



Preliminary Report on the Supply of School Uniforms

National Consultation Document

Office for Competition

14 September 2011

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List of Abbreviations

MCCAA	Malta Competition and Consumer Affairs Authority
MSO	Market Surveillance Officers
Office	Office for Competition
P.E.	Physical Education

Executive Summary

The Office for Competition (henceforth 'Office') within the Malta Competition and Consumer Affairs Authority (henceforth 'MCCAA') undertook a fact-finding exercise on the supply of school uniforms and drew up a preliminary report on its findings¹. A number of state, church and independent schools at different educational levels were selected to obtain information on school uniform prices and the manner by which school uniforms are supplied. A series of price comparative exercises were conducted to determine the minimum, mean and maximum prices of frequently compulsory school uniform items.

The Office found that uniforms specific to the school bought from specific points of purchase reflect higher prices and a lack of choice on quality and retailer. It was also noted that prices of certain uniform items appear to be considerably high across all three types of schools. Basing itself on the conclusions derived from the numerous exercises conducted, the Office proposed a set of recommendations on how the conditions of competition in the market for the supply of school uniforms may be improved to the benefit of parents and stakeholders. In view of the above, the Office considers that there is further scope for investigation of this market in terms of the Competition Act.

¹ This fact-finding exercise was commenced by the Office for Fair Competition which formed part of the Consumer and Competition Department. With the coming into force of the Malta Competition and Consumer Affairs Authority Act on the 23 May 2011, the Office for Fair Competition was succeeded by the Office for Competition which is one of the four entities within the MCCAA.

1 Introduction

1. In Malta education is provided by the state, church and independent schools. Education is compulsory for children aged between five and sixteen. There is also a tendency for children aged three to five to attend pre-primary school on a voluntary basis. School years are divided into pre-primary, a six-year primary cycle and five years of secondary education.
2. Irrespective of whether the school is a state, church or independent school, students are required to wear a school uniform until the age of sixteen. The Office sought to conduct a fact-finding exercise to examine the practices being adopted by state, church and independent schools with regards to the supply of school uniforms. In order to study such market and acting under the Competition Act, Chapter 379 of the Laws of Malta, the Office compiled questionnaires and approached stakeholders to acquire the necessary information on the said market².

1.1 Aim of the Study

3. The study was triggered after the Office found that the majority of schools have specific uniform items and require parents to purchase the compulsory school uniform from a particular retailer or from the school itself, leading to lack of choice for the consumer in terms of prices, quality and retailer. Moreover, the Office was concerned that since each specific school uniform item can constitute a separate product market in itself, where suppliers and retailers enjoy exclusivity on such market, competitors may be foreclosed from the market. Hence, the primary objective of this study was to determine, amidst the different practices prevalent on the market, the extent to which the market for school uniforms is competitive.

² The Office undertook such study in terms of articles 3 (1) (a) and 12 (1) of the Competition Act as it existed prior to the latest amendments to the Competition Act that came into force on 23 May 2011.

4. The main aims of the study were to:

- Outline the current systems being adopted by state, church and independent schools in the supply of school uniforms;
- Determine the minimum, mean and maximum prices of each compulsory school uniform item;
- Assess how compulsory school uniform items supplied by designated retailers or from the schools themselves compare with those purchased from any other general retailer;
- Assess the link between schools' uniform policies and the prices of uniforms, in order to determine whether parents suffer any detriment as a result of exclusive arrangements between schools and retailers.

2 Methodology

5. As described in the previous section, education in Malta is provided by the state, church and independent schools. Given the differences in practices adopted by each type of school for the supply of school uniforms, the Office determined that each type of school should be assessed separately. Moreover, further separation was made between pre-primary, primary and secondary levels. The Office also sought to determine the general practices adopted by state, church and independent schools in the supply of school uniforms.
6. The study was based fundamentally on two complementary stages, namely the collection of data and the processing and analysis of the collected data. In the subsections below, further detail will be given on the manner by which such data was collected during the first stage of the study and the subsequent analysis undertaken in processing the data and deriving the main findings thereof.

2.1 First Stage: The Collection of Data

7. The primary step within the first stage of the study consisted of choosing a basket of compulsory school uniform items, namely long and short trousers, skirt, long and short sleeve shirt, jersey, polo shirt, tie, blazer, P.E. tracksuit, P.E. t-shirt, P.E. shorts and cap. To ensure consistency, the prices used pertained to scholastic year 2010 – 2011. Moreover, all price data included in this report pertains to size medium or equivalent sizes.
8. In order to have a comprehensive representation of the school population which is of approximately 225 schools, the Office took a sample of 40 out of the 99 state schools, 35 out of 79 church schools and 22 out of 49 independent schools. A stratified random sampling method was used to establish the number of schools selected within the different educational levels as illustrated in the table below:

Education Level	State	Church	Independent
Pre-Primary	27	14	10
Primary		11	6
Secondary	13	10	6
Total	40	35	22

Table 1: Sample size selected for state, independent and church schools

(Source: Calculations of the Office)

9. Several meetings were held with officials from the Directorate for Educational Services within the Ministry of Education, Employment and the Family to obtain better knowledge on the manner by which school uniforms are supplied in particular with regard to state schools. Following these meetings, the Office found that there is a considerable difference in the manner by which school uniforms are supplied by state schools and the manner by which school uniforms are supplied by church and independent schools. In view of this, it was decided that two separate formats of questionnaires should be distributed to the selected schools belonging to the state (Annex 1) and to the selected church and independent schools (Annex 2).

10. The aim of the questionnaire sent to state schools was to determine which system was currently being adopted by the school, to identify the name of the supplier/s and retailer/s of the particular school uniform items and to provide the respective prices for each item within the selected basket of school uniform items. On the other hand, since there is a tendency that church and independent schools adopt a number of different practices for the supply of school uniforms, the questionnaire sent to church and independent schools was designed differently and more information was requested on the manner by which school uniforms are supplied, on any existing contracts, on who the suppliers and retailers are and on the prices of the school uniform items.

11. From the submissions received from a number of state schools, it was noted that some of the selected school uniform items were not specific to the school and therefore could be purchased from any other general retailer. For the purpose of

the study, these items are referred to as 'generic items'. In order to obtain the prices of such generic items, a template was prepared which included the same basket of school uniform items used for the questionnaires referred to above. Market Surveillance Officers (henceforth 'MSO') were assigned to collect the prices of such generic items from a number of general retailers from different geographic areas across the Maltese Islands.

12. Following the receipt of the questionnaires, it was noted that a number of schools did not submit the prices of the selected school uniform items. As a result, the Office requested a number of school uniform suppliers and retailers to provide such prices, particularly when the school uniform was specific to the school in question.

