

Consultation on draft statutory guidance to school governing bodies on school uniform and appearance policies

Consultation response form

Your name:

Organisation (if applicable):

e-mail/telephone number:

Your address:

Responses should be returned by **21 February 2019** to:

Education Business Planning and Governance Division
The Education Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: schoolfundingmailbox@gov.wales

Question 1 – Do you agree that school governing bodies should have regard to 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

The Bevan Foundation agrees that school governing bodies should ensure that their school uniform and appearance policies are affordable for all parents. We are concerned, however, that the proposed guidance does not go far enough. The Draft Guidance is, in substance, extremely similar to Section 3 of the current Guidance for governing bodies on school uniform and appearance policies. We suggest the guidance should be worded more strongly.

In both the Draft Guidance and the current Guidance, school governing bodies must ensure that “no school uniform should be so expensive as to leave pupils or their families feeling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.” We believe this requirement should be changed. There are two primary reasons for our views.

First, there is no measure of affordability. Rather than linking it with actual incomes and costs, the measure is based on a school’s assessment of a notional deterrent effect. This is highly subjective. School governing bodies should know the number children eligible for free school meals that attend their school, but it is much more difficult for them to assess how much each family can afford to spend on a uniform. School governing bodies may therefore underestimate the stresses faced by low income families when trying to balance their budgets to buy school uniform. Such a subjective measure also means there is no consistency across Wales – with one school deeming a uniform to be affordable that would not be so regarded elsewhere.

Second, in many areas of Wales, in particular in rural areas, parents may have no option but to send their child to a particular school given the distance and costs of travelling to an alternative. School governing bodies in such areas may therefore be able to argue that they have complied with the guidance, even if their school uniform is not affordable for some parents.

We believe that for the Draft Guidance to effectively ensure that school uniforms are affordable for all children in Wales, it should establish a cap on school uniform costs. We believe that such a cap should be set no higher than the sum to which a family is entitled from the Pupil Development Grant. This would ensure that low income families who qualified for financial support to cover the costs of their school uniform would not face the risk of having to spend further money on top of the grant on their children’s school uniform. It would also reduce the scope for wide variations in school uniform costs developing between schools, whilst limiting the risk of some school governing bodies misunderstanding the financial pressures faced by families in their communities. It should be noted, however, that the Pupil Development Grant is designed to give parents support for paying for sports kit and equipment as well as school uniforms. We believe that if the cap was set at the Pupil Development Grant level, the Draft Guidance should make it clear that the cap covers the costs of all items of clothing and equipment required at the school, not just the basic school uniform.

In addition to the above, we believe that the language used in the Draft Guidance should be strengthened to ensure that all schools act in compliance with it. In particular, we believe that the following wording in paragraph 3.1 “No school uniform should be so expensive as...” needs strengthening. We believe that a clause similar to “A school governing body must ensure that...” would provide a more robust safeguard to ensure that all schools comply with the Draft Guidance.

Question 2 – Do you agree that school governing bodies should have regard to 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

We agree that school governing bodies should have regard to access and availability of uniform items when setting their school uniform and appearance policy. As noted in the Draft Guidance, items of school uniform that are only available from one store are often more expensive than those which are readily available in a number of outlets. This puts additional pressure on the incomes of families trapped in poverty.

As identified in the Draft Guidance parents from remote areas may find it difficult to gain access to specialist uniform suppliers. This problem is likely to be exacerbated for low income families living in such areas as the cost of any additional travel will be a further cost that they must incur. We therefore believe that if there are some elements of the school uniform that are only available from one retailer (e.g. school badge, school rugby or football top) these should be made available for purchase and collection at the school at no additional cost compared with buying them at the retailer.

Question 3 – Do you agree that schools’ uniform policies should not dictate different items of clothing on the basis of sex or gender?

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

Question 4 – Do you agree that school governing bodies should make clear their approach to flexible uniform items to account for extreme weather conditions 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 Draft Guidance that school governing bodies should make clear their approach to flexible uniform items to account for extreme weather conditions when setting their school uniform and appearance policy.

We also support the slight amendments made in the Draft Guidance compared with the Guidance currently in force on coats. We are please to see that the following sentences have been removed – “The Welsh Government recognises however that certain fashion coats could be deemed inappropriate. Governing bodies should therefore consult and work with pupils and parents on this issue to reach a solution that both agree with.” We believe it is important that schools are aware of this slight modification.

Question 5 – We would like to know your views on the effects that guidance to schools and governing bodies on school uniform and appearance policies would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) 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

Question 6 – Please also explain how you believe the guidance to schools and governing bodies on school uniform and appearance policies could be formulated or changed so as to have:

- i) 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
- ii) 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

Having a consistent cap on school uniform costs across the whole of Wales could have a positive impact on the number of children who access Welsh medium education. Some low-income families may currently wish to send their children to a Welsh medium school but decide against doing so if their school uniform is more expensive than other schools in the area. Having a consistent cap across the education sector could encourage more parents to send their children to Welsh medium schools and could help ensure that Welsh medium education is accessible to all children, regardless of their family's income.

Question 7 – 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.

We support the changes that have been made in section 4 of the Draft Guidance compared with the current Guidance with regards to noncompliance, in particular the addition of paragraph of 4.17 which encourages head teachers to ascertain why a child may not be complying with the school's uniform policy and to signpost them in the right direction to receive help. It is vital however that, for this provision to be successful, all staff at schools must be provided with appropriate training to deal with any conversation with a pupil who is not in compliance with a school's uniform policy sensitively. Stigma is one of the major reasons why many low-income families do not always claim all the support they are entitled to. There is already evidence that stigma does have an impact on school children. For example, according to the information gathered by Welsh Government on school census day in 2017/18, 24% of children, eligible for a free school meal did not eat one. It is important that a school does not unintentionally increase the stigma around poverty when engaging with students and their families when discussing non-compliance with school uniforms.

Whilst welcoming this change in approach, we believe that the Draft Guidance should go further and set out that no child in Wales should be excluded from school, or school activities (such as trips) as a result of not having a school uniform. There is a wealth of evidence demonstrating that children from lower income households tend to achieve lower grades than children from higher income households. We believe that it is wrong that children whose family may not be able to afford a school uniform should be further disadvantaged by being excluded from the classroom due to circumstances beyond their control.

We also believe that the Welsh Government should consistently monitor whether schools are complying with its guidance. In particular we believe it is important that the Welsh Government seeks to gain feedback from parents, especially those from low-income households to see whether its guidance is successfully controlling the cost of school uniform.

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: