online takes stigma out of it for parents: “they are not buying it from a desk from the PTA – we are guaranteeing them a level of quality and anonymity.”

#### *Other stakeholders*

- 1.304 Stakeholders generally considered it very important that schools run uniform exchange schemes. It was also suggested that attitudes to second-hand clothing have changed and buying “pre-loved” has become far more acceptable in recent years.
- 1.305 Key advantages of second-hand clothing schemes cited include:
- Cost savings to parents.
  - Providing access to better quality clothing at cheaper price (i.e.: second-hand uniform from specialist providers as opposed to new uniform from supermarkets).
  - Generating additional income to schools: “On average, PTAs raise £7-9,000 per year ... sales from pre-loved clothes can help towards this.”

- Environmental benefits in terms of preventing clothes going to landfill. This reason could be considered more socially acceptable than being unable to afford a new school uniform.

1.306 Disadvantages cited by stakeholders include:

- Possible stigma around second-hand clothing. One stakeholder suggested that there is a “Need to be mindful of peer pressure in schools”.
- Organising a second-hand uniform exchange is a challenge for schools as it may be difficult to find time to run them properly: Stakeholders suggested that “Schools are very tightly stretched, and this is another thing for them to do.”
- The risk that a second-hand exchange could be badly or insensitively handled by the school, exacerbating stigma and embarrassment for parents and learners.

1.307 Most stakeholders did not know how commonly such schemes exist although it was suggested that anecdotally, they seem to be on the increase.

1.308 Some further comments and suggestions from stakeholders on this issue included:

- The value of looking at good practice examples of second-hand uniform schemes and sharing this with other schools.
- Ensuring careful communication of the existence of the scheme: “It’s very much about the sell on it ... that’s where the involvement of pupils is so important – for example through Eco Schools ... it shouldn’t be tucked away or made to be shameful.”
- Exploring opportunities to run schemes at a community or local authority level or to organise a cluster of schools to run schemes collaboratively, to reduce the pressure on individual schools/PTAs.



## Theme 8 – Welsh Language Impact Analysis

- 1.309 N.B Engagement respondents were not asked any questions related to this theme.

*Question 11 – We would like to know your views on the effects that guidance on school uniform and appearance policies would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than the English language. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?*

### *Consultation Respondents*

- 1.310 Most respondents were unable to identify any potential impacts of changing school uniform guidance on the Welsh language.
- 1.311 The most frequently cited effects related to the language of school names on uniform logos. Logos and branded school uniforms were seen by several respondents to promote a sense of identity. As such, some respondents felt that logos should all be bilingual, with a preference for Welsh language. This could be true of either sewn-in or iron-on patches.
- 1.312 On the other hand, it was also suggested that removing logos entirely from uniforms would reduce the stigmatisation of learners based on assumptions of their linguistic background.
- 1.313 It was also felt that all school uniform guidance, information, and instructions should be published and accessible bilingually. That said, others said that most people will learn of school uniform guidance and policies via word of mouth, so the language of guidance is less important.
- 1.314 The other potential impact cited by a number of respondents related to school uniform suppliers. Having multiple uniform suppliers could provide more job opportunities for Welsh speakers and more options to support local Welsh suppliers. One response felt that the staff of school uniform suppliers should be bilingual, wherever possible, so that interactions with customers may take place in either English or Welsh.

- 1.315 Many respondents seemed frustrated by this question, underscoring the importance of affordability and quality of teaching. There was a lack of understanding about how school uniform guidance and Welsh language would be linked, and a few respondents expressed annoyance with what they perceived as a political agenda to force the Welsh language on people.

*Question 12 – Please also explain how you believe the guidance on school uniform and appearance policies could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.*

*Consultation Respondents*

- 1.316 As with Question 11, responses to this question overwhelmingly saw school uniform policy guidance as irrelevant to the Welsh language.
- 1.317 The main change recommended was to mandate that all logos displayed on uniforms are bilingual, with some suggestions that Welsh precede English. Respondents also felt that all guidance and information should be provided bilingually. Bilingual logos could be iron-on or sew-on. Alternatively, removing logos from school uniform could also improve equality between English and Welsh by not privileging one over the other in terms of uniform design.
- 1.318 Some respondents noted that supplier arrangements could impact Welsh language. Having multiple school uniform suppliers could increase the number of Welsh speaking jobs available and provide more opportunity to support local Welsh language businesses.

