
Ymateb i Ymgynghoriad / Consultation Response

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Dyddiad / Date:	28.11.22
Pwnc / Subject:	Changes to statutory guidance on school uniform and appearance policies

Background information about Estyn

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

In general, Estyn supports the principles underpinning the proposed changes to the school uniform guidance. These include school governing bodies having regard to the affordability, access and availability of uniform items when setting their school uniform and appearance policy. This supports the Welsh Government's national mission to reduce the impact of poverty on attainment. In addition, the policy will provide worthwhile support to families during the current cost of living crisis, supporting the statement in the consultation that 'No school uniform should be so expensive as to leave pupils or their families feeling unable to apply for admission or to attend a particular school'.

Whilst we think that schools should not insist that there is a logo on uniforms, they also need to consider how they will safeguard pupils on trips and visits where no uniform or no logo is used. If schools do require logos, they should require just one item of outer clothing to have a sewn-on or iron-on logo or a badge which could be provided by the school.

We agree with the proposal that schools should operate a uniform exchange and/or recycling scheme for families. We already inspect many schools that do this successfully and include examples below.

We think that some schools may need additional guidance to support them in understanding how they can reduce the impact of financial hardship on education, including the review of school uniform policies. Local authorities and regional consortia have a key role to play in this. "[The Price of Pupil Poverty](#)"¹ is a useful guide for schools when considering development of their school uniform policy. The document contains some helpful practice examples that schools could use to support them in implementation of an appropriate uniform policy.

Consultation questions

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

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

We agree with the statements in the current guidance that state 'Governing bodies will give high priority to cost and affordability considerations. No school uniform should be so expensive as to leave pupils or their families feeling unable to apply for admission or to attend a particular school'. Recent inspections have identified positive examples of this in practice. For example, in Pantysgallog Primary, Merthyr Tydfil² leaders mitigated costs for all families by funding a blazer for every pupil in Year 5 and 6 to provide a sense of belonging and cohesion for these pupils. Key to the success of this approach is the school's secure knowledge of its community, its families, and pupils.

Through inspection activity, we have also seen good examples of schools that do not require an embroidered logo on uniforms. This ensures that no pupil or family is discriminated against due to

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lack of affordability. A few schools also run their own “Used Uniform Shops” which also supports families with uniform costs.

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?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

Uniform items that are readily available and easy to access, can help to ensure that there are no additional costs. We think that schools should consider their uniform carefully, including the choice of colours to allow families a choice of supplier. This will also to ensure that families can source the most reasonably priced items.

Question 3 – Do you agree that logos should not be required on school uniforms?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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Comments

We agree that schools should not require logos to be printed or embroidered on uniforms as this can add to the cost of the items purchased. However, schools might want to offer cheaper alternatives such as a school badge that can be provided by the school.

Schools will need to consider as part of their risk assessments how they safeguard pupils such as when out on a school trip, taking into consideration any uniform arrangements.

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

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

Limiting the need for logos to outer garments would help to reduce costs.

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

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

If iron-on or sewn-on badges were provided free of charge, this would reduce uniform costs for families. It would also allow families to buy plain uniform from a choice of suppliers.

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	✓
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Comments

We do not think that sportswear worn for PE or games lessons need a school logo as this is within the confines of the school grounds. However, it may be appropriate to require a logo on one outer garment of sportswear when the school is either competing against an outside provider or where sports activities take place off school site. In these cases, schools could consider loaning or providing their own branded kit to pupils.

Under section 175 of the Education Act 2002 (“the 2002 Act”) a governing body must make arrangements for ensuring their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of pupils at the school. Therefore, when a governing body is considering introducing a school uniform policy, it should have regard to this overarching duty to do so in a way that safeguards and promotes the welfare of pupils.

Schools should promote the use of the PDG-Access Grant which can be used to purchase school PE kit; uniform for wider activities outside the school day (such as sports, scouts and guides); school equipment where new curriculum activities begin (such as design and technology); and equipment for out of school hours trips (such as waterproofs for outdoor learning).

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?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

We think that schools should give families a choice of suppliers and where possible include readily available items from shops that supply goods at a reduced cost such as local supermarkets. Where a uniform item is only available from a single outlet, prices are likely to be higher than they would be if parents were able to buy the item from other sources.

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?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

To comply with financial regulations schools should always demonstrate the benefit of using a specific supplier. Any savings negotiated with suppliers should always be passed on to parents wherever possible.

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?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

Ideally, families would be able to buy uniform from a range of suppliers to help ensure competitive costs. Schools should always source suppliers that are competitive in price and readily available.

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

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments

The high cost of a uniform is potentially a barrier to learning for some pupils and a uniform exchange and/or recycling scheme can be a very helpful. We have inspected many schools that do this successfully.

For example, during the pandemic, Waun Wen Primary School in Swansea identified a need to support the community with food, clothing and other household products. These are available through a pop-up shop. Governors pay attention to closing the poverty gap and note the positive impact that the school pop-up shop has on supporting families in financial need. The school has been asked to write a case study for Estyn on removing barriers to learning.

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?

Supporting comments

We do not consider the policy to have any negative impact specifically on the Welsh language.

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.

Supporting comments

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.

Under the Equality Act 2010, governing bodies and head teachers need to have regard so as not to discriminate unlawfully on the grounds of sex, gender reassignment, sexual orientation, pregnancy and maternity, race, religion or belief and disability. Schools should pay due regard to this in their uniform policies, not advocating specific uniform requirements in relation to gender, for example.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: