



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: School Uniform Policy Consultation

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Foyle Women's
Information
Network



Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women’s Regional Consortium appreciates the opportunity to respond to the Department of Education (DE) Consultation on School Uniform Policy. We know from our own research with local women on the impact of the Cost-of-Living Crisis² how much school costs, including the cost of school uniforms, impact on the lives of women and families.

1.5 We wish to endorse the response made by the Women’s Policy Group of which we are a member and the response made by our colleagues in Save the Children NI. We fully endorse their responses and urge the Department to take their evidence fully into consideration.

² <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Cost-of-Education-Summary-from-Women-Cost-of-Living-Research.pdf>

2.0 General Information

We welcome the Minister's recognition in the consultation that people are facing a cost-of-living crisis and that he is clear that "*action needs to be taken to make sure uniforms are affordable.*" We know from our research work with local women that the costs of school uniform is an annual dread for many women and increasingly occupies their thoughts, significantly contributing to anxiety levels particularly over the summer months. We wish to highlight the following areas which we believe must be taken into consideration when considering the costs of school uniforms and the fact that it is often more likely to be women who are bearing these financial costs. The wider environment has undoubtedly had an impact on household finances and their ability to pay for the essentials including school uniforms.

2.1 The Impact of the Cost-of-Living Crisis on Women in Northern Ireland

The Women's Regional Consortium and Ulster University carried out detailed research with 250 women in Northern Ireland on the impact of the Cost-of-Living Crisis on their lives and families. A research paper summarising the findings was published in June 2023 along with a shorter summary document and a topic summary specific to the costs of education. These documents are all available on the Women's Regional Consortium website here:

- **Full research paper:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>
- **Summary leaflet:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/03/The-Impact-of-the-Cost-of-Living-Crisis-on-Women-in-NI-In-Brief-1.pdf>
- **Topic summary on the Costs of Education:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Cost-of-Education-Summary-from-Women-Cost-of-Living-Research.pdf>

We are extremely concerned about the impact of the Cost-of-Living Crisis on the lives of everyone in Northern Ireland but most particularly on women and children. Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing care either for children or other family members which limits their ability to carry out paid work and more likely to have to make up for cuts to public services through unpaid work. All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, heat or clothes in order to meet the needs of children and/or other family members when money is tight.³ These actions taken by women are often unseen within the home and given little attention or focus in terms of policy.

"I am now scraping along to provide food and keep a roof over mine and my child's heads. The cost to survive is atrocious."

"Women are the ones who often give up/do without to absorb debt rather than let it impact on their children. I'll do without spuds and put the spud on the child's plate. Women are at the frontline of this."

"Women normally run the house and do the grocery shopping. I'm the one buying the kids their clothes and managing the finances. You take on the financial impact of it and the constant thinking about it."

"I don't think anyone recognises the impact of this Crisis on women especially. We have a high level of responsibility and it's impacting really badly and Government are not taking enough notice. People are suicidal and feel like a failure. I'm lying in bed at night and getting really bad intrusive thoughts to the point where I look at my daughter and think if something happens to me who will look after her? I asked the person in charge in my hostel to ring me in the morning and check if I'm OK. It's really, really impacting on people and Government need to be more aware of the impacts of this Crisis."

³ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019
<https://fabians.org.uk/a-female-face/>

“Sometimes you struggle between turning the heating on and feeding the children. As a mother you’d go without to make sure the kids have what they need. I’ve made dinner sometimes and there hasn’t been enough for everyone so I’ve lied and said it’s alright I’ve eaten so that I can try and make it stretch.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

2.2 Welfare Reform/Austerity Policies and Women

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings. However, the safety net provided by the social security system has been weakened by a decade of welfare reform changes meaning that many people are unable to meet the costs of essential items such as food, heat and clothing and are unable to cope with unexpected life events such as a washing machine breaking down.

Welfare reform and austerity policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women.⁴

In Northern Ireland an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)⁵ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. Their most striking finding was that households with children experience much larger losses as a result of the reforms than those without children. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

⁴ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017
<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

⁵ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019
https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

“Government need to increase benefits. There needs to be an increase in income whether people are working through a Living Wage and if you can’t work on a benefits system that gives you enough of an income that you’re able to live and not struggle. At the minute anyone on benefits is existing they’re not living.”