### **Final Comments Analysis**

*Question 13 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.*

#### *Consultation Respondents*

- 1.319 Many of the responses to this question repeated or emphasised aspects of previous questions to the consultation. These centred on aspects of cost as well as more general preferences about uniforms.
- 1.320 A theme unaddressed in other questions but mentioned in the final comments was the Pupil Development Grant – Access which provides funding for lower income families to buy school uniform and other equipment associated with attending school. Some formal consultation respondents expressed appreciation for the grant, while others called for Welsh Government to expand the eligibility requirements, as many families who struggle to afford school uniform are unable to claim the funding under the current eligibility criteria.
- 1.321 On the other hand, a few respondents were critical of Welsh Government for providing uniform grants to families either because they believed the grants were being used inappropriately (given that there is no scrutiny over how the money is spent by families who receive it) or because they disagree with this use of tax revenue for parents who choose to have children.
- 1.322 A large number of responses underscored that uniforms should be of high quality and should not be a financial burden on parents. The environmental impact of low-quality uniforms and ethical implications of how “fast fashion” garments are made were also mentioned.
- 1.323 As in previous questions, respondents had opinions on where uniforms should be bought. Some wished to source garments from supermarkets, while others emphasised school uniform suppliers as important to local communities. Parents frustrated with the limited size range available at single suppliers cited this as a reason for allowing more freedom about where uniform is sourced. Several respondents suggested that schools



should be funded to provide uniforms directly, eliminating the need for a debate over supermarkets versus single suppliers. Many were critical of the idea that anyone should be profiting from the sale of uniforms which are costly to parents and deemed mandatory by schools.

- 1.324 Some respondents expressed opinions about school uniform in general, with a divide between those underscoring its importance and those who see it as unnecessary for a range of reasons. Those in favour of school uniforms cited its ability to promote a sense of uniformity, community, and shared aspiration among learners. Uniforms were said to provide a level playing field for learners of different socio-economic backgrounds, prevent bullying due to observable differences in the quality or price of children's non-uniform clothing, and improve behaviour, both within school and externally.
- 1.325 Conversely, some respondents believed that uniforms are archaic or unnecessary, emphasising that they do not support learning and that problems with uniform lead to unnecessary punishment and embarrassment for learners. A number of parents argued that few workplaces have uniform policies that are as strict as those of schools, and when they do, uniforms are all necessary items are provided to employees free of charge.
- 1.326 Of those critical of uniforms generally, quite a few responses referred to the challenges school uniforms bring up for children with ALN, ASD, or sensory issues, as the material and style of uniforms often prevents them from being comfortable and inhibits their ability to learn. Respondents were also concerned about the impact of current uniform guidance on diversity. Diversity, including afro hair and coloured hair, should be celebrated and not restricted by uniform policies, some said.
- 1.327 The gendered nature of uniforms was also mentioned by a number of respondents, with some seeing gender-based guidance as discriminatory. Relevant issues include whether it is appropriate to mandate the length of girls' skirts and require learners to wear specific items regardless of weather.

- 1.328 Specific garments were mentioned frequently in response to this question. Simple colour-based uniforms with iron-on or sew-on logo patches were favoured by many. This could be limited to a polo or other shirt and not specify details about outer garments, for example. Blazers were seen as unnecessary by many due to their cost and style, with divergent beliefs about how formal school uniforms should be. Shoes were frequently mentioned as an item which causes problems, either because guidance is too strict, making it impractical and expensive for parents to find an appropriate pair, or because learners have some freedom regarding footwear, leading to observable differences between learners with branded and unbranded shoes.
- 1.329 Further issues mentioned included the consultation process, with respondents emphasising the importance of consulting with parents and those affected; safeguarding concerns, including the risk of unidentified people being able to enter the school anonymously if learners are not in uniform; and questions of authority over uniform guidance, with some believing Welsh Government should decide and others believing governors should have more power in this area. A number of respondents also expressed frustration with the questions about Welsh language, identifying no link with uniform policy.

*Engagement Question N - Is there anything in particular that you think should be included in future Welsh Government guidance on school uniform and appearance policies?*

*Parents*

- 1.330 Five participants believed that there should be a focus on the environmental impact of repeat uniform purchases, and this should be considered in creating guidance on uniform policy.
- 1.331 Three participants thought that generally, there is too much pressure on secondary schools and that rules surrounding uniform should be less strict. This would allow parents to be source uniform which is more competitive.

