

Written evidence from Uniform Direct (CWS 02)

Education Committee
Children's Wellbeing and Schools bill

Written evidence submission on the matter of school uniforms put forward by Bill 151
(17th December 2024)

1. Executive Summary

- **Key Concern:** The Bill's item cap on branded uniform could inadvertently inflate remaining item costs.
- **Environmental Risk:** Massive textile waste due to forced discard of still-usable uniforms.
- **Inclusivity & Poverty:** Potential to exclude children with specialist sizing needs; risk of harming low-income families.
- **Recommended Solution:** Either a price cap or carefully refined definitions to avoid unintended consequences and promote fairness.

Submission co-developed with University of Lincoln to ensure research-based findings.

2. About Us

(1) Sam Singh

I am Sam Singh, a founder of Uniform Direct, created by parents for parents with over 20 years' experience in the fashion industry. My focus has been on making school uniforms affordable while maintaining quality, consistency and high standards of environmental responsibility. We supply uniforms to approximately 400 Primary and Secondary schools across the UK, giving us first-hand knowledge of the practical and financial challenges faced by parents, schools, and suppliers.

Our typical total cost for a child's compulsory uniform (including PE kit) has ranged between £65 and £80, depending on size, items, and inflationary pressures. This compares favourably to the 2023 national average of £382 (DfE/BMG Research, Cost of School Uniforms Survey 2023), suggesting significant savings for families - particularly those on lower incomes who struggle with rising living costs. We estimate that, over two decades, this approach has collectively saved parents many **millions of pounds** compared to standard market offerings.

We also consult with schools to ensure their uniform policies balance parental concerns, uphold school values, and safeguard children's welfare. Our evidence is rooted in these on-the-ground experiences, as well as our commitment to a fair, inclusive, and sustainable marketplace for school uniforms.

(2) Collaboration with the University of Lincoln

This submission has been produced in collaboration with the University of Lincoln, whose research team provided additional analysis and support, particularly around data collection on school uniform costs and environmental impacts. Their expertise has helped to ensure that the recommendations are underpinned by robust, evidence-based findings.

(3) Reason for Sending This Evidence

We are submitting this evidence to support the Children's Wellbeing and Schools Bill 2025 Committee's examination of provisions relating to school uniforms. In particular, we wish to address the proposed limit on the number of

branded uniform items (three for primary pupils, four for secondary/middle pupils if one is a tie) and how this measure, as currently drafted, may adversely affect inclusivity, costs, competition, supply chains, and environmental sustainability.

3. Issue Identification

(1) Children’s Welfare, Sense of Belonging, and School Identity

(a) Role of Uniform in Fostering Inclusivity and Belonging

Uniforms help promote a sense of community, reducing the visibility of socioeconomic disparities among pupils. Branded items, if chosen carefully, can reinforce identity and cohesion. A uniform that is too fragmented or uncoordinated, especially if schools lose the ability to specify a consistent “look” or quality may undermine pupils’ sense of unity and belonging.

(b) Potential Risks to Child Welfare

Some schools and parents consider clear, recognisable uniforms as a protective factor, discouraging gang grooming and ensuring students are visibly identified as belonging to a particular school community. By strictly capping the number of branded items, schools and the wider community may lose a key tool they use to maintain these protective benefits.

(c) Extracurricular Participation

Limiting students to only three or four branded items risks restricting participation in extracurricular activities if each activity requires a distinct branded garment (for example, sports tops, trip hoodies, or other event-specific attire). Consider sports such as Karate, Tae Kwon Do and groups such as Scouts and Guides - uniform is intrinsic to these activities and helps promote British values of respect. We believe every child should have the flexibility to engage in multiple activities without being constrained by a universal item cap.

(2) Economic and Market Impact

(a) Rising Prices vs. Intended Cost Reduction

The Bill aims to reduce uniform costs by limiting compulsory branded items. Yet suppliers may respond by raising prices on the remaining branded

pieces to offset a narrower product range. As a result, the total uniform cost might remain the same - or even increase - thus negating the Bill's intended financial relief for parents.

(b) Existing Contracts and Financial Burden on Schools and Families

Many schools have established multi-year contracts or supply arrangements. Schools could face contract-breach liabilities if forced to reduce branded items abruptly. Families who have already purchased multi-year uniform sets may bear additional costs if newly compliant items differ in design. This rapid changeover period could disproportionately affect lower-income households, who cannot easily replace already-purchased uniforms.