“It would be good if the Government could give people more money in benefits. You are expected to live off what they give you but they couldn’t do it. You have to buy shopping, clothes, gas and electricity with what they give you but you can’t do it. You can’t even afford to get a new pair of shoes, you have to borrow.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

2.3 Borrowing and Debt

There is a lack of specific data on levels of personal debt in Northern Ireland but the data which does exist has shown that personal debt in Northern Ireland (excluding mortgages) is higher than any other part of the UK. Research by the Financial Conduct Authority (FCA)⁶ shows adults in Northern Ireland owe £3,990 on average and adults with debts owe £10,730 on average. This compares to £3,320 and £9,570, respectively, for all UK adults. The research found that well over half (54%) of adults in Northern Ireland have either no cash savings, or savings of less than £2,000; compared with 46% in Wales, 45% in England and 43% in Scotland. These figures are likely to have increased with the impact of the pandemic and the Cost of-Living Crisis.

Borrowing and debt are far from gender neutral. Women are more likely than men to claim social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing unpaid care and more likely to have to make up for cuts to services through unpaid work. As women’s incomes are generally lower over their lifetimes this leaves them more vulnerable to short-term financial problems or income shocks making them more likely to have to rely on borrowing and debt to make ends meet.

⁶ The financial lives of consumers across the UK, Key findings from the FCA’s Financial Lives Survey 2017, Financial Conduct Authority, June 2018 Updated January 2020
<https://www.fca.org.uk/publication/research/financial-lives-consumers-across-uk.pdf>

Research by the Women's Regional Consortium⁷ on Women Living with Debt in Northern Ireland showed that the majority of the women's borrowing had been to fund essential items or to make ends meet. It also found that many (51%) had resorted to high-cost lending and difficulty meeting their debt repayments was a common problem (60%). Worryingly, there were also examples of borrowing through loan sharks including paramilitaries (6%). The impact of the Cost-of-Living Crisis on women's debts was evident in our most recent research with 60% of the women reporting their debts had been impacted by rising energy prices and 60% also reporting their debts had been impacted by rising food prices.⁸

Single parents are more likely to be impacted by financial hardship and debt. In Northern Ireland Census results show that the majority of single parent households are headed by a woman (93%). Research by the Joseph Rowntree Foundation⁹ has found that single parents are by far the most likely of any family type to be struggling with poverty. Further research by the Joseph Rowntree Foundation¹⁰ shows that the risk of living in very deep poverty has increased by a third for people in lone-parent families, to reach 19% or 900,000 people.

Low-income households are the most vulnerable to debt and increasingly are having to use borrowing to meet everyday expenditure. Research by the Joseph Rowntree Foundation¹¹ shows that Cost-of-Living increases have hit poorer households the hardest. In the poorest fifth of families 6 in 10 cannot afford an unexpected expense, more than half are in arrears and around a quarter use credit to pay essential bills.

⁷ Women Living with Debt, Women's Regional Consortium, September 2022
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

⁸ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

⁹ UK Poverty 2022, Joseph Rowntree Foundation, January 2022
<https://www.jrf.org.uk/report/uk-poverty-2022>

¹⁰ Going without: deepening poverty in the UK, Joseph Rowntree Foundation, July 2022
[Going without: deepening poverty in the UK | JRF](https://www.jrf.org.uk/sites/default/files/jrf/files-research/uk_poverty_2023_-_the_essential_guide_to_understanding_poverty_in_the_uk_0_0.pdf)

¹¹ UK Poverty 2023, Joseph Rowntree Foundation, January 2023
https://www.jrf.org.uk/sites/default/files/jrf/files-research/uk_poverty_2023_-_the_essential_guide_to_understanding_poverty_in_the_uk_0_0.pdf

Paramilitary Lending

Some of the most vulnerable borrowers are forced into using illegal lending or 'loan sharking' because of a more urgent need for money. In Northern Ireland illegal lending is often linked with perceived paramilitary activity.¹² Research conducted by Advice NI on behalf of the Consumer Council¹³ in Northern Ireland has highlighted that one of the themes around illegal lending is low income and lack of access to mainstream credit. Two pieces of research by the Women's Regional Consortium¹⁴ with women in Northern Ireland found examples of borrowing through loan sharks including paramilitaries.

There are a range of external factors which can drive people to use illegal lending including paramilitary lending. Welfare reform/austerity policies, a constrained Budget for Northern Ireland which has seen cuts to important areas of support and the impact of the Cost-of-Living Crisis are driving more people to debt.

Research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending¹⁵ particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits. This ensured that benefit claimants were often short of the funds they needed to support their household leading them to look to other means of getting the money they needed.

“I've been to a loan shark – it's not good. The interest they put on. If you miss a payment they are at your door – you don't miss those payments.”