- 1.332 Two participants thought there was no need for uniform, specifically in primary school.
- 1.333 One parent mentioned that alongside the rules of *what* should be worn, there should also be guidelines on *how* clothes are worn.
- 1.334 One participant mentioned that there should not be gendered rules on school uniform, citing an incident where their daughter was not able to wear trousers in the winter meaning she was cold and uncomfortable during the school day.

#### *School governors*

- 1.335 All school governors mentioned how generic guidance provided by Welsh Government is useful, making it easier for each school to determine individual policies dependent on their local context within the school.
- 1.336 Further to this, one school governor stated that the guidance is already flexible enough and that a generic policy from Welsh Government is easier to enforce.
- 1.337 Another school governor wondered how consideration was made by governing bodies on the colour of school uniform, which led to a discussion on common uniform colours (which were more related to access and availability), bright uniform colours (oftentimes used for reasons related to safety) and how new schools choose their school colour. It was thought that this should be considered in relation to the other schools in the same area.

#### *Teaching staff*

- 1.338 Teaching staff did not provide any suggestions for what could be included in future Welsh Government guidance on school uniform and appearance policies, other than reiterating that it was useful to have the guidance.

#### *Children and young people*

- 1.339 Some learners argued that wearing own clothes was the best way forward as this would allow for greater comfort and self-expression. They said that on 'own clothes days' they felt freer to express themselves.
- 1.340 Other learners suggested that they would prefer a more comfortable uniform, perhaps without ties and with comfy tops such as polo shirts.
- 1.341 Fleeces were also suggested as a replacement to blazers as they would be more comfortable for learners. Some learners suggested that there could be different colours fleeces for different houses/ year groups.
- 1.342 Other young people also highlighted that uniform should be retained as it is less expensive in the long run than feeling under pressure from peers to constantly buy new clothes for school.

*School uniform suppliers*

- 1.343 Specialist school uniform suppliers had a number of recommendations for future guidance, including:
- Making the guidance statutory as is the case in England.
  - Including guidance to improve the rigour of the processes involved in appointing suppliers, including tendering, contract award and contract review, for example it was suggested that School Business Managers could take this on.
  - Ensuring schools are required to give suppliers sufficient notice if changing uniform: “If schools change their uniform with very short notice, the supplier can be left with tens of thousands of pounds worth of redundant stock.”
  - Ensuring the guidance prioritises quality as well as cost.
  - Continuing to grant schools a degree of latitude in making decisions about school uniform.
  - Retaining school uniform as a concept: “It’s pretty universally agreed that having school uniform is really important for a number of reasons - it takes out all sorts of inequality and potential for bullying, increases sense of pride and

belonging, improves concentration as pupils aren't looking at each others' clothes.”

### *Other stakeholders*

1.344 Other stakeholders also had a number of suggestions of what to include in future guidance, namely:

- Further guidance on lead-in time / consultation requirements for changing uniform. This was in the interests of both suppliers and parents: “Parents want to have some control over it and want to be consulted and to know *why* they are changing uniform – not just telling them “this is what is happening and giving them no chance to feed into it””.
- Including a maximum threshold for how much uniform should cost.
- Encouraging schools to run school uniform exchange schemes.
- Greater transparency over what is ‘normal’ in terms of school uniform costs / number of branded items: “Parents don't know what other schools are doing, so wouldn't know how theirs compare”.
- Guidance on number of items that should be branded: “then parents can have a sense of whether their school is over the top.”
- Advocating consultation with parents at every stage.
- Including case studies of effective and sensitively managed pre-loved schemes: “Snippets or case studies of what's worked well elsewhere – gives people an idea of things they could apply in their school.”

*Engagement Question O - Are there any further issues relating to school uniform policies and/or Welsh Government guidance on school uniform and appearance policies that you would like to raise?*

*Parents*

- 1.345 Three parents believed that there should be a policy for every school to have some sort of recycling box or reuse scheme, or that an annual event such as 'bags for school' could be held which also benefits parents wishing to get rid of old uniform.
- 1.346 One participant said that with physical exercise such a priority for children, uniform should be practical to reflect the need for children to be active during their school days.
- 1.347 Another participant believed blazers were unnecessary as a uniform requirement.
- 1.348 One participant believed more schools should be involved in schemes such as Dragon Bags, meaning that uniform that is not able to be re-worn or donated for children to re-use can be recycled and used for other purposes.
- 1.349 One parent also mentioned the problem of uniform being sourced from India and China with cheap and unsustainable materials that likely shed microplastics.
- 1.350 Another suggested that perhaps uniforms that are more environmentally friendly could be subsidised by the government.
- 1.351 Lastly, one parent mentioned that again, price is the biggest problem.