2.2 Second Stage: The Processing and Analysis of Data

13. Subsequent to the collection of data, the Office proceeded to the second stage of the study by processing and analysing the data received from schools and other stakeholders. The first step was to create a profile for each selected school which included information on how school uniforms are supplied, the name of the supplier/s and retailer/s, whether the selected school uniform items are specific and/or generic and the respective prices for each selected school.
14. Basing itself on the data collected for specific and generic school uniform items, the Office determined the minimum, mean³ and maximum prices of each selected school uniform item of an equivalent medium size for pre-primary, primary and secondary levels. In addition, in the tables provided, the Office calculated the total mean price of a school uniform for each different educational level. The Office utilised the 95% confidence level for its statistical estimations. The prices derived from such calculations were used as a basis for a number of assessments and comparative analysis for the supply of school uniforms applicable to state, church and independent schools.

³ The mean provided in the tables in the study consists of the average of all the prices gathered for each specific uniform item.

2.3 Limitations of the study

15. It is pertinent to note that the study included only an in depth assessment of prices of school uniform items and did not take into consideration the quality of material and the design of the school uniform items.

3 State Schools

16. The education system provided by the state is catered for by approximately 99 schools, of which 68 are primary schools with the remainder being secondary schools. By October 2007, a system was created whereby a group of schools clustered in a particular area form part of a college. In total, there are nine colleges in Malta and one other college in Gozo with each college consisting of pre-primary, primary and secondary schools. Pre-primary and primary state schools are found in nearly every town and village in Malta and Gozo while secondary schools are based more on a regional basis. Currently, pre-primary and primary schools are co-educational while students at secondary level are segregated between girls and boys.

17. At present, the supply of school uniforms within state schools is undergoing a transitional phase. It is pertinent to note that while state schools offer free education to students aged between three and sixteen years, the cost of school uniforms is borne by parents. Prior to the introduction of the new system, individual schools entered into some form of agreement with particular suppliers and retailers for the supply of school uniforms. Under the old system, there are circumstances where school uniforms are not specific to the school and parents have the possibility of purchasing school uniforms from any general retailer. These circumstances will no longer be in place once the new system will be fully implemented. Under the new system, contracts are awarded to school uniform suppliers after a tendering process issued by the Directorate General for Educational Services. Such change in system is intended to ensure price stability and a more distinct identity for each college by having a specific uniform with distinct colours and patterns which cannot be substituted by generic school uniform items.

18. The new system has been fully implemented by all colleges with respect to the supply of school uniforms for pre-primary pupils. However, with regards to primary level, it is only Zurrieq Primary Year 1 of St. Benedict College that has started to adopt the new system while all other schools are still using the old system. In

terms of secondary schools, only five schools belonging to four different colleges namely Maria Regina College, Santa Margerita College, Gozo College and St. Benedict College have implemented the new system for the supply of school uniforms.

19. A total number of 40 questionnaires were sent to state schools which were divided into 27 pre-primary and primary schools, together with thirteen secondary schools. All the state schools selected within the sample replied to the questionnaire.

3.1 Pre-Primary Schools

20. Before school uniforms were introduced for kindergarten, children were allowed to attend school without wearing a specific school uniform. This implied that parents were free to send children to pre-primary school in garments of their choice. However, under the new system a specific school uniform was introduced for kindergarten pupils for every college. The school uniform consists of the polo shirt, shorts, jogging suit and baseball cap. Similarly to other state schools, the Directorate General for Educational Services issued a call for tenders for each college to assign particular suppliers for the supply and selling of such uniforms. The average duration of the said contracts is of approximately four and a half years. These school uniform items can only be bought from designated retailers due to their unique colour codes as opposed to generic uniform items purchased from general retailers.

21. The Office compiled the following table illustrating the minimum, mean and maximum prices for each school uniform item of state pre-primary schools.

	Polo shirt	Shorts	Baseball Cap	Jogging Suit	Complete Uniform
Minimum Price	€7.90	€5.80	€3.90	€13.15	€30.84
Mean Price	€9.03	€6.14	€4.27	€15.03	€34.47
Maximum Price	€10.04	€6.23	€4.57	€16.77	€37.24

Table 2: Minimum, mean and maximum prices for state pre-primary school uniform

(Source: Calculations of the Office)

22. As illustrated in the table above, the total mean price of a school uniform for a pupil attending a state pre-primary school is €34.47 with the jogging suit being the most expensive item from all school uniform items. The Office considered that a comparative analysis between the old and the new system could not be undertaken, since prior to the adoption of the new system for school uniform items, children were not required to wear a specific school uniform. Therefore, the Office could not compare prices to similar school uniform items.

3.2 Primary Schools

23. In contrast to state pre-primary schools, from the sample selected, schools at primary level are still adopting the old system whereby the supply of school uniforms is not adjudicated by a tender to a particular retailer. It was found that around 30% of the schools have a specific uniform which must be bought from a particular retailer, another 37% have a mixture of specific and generic school uniform items while the remaining 33% may buy uniform items from any retailer. These figures do not include P.E. uniform items but are solely related to all other items included within the basket of goods. With respect to P.E. school wear, around 40% of schools have to purchase the P.E. uniform from a specific retailer and another 30% may buy the uniform from any general retailer. For the remaining share, certain P.E. items may be bought from any general retailer while other items must be bought from a particular retailer.
24. After compiling a specific profile for each selected school, it was noted that the blazer and the cap are not frequently compulsory items at a primary level. This is due to the fact that only approximately 15% of the selected schools indicated clearly that the blazer is part of their school uniform. The remaining selected schools indicated that they do not have a blazer or did not specify at all whether it is part of their school uniform. Similarly, with regards to the cap, around 52% of the selected schools either indicated that it did not form part of their school uniform or did not provide such information. Thus, these two items were excluded from any calculation related to the selected basket of school uniform items at primary level.

25. The figure below provides a graphical representation of how many of the selected schools require that each frequently compulsory school uniform item be purchased from either designated or general retailers. It also indicates the instances where a particular item does not form part of the school uniform and where no information was provided as to from where certain uniform items may be purchased.

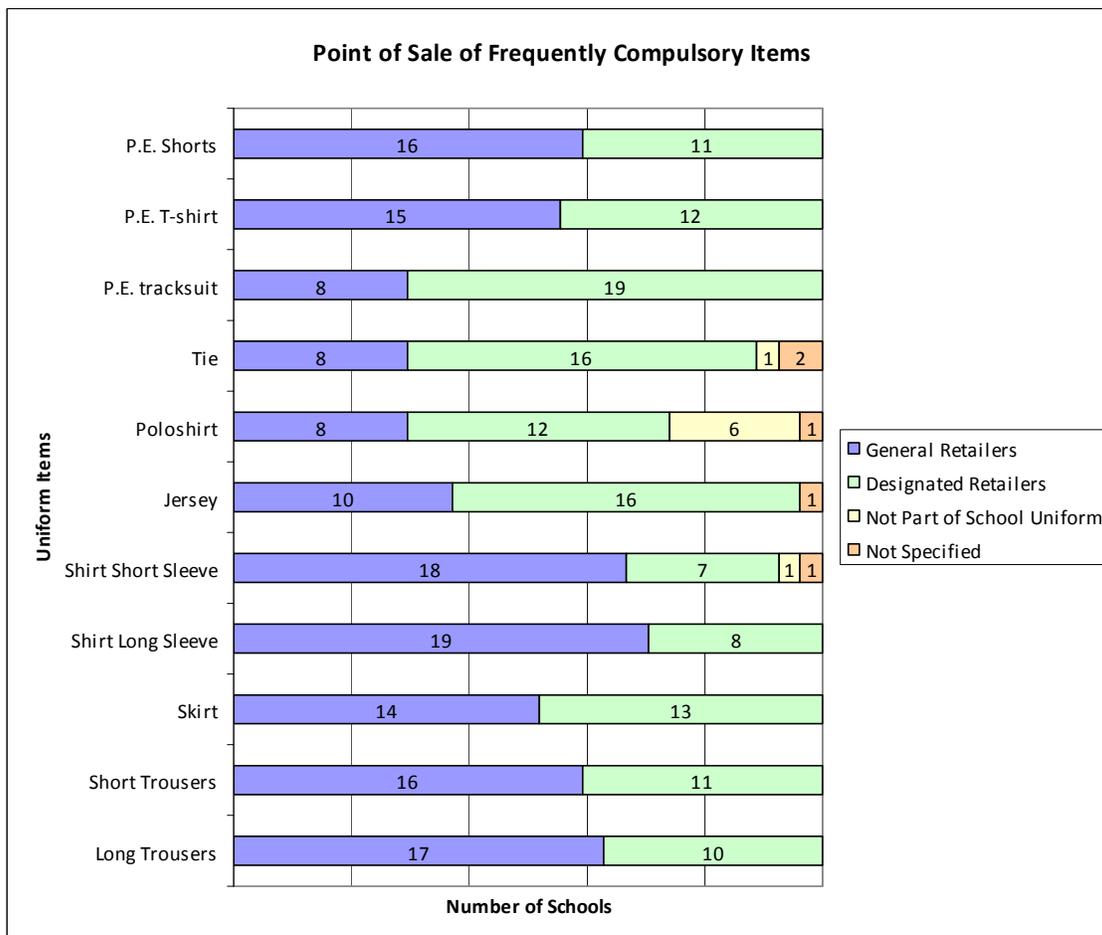


Figure 1: Point of sale of frequently compulsory state school uniform items
 (Source: Created by the Office)

26. With reference to Figure 1, it can be noted that short and long sleeve shirts are the most popular generic items while P.E. tracksuit, tie and jersey have mostly been indicated as specific items by the majority of the selected schools. In fact, there are only eight to ten instances where such items may be purchased from any general retailer. With respect to the polo shirt, it is highly probable that six of the selected

schools do not have this item as part of their school uniform due to the fact that short sleeve shirts are used instead. As can be seen from the above figure, there are more instances where school uniform items may be bought from general retailers. This is highly linked to the fact that all selected schools are still adopting the old school uniform system. Such scenario will change in the future since following the full implementation of the new system, each school will have its distinct school uniform.

27. The Office used the selected frequently compulsory school uniform items to derive a mean, a minimum and a maximum price for each item as disclosed in the following table. It is pertinent to note that when doing such calculations, a distinction was made between generic and specific items in order to provide an accurate account of the prevailing prices of such school uniform items. Additionally, in instances where schools indicated that certain school uniform items can be purchased from general retailers, the Office used the prices of each frequently compulsory item as collected by the MSO from a number of general retailers.

School Uniform Items	Minimum Price €		Mean Price €		Maximum Price €	
	Generic	Specific	Generic	Specific	Generic	Specific
Long Trousers	10.40	10.00	13.89	14.96	18.50	23.00
Short Trousers	6.41	8.90	10.58	11.60	17.00	15.00
Skirt	9.20	8.90	12.00	14.96	18.25	25.00
Shirt Long Sleeve	4.54	5.90	6.05	10.35	8.76	17.00
Shirt Short Sleeve	4.54	5.90	5.87	9.21	8.15	13.15
Jersey	7.90	11.06	14.58	14.82	18.00	25.00
Polo shirt	2.33	5.00	4.14	10.17	8.97	14.30
Tie	3.50	1.50	3.50	4.33	3.50	7.00
P.E. Tracksuit	9.95	16.30	12.98	28.73	17.50	44.05
P.E. T-shirt	2.30	2.33	3.60	6.70	6.00	13.00
P.E. Shorts	2.80	3.90	4.35	6.43	9.00	8.65
Total Girls' School Uniform⁴			80.96	120.66		
Total Boys' School Uniform			79.54	117.30		

Table 3: Minimum, mean and maximum prices for state primary frequently compulsory school uniform items

(Source: Calculations of the Office)

28. Table 3 indicates that on average a uniform bought from specific retailers tends to be more expensive than if it had to be bought from general retailers. It is apparent that the P.E. tracksuit is the most expensive item while the tie is the cheapest school uniform item bought from specific retailers. On the other hand, when taking into consideration the mean price, the jersey is the most expensive item while the tie is the cheapest for school uniform items bought from any general retailer. Additionally, it may be noted that in the case of a specific P.E. tracksuit, the price ranges from a minimum of €16.30 to a maximum of €44.05. However, if the P.E. tracksuit had to be bought from a general retailer, the price variation between the minimum and maximum is less significant since the minimum price was found to be €9.95 while the highest was €17.50.

29. The survey results were also used to calculate the differences in the mean prices between school uniform items purchased from general retailers and those purchased from specific retailers.

⁴ Total mean price excludes the short trousers.

	Generic	Specific	Difference between prices	% difference between prices
Uniform Items	Mean Price: €	Mean Price: €	€	
Long Trousers	13.89	14.96	1.07	7.73%
Short Trousers	10.58	11.60	1.01	9.58%
Skirt	12.00	14.96	2.96	24.64%
Shirt Long Sleeve	6.05	10.35	4.29	70.93%
Shirt Short Sleeve	5.87	9.21	3.34	56.85%
Jersey	14.58	14.82	0.24	1.62%
Tie	3.50	4.33	0.83	23.66%
Polo shirt	4.14	10.17	6.02	145.33%
P.E. Tracksuit	12.98	28.73	15.75	121.36%
P.E. T-shirt	3.60	6.70	3.09	85.87%
P.E. Shorts	4.35	6.43	2.08	47.80%
Total Girls' School Uniform	80.96	120.66	39.70	49.04%
Total Boys' School Uniform	79.54	117.30	37.76	47.47%

Table 4: Difference between mean generic prices and mean specific prices for state primary schools (Source: Calculations of the Office)