¹² Expensive Lending in Northern Ireland, Centre for Economic Empowerment, NICVA, May 2013
https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee_expensive_lending_in_northern_ireland_2013.pdf

¹³ Illegal Lending – The Human Story, Advice NI, September 2019
<https://www.adviceni.net/policy/publications/illegal-lending-human-story>

¹⁴ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020
[Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf)

Women Living with Debt, Women's Regional Consortium, September 2022
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

¹⁵ Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020
[Illegal Money Lending Report.PDF \(consumercouncil.org.uk\)](https://www.consumer-council.org.uk/wp-content/uploads/2020/03/Illegal-Money-Lending-Report.pdf)

“I have a debt to a paramilitary lender. On every £100 I pay £30. I pay it back every 2 weeks. On £1,000 I pay £300 interest. I work full time but still have difficulty making ends meet on a low income. You ask these lenders can I borrow £1,000 today and they will leave it round to you that night.”

“If you can’t get a bank loan, a Credit Union loan because you have to have savings, or payday loans then after that it’s paramilitaries.”

(Quotes taken from Women’s Regional Consortium Research paper on Women Living with Debt, September 2022)

2.4 Impact of Cuts

The Department for Education announced that the Holiday Hunger Scheme would no longer provide support to families (approx. 96,300) entitled to Free School Meals¹⁶ during holiday periods (£27 per child, every two weeks). This scheme was set up with cross-party support during the pandemic and pioneered a cash-first approach to provide families with extra support during a crisis. Research by Spyreli et al (2021) which studied the impact of Covid-19 on the food decisions of economically disadvantaged families in NI found that the Holiday Hunger Scheme, together with informal support offered through social circles was crucial for parents, particularly lone parents who needed to reduce costs and feed their family with a limited budget.¹⁷

The ‘Extended Schools Programme’ which provides support to schools in disadvantaged areas to put in place activities to support children’s learning (which included schools running Breakfast Clubs) has been subject to budget cuts.

A rapid response report detailing the consequences of the cuts to education for children and young people in Northern Ireland¹⁸ states:

¹⁶ The threshold for entitlement for Free School Meals (FSM) is extremely low at £7,400 per year (after tax and not including benefits)

¹⁷ A qualitative exploration of the impact of COVID-19 on food decisions of economically disadvantaged families in Northern Ireland, BMC Public Health, December 2021
[A qualitative exploration of the impact of COVID-19 on food decisions of economically disadvantaged families in Northern Ireland | BMC Public Health | Full Text \(biomedcentral.com\)](#)

¹⁸ The Consequences of the Cuts to Education for Children and Young People in Northern Ireland, June 2023
<https://www.stran.ac.uk/wp-content/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-and-Young-People-in-Northern-Ireland-Final.pdf>

“The removal of, or deep cuts to, schemes such as those to alleviate holiday hunger, period poverty and the high costs of school uniforms have a cumulative impact on groups which are already disadvantaged, in terms of their experience of education provision.”

It is important to recognise the cumulative impact of the public sector cuts across communities, health, and education on the lives of women and their children. The complete removal of additional opportunities to access food in and out of school, coupled with restrictions on the Discretionary Support scheme will remove a crucial safety net for women and those at most risk of falling into financial hardship.

2.5 Other Regional Issues

Research by the Northern Ireland Human Rights Commission outlined that larger family sizes are more common in Northern Ireland. ONS statistics show that 21.4% of families in Northern Ireland have three or more children, compared to 14.7% of families in the UK as a whole.¹⁹ This means that more households in Northern Ireland are under increased pressure to meet the costs of school uniforms.

As time goes on, the two-child limit is likely to have a disproportionate impact on families in Northern Ireland. The Department for Communities has estimated that the average number of monthly recipients on Universal Credit and Child Tax Credit affected by the policy will be 14,000 in 2022/23, rising to 16,000 in 2023/24 and 19,000 in 2024/25.²⁰ Households that are impacted by the two-child limit lose £270 per month per child. Figures from the Department for Communities show that nearly one in six children in Northern Ireland are living in absolute poverty (68,000 children) meaning they cannot meet their basic needs.²¹ This will impact on the ability of these families to afford a range of essentials including the cost of school uniforms. As outlined throughout this response, women will be absorbing the impact of this policy by going without essentials to try and provide for their children and families.

