

## **Submission to the Education and Training Committee Parliamentary Inquiry into Dress Codes and School Uniforms in Victorian Schools**

### **Executive Summary**

The TFIA believes that governments – State and Federal – can do more in the development of procurement and purchasing policies to benefit the industry, students, parents and schools.

The TFIA makes the following recommendations:

- Any focus on dress code must address the issue of Australian versus overseas content;
- Full and complete information must be provided to schools, parents and students regarding the construction of the garment, its inputs and any other information considered relevant including possibly statements as to the ethical and sustainable nature of the product;
- Governments must work with the industry to develop education resources on school uniforms and proper purchasing guidelines;
- Governments must review the prospect of providing rebates or tax advantages to schools and parents who purchase uniform products with a 60% or greater Australian content – this could be extended to include content from our Free Trade Agreement partners;
- A strong set of guidelines must be developed to provide consistent and uniform direction and processes for school uniform shops to follow. These guidelines should be developed in conjunction with both industry and schools to ensure they take account of the specialised needs and wants of each group;

### **Introduction**

The Council of Textile and Fashion Industries of Australia Limited (TFIA) is the peak national association for the Australian Textile, Clothing and Fashion sector and represents some 350 members from all parts of the TCF supply chain in Australia. These members range in size from micro to multinational companies and include a range of smaller associations.

The majority of TFIA members like the industry are located in Victoria and New South Wales and the TCF sector remains a critical part of the Victorian and National economy. The industry in Victoria accounts for around 40% of total industry in Australia.

The industry has undergone a significant period of rationalisation and this has produced a range of companies focusing on niche product areas and production processes. As such the production of school wear and associated articles is a strong area of growth for the Victorian TCF industry. A review of the industry shows that there are more than 140 companies<sup>1</sup> operating in this area.

---

<sup>1</sup> Yellow pages website supplemented by search on ATF portal

Level 2, 20 Queens Road

Melbourne Vic 3004

Ph: 61 3 9866 8962

Fax: 61 3 9866 8963

Email: [avkrieken@tfia.com.au](mailto:avkrieken@tfia.com.au)

Council ABN: 98 005 502 492

The TFIA, not being an expert in the area of school policy and dress codes seeks to comment on only one, but a critical area for the industry, of the terms of reference – c) the most cost efficient and practical uniform procurement arrangements.

### **Procurement arrangements**

It is clear from discussion with TFIA members that considerable problems exist with the current methods of buying and distributing uniforms from the perspective of manufacturers. These problems relate to the amount of information supplied to parent and parent groups on uniform origin and make up; the purchasing and distribution of uniforms within the public and private school sectors; and the quality, wearability and durability of school uniforms.

As noted above the Australian TCF industry is categorised by highly specialised niche manufacturing operations as opposed to a large commodity focused industry. While many companies are finding success in markets, particularly overseas, through this strategy, they require a strong and stable domestic market and this can be assisted by governments in their purchasing policies.

Consistent with the broader policy position of the TFIA we would argue that a key element of a revised Dress Code must be a focus on Australian made product. This can be done in several ways including the granting of a preference to Australian made product for all government purchases along with mandatory labelling requirements for school uniforms given that the Government is not the ultimate purchaser of the product.

The TFIA would propose that strict regulations are put in place regarding the labelling of school uniforms and the information provided to school groups, parents and students. As a minimum the government must ensure that school uniforms adhere to the labelling requirements of the Trade Practices Act clearly denoting the country of origin of the product.

However, going beyond this and reflecting the increasing amount of ‘fully made-up’ uniform garments entering the market from overseas the TFIA believes that school uniform providers should provide additional information on the products being offered to schools and community groups. This information need only be provided with the initial sales consultation and delivery and should include:

- The origin of the finished garment
- The origin of the textiles in the garment
- Adequate care instructions relating to the garment
- If applicable any ethical, environmental and sustainability accreditations
- Details of the principal manufacturer / importer of the products

The information above is designed to ensure that schools, parents and students have full and comprehensive information about the products to enable them to make an

Level 2, 20 Queens Road  
Melbourne Vic 3004

Ph: 61 3 9866 8962

Fax: 61 3 9866 8963

Email: [avkrieken@tfia.com.au](mailto:avkrieken@tfia.com.au)

Council ABN: 98 005 502 492

appropriate decision. They are not intended to act as a non-tariff barrier to imported garments but rather to ensure schools and community groups have the opportunity to assess the merits of a locally made garment against a fully imported garment.

