

Model Ethical School Uniform Policy
To improve living conditions in developing countries

Is your school uniform made by children who cannot attend school?

Head Teachers and governors can adopt an ethical policy for the 'branded' items unique to their school, such as sweat shirts or PE polo shirts with school logos, (as opposed to generic plain items that parents buy in high street shops). Nationally this un-scrutinised, specialist sector supplies around 5 million students, mostly with garments made in developing countries where illegal working conditions are widespread: women forced to work illegal 80 hour weeks, minimum wage laws broken, and, especially in subcontractors, children miss school to work full time to supplement their parent's poverty wages.

Model Policy: key elements

If, as is likely, your 'branded' uniform items are manufactured in a developing country, there are several standards and strategies schools can require. The scores in the table below indicate an element's importance for improving working conditions.

Policy element	Score	Policy purpose & notes
Knows country of manufacture	1	Policies should take account of local working standards and laws, which vary between countries
Asks for full information from the importer	1	See suppliers' questionnaire enclosed. Note: school uniform shops are not responsible for importers' policies.
Manufacturer: contracts with importer requires:		Schools can insist, by contract, that their uniform importer requires standards of their manufacturer, by contract.
Compliance with ILO Core conventions	1	ILO core conventions are internationally recognised as basic human rights: to freedom of association and collective bargaining; non discrimination; health and safety etc.
Independent factory audits (not just 'self-assessments')	1	Several accreditation schemes require independent audits of factories, to assess compliance with local laws on safety, minimum wages, maximum working hours etc. If subcontractors are used they should also be audited.
Best practice factory audits	1	Auditors must consult employees without managers present, including temporary 'contract labour' supplied by agencies. To prove this reports must provide details.
Audit reports reviewed and acted upon	1	Schools need to read audit reports to judge: whether any improvements are necessary or have been made in the past; and agree credible improvement plans.
Higher standards (factory)		
Requires recognition of an independent trade union	4	In a genuinely independent union, workers must be able to meet without managers present, elect their representatives, and negotiate over pay and conditions.
Requires payment of 'living' wages	3	A 'living' wage is defined by an independent organisation, based on income needed for adults to support children, and are above legal minimums.
Supply chain conditions		
Auditing of second tier suppliers to ensure compliance with ILO conventions and laws	3	Second tier suppliers (such as textile processing and dyeing) often have worse conditions than more regulated factories. Child labour is much more prevalent in this sector.
Guaranteed incomes for cotton farmers	4	Incomes/prices guaranteed to cover production costs and allow some disposable income. Fairtrade standards or equivalent. Fairtrade certified cotton is readily available.
Maximum Total	20	

Schools can also require proof that workers are informed of their legal rights by means such as notices in pay packets or workplace canteens. Monitoring of second tier suppliers is difficult, as is finding factories that pay recognised 'living' wage rates, but both should be long term aims communicated to importers to raise standards. Schools can find out which companies' have the most committed policies and where the best working conditions are. Schools could also affiliate to the Workers' Rights Consortium, and require the disclosure of factory locations, like LOCOG did for suppliers for the 2012 Olympics, to enable local NGOs to report on working conditions.

Switching to more ethical products or suppliers – making informed decisions

Switching to a new company without finding out about working conditions in your existing importers' supply chain is not fair or objective. It would also miss the opportunity to ask for specific standards from more than one company. Some uniform companies offer a range of products, including more ethically sourced versions, so if schools are unsatisfied with responses for particular items they can enquire if there are alternatives, or compare standards between companies. Many 'bespoke' school uniform suppliers are members of the School Wear Association. (<http://www.schoolwearassociation.co.uk/>). Fairtrade cotton companies also provide branded uniform items such as polo shirts and sweat shirts. A suppliers' directory is available on Fairtrade London's website – a 'Fairtrade Uniforms Guide' - <http://fairtradelondon.org.uk/fairtraderesources/>). Paper Codes of Conduct can mean very little in practice, and working conditions for the whole supply chain should be assessed, which no accreditation scheme covers.

Company standards can be independent of accreditation schemes

Companies selling certified products may be able to demonstrate higher standards than that particular scheme's minimums. Actual working conditions are what count. Companies with uncertified products could also promote good working conditions. It is always advisable to ask for detailed, independently verified evidence.

Citizenship projects: research, formulating policies, and the Bangladesh connection

Globalisation and development are major syllabus topics at Key Stage 3 (and 4) for Citizenship and Geography. Textbooks focus on poor working conditions in supply chains for sportswear brands or high street retailers. Students may find investigating their own uniform's supply chain an engaging project, not just because they wear the clothes - they could suggest elements of an ethical uniform school policy or help compile a questionnaire for the importer. (A model questionnaire is included below)

Such projects would be particularly relevant in Tower Hamlets because Bangladesh has the worst working conditions in the global clothing industry, with a minimum wage of only £25/month, which is often not paid – a fact conclusively proved by War on Want's comprehensive 2011 report – and it is known that some school uniform items are manufactured there. Possible activities could include: researching working conditions in various countries, or different companies' policies.