¹⁹ Cumulative impact of tax and social security reforms in Northern Ireland, NI Human Rights Commission, November 2019, [Final CIA report Oct 2019.pdf \(qub.ac.uk\)](#)

²⁰ Welfare Mitigations Review, Independent Advisory Panel Report, October 2022 <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

²¹ [Cost of Living Crisis: 68,000 Northern Ireland children are living in absolute poverty, report finds | BelfastTelegraph.co.uk](#)

2.6 Concerns on School Uniform Costs in Northern Ireland

LucidTalk research commissioned by **Save the Children NI**²² found that families are forced to cut back on food and fuel to cover excessive costs of school uniforms and PE kits and detailed what parents and the public think about school uniforms:

Financial Impact on Families

- 1 in 10 parents said their child has missed out on school due to issues relating to school uniform or PE kit.
- 1 in 3 parents have had to borrow money to cover the cost of school uniforms and PE kits.
- 6 in 10 find the costs of school uniforms and PE kits financially challenging.
 - For low-income families this rises to over 7 in 10 (73%).
 - For middle-income families it is almost 5 in 10 (49%).

What do the public think?

- 99% want action taken to alleviate the financial pressure.
- 88% don't believe that parents should experience debt to pay for uniforms.
- 78% believe not enough is being done by relevant authorities to help families manage the cost.

Solutions parents and the public want to see to tackle the costs

- 97% believe schools should ensure parents have adequate choice of school uniforms/PE kit suppliers.
- 97% believe when completing school uniform lists boards of governors must consider affordability as a priority.
- 64% support generic uniforms from high street shops.
- 51% support the introduction of a price cap.

²² Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023
https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf

Research by the **Irish League of Credit Unions** in 2022²³ into Back-to-School costs found the following in relation to school costs:

- 7 in 10 Northern Ireland parents (72%%) say the cost of Back to School is a financial burden - up 10% from 2021.
- Parents spending £826 per secondary school child.
- At primary school level, parents are spending £756.
- 38% are getting into debt compared to 34% in 2021 – average debt of £246.
- 2 in 3 parents (72%) say schools don't do enough to keep costs down.

The research found that the most expensive item for primary and secondary schools is still school uniforms at £122 and £173 respectively. When parents were asked if the rising costs of living were affecting the costs of education, 61% said the increasing costs of school uniforms was the biggest effect.

A survey by ParentKind²⁴ has also found that parents in Northern Ireland are more concerned about school uniform costs than parents in the rest of the UK. The Parent Engagement Group (PEG) set up by parents in Northern Ireland which campaigns for school uniform reform in Northern Ireland has raised concerns about the cost of branded items and limited choice of suppliers and has called for legislation to introduce a cap on school uniform costs. As far back as 2017 the Northern Ireland Commissioner for Children and Young People (NICCY) wrote to principals and head teachers about school uniform costs²⁵ asking them to *“review their school uniform policy to ensure that the views and voices of pupils and their parents and carers are heard and to show flexibility and pragmatism in the application of the policy, namely to:*

- *Make sure that parents are able to avail of the most affordable options for school uniforms and are not required to purchase expensive items from particular suppliers or from your school directly if this is your policy.”*

²³ <https://www.creditunion.ie/news/latest-news/ilcu-annual-survey-finds-rising-costs-of-living-im/>

²⁴ <https://www.parentkind.org.uk/assets/resources/The-National-Parent-Survey-UK-2023.pdf>

²⁵ <https://www.niccy.org/wp-content/uploads/2017/09/niccy-school-uniform-letter-sept-17.pdf>

A report on the consequences of the cuts to education for children and young people in Northern Ireland²⁶ highlights that financial hardship will be further compounded by the pressure of school uniform costs, stating: *“The failure of government to review the school uniform grant coupled with the Cost-of-Living Crisis has led to schools and community organisations setting up ‘uniform swaps shops’ to support local families, which relies on parents and/or teachers and local volunteers to organise, sort and distribute. An increased reliance on charitable provision can increase the stigma that parents and children feel, exacerbating feelings of social exclusion.”*

There has been an increase in the number of pre-loved school uniform schemes across Northern Ireland in response to rising school uniform costs. Recent news reports²⁷ show that the demand for these schemes has substantially increased in recent years with one Belfast pre-loved scheme providing uniforms for over 800 children over the last few months. The operator of this scheme heard from a number of parents who have kept their child off school because they can’t afford their school uniform costs.

²⁶ The Consequences of the Cuts to Education for Children and Young People in Northern Ireland, June 2023

<https://www.stran.ac.uk/wp-content/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-and-Young-People-in-Northern-Ireland-Final.pdf>

²⁷ <https://www.bbc.co.uk/news/articles/ckvg74jw8pko>

<https://www.belfastlive.co.uk/news/belfast-news/belfast-children-missing-school-due-29897708>

3.0 Specific Questions

Q.1 Do you agree that schools should be legally required to comply with Departmental uniform guidance?