In addition to requiring producers to provide this information to school groups the TFIA would propose that the Government provide public and private schools with additional information on purchasing products in line with government policy. This information should include information on costing a product beyond the end price – that is, taking into consideration the potential costs of transport, loss of stock, errors (in names or logos) etc. – in addition to information provided by the industry on the school wear industry in Australia.

Several members have expressed concern that while many garments now enter Australia fully imported they are not necessarily cheaper nor are often of the same quality as that made locally. Equally, several other members have also noted that imported products can produce long lead times leading to logistical problems or schools running out of stock. The ultimate loser from this is the industry as a whole whose reputation is damaged as a result of inferior product or unnecessary delays.

In addition there is a considerable risk that more and more Australian school wear producers will give in to the pressure of cheaper imports thus robbing parents and students of the variety of choice they currently have. It should be remembered that for many, if not all, schools a uniform reflects the school's cultures, value and history.

For many schools the cut, colour, look and feel of the uniform is critical and an increasing move to more imported products – as evidenced in other markets – could see this ability for variation disappear as only a few large multinational companies begin producing standardised uniforms for sale into Australia.

Moving forward one more step the TFIA would propose that the Government look at providing some form of rebate for schools that purchase garments that have a content greater than 60% and / or have proven adherence to ethical production – both treatment of workers and the environment. Again this proposal is not proposed as a NTB but rather as providing additional factors for consideration by schools and parents and promoting the Australian industry. Indeed in respect to the latter proposal this would match closely the Victorian Government's Ethical Purchasing Policy (VEPP).

The actual purchase of garments is one part of the procurement process for school uniforms with the other and perhaps more significant from a production point of view being the distribution and sale of uniforms at the school level. The first point to note is that there is a considerable difference in the process followed by private schools compared with that of public schools however both cause problems for companies selling school uniforms.

The most common problem relates to the ordering processes of many schools whereby orders are placed after stock has run out, incorrect garments and sizes are ordered and

Level 2, 20 Queens Road  
Melbourne Vic 3004

Ph: 61 3 9866 8962

Fax: 61 3 9866 8963

Email: [avkrieken@tfia.com.au](mailto:avkrieken@tfia.com.au)

Council ABN: 98 005 502 492

many parents are left for a period of time with no uniform for their students. To ensure consistency and to maximise efficiency in the process the TFIA would propose that a mandatory set of guidelines be developed that school uniform shops can follow regardless of whether they are run as a commercial operation – by the school or private company – or as a voluntary parent run operation.

These guidelines would cover ordering processes, inventory management and should be developed with the industry to ensure they will be useful to the industry. The guidelines would include requirements such as:

- Ensuring that the uniform shop has a standardised ordering form and process for school uniforms;
- Ensuring that appropriate inventory controls and monitoring are in place – relevant to the size of the school and total number of uniform items;
- Ensuring all employees / volunteers operating the shops are appropriately trained in all aspect of the garments – including fit, wear and the care required for different fabric and garment types.
- Ensuring one person is responsible for liaison with the uniform supplier(s) and that the supplier's contact details are available to all staff should problems arise;
- Ensuring that orders are placed with consideration to production and delivery times

While seemingly complex the TFIA believes the guidelines above could be implemented and once understood would be a simple system for voluntary (parent run shops) to operate under. Similar guidelines are in place for a variety of other voluntary bodies including canteen staff and other community groups. These guidelines are easily understood and have been accepted by volunteers when implemented.

The TFIA would propose that as a transition to this system the Victorian Government look at transitional funding assistance – on a needs basis – for school uniform shops to undertake training and implementation. The TFIA does not have expert knowledge on the processes followed to assign public monies to schools but would think that if this is done on a needs basis or means test then this could be used in providing assistance for implementation of these guidelines.

An alternative option to guidelines would be for the supply of school uniforms to be tendered to one or several groups possibly on a regional basis who would be responsible for the efficient operation of the entire system. This model has been followed by other government departments including defence and has produced significant efficiencies in respect of ordering and processing. Potentially this option could also increase the purchasing power of the school sector in terms of uniforms potentially allowing for significant discounts to schools for uniforms.

Submission ends

Level 2, 20 Queens Road  
Melbourne Vic 3004

Ph: 61 3 9866 8962

Fax: 61 3 9866 8963

Email: [avkrieken@tfia.com.au](mailto:avkrieken@tfia.com.au)

Council ABN: 98 005 502 492