*School governors*

- 1.352 Several school governors from secondary schools mentioned the difficulty that parents of older children face over the additional cost of larger-sized uniform items due to the VAT added to 'adult' clothing and shoes above a certain size, even though they are being worn as school uniform.
- 1.353 Some school governors also mentioned concern over the apparent lack of enforcement to ensure the Pupil Development Grant is spent on uniform and not on other items.

- 1.354 One school governor also mentioned that they were not sure that everyone eligible for the grant was aware of it, suggesting there be a more effective way to ensure schools are supportive in promoting it to parents.
- 1.355 Similarly, one school governor mentioned that the grant relied on access to an internet connection, so ensuring it was accessible for everyone should be a priority. They also mentioned that the stigma surrounding parents claiming any kind of benefit meant there were some groups not accessing the grant even if eligible.
- 1.356 Two governors discussed the use of the word 'uniform' and its potential connotations, suggesting it could be triggering for some young people such as those in care, potentially attributing the word to policing or ambulance services, for example.
- 1.357 A suggestion for an alternative term to use would be 'dress code' as is utilised by the Senedd and teachers.
- 1.358 Finally, another school governor mentioned how being visible should be a consideration, for example being safe on the way to and from school, and that reflective materials should be promoted as part of wider guidance.

#### *Teaching staff*

- 1.359 No teaching staff who participated in the focus groups had any additional thoughts to share that had not been already covered in the engagement questions asked.

#### *Children and young people*

- 1.360 Some learners questioned the purpose of a school uniform, stating 'If it's to prepare students for uniformed work because that's not relevant to all students [sic].'
- 1.361 Other young people opposed this view, arguing that school uniform should be kept as it reduces bullying on the grounds that learners all look

the same. However, they stated that there should be a more relaxed approach to uniform that allows for piercings and different coloured hair dye, as teachers are allowed to dye their hair and have piercings in lots of schools.

### *School uniform suppliers*

1.362 Suppliers had a number of comments in response to the final question, including:

- School uniform is important – it is a leveller and ensures everyone wears the same clothes
- Specialist school uniform suppliers offer an ethical advantage over supermarkets in terms of their supply chain: “I know what it costs to bring a garment into the country, I know the shipping costs, the costs of that fabric: “It’s not £6 because it’s got a badge on – it’s £6 because everyone in the supply chain is being paid fairly.”
- Specialist school uniform suppliers also supply ‘outlier’ clothes – for very small or very tall children, which cannot be provided by the supermarkets.
- Concerns about the rationale for and potential effect of this consultation: “[Welsh Government] is trying to fix something that isn’t broken.”
- Better management of available grants, for example introducing vouchers to ensure it is spent on uniform.
- Ensuring governing bodies engage with suppliers when setting policy to ensure it is appropriate: “I had a conversation this afternoon with a school in a deprived area ... their sports kit is purple and is the most expensive to produce.”

### *Other stakeholders*



1.363 Other stakeholders offered no further comments in response to this question.

## **Annex A – Consultation Questions**

- 1.364 Question 1 - Do you agree that school governing bodies should prioritise affordability when setting their school uniform and appearance policy?
- 1.365 Agree
- 1.366 Disagree
- 1.367 Neither agree nor disagree
- 1.368 Question 2 - Do you agree that school governing bodies should ensure easy access and availability of uniform items when setting their school uniform and appearance policy?
- 1.369 Agree
- 1.370 Disagree
- 1.371 Neither agree nor disagree
- 1.372 Question 3 - Do you agree that logos should not be required on school uniforms?
- 1.373 Agree
- 1.374 Disagree
- 1.375 Neither agree nor disagree
- 1.376 Question 4 - Do you agree that logos should be limited to one outer garment, for example a jumper, cardigan or blazer?
- 1.377 Agree
- 1.378 Disagree
- 1.379 Neither agree nor disagree
- 1.380 Question 5 - Do you agree that iron-on or sew-on logo badges should be provided for learners, free of charge?
- 1.381 Agree
- 1.382 Disagree
- 1.383 Neither agree nor disagree