Strengthening current guidance

Key Principles

2.2 Our key principles underpinning the proposed guidance on uniforms are identified below.

School uniforms should be:

- (i) affordable;
- (ii) comfortable; and
- (iii) sustainable.

School Uniform policies should be:

- (iv) developed in partnership with pupils and their parents/carers;
- (v) published; and
- (vi) regularly reviewed.

Yes. We agree that schools should be legally required to comply with Departmental uniform guidance. The Department currently offers ‘guidance’ only to schools on uniform policy and yet there are widespread problems with affordability, the use of branded items and limited choice of suppliers. It is therefore clear that the existing non-statutory guidance is not working with many schools not complying with it. The rationale for making it statutory is therefore clear and compelling. In England and Wales new legislation introduced in 2021 requires all schools to follow statutory guidance to keep prices down, consider high street alternatives and encourage second-hand uniforms.²⁸

We also believe that any statutory guidance for school uniform policies should include an embedded price cap to ensure that costs are kept to a minimum, do not place an unnecessary burden on parents and children and do not take advantage of the limited budgets of families particularly in these difficult economic times.

²⁸ <https://www.legislation.gov.uk/ukpga/2021/20/contents/enacted>

Q.2 Do you agree with these principles?

Yes. We agree with these principles particularly around the issue of affordability. School uniforms should not be a barrier for low-income children and families accessing the school they wish to go to. A uniform policy that puts affordability at its core has the potential to make the lives of both children and parents easier. Polling carried out by Save the Children NI found that 99% of the public want action taken to alleviate the financial pressure of school uniforms (see Section 2.6).²⁹

There is a clear case for affordability given the concerns we have outlined in Sections 2.0 of this response namely:

- The impact of the Cost-of-Living crisis particularly on women (see Section 2.1)
- The gendered impact of welfare reform/austerity policies (see Section 2.2)
- Increased use of borrowing to fund essential items (see Section 2.3)
- The impact of cuts in education including the Holiday Hunger Scheme (see Section 2.4)
- Northern Ireland has a greater proportion of larger families and is more impacted by the two-child limit (see Section 2.5)
- Research by a range of stakeholders which show the pressure that school uniform costs put on parents and families (see Section 2.6)

We know from our research work with local women that the costs of school uniforms is an annual dread contributing to significant levels of anxiety and financial hardship for many women. Our research on the impact of the Cost-of-Living Crisis³⁰ shows how much school costs, including the cost of school uniforms, impact on the lives of women and families. We believe that it is often more likely to be women who are bearing these financial costs and we heard examples of women going without essentials such as food and heating to pay for school uniforms.

²⁹ Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023
https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf

³⁰ <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Cost-of-Education-Summary-from-Women-Cost-of-Living-Research.pdf>

Save the Children NI polling also shows that 6 in 10 families find the cost of school uniforms and PE kits financially challenging and for low-income families this rises to over 7 in 10 (73%).³¹

We do not believe that it is right that parents and families are getting into debt to pay for the cost of school uniforms. Polling by Save the Children NI³² shows that 1 in 3 parents have had to borrow money to cover the cost of school uniforms and PE kits and that 88% of the public don't believe that parents should experience debt to pay for uniforms. This raises serious concerns about the adequacy of current provisions around school uniform costs and the level of these costs against a background of chronic low incomes through social security and low paid work as well as an ongoing Cost-of-Living Crisis.

We also wish to raise the inadequacy of the School Uniform Grant as part of affordability considerations. The school uniform grant in Northern Ireland is significantly less than those in other parts of the UK. Despite a welcome 20% rise announced in 2022 it still only provides less well-off families with children at primary school with £42.90 and those with secondary school children with £61.20 (under 15) and £67.20 (over 15) and £26.40 for PE kit. Our research has shown examples of school blazers alone costing more than the existing levels of the school uniform grant. Given widespread price increases for the essentials including clothing, cuts to important areas of help including the Holiday Hunger Scheme and inadequate support through the social security benefits system it is clear that the current levels of support through the School Uniform Grant are insufficient.

We provide the following quotes from women who have taken part in our research to show the considerable issues they face with affordability of school uniforms and the very real impacts it has on them:

³¹ Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023 https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf

³² Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023 https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf

“Schools put pressure on too. My youngest is starting secondary school this year and I’m dreading it. It’s £65 for a blazer. The grant for a school uniform doesn’t even go anywhere near the actual costs.”

“I had to use a credit card for the kid’s school uniform this year. I struggled to pay the kid’s school uniform worse this year than any time before.”

“I have three kids and with uniforms, shoes, school bags and all the extras it cost me over £1,000 for the three of them and we get no help.”

“My son needs a new school uniform every day as he has sensory issues and there are a lot of changes. I had to buy all his school uniform, shoes, PE kit, school bag and contents. It was £345 for primary school. I literally broke down in tears because I had to get for my daughter as well and she’s in secondary school.”

“The school uniform grant is nowhere near enough. Hoodies are £50, a secondary school blazer is £100. The school uniform grant should be increased and it should be open to more people.”

“The school uniform grant is less than £50, what would that buy you now? It’s £65 for a PE kit and £60 for my son’s shoes – he has size 11 feet.”

“My son is starting secondary school in September and I’m scared already. The blazer is £65. He’s 11 but he’s so tall so it’s like an adult size for his clothes and his shoes. The grant for a school uniform doesn’t even go anywhere near the actual cost of a uniform.”

“I have 3 kids in the house, I’m always going without to make sure they have what they need. The little one needs new school shoes and I’m trying to figure out how I’m going to pay for them. There is nowhere to take the money from. He needs them so this week I’ll cut back on gas and not do a full shop so that I can save some money for his shoes.”

Q.3 Should any others be included? If yes, please state any additional principles.

We would like to see the principle of **Flexibility** included moving away from policies which seek to control, towards policies which are child-centred, and allow a degree of flexibility according to the circumstances.

We also support the points made by our colleagues in the Women's Policy Group who have suggested a number of additional areas which school uniform policy should address:

- A mandatory requirement for gender-neutral options for school uniforms so that pupils have the ability to choose the options that work for them and which do not reinforce harm to trans and gender non-conforming students. All students should be offered gender-neutral options for school uniform to help break down harmful gender stereotypes.
- School uniform policies should be flexible allowing for changes in the weather. They should ensure that pupils are allowed to remove items of uniform such as blazers/jumpers if it is too warm and schools should provide low cost, plain uniform options for additional layers if it is very cold including gloves, scarves and coats.
- School uniform policies should be accommodating of pupil's individual needs to include sensory issues and the specific needs of SEN children, the needs of pupils with disabilities and cultural accommodations for students from minority ethnic backgrounds.
- School uniform policy should take a child-centred approach to issues like the management of hair/piercings and appearance. Often the approach taken to these issues is highly gendered and the sanctions imposed for non-compliance are damaging to children and young people. We refer the Department to the points made by the NI Commissioner for Children and Young People in her letter to schools in 2017 which addresses these issues and the sanctions that are often applied.³³ We strongly disagree with the actions of schools who exclude/sanction their pupils for breaches of school uniform policy.

³³ <https://www.niccy.org/wp-content/uploads/2017/09/niccy-school-uniform-letter-sept-17.pdf>

Q.4 Do you agree that it should be compulsory for schools to demonstrate how they have taken costs into account when designing their uniform?

Yes. We believe that it must be compulsory as this helps to ensure that schools have done all that they can to take cost into account and keep them to a minimum. Making it compulsory to demonstrate how they have taken costs into account in the design of school uniforms provides for some degree of accountability and allows for scrutiny of the process.

Polling by Save the Children NI³⁴ shows that 97% of parents and the public believe that when completing school uniform lists boards of governors must consider affordability as a priority.

Q.5 Do you agree that it should be compulsory for schools to publish details of the costs of their uniform?

Yes. This is important as it ensures that parents have access to complete information on the full cost of the school uniform so they can take this into consideration in relation to their household budgeting. Making it compulsory for schools to publish cost details for their school uniform also helps with transparency and in making them accountable for their decisions in relation to costs.

Q.6 Do you agree with our proposals that schools must review their uniform policy and explain their decision to use any unusual colours or designs?

Yes. Schools should provide an explanation for any unusual colours or designs which can significantly add to the price of a school uniform. Limiting the use of unusual colours and designs helps to ensure that items can be bought from multiple retail suppliers and at more reasonable prices. Schools should also avoid variation in colours and design for different year groups as this is also expensive for parents and limits their ability to hand down school uniform to younger siblings.

Polling by Save the Children NI³⁵ shows that 64% of parents and the public support generic uniforms from high street shops.

³⁴ Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023 https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf

³⁵ Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023 https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf

Some schools have in place very specific school uniform around internal transitions, for example, special blazers for areas of focus like music or a change of jumper/blazer for moving from junior school to senior school. Any school uniform policy should aim to minimise these requirements which can be costly. If they are required they should be centred around something small and more easily affordable like a school tie.