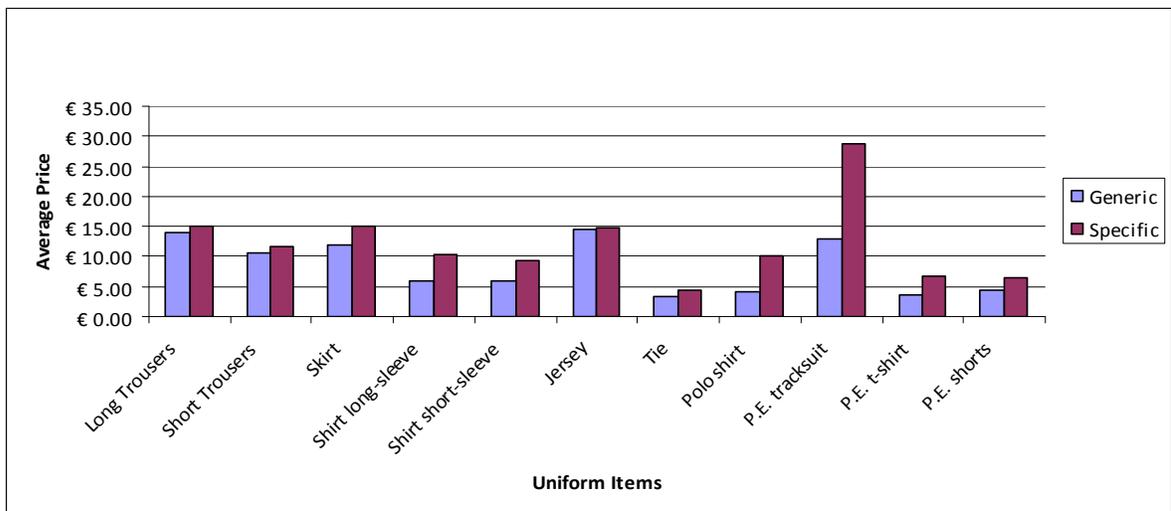


Figure 2: A comparison between mean prices for generic and specific state primary school uniform items (Source: Created by the Office)

30. Both graphical representations show a difference between the prices paid for all specific and generic school uniform items with the mean percentage difference in total amounting to more than 45%. It was observed that the largest price differences were registered for the P.E. tracksuit and the polo shirt since more than €15 and €6 had to be paid extra for each respective item, amounting to a percentage difference exceeding 120%. The only three school uniform items with a similar price bought from either a general or specific retailer are the jersey and the long and short trousers since the price differences range between €0.24 and €1.07. If these items had to be excluded from the price difference calculations, the mean percentage difference between specific and generic school uniform items would exceed 70%.
31. Moreover, in reality where they are able to buy generic items, parents are able to make greater savings than €39.70/€37.76 as shown in Table 4 since they are able to shop around and opt for the minimum price rather than the mean price. On the other hand, in the case of specific school uniform items, parents do not enjoy such flexibility.
32. As aforementioned, the old system of how school uniforms are supplied is being phased out. Thus all school uniforms will eventually have to be purchased from exclusive retailers. This contrasts with the advantages of having a generic school uniform where parents have a greater choice at a retail level on price, quality and retailer.

3.3 Secondary Schools

33. The supply of school uniforms at secondary level is also undergoing a period of transition. Prior to the commencement of the implementation of the new system, each secondary school adopted a policy whereby agreements were made between heads of schools and exclusive suppliers and no tendering system was in place. On the other hand, under the new system, school uniform items are supplied by means of a tendering process issued by the Directorate General for Educational Services. Irrespective of which policy is in place to supply the school uniform at each secondary school, that is whether it is the old or the new system, the Office noted

that both systems restrict the purchase of school uniforms to an exclusive retailer, thereby excluding the possibility that school uniforms may be purchased from any general retailer.

34. Unlike primary schools, state secondary schools are segregated between boys and girls. Given that frequently compulsory uniform items vary between girls' secondary and boys' secondary schools, the Office determined that any price analysis on school uniform items should be undertaken separately. From the selected thirteen secondary schools, eight schools were boys' secondary schools while the remaining five were girls' secondary schools.
35. From the selected schools, all the girls' secondary schools, during the reference year were still adopting the old system. With respect to the selected boys' secondary schools, 38% have started to implement the new system whilst the remaining 62% are still adopting the old system. As will be shown in the subsequent paragraphs, the Office undertook further price analysis of the frequently compulsory school uniform items and conducted comparative price analysis between the old and the new system. For the majority of the state secondary schools, the cap did not feature as a compulsory school uniform item. It was, thus, omitted from any analysis on the basket of frequently compulsory school uniform items.
36. The Office compiled the following tables illustrating the minimum, mean and maximum prices for the selected frequently compulsory school uniform items for boys' and girls' secondary schools respectively.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	12.92	17.92	20.97	62.31%
Short Trousers ⁵	18.86	18.86	18.86	0.00%
Shirt Long Sleeve	8.82	10.49	14.43	63.61%
Shirt Short Sleeve	9.20	10.83	12.45	35.33%
Jersey	10.94	14.48	16.30	48.99%
Polo shirt	9.09	11.46	13.85	52.37%
Tie	4.55	5.53	7.64	67.91%
Blazer	53.57	56.88	63.58	18.69%
P.E. Tracksuit	33.54	40.60	51.69	54.11%
P.E. T-shirt	5.47	6.76	10.70	95.61%
P.E. Shorts	6.40	7.25	10.70	67.19%
Total Boys' School Uniform		201.06		

Table 5: Minimum, mean and maximum prices for state boys' secondary frequently compulsory school uniform items

(Source: Calculations of the Office)

37. As disclosed in Table 5, the blazer is the most expensive boys' school uniform item with prices ranging between €53 and €64. The P.E. tracksuit may also be considered as an expensive item compared with other items which make up the school uniform. It may be noted that the difference between the minimum and maximum prices for most items is remarkably significant with percentage differences exceeding 50%. These observations raise concern since no choice is available at retail level as school uniform items have to be purchased from a specific retailer indicated by the school.

⁵ The price is the same in all three columns because only one school indicated that it had short trousers as part of its school uniform.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	13.00	19.33	28.00	115.38%
Skirt	13.00	19.21	29.75	128.85%
Shirt Long Sleeve	8.75	10.44	15.00	71.43%
Shirt Short Sleeve	8.75	11.07	15.70	79.43%
Jersey	15.70	18.13	25.00	59.24%
Polo shirt	12.11	13.42	15.90	31.30%
Tie/Bow	3.50	4.19	5.00	42.86%
Blazer	54.42	60.29	68.72	26.28%
P.E. Tracksuit	36.10	39.46	43.90	21.61%
P.E. T-shirt	4.75	8.38	15.05	216.84%
P.E. Shorts	6.40	8.13	9.90	54.69%
Total Girls' School Uniform		212.05		

Table 6: Minimum, mean and maximum prices for girls' secondary frequently compulsory school uniform items

(Source: Calculations of the Office)

38. When looking at girls' secondary school uniform items, the blazer is again the most expensive item with prices ranging between €54 and €69. It was found that for seven out of eleven items, the percentage difference between the minimum and maximum prices was more than 50%. In the case of long trousers, skirt and P.E. t-shirt, some parents have to pay more than twice the minimum price. Such price differences raise serious concerns since the school dictates from where to purchase such items, thus leaving no room for choice for the parents to purchase from any other retailer at cheaper prices.
39. As aforementioned in paragraph 35, from the selected schools, three boys' secondary schools have started to adopt the new system for the supply of school uniforms. The Office sought to determine whether there are any differences in prices for school uniforms supplied by the old system and those of school uniforms supplied by means of a tendering system. The table below shows the minimum, mean and maximum prices for each school uniform item which were used as the basis to compare the prices of the frequently compulsory school uniform items supplied by the old system with the same items supplied by means of the new system.