(c) Independent Suppliers and Potential Market Contraction

Restricting the number of branded uniform items could render the market less profitable for independent or socially conscious suppliers, risking job losses and reduced product variety. A contraction in the number of uniform providers may result in a de facto dominant supplier, lessening competition, and potentially driving prices up further. These unintended consequences do not align with the Bill's spirit of affordability and inclusivity.

(3) "Particular Suppliers" Clause and Legal Ambiguity

(a) Clause on Colour, Design, or Fabric

Section 5(b) of the Bill defines a branded item partly by stating that, due to its "colour, design, fabric or other distinctive characteristic, it is only available from particular suppliers." This wording is unclear: if one or two suppliers discontinue an item for commercial reasons, does this item become "available only from particular suppliers" even though it is, in principle, a generic garment? Such ambiguity could inadvertently restrict permissible uniform items or lead to confusion in the marketplace.

(b) Intellectual Property and Design Rights

Many uniform designs incorporate specific features (cuts, trims, or patent-protected aspects). Yet not all distinctive characteristics are "logos" or "graphics." The Bill's wide definition could clash with normal clothing design rights, hamper legitimate differentiation, and disrupt established IP norms

in the textiles sector.

(4) Implementation Timeline and Contractual/Reputational Risks

(a) Short Transition Period

A rushed implementation - particularly if schools must comply by the next school year - places a heavy burden on suppliers and Schools with existing bespoke stock, and on parents who own newly purchased items that might become non-compliant. The result is potential large-scale disposal of perfectly usable uniforms. Schools might also face reputational damage if forced to abandon uniform policies in mid-contract.

(b) Possible Contractual Breaches

UK contractual law typically imposes penalties for abrupt changes. If the Bill compels schools to reduce branded items significantly, pre-existing supply deals may be invalidated or require renegotiation. This can trigger financial penalties or litigation, straining school budgets and public resources.

(5) Environmental and Waste Management Concerns

(a) Risk of Excess Textile Waste

If parents must discard uniforms that no longer comply, huge volumes of textiles could end up in landfill. A single blazer weighs around 800 grams; with large numbers of students nationwide, this could amount to millions of kilos of fabric waste. The UK lacks robust textile recycling infrastructure, so a sudden uniform overhaul could worsen landfill pressures and undermine environmental priorities.

(b) Destruction of current swap-shops

Second hand uniform swap shops are reliant on donations. An abrupt limit on items that are swappable will disadvantage second hand uniform and swap shops – potentially rendering them unviable if they cannot source the amount of high quality branded uniform items that they currently do. This further exacerbates the environmental issues of the immediate dumping of textiles as well as disproportionately affecting the support currently received by swap shops.

(c) **Longer Uniform Lifecycles**

School uniform items can last several years - often longer than typical fashion garments. It therefore makes sense to encourage gradual rather than abrupt policy changes, allowing for normal wear-and-tear replacement cycles. Without this measured transition, more families will be forced to discard serviceable items prematurely.

4. Actions to Implement

(1) **Refine the Definition of “Branded Items”**

- (a) **Exclude design/fabric alone:** Do not automatically classify items as “branded” solely because of their colour, cut, or fabric. If an item lacks a logo or other unique identifier, it should not be viewed as a required “branded” piece.
- (b) **Protect school autonomy:** Let schools keep distinctive designs or colours, provided that a non-logo generic alternative is permissible.

(2) **Clarify “Particular Suppliers”**

- (a) **Narrow the language** to cover only items that bear a mandatory school-specific logo (or unique trademarked feature) which no alternative supplier may lawfully replicate.
- (b) **Avoid penalising generic** items just because few suppliers carry them - markets naturally fluctuate, and low-demand items may be stocked by limited retailers without necessarily counting as a “particular supplier.”

(3) **Price Cap on Essential Branded Items**

- (a) **Instead of (or in addition to) item cap:** Impose a maximum total cost or price cap for core branded uniform components, ensuring that suppliers cannot recoup margins by raising individual prices.
- (b) **Maintain uniform identity:** Schools can still specify certain brand-design items, but overall costs for families remain contained.

(4) **Optional Items and the Concept of “Required”**

- (a) **Codify a clarity clause:** “An item of school uniform is not ‘required’ if the school policy explicitly permits a generic, widely available equivalent.”
- (b) **Extend to clubs/activities:** If an item is purely optional and not needed to participate, it should fall outside the “required branded item” limit.