Q.7 Do you agree that where a crest is considered necessary on a blazer or jumper that an option to purchase the crest alone should be available?

Yes. Adding crests to items of uniform significantly increases the price of those items. Therefore, these should be avoided where possible. Where a crest is considered necessary it would help to keep costs lower if a crest alone can be purchased. This would allow parents to source cheaper items of uniform from a range of retail suppliers and then add the crest. Another suggestion would be to limit any branded elements to just one item of school uniform particularly smaller and more easily replaceable items such as a school tie. These are likely to last for the duration of a child's school career and are easier to replace if lost or damaged.

Q.8 Do you agree that this crest should be reusable?

Yes. It is important that the crest should be reusable as this can help to ensure that it can be passed on to siblings, encourages sustainability and promotes the environmental benefits of recycling.

Q.9 Do you agree that branded sports kits should not be compulsory elements of a school PE kit?

Yes. This is an area which puts huge financial pressure on parents. The costs of branded sports kits can be significant driving up the price of school uniforms. Many parents struggle to pay these costs especially when they have multiple children at school. We believe that branded items should not be compulsory and schools should also have arrangements in place to ensure the availability of second-hand uniforms.

We would argue that there is a need to go further than simply making branded sports kits non-compulsory. We would like to see stronger requirements on schools to avoid the use of branded sports kits completely. Simply making branded sports kits non-compulsory will still create a difference between those who have the means to

afford them and those who do not. This could result in some children feeling stigmatised or standing out from others because they don't have the branded sportswear. It goes even further than stigmatisation and could actually be a barrier to participation in sports. No child should be excluded or discouraged from taking part in sport because they do not have the "right" kit. If part of the purpose of a school uniform is to be a leveller then branded sports kits must be avoided.

In relation to PE kits we would also like to see school uniform policy around PE kits not having different rules for girls and boys. Boys and girls should be treated the same in terms of what they are able to wear for PE and these policies should not include the policing of girl's bodies.

Q.10 Do you agree that parents should only have to purchase specific branded or school sports kits when their child is chosen to represent the school, either as part of a team or individually?

No. Schools should provide team kits available for loan for those representing the school – see our answer to Q11.

Q.11 Do you agree that schools should aim to have team kits available for loan for those representing the school?

Yes. We think that this option would help to ensure that children from the lowest income families do not miss out on opportunities to be part of team activities and the ability to represent their school due to the prohibitive costs of school sports kits. It is in the schools' interest to have talented children representing the school but expecting them to pay the often-significant costs of a team kit could result in them withdrawing from competitive sport. It should be the standard that schools should supply team kits when pupils are representing their school.

Q.12 Do you agree that all schools should be required to list more than one supplier of their compulsory uniform items?

Yes. Extending the range of suppliers for compulsory uniform items helps to keep prices competitive and addresses issues that parents might have in accessing specialist uniform suppliers, for example, if they live in rural areas. Prices are likely to be higher when there are single suppliers and this situation should be avoided. Having a wide range of uniform suppliers helps to demonstrate that schools have

tried to obtain the best value for money from suppliers as competition is likely to result in lower prices.

Q.13 Do you agree that any financial or in-kind benefits to schools from arrangements with suppliers or manufacturers should be published?

Yes. We would prefer not to see special arrangements with suppliers or manufacturers being allowed especially where this results in a singular specialist uniform supplier as this results in increased prices for parents and families. Where these arrangements do exist publishing the financial or in-kind benefits to schools allows for openness and transparency.

Q.14 Do you consider that a method of cost control should be introduced, for example, a cost cap?

Yes. As we have previously stated we would like to see the introduction of statutory guidance for school uniform policies with an embedded price cap. This would help to ensure that costs do not become prohibitive and cause financial hardship for parents.

Women's Regional Consortium research showed the impacts on women of costly school uniforms causing financial hardship, distress and anxiety. Women reported borrowing and using credit cards to pay for school uniforms and others went without food or heating to try and meet the costs. Save the Children NI polling also shows that 6 in 10 parents find the cost of school uniforms and PE kit financially challenging rising to 73% for low-income families.³⁶ The research outlined in Section 2.6 and the quotes from women contained in our answer to Q2 of this response make a clear case for the introduction of a cost cap for school uniforms.

Q.15 Do you agree that a key consideration in all actions taken by the Department should be to encourage schools to change their practice in setting uniform policies to ensure there is a competitive market for uniform items?

Yes. As we have stated in our previous answer competition helps to keep prices lower and this should not only be encouraged by the Department but ensuring a

³⁶ Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023 https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf

competitive market for uniform items should be set out in statutory guidance which schools are obliged to follow.