Barrier 1: mistaken assumptions about increased costs to parents

Insisting on decent standards does not lead to large price increases for parents. Clothing factory workers only receive 1-3% of a garments' end price. For a £10 garment, the machinist who made it is paid around 20p, (2%), so increasing her wages by 50% would only add 10p to labour costs, which only form part of production costs anyway. Prices needn't increase at all. Even if they did parents would only have to pay a few pence extra for one or two 'branded' uniform items amongst many generic 'plain' ones – a minimal price to pay to help prevent abject poverty in the global clothing industry.

Barrier 2: local retailers should not be affected

Many schools use local retailers to stock their branded products but as customers schools can decide what standards they require. Ultimately, uniform shops can stock products that schools choose without affecting the number of units sold. Retailers are not responsible for working conditions in manufacturers; importers are. Uniform shops can pass on requests for information to importers but it is better if schools contact them direct. It is unfair to expect importers to take all possible steps to ensure good working conditions throughout clothing supply chains unless schools take responsibility for specifying standards.

Barrier 3: the responsibility chain

UK importers are not legally responsible for working conditions in their foreign manufacturers but importers' policies, on prices and lead times, obviously affect working conditions, and as paying customers they have the power to require legal standards, by contract. In this way, responsibility can be passed down the supply chain, backed by contract law and effective monitoring by factory auditing inspections.

Briefing: what schools need to know to implement an effective ethical policy

Tower Hamlets Ethical School Uniform Campaign can email a briefing to help schools evaluate responses from importers – based on research used by local authorities such as Hackney and Tower Hamlets to develop ethical policies for staff clothing. Subjects include:

- * Ethical issues by stages of the supply chain, explaining why policies are needed, including: factory fires in Bangladesh and Pakistan; how legal minimum wage rates are often not paid, leading to illegally excessive working hours and one days leave per month; suppression of trade unions - globally 92% of clothing industry workers do not belong to a union; exploitation of women and temporary workers - 75% of clothing workers have no written contract. Many are employed by agencies, so factories can plausibly deny responsibility for rights. Most are women. Sexual discrimination can be common.
- * Benchmark standards to assess working conditions and wage levels: ILO core conventions and the Ethical Trading Initiative's Base Code which promotes 'living' wage rates.
- * Links to NGO reports and learning resources for teachers and students. For a 1 minute video introduction to working conditions in Bangladesh's clothing factories see:
<http://www.waronwant.org/campaigns/fighting-supermarket-power/extra/watch/14925-the-people-who-make-your-clothes>
- * Factory auditing and certification schemes: some have higher standards.
- * Minimum wage levels for major sourcing countries, and 'living' wage levels as calculated by unions and NGOs such as the Asian Floor Wage – to compare to the income levels of the people who make your uniforms, if your supplier can or will supply that information.
- * Links to ethical procurement policies for public organisations: Transport for London, and NHS Supply Chain – as examples of best practice to follow.

For a copy of the briefing email: powerglen@gmail.com. To develop an ethical policy you need to send a detailed questionnaire to your importer, then evaluate what information comes back. A suggestion is included at the end of this briefing, but first, a summary of other initiatives to support better working conditions in developing countries.

Other ethical initiatives schools can support

Unique clothing items for events

If schools buy customised clothing for special events, such as school trips or final year students, the same policy should apply.

General uniform items without school logos bought by parents in high street retailers

To help parents make ethical choices school websites can include links to organisations that provide information. Ethical Consumer gives detailed scores for the school uniforms sold by high street retailers, based on environmental factors and working conditions. See:

<http://www.ethicalconsumer.org/buyersguides/clothing/schooluniforms.aspx>.

Labour Behind the Label ranks high street retailers based on working conditions in their supply chains, for general clothing items rather than school uniforms.

<http://www.labourbehindthelabel.org/campaigns/itemlist/category/250-company-profiles>

School canteens: asking for relevant fairly traded products

Schools in south Wales and London have been supplied with Fairtrade bananas and fruit juices at no extra cost under council contracts, because officers requested them in tender documents. If schools arrange their own catering contracts they can do the same. Alternatively, they could lobby councillors to ask for full product ranges. The fairly traded products relevant to school canteens fall into three categories:

1. Commonly used items which may be price competitive enough to be supplied as standard lines at no extra cost: a) fruit juices, b) bananas, c) bulk sugar.
2. Other items which, though considerably more expensive than equivalent products, could be stocked as options or occasional items, if there is sufficient demand. Possibilities could include: Fairtrade rice, olive oil, oranges and other tropical fruits (eg. pineapples, kiwi fruits), cereal bars, yoghurt. If these products are used schools could ask canteen managers or local authorities to include them as 'core products' in Price Schedules.
3. Breakfast clubs – if muesli, jam, marmalade, or honey are used, Fairtrade version exist, which could be supplied either through school canteen contracts, or by Traidcraft.