School Uniform Items	Minimum Price €		Mean Price €		Maximum Price €	
	Old System	New System	Old System	New System	Old System	New System
Long Trousers	12.92	16.56	17.38	18.80	18.50	20.97
Short Trousers	none	18.86	none	18.86	none	18.86
Long Sleeve Shirt	8.82	10.51	9.12	12.78	9.20	14.43
Short Sleeve Shirt	9.20	12.45	9.20	12.45	9.20	12.45
Jersey	13.85	10.94	15.30	13.12	16.30	14.56
Polo shirt	12.80	9.09	13.06	9.32	13.85	9.78
Tie	4.55	5.36	5.17	6.14	7.64	7.10
Blazer	54.16	53.57	56.86	56.91	61.86	63.58
P.E. Tracksuit	33.54	36.61	37.22	46.24	40.90	51.69
P.E. T- Shirt	5.85	5.47	7.40	5.70	10.70	5.94
P.E. Shorts	6.40	6.98	7.41	6.99	10.70	6.99
Total Boys' School Uniform			178.12	207.31		

Table 7: Comparison of minimum, mean and maximum prices of frequently compulsory state boys' secondary school uniform items procured by the old and the new system
(Source: Calculations of the Office)

40. The Office observed that overall the new system did not result in much lower prices. In fact, the total mean price of a uniform under the new system exceeds that under the old system, even if the price of the short trousers is excluded from the total. However, the Directorate for Educational Services underlined that the adjudication of the tender was not based solely on price considerations but also took quality and security of supply into account.

3.4 Conclusion

41. The aim of this chapter was to provide a general picture of the current situation on the supply of school uniforms in state schools. The Office found that while pre-primary schools have fully implemented the new system, the situation at primary and secondary level is still at a transitory stage, since a number of both primary and secondary schools have implemented the new system while some other schools are still using the old system. After conducting price analysis on school uniform items particularly at a primary level, it may be concluded that school uniforms which contain generic items and may be bought from any general retailer come at a much cheaper price. Significant price discrepancies between the minimum and maximum prices were observed for many school uniform items.

Moreover, it was noted that certain uniform items such as the blazer and the P.E. tracksuit tend to be rather costly. The Office observed that when school uniforms are specific to a school and some form of exclusive agreement exists between the school and a particular retailer, consumer choice is limited and is often reflected in higher prices.

Q1. Do you agree with the above preliminary conclusions drawn up by the Office on the supply of school uniforms for state schools?

4 Church Schools

42. The church plays an important role in the education system in Malta since most religious orders altogether run a considerable number of schools catering for boys and girls at pre-primary, primary and secondary level. It does not seem that there is a common trend among church schools in the manner by which boys and girls are segregated at pre-primary and primary level mainly because while a number of schools are co-educational, others segregate between the sexes from a pre-primary level onwards. Despite these differences at pre-primary and primary levels, all secondary church schools are segregated between boys and girls.
43. The Office took a sample of 35 church schools divided into fourteen pre-primary, eleven primary and ten secondary schools. The overall response rate to questionnaires sent to church schools at all levels was of 85.7%. Nevertheless, the Office still managed to obtain the prices of the uniform items of those schools which did not reply to the questionnaire sent. Therefore, the price analysis undertaken includes the data of all the selected church schools.

4.1 Pre-Primary Schools

44. A total of ten pre-primary church schools replied to the questionnaire sent by the Office establishing a response rate of 71.4%. Yet, the Office as explained above, still obtained the prices for the four schools that did not reply to the questionnaire from particular retailers. Hence, price analysis will include all the selected church schools at pre-primary level. In the subsequent paragraphs, a brief overview of the practices adopted by pre-primary church schools for the supply of school uniforms is provided.
45. The table below illustrates the manner by which school uniforms are supplied. From the replies received, it may be determined that each school has its own specific uniform since none of the schools indicated that school uniform items may be purchased from any general retailer. In addition, there are a number of schools

which provide the parents with the option of either purchasing the school uniform from a particular retailer or purchasing the material and sewing the uniform themselves. The remaining schools have indicated that school uniform items may only be purchased directly from the school.

System adopted for the Supply of School Uniforms	Number of Schools
Directly from school	2
Exclusive retailer	4
From any general retailer	0
Purchase of material	0
Exclusive retailer and purchase of material	4

Table 8: System adopted for the supply of school uniforms for pre-primary church schools
(Source: Replies to questionnaires)

46. From the selected pre-primary church schools, six different undertakings were identified as being both at the same time the supplier and retailer of the school uniform of a particular school. Other selected schools have an exclusive supplier, with the school acting as the retailer since the school uniform is bought directly from the schools' premises.
47. Furthermore, the selected schools were asked to specify the type of existing agreement between the school and the supplier/retailer and the duration of such agreement. From the replies received, it was determined that six of the selected schools have a word-of-mouth agreement while three schools have a contract with a particular supplier/retailer with the duration of such contracts varying between two to five years. Two of the latter three schools entered into a contract following an expression of interest. Information was not provided by one school on the type of existing agreement that the school has with the supplier/retailer. The selected schools identified an array of criteria as to the reason why they chose a particular supplier/retailer. Good quality, recommendation from parents and other schools, affordability and reliability were few of the criteria mentioned when selecting the

particular supplier/retailer. Moreover, all the schools that replied to the questionnaire indicated that they do not intend to change the manner by which they supply school uniforms in the near future.

48. Similar to state schools, seven out of the selected church schools at pre-primary level have a limited number of school uniform items, hereinafter referred to as 'simple uniform'. However, the rest of the selected pre-primary schools were found to have a complete uniform which include items such as blazer, skirt, long trousers and P.E. kit, hereinafter referred to as 'complete uniform'. In conducting its price analysis, the Office deemed appropriate to determine separate baskets of frequently compulsory school uniform items for boys and girls even in those cases where the selected pre-primary schools are co-educational and have a complete uniform. However, in the case of a simple uniform, the same basket of frequently compulsory school uniform items was used for both boys and girls as illustrated in the table below.