Q.16 Do you agree with the proposal to make it compulsory for schools to demonstrate how their school uniform policy fulfils the conditions of comfort, flexibility and safety?

Yes. Schools should be accountable for all their actions around school uniform policy including comfort, flexibility and safety. If schools are truly concerned with the wellbeing and safety of their pupils then this should be an ongoing and necessary part of their regular activities.

Q.17 Do you agree that all schools should be required to establish a Uniform Bank?

Yes. This makes good sense and helps to remove any stigma that exists around pre-loved school uniforms as well as being environmentally friendly and promoting sustainability. Second-hand school uniforms can benefit all parents and particularly those on low incomes. However, we agree with our Women's Policy Group colleagues that there should be some checks on the quality of these second-hand items so that any items which are in poor condition or badly worn are not suitable for donation as this could further stigmatise children.

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

Yes. Engagement with pupils on school uniform policy is currently referred to in the existing non-statutory guidance with schools encouraged to "*consult widely on proposed policies and changes to established policies*" by including prospective and current pupils, parents, etc. While this is included in the existing guidance to schools the extent to which it happens is unclear as schools are under no obligation to do so.

We agree that engagement with pupils on uniform policy should be mandatory.

Engaging with pupils on issues such as school uniform helps schools to understand better the needs of their pupils and to ensure that the school is fulfilling their needs. It stands to make sense that if pupils needs are being met they are in a better place to learn and to develop their skills and opportunities. This is surely what every school wants for their pupils.

Q.19 Do you agree that engagement with parents on uniform policy should be mandatory?

Yes. As raised in our answer to the previous question this is currently referred to in the existing guidance but the extent to which it happens is also unclear as schools are under no obligation to do so. We believe that making it mandatory will ensure that as many parents as possible are involved in this process.

Engaging with parents on issues such as school uniform helps the school better understand the families in their school community, the issues they face and the things that would help them support their children through their learning journey. However, we agree with our Women's Policy Group colleagues that care must be taken to ensure that parents are not given a veto over school uniform policy and that school uniform policies should be child-centred.

Q.20 Do you agree that schools should be required to publish details of stakeholder consultation on uniform policy?

Yes. Publishing details of stakeholder consultation on school uniform policy helps with the transparency of the process and helps to ensure openness and accountability. It enables pupils, parents and other stakeholders to understand the consultation process, to see what is being done and provides the ability to question the process if they feel it is not being done properly.

Q.21 Do you agree that it should become a legal requirement to publish details on the development of the uniform policy?

Yes. Once again this helps to ensure the transparency of the process and helps with openness and accountability. It also helps to spotlight and share areas of good practice and where improvements are needed.

Q.22. If yes, which of the following should schools be required to publish? Details of all stakeholders consulted; Response to issues raised by stakeholders; Rationale for a specific design or colour (if it is not a standardised colour); A list of compulsory and optional items; Estimated costs; A list of suppliers; Other

We believe that schools should be required to publish all the details listed above. Schools should be able to provide details in all these areas if they have carried out thorough and meaningful consultation with stakeholders so this should not be overly onerous if the process has been carried out properly. Providing all these details in a

transparent manner allows for scrutiny of the process and an analysis of how decisions have been taken.

Q.23 Do you agree with the proposal that schools should review their uniform policy every three years?

Yes. It is important to keep uniform policy under review so that it can be responsive to the needs of pupils, parents and all stakeholders. Regular review of school uniform policy particularly around cost will help to ensure that prices remain competitive and do not become excessive.

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

Yes. As we have already highlighted in our answer to Q2 of this response we believe that the school uniform grant is too low to provide the help that is required to low-income families to meet the often-significant costs of school uniform. As detailed in the consultation document this is particularly the case where pupils are in transition years when these costs are considerably higher. We support the proposals that the bandings for school uniforms should include a band for pupils as they move into Year 8 or Year 13 when uniform costs are typically higher. We would strongly oppose any attempt to reduce the current rate of the school uniform grant for non-transition years as a consequence and argue that the current rate of the grant is insufficient even when children are not in transition years.

Q.25 Do you agree with the proposed plans for monitoring and evaluation?

Yes. We agree that schools should be required to complete a return to the Department every three years demonstrating how they have followed the guidance. This helps to ensure that all schools are complying with the guidance, therefore ensuring that school uniforms meet the needs of pupils and parents and costs are not excessive. We also welcome the Department's proposal to commission specific independent evaluation into the effectiveness of the statutory guidance within three years of its implementation.