(5) Support for Affordability and a Just Transition

- (a) **Remove or reduce VAT** on core school uniform items where possible, easing financial burden on families.
- (b) **Give schools and suppliers enough lead time** (e.g. until September 2027) to phase out non-compliant stock, honour current contracts, and devise ethical waste disposal routes.
- (c) **Offer transitional assistance:** Provide guidance or grants for recycling/disposal solutions to prevent a flood of uniforms into landfill.

(6) Encourage Competition and Monitor Market Dynamics

- (a) **Prevent “Abuse of Dominance”:** Enforce or expand competition rules to ensure no single supplier monopolises uniform sales after independent operators exit the market.
- (b) **Collaborate Broadly and Replicate Best Practices:** Work with a wide range of stakeholders - including independent suppliers, schools that have succeeded in keeping costs low, and fair-minded trade bodies - to develop cost-containment strategies. By learning from proven cost-effective models (for example, Uniform Direct), the government can replicate and scale best practices, just as it has done with Academies and Free Schools. This inclusive approach will foster competition, innovation, and affordability throughout implementation.

5. Questions the Committee Should Ask the Government

(1) Impact on Existing Contracts

- (a) If schools breach supply contracts under the new uniform rules, who bears liability for penalties or compensation?

(2) Handling Stock and Parental Purchases

- (a) What mechanisms will ensure that newly obsolete uniforms - both in warehouses and in families' homes - do not end up in landfill?
- (b) If parents and suppliers have already purchased multi-year uniforms, will transitional measures allow them and second hand uniform shops to continue using existing items?

(3) Ensuring Cost Savings Truly Occur

- (a) How will the Government mitigate the risk of suppliers raising prices on the reduced set of branded items, thus eroding any cost savings for parents?

(4) Inclusivity (Child Poverty, Size Ranges, and Specialist Needs)

- (a) In England, 1 in 4 children currently live in poverty. How will the Bill's provisions ensure that families on the lowest incomes - often those with the least flexibility for new or specialist purchases - are not disproportionately burdened by changes to branded uniform requirements?
- (b) The supermarket or high-street approach typically focuses on the most profitable size ranges. How will the Government guarantee that children who require much smaller or larger uniform sizes (for instance, those who are taller, shorter, or have special fit requirements) can reliably access suitable attire at fair prices?
- (c) Many schools rely on dedicated uniform suppliers that guarantee coverage of all sizes and shapes to ensure no student is excluded. Does the proposed cap risk undermining these tailor-made services - potentially forcing families to turn to more expensive or difficult-to-find specialist suppliers?
- (d) If the Bill primarily restricts "branded" items while ignoring the significant cost of generic items like shoes or trainers (often among the largest

expenses), does it risk creating new inequalities rather than solving the underlying cost issues?

- (e) Should a price cap be introduced (as an alternative or in addition to the item cap) to ensure affordability for all, especially given rising childhood obesity and the increased need for inclusive size ranges?

(5) Clarification of “Particular Suppliers”

- (a) Does “particular suppliers” encompass both wholesalers and retailers, even if availability changes (notwithstanding seasonal and fashion changes) over time?
- (b) Will a garment be deemed “branded” if temporarily sold by only a few suppliers for commercial reasons or fluctuations in demand and fashion?

(6) Gang Safety and School Identity

- (a) Has the Government evaluated the protective role of identifiable school uniforms in deterring gang grooming and ensuring child safety?
- (b) Will limiting branded items compromise schools’ ability to maintain a cohesive, recognisable uniform?

(7) Waste and Environmental Concerns

- (a) What robust waste management strategy does the Government proposed to deal with the surge of discarded uniforms?
- (b) Are there plans to incentivise or support recycling innovations within the school uniform supply chain?

6. Conclusion

- (1) We welcome the intent of Bill 151 to make school uniforms more affordable and accessible. However, the rigid cap on branded items, combined with ambiguous wording about “particular suppliers,” short implementation timelines, and minimal focus on environmental repercussions, risks undermining the very objectives it sets out to achieve. We respectfully propose that the Government consider refined definitions, a change to the total items, a price cap, rates relief, VAT relief, and clearer transition periods to protect families, preserve the benefits of cohesive school uniforms, and support a competitive and sustainable market.

- (2) We appreciate the Committee’s attention to these concerns and trust that the evidence and recommendations provided will assist Parliament in refining the Bill. Our overarching goal is to ensure school uniforms remain a unifying, cost-conscious, and environmentally responsible component of every child’s educational journey.

January 2025