Complete Uniform - Girls	Complete Uniform - Boys	Simple Uniform
Long Trousers	Long Trousers	Polo shirt
Skirt	Short Trousers	Short Trousers
Shirt Long Sleeve	Shirt Long Sleeve	Jogging Suit
Shirt Short Sleeve	Shirt Short Sleeve	Baseball Cap
Polo shirt	Jersey	
Jersey	Blazer	
Blazer	P.E. Tracksuit	
P.E. Tracksuit	P.E. T-shirt	
P.E. T-shirt	P.E. Shorts	
P.E. Shorts		

Table 9: List of frequently compulsory school uniform items for complete and simple uniform for church pre-primary schools
(Source: The Office)

49. As in the case of state schools, the Office compiled a table highlighting the minimum, mean and maximum prices of frequently compulsory school uniform items that comprise a simple school uniform.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Polo shirt	5.00	9.74	13.72	174.40%
Short Trousers	5.00	10.89	13.95	179.00%
Baseball Cap	3.95	4.21	5.00	26.58%
Jogging Suit	13.50	22.30	37.00	174.07%
Total School Uniform		47.14		

Table 10: Minimum, mean and maximum prices for a church pre-primary simple school uniform
(Source: Office calculations)

50. As illustrated in the table above, it can be noted that considerable differences of over 170% exist between the maximum and minimum prices of three out of four of the compulsory school uniform items. This raises concern in that since every school has its own specific school uniform sold by a specific retailer or by the school itself, parents are not in a position to choose on the basis of prices and quality but are rather obliged to pay the prices demanded.

51. Similar tables were also compiled to illustrate the minimum, mean and maximum prices of a pre-primary complete boys' uniform and a pre-primary complete girls' uniform.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	15.85	18.53	19.90	25.55%
Skirt	15.75	20.54	27.00	71.43%
Shirt Long Sleeve	6.05	9.72	13.30	119.83%
Shirt Short Sleeve	5.87	8.14	11.55	96.76%
Polo shirt	7.50	8.65	9.80	30.67%
Jersey	10.85	15.63	20.50	88.94%
Blazer	48.92	58.08	64.50	31.85%
P.E. Tracksuit	21.00	26.04	33.60	60.00%
P.E. T- Shirt	5.25	5.84	6.40	21.90%
P.E. Shorts	6.40	7.26	11.50	79.69%
Total Girls' School Uniform		178.43		

Table 11: Minimum, mean and maximum prices for a church pre-primary girls' complete school uniform
(Source: Office calculations)

52. Although the price differences in the case of pre-primary girls' complete uniform are not as extensive as in the case of the simple uniform, the price differences observed for the majority of the items, particularly the shirts and jersey, remain very significant.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	15.85	17.62	18.50	16.72%
Short Trousers	13.85	13.85	13.85	0.00%
Shirt Long Sleeve	6.05	6.05	6.05	0.00%
Shirt Short Sleeve	5.87	5.87	5.87	0.00%
Jersey	10.85	13.32	14.55	34.10%
Blazer	48.92	54.35	57.07	16.66%
P.E. Tracksuit	21.00	21.00	21.00	0.00%
P.E. T- Shirt	5.85	5.85	5.85	0.00%
P.E. Shorts	6.40	6.40	6.40	0.00%
Total Boys' School Uniform		144.31		

Table 12: Minimum, mean and maximum prices for a church pre-primary boys' complete school uniform
(Source: Office calculations)

53. The Office applied caution in deriving preliminary conclusions on the results of the percentage price differences between the minimum and maximum prices of a complete boys' uniform, since from the sample taken, only three schools have a complete uniform at pre-primary level for boys. In addition, the three schools chosen pertain to the same congregation, therefore it is likely that the school uniform items are the same and are purchased from the same retailer. However, the percentage price differences noted for the long trousers, jersey and blazer may be attributed to slight variations in the design of the said uniform items used solely by one of the schools.

54. From the replies received, a number of schools indicated that school uniforms must be purchased directly from the school while other schools indicated that school uniforms should be purchased from a specific retailer. Given that from the sample taken most of the selected schools have a simple uniform, the Office considered it appropriate to conduct a price analysis for the simple uniform, to determine

whether price differences exist between different points of purchase as shown in the table below.

	Mean Price of item purchased from school	Mean Price of item purchased from specific retailer	% Mean Price Difference
School Uniform Items	€	€	
Short Trousers	8.27	11.94	44.38%
Polo shirt	9.36	9.90	5.75%
Jogging Suit	23.54	21.80	-7.37%

Table 13: Comparison of mean prices of church pre-primary school uniform items bought from different points of purchase
(Source: Office calculations)

55. For two of the items illustrated above, the mean prices of the school uniform items purchased from the school are cheaper than those purchased from a specific retailer. A remarkable difference may be noted for short trousers where the same item is purchased 44.38% higher from a specific retailer than from the school.
56. In conclusion, from the above price analysis, it may be highlighted that price differences for the same school uniform items exist not only between schools, but also between different points of purchase. Once more, it is clearly shown that parents remain in an unfavourable position since they are often restricted to purchase school uniform items from designated retailers or from the school itself at often higher prices without having any choice on quality, price and retailers.

4.2 Primary Schools

57. The Office took a sample size of eleven church primary schools and received replies to the questionnaire from all the selected schools. The tendency for the supply of school uniforms for church schools at primary level is that school uniforms are purchased from exclusive retailers. Three schools indicated that the school purchases the school uniform items from suppliers and then sells the items directly to parents itself. One school offers a wider choice in that a number of items have to be purchased from a specific retailer, whilst a limited number of school uniform

items may be purchased from any general retailer. At the same time, it is possible to purchase solely the uniform material so that the school uniform may be sewn separately. There is also another school where the uniform can be bought directly from the school with the possibility of purchasing the material alone or purchasing certain school uniform items from any general retailer.

58. Word-of-mouth agreements remain the most popular type of agreement between the schools and exclusive suppliers and retailers. Yet, three schools have a specific contract with a particular supplier with the duration of such contracts ranging between three to five years. Schools indicated good material, reliability and reasonable prices amongst others for selecting the indicated suppliers and retailers. Only one school indicated that it intends to change the manner by which the school uniform is supplied. All the rest do not have any intention to change the manner by which the school uniform is supplied in the next few years.

59. From the replies received, it was noted that in contrast to pre-primary schools, the majority of schools have a complete uniform while only two schools have a simple uniform at primary level. Similar to the exercise carried out for church pre-primary schools, in conducting its price analysis, the Office considered it appropriate to determine a separate basket of frequently compulsory school uniform items for boys and another for girls even in those cases where the selected primary schools are co-educational and have a complete uniform. However, in the case of a simple uniform, the same basket of frequently compulsory school uniform items was used for both boys and girls as illustrated in the table below.