Catering products delivered for: staff rooms, breakfast clubs, parents' evenings

Supermarkets stock varying ranges of Fairtrade products. One generalist fair trade company also delivers to schools direct - tea, coffee, sugar, fruit juices, smoothies, cereal bars, wine, nuts, dried fruit, biscuits, cakes, chocolate, yoghurt etc. Also breakfast club products. Note: Traidcraft can also sell products on a wholesale basis for students to sell on stalls at events like parents evenings to raise money for school funds.

Contact Traidcraft : 0191 491 0591. See their website at:

www.traidcraftschools.co.uk/buying_fairtrade_products

Fairtrade sports balls

Over 60% of the worlds' stitched sports balls are manufactured in the Sialkot region of Pakistan where child labour and appalling working conditions are common.

See - <http://www.thefaircorp.com/producer-stories>

Fairtrade rugby balls, netballs, and footballs are available from the Fair Corporation, (formerly 'Fair Deal Trading'). They also stock ethically sourced trainers. www.thefaircorporation.com. 0845 094 4746.

contact@thefaircorp.com

Spreading best practice

If your school adopts an ethical uniform policy please let the local campaign know, so we can publicise it to encourage other schools. Information received from suppliers would also be useful. For that you need a detailed questionnaire like the suggestion overleaf.

Questionnaire for school uniform importers

This questionnaire should be responded to if products are manufactured in a country where abuses of labour laws and ILO conventions are common. Countries where such exploitation applies include all 'developing countries,' Eastern Europe, and large parts of the Middle East. In case of any doubt, officers will consult the ILO.

Ethical uniform policy: defining standards and aims

Our ethical uniform policy aims to meet all elements of the Ethical Trading Initiative Base Code, to promote working conditions above core ILO conventions and local laws. We want our uniforms to be made in a safe factory where an independent trade union is recognised, and living wages are paid, as defined by unions or civil society organisations. Legal maximum working hours should be followed. Overtime should be voluntary. Workers should be permanent employees with written contracts and made aware of their rights. Employers should not avoid responsibility for rights to social security benefits by exploiting temporary 'contract' workers. The use of temporary labour should be kept to a minimum, and any agencies supplying workers should be audited.

Compliance with ILO core conventions and local laws should be written into contracts, with responsibility passed down the supply chain. Rights should be upheld in subcontractors, and cotton producers should

receive guaranteed remuneration, to Fairtrade certified standards or equivalent. Standards should be verified by factory audits by recognised accreditation schemes or another credible, independent third party.

To help us assess standards please provide as much information as possible about all the issues below. If any points are covered in independent audit reports, these documents can be submitted as supplementary evidence.

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Part 1: Uniform importer: CSR information

1. What type of company are you? Brand owner, or re-seller?
2. In which country (town/region) are products manufactured?
3. Which of the ILO's eight core conventions have been ratified there?
4. Are you prepared to disclose the location of your manufacturing facility, either in confidence, or publicly, to enable local NGOs to investigate working conditions?
5. Is a senior manager responsible for ensuring that ethical standards and labour rights are complied with? Please provide contact details for the person dealing with this issue.
6. Order lead times: do you have a minimum order lead time to avoid contributing to pressures that lead to excessive working hours or forced overtime? If this is judged unnecessary please explain why in terms of volumes or stocking arrangements.
7. Do you have any procedures for evaluating new or existing manufacturer's ethical/labour standards? If so, please detail. See also point 8.

Part 2: Code of Conduct and Contract with the manufacturer

8. If you have an ethical or socially responsible Code of Conduct please provide a copy.
9. Does your contract with the manufacturer require the following steps?
 - a) Compliance with core ILO conventions, and local labour laws on: health, safety and fire regulations; minimum wages, maximum working hours; social security; avoiding the overuse of insecure temporary or contract labour; the rights to freedom of association and collective bargaining etc.
 - b) A requirement that workers are made aware of their legal rights by established means: workplace notices in local languages; notices issued with wage packets; publicising local phone hotlines for workers to report violations; training by local civil society organisations or independent trade unions.
 - c) An obligation for the manufacturer to include an ethical/CSR code of conduct in contracts with their sub-contractors? If so, what are the ethical/CSR standards?
 - d) Reporting of locations of sub-contractors.
 - e) Auditing of subcontractors. If so, by what means?
 - f) Penalties for non-compliance? If so, please detail.