- 1.384 Question 6 - Do you agree that logos should not be required on school sportswear and other school equipment?
- 1.385 Agree
- 1.386 Disagree
- 1.387 Neither agree nor disagree
- 1.388 Question 7 - Many schools enter into single supplier arrangements with a school uniform supplier. This means that there is no choice about where branded uniform items are bought. Do you agree that schools should avoid single-supplier agreements with suppliers of branded school uniforms?
- 1.389 Agree
- 1.390 Disagree
- 1.391 Neither agree nor disagree
- 1.392 Question 8 - Do you agree that schools should be transparent in demonstrating that any benefit of a financial agreement they have with a school uniform supplier is being passed on to the customer?
- 1.393 Agree
- 1.394 Disagree
- 1.395 Neither agree nor disagree
- 1.396 Question 9 - Do you agree that if schools enter into an agreement with a school uniform supplier, they should ensure that the costs of using this supplier are similar to the costs of school uniforms available from high street retailers or supermarkets?
- 1.397 Agree
- 1.398 Disagree
- 1.399 Neither agree nor disagree
- 1.400 Question 10 - Do you agree that schools should operate a uniform exchange and/or recycling scheme available to families?
- 1.401 Agree

- 1.402 Disagree
- 1.403 Neither agree nor disagree
- 1.404 Question 11 – We would like to know your views on the effects that guidance on school uniform and appearance policies would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than the English language.
- 1.405 What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
- 1.406 Question 12 – Please also explain how you believe the guidance on school uniform and appearance policies could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

### **Annex B – Engagement Questions**

- 1.407 Theme 1: Affordability
- 1.408 1. To what extent should school governing bodies prioritise affordability when setting their school uniform and appearance policy?
- 1.409 2. To what extent do you think school governing bodies do prioritise affordability when setting their school uniform and appearance policy?  
What evidence is there of this?
- 1.410 Theme 2: Access & Availability
- 1.411 3. To what extent should school governing bodies ensure easy access and availability of uniform items when setting their school uniform and appearance policy?

- 1.412 4. To what extent do you think school governing bodies do ensure access and availability of uniform items when setting their school uniform and appearance policy? What evidence is there of this?
- 1.413 Theme 3: School Logos
- 1.414 5. How important is it to have school logos on school uniforms? Why do you say that?
- 1.415 What are the relative advantages/disadvantages of having a school logo?
- 1.416 Are there any particular items of school clothing that you think should / should not include a logo?
- 1.417 6. To what extent do you think iron-on or sew-on logo badges are a viable alternative to the traditional embroidered logo? Should these be provided for pupils free of charge, in your opinion?
- 1.418 Theme 4: Supplier Arrangements
- 1.419 7. How appropriate is it for schools to enter into single supplier arrangements with a school uniform supplier? Prompt if necessary: This means that there is no choice about where uniform items are bought. What are the relative advantages/disadvantages of having single supplier arrangements with a school uniform supplier?
- 1.420 8. NB: not all stakeholders will be aware of this. How common is it for schools to enter into single supplier arrangements with a school uniform supplier?
- 1.421 Theme 5: Transparency for Customers
- 1.422 9. How important is it that schools are transparent in demonstrating that any benefit of a financial agreement they have with a school uniform supplier is being passed on to the customer?
- 1.423 10. How common is it for schools to be transparent in demonstrating that any benefit of a financial agreement they have with a school uniform supplier is being passed on to the customer? What evidence is there of this?

- 1.424 Theme 6: How similar should school uniform costs be to costs for un-branded uniforms in supermarkets?
- 1.425 11. How important is it that schools ensure that the cost of uniform available through single supplier agreements is similar to the cost of school uniforms available from high street retailers or supermarkets? To what extent is this the case?
- 1.426 12. How important is it that schools operate a uniform exchange and/or recycling scheme? What are the advantages of uniform exchange and/or recycling schemes? Are there any disadvantages? How common is it for schools to operate a uniform exchange and/or recycling scheme?
- 1.427 Theme 7: What else should be included/ what other issues should be considered?
- 1.428 Is there anything in particular that you think should be included in future Welsh Government guidance on school uniform and appearance policies?
- 1.429 Are there any further issues relating to school uniform policies and/or Welsh Government guidance on school uniform and appearance policies that you would like to raise?