Complete Uniform - Girls	Complete Uniform - Boys	Simple Uniform
Long Trousers	Long Trousers	Polo shirt
Skirt	Short Trousers	Short Trousers
Shirt Long Sleeve	Shirt Long Sleeve	Jogging Suit
Polo shirt	Polo shirt	
Jersey	Jersey	
Blazer	Blazer	
P.E. Tracksuit	P.E. Tracksuit	
P.E. T-shirt	P.E. T-shirt	
P.E. Shorts	P.E. Shorts	

Table 14: List of frequently compulsory school uniform items for complete and simple uniform for church primary schools
(Source: The Office)

60. The tables below are intended to provide a tabular representation of the minimum, mean and maximum prices and percentage price differences between the minimum and maximum prices for a simple uniform and a complete uniform for girls and boys. Further explanation on each table is provided in the subsequent paragraphs.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Polo shirt	7.00	9.27	11.53	64.71%
Short Trousers	6.70	11.39	16.07	139.85%
Jogging Suit	30.05	30.10	30.15	0.33%
Total School Uniform		50.76		

Table 15: Minimum, mean and maximum prices for a church primary simple school uniform
(Source: Office calculations)

61. As shown in Table 15, the percentage price difference is minimal for the jogging suit while there is a significant percentage price gap for short trousers and the polo shirt. As already referred to above, such significant price differences continue to underline the fact that parents are made to pay much higher prices for very similar items without having any choice on prices, quality and retailers.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	16.85	22.84	33.00	95.85%
Skirt	16.50	22.69	29.50	78.79%
Shirt Long Sleeve	10.50	13.13	17.50	66.67%
Polo shirt	7.50	9.35	11.35	51.33%
Jersey	12.00	17.33	25.00	108.33%
Blazer	50.25	60.05	71.75	42.79%
P.E. Tracksuit	18.70	27.41	40.80	118.18%
P.E. T- Shirt	3.60	6.54	9.70	169.44%
P.E. Shorts	4.35	7.79	11.50	164.37%
Total Girls' School Uniform		187.13		

Table 16: Minimum, mean and maximum prices for a church primary girls' complete school uniform
(Source: Office calculations)

62. Similar to the trends observed in previous price comparisons, percentage price differences between the minimum and maximum prices for a girls' complete uniform are high, ranging between 42% and 170%. The P.E. t-shirt and P.E. shorts are the two items that registered the largest percentage price difference. This may be due to the fact that certain schools indicated that these two uniform items may be bought from any general retailer, suggesting that specific school uniform items tend to be more expensive than items bought from any general retailer.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	10.25	16.44	20.75	102.44%
Short Trousers	10.58	12.57	13.85	30.91%
Shirt Long Sleeve	6.05	9.35	12.35	104.13%
Polo shirt	7.00	9.74	11.85	69.29%
Jersey	12.00	16.57	19.55	62.92%
Blazer	48.50	56.91	64.75	33.51%
P.E. Tracksuit	18.70	27.78	41.00	119.29%
P.E. T- Shirt	3.60	8.10	14.00	288.89%
P.E. Shorts	4.35	8.03	12.50	187.36%
Total Boys' School Uniform		165.49		

Table 17: Minimum, mean and maximum prices for a church primary boys' complete school uniform (Source: Office calculations)

63. For a boys' complete school uniform, the percentage price differences between the minimum and the maximum prices are higher than those registered for the girls' complete uniform. For items such as the P.E. t-shirt and P.E. shorts, the percentage price differences reach 289% and 188%, respectively. Such significant percentage price differences may also be attributed to the fact that the minimum price of €3.60 and €4.35 of the P.E. t-shirt and P.E. shorts, respectively, pertain to generic uniform items. Additionally, this is also the case for long sleeve shirt and short trousers since the minimum prices also pertain to generic uniform items. However, the percentage price difference of the short trousers is much less pronounced than that of the long sleeve shirt. In general it was noted that the prices of girls' school uniform items are higher than those registered for boys' school uniform items even though the percentage price differences for some items are less accentuated.
64. The Office sought to undertake a price analysis on the different points of purchase of school uniform items. In contrast to church pre-primary level, from the sample taken, the Office did not consider it appropriate to conduct such analysis for a simple uniform due to the fact that only two of the selected schools use the simple uniform.
65. In addition, the same exercise could not be undertaken for a boys' complete uniform, since from the replies received, there was an inadequate number of schools using different points of purchase to be able to conduct such comparative analysis. As seen in Table 18, the Office could conduct such price analysis on the basis of the replies received only for certain items pertaining to the girls' school uniform.

	Mean Price of item purchased from school	Mean Price of item purchased from specific retailer	% Mean Price Difference
School Uniform Items	€	€	
Shirt Long Sleeve	14.00	12.55	-10.36%
Jersey	14.25	18.56	30.22%
Blazer	60.25	59.97	-0.46%
P.E. Tracksuit	27.35	27.44	0.33%
P.E. T-shirt	8.70	5.61	-35.52%
P.E. Shorts	6.43	8.33	29.65%

Table 18: Comparison of mean prices of church primary girls' school uniform items bought from different points of purchase
(Source: Office calculations)

66. No conclusions can be derived from the above table since certain school uniform items bought directly from the school are more expensive than school uniform items bought from specific retailers, while the situation is reversed for other school uniform items. However, it should be highlighted that having a mean percentage price difference of up to 35% for the same uniform item bought from different points of purchase, does raise some concerns.

67. The supply of school uniforms for church primary schools reflects similar conclusions derived for church pre-primary schools. This is corroborated by the fact that significant price differences were noted between the minimum and maximum prices of the majority of school uniform items, particularly when one school indicated that certain uniform items may be bought from any general retailer. It is apparent, that the supply of school uniforms for church schools at primary level continues to raise competition concerns since having to purchase specific school uniform items from specific points of purchase is resulting in significant price differences and lack of choice for parents.

4.3 Secondary Schools

68. The same questionnaires were sent to ten church schools at secondary level out of which the Office received nine replies. Five of the selected schools indicated a

specific retailer or the school itself for the supply of school uniforms with the possibility for parents to purchase the material separately. For three other selected schools, school uniforms may only be purchased from a specific retailer as indicated by the school. The remaining school offers a wider choice, since it was indicated that a number of school uniform items must be purchased from the school whilst the rest may be purchased from the school or from any general retailer and the material may also be purchased separately.

69. Similar to the trends noted in other educational levels, the most common type of agreement is a word-of-mouth agreement between the school and the supplier but three of the selected schools have a definite contract with the duration ranging between two to five years with a specific supplier/retailer. The criteria for selection of the indicated suppliers/retailers identified from the replies received include affordability, efficiency and reliability amongst others. It was further noted that none of the schools have an intention to change the manner by which they supply school uniform items in the foreseeable future.

70. From the sample taken, six of the selected schools are girls' schools while the remaining four are boys' schools belonging to different congregations in Malta and Gozo. In view of this, the Office established a separate basket of school uniform items for boys and girls as indicated in the table below.