Part 3: The manufacturing facility: employment status

10. How many people regularly work in the manufacturing facility?
11. Please give as clear a picture as possible of the proportion employed by employment status categories:
 - a) Full time permanent staff employed by direct by the manufacturer
 - b) Temporary or 'contract' workers employed by external agencies.
 - c) Are external employment agencies used audited? Are they required to comply with labour laws by your contract with the manufacturer?
 - d) Trainees: how long does the training period last? How long are trainee wage rates paid?
 - e) Proportion of migrant workers, ie, non-nationals of the location country.

12. Detail pay rates and other benefits for each of the above groups compared to directly employed permanent staff.

13. Temporary workers and equal pay for equal work: all indirectly employed workers should receive legally mandated benefits (e.g. medical care, health insurance, maternity leave, etc.). Do you require verification of this by consulting temporary workers?

Wage rates and working hours: please state

14. Any legal minimum wage applying to this industrial sector/location, as an hourly rate, in local currency.

15. The minimum wage actually paid. The proportion and grades of staff this applies to.

16. Does the manufacturer avoid paying legal minimum wages by making wages contingent on demonstrably unrealistic production targets, or by imposing pay deductions? Please report fully what you know about these issues.

17. Any legal maximum limit to working hours per week. Maximum hours actually worked, in which circumstances, and with what regularity.

18. Do any workers receive a 'living wage' as defined by a trade union or civil society organisation, based on income levels needed to support families and avoid child labour?

Worker representation

19. How workers are represented: nature of organisation and participation.

a) Is an independent trade union recognised, ie, where members can meet without management present, elect their own representatives, and collectively bargain over pay and conditions? If so, could contact details be provided?

b) Any other form of workers' representation.

c) Does some kind of representative workers' organisation collectively bargain over pay and conditions?

20. NGOs and the ILO report widespread suppression of independent trade unions in the clothing industry. Are you aware of any instances in your manufacturing facility?

21. Do you take any action to counteract anti-union discrimination?

Child Labour

Child labour is defined as children under school leaving age working full time hours to the extent that they are prevented from attending school.

22. What is the legal minimum working age in the sourcing country?

23. What is the age of the youngest person(s) working in the facility? How is this known?

Independent auditing and remedial action

24. Do you arrange for independent audits of your manufacturer? If so, please detail methods and standards audited, and any use of accreditation schemes or ethical Multi-Stakeholder Initiatives.

25. Have you identified, through independent audits or self-assessments, any violations of labour rights or local laws in your manufacturer? If so, please provide details of any concerns found and, if relevant, any agreed plans for improvements with deadlines.

26. Please report in detail on fire safety measures and risks.

27. Details of worker consultation methods: how many workers were consulted? Did consultations take place with a manager present? Off-site or on-site? Were temporary or 'contract' workers consulted? How many? Were local unions, workers organisations or civil society organisations consulted?

28. Has anyone from the company visited the manufacturer? If so, how recently? Were workers consulted independently of managers? How?

Part 4: supply chain: second tier sub-contractors

29. Are you aware of the locations of your manufacturers' sub-contractors, the second tier suppliers of textiles or accessories? If so, please state locations and the nature of their business in terms of work done or products supplied.
30. Have you or your manufacturer arranged independent audits of any subcontractors? If so, please provide details.
31. Has anyone from your company personally visited any subcontractors?
32. Please provide any information you have about working conditions, including: whether child labour is involved; the use of temporary and casual labour; home working; and the difficulties of monitoring your supply chain.

Part 5: Cotton producers (farmers or plantation workers)

33. If relevant, do your garments include cotton certified by an accreditation scheme, such as Fairtrade, or the Global Organic Textile Standard?
34. Please provide any information you have about working conditions amongst cotton producers; if child labour is involved; prices received paid by unit of weight for farmers, or wage rates per hour for plantation workers.

Part 6: Membership of Multi-Sector Initiatives, CSR initiatives, and data sharing platforms

35. Are you a member of any trade association or Multi-Sector Initiative which has a commitment to Corporate Social Responsibility? For example, the Fair Wear Foundation, the Ethical Trading Initiative, Social Accountability International (SA8000), BSCI?
36. Do you use a data sharing platform to help share audit reports with customers? For example, the Suppliers Ethical Data Exchange?
37. Better Cotton Initiative and Cotton Made in Africa members: if all ILO core conventions have been certified please evidence this, as some are only 'medium term' requirements.
38. Business Social Compliance Initiative (BSCI) members: have you achieved SA8000 certification as recommended best practice? If not, please detail which standards of the BSCI ethical code of conduct have been achieved.