Complete Uniform - Girls	Complete Uniform - Boys
Long Trousers	Long Trousers
Skirt	Shirt Long Sleeve
Shirt Long Sleeve	Polo shirt
Polo shirt	Jersey
Jersey	Blazer
Blazer	Tie
Tie/Cravat	P.E. Tracksuit
P.E. Tracksuit	P.E. T-shirt
P.E. T-shirt	P.E. Shorts
P.E. Shorts	Cap

Table 19: List of frequently compulsory school uniform items for complete uniform for church secondary schools (Source: *The Office*)

71. The two tables below are intended to provide a tabular representation of the minimum, mean and maximum prices and percentage price differences between the minimum and maximum prices for girls' school uniform items and the boys' school uniform for all the selected schools including the only school that did not provide a reply to the questionnaire. Further explanation on each table is provided in the subsequent paragraphs.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	18.95	22.98	27.83	46.86%
Skirt	19.75	25.18	29.40	48.86%
Shirt Long Sleeve	10.48	13.26	17.50	66.98%
Polo shirt	7.50	13.75	20.95	179.33%
Jersey	17.43	21.26	26.90	54.33%
Blazer	54.40	65.60	71.75	31.89%
Tie/Cravat	3.40	4.81	6.50	91.18%
P.E. Tracksuit	29.95	42.32	56.49	88.61%
P.E. T- Shirt	6.40	8.49	14.50	126.56%
P.E. Shorts	6.40	9.45	11.75	83.59%
Total Girls' School Uniform		227.10		

Table 20: Minimum, mean and maximum prices for a church secondary girls' school uniform
(Source: Office calculations)

72. The percentage price differences between the minimum and maximum prices for girls' school uniform items remain considerably high with percentage price differences ranging between 31% and 179%. The polo shirt and P.E. t-shirt are the two items which registered the largest gap between the minimum and maximum prices, so that for these two items, parents of some schools were made to pay more than two fold of the minimum price paid by parents of other schools. The Office also observed that the prices of the blazer and the P.E. tracksuit are on the high side.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	15.96	20.50	24.00	50.38%
Shirt Long Sleeve	6.05	8.20	10.25	69.42%
Polo shirt	8.50	10.56	11.85	39.41%
Jersey	16.54	19.40	21.50	29.99%
Blazer	48.50	57.59	65.00	34.02%
Tie	3.10	5.23	8.00	158.06%
P.E. Tracksuit	40.50	45.61	53.00	30.86%
P.E. T- Shirt	3.75	5.91	8.50	126.67%
P.E. Shorts	7.60	9.53	12.50	64.47%
Cap	5.00	5.50	6.00	20.00%
Total Boys' School Uniform		188.03		

Table 21: Minimum, mean and maximum prices for a church secondary boys' school uniform
(Source: Office calculations)

73. The results obtained from price analysis conducted by the Office, tend to suggest a better scenario for a boys' school uniform at secondary level. This is corroborated by the fact that five items out of the basket of frequently compulsory items chosen, registered a percentage price difference between the minimum and maximum prices of less than 40%. Nonetheless, two school uniform items exceeded a percentage price difference of 125%. Once more, it may be noted that on average, boys' school uniform items are cheaper than girls' school uniform items. Nonetheless, the prices of certain items like the blazer and the P.E. tracksuit are also on the high side.

74. The Office could not estimate any mean percentage price differences between different points of purchase for both girls' and boys' school uniform. This is due to the fact that in the case of girls' secondary schools, none of the selected schools offer the option of purchasing the school uniform directly from the school, therefore no comparison could be conducted between uniforms bought directly from school with uniforms bought from specific retailers. In the case of boys' secondary schools, such price analysis could also not be conducted since various systems are adopted. Out of the four selected schools, one school indicated that the school uniform could be bought directly from the school, another two indicated specific retailers as their point of purchase while another one indicated that it

adopts a mixed system whereby the uniform is bought from the school or general retailer together with the possibility of purchasing material.

4.4 Conclusion

75. The method of supply of school uniforms adopted by church schools was found to be very different from that adopted by state schools. One of the major differences noted is that the vast majority of state schools still have a generic uniform which can be purchased at a cheaper price than a specific uniform. Moreover, it was observed that in state schools the manner by which school uniforms are supplied is shifting to a more competitive and transparent manner by virtue of a tendering process. In the case of church schools, the choice is restricted since in the majority of cases, school uniforms are specific and should either be bought from the school or from a specific retailer as indicated by the school.

76. From the price analysis conducted, the Office found that there are significant price discrepancies between the minimum and maximum prices for many of the school uniform items at all educational levels. This raises competition concerns since there is not only the restriction of competition between suppliers and retailers, but also because parents are being deprived from any choice in terms of price, quality and point of purchase.

Q2. Do you agree with the above preliminary conclusions drawn up by the Office on the supply of school uniforms for church schools?

5 Independent Schools

77. A considerable number of independent schools also provide an important contribution to the educational system in Malta. Over the years, a number of independent schools continue to provide education at all levels for both male and female students. The majority of independent schools are co-educational with only a few exceptions existing where schools are segregated between girls and boys.
78. The Office conducted a similar exercise to that carried out for church schools to establish the manner by which school uniforms are supplied by independent schools. A total number of 22 questionnaires were sent to independent schools which were divided into ten pre-primary, six primary and six secondary schools. The overall response rate of the selected independent schools was of 81.82%.

5.1 Pre-Primary Schools

79. A total of seven replies were received from independent pre-primary schools with the remaining three failing to provide a reply to the questionnaire. In contrast with the price analysis undertaken for church schools, the Office did not manage to obtain the school uniform prices for schools which did not provide a reply. As a result, any price analysis undertaken will pertain only to those schools that submitted replies.
80. Five schools indicated that the school uniform is bought directly from the school while the remaining two schools indicated that the uniform is bought from a specific retailer. A total number of four schools have a word of mouth agreement between the school and the specific supplier/retailer while three schools have a contract with an average duration of two and a half years. Reliability, good quality and provision of a good service are a few of the reasons indicated by the schools for the choice of the indicated suppliers and retailers. None of the schools intend to change the manner by which they supply school uniform items in the coming years.

81. From the information collected, it was noted that the school uniform at pre-primary level may be classified as a simple uniform since it does not comprise all the school uniform items. There were a number of items which were listed as school uniform items for a number of schools such as the skirt, jersey and cap. However these items were not considered as frequently compulsory items, since there were not enough schools that indicated that such items are part of their uniform. The same basket of frequently compulsory school uniform items was used for both boys and girls as illustrated in the table below.

Simple Uniform
Short Trousers
Polo shirt
Jogging Suit

Table 22: List of frequently compulsory school uniform items for simple uniform for independent pre-primary schools
(Source: The Office)

82. In the subsequent table further assessment will be undertaken on the minimum, mean and maximum prices together with any resulting percentage price differences for a simple school uniform.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Short Trousers	5.00	13.46	19.00	280.00%
Polo shirt	2.30	11.06	17.00	639.13%
Jogging Suit	13.99	36.72	69.00	393.21%
Total Boys' School Uniform		61.24		

Table 23: Minimum, mean and maximum prices for an independent pre-primary simple school uniform
(Source: Office calculations)

83. As highlighted in the table above, the Office noted that the percentages are significantly high in contrast to the percentage price differences noted for state and church schools. In the case of the polo shirt, a 639% price difference may be

attributed to the fact that the minimum price of €2.30 corresponds to a generic t-shirt while the maximum price of €17 may be attributed to a more elaborate polo shirt specific to the school. Nonetheless, the fact that the percentage price differences for short trousers and jogging suit also exceed 230% do raise similar concerns from a competition law perspective as discussed in the previous sections since parents are being forced to pay substantially higher prices for similar school uniform items.

84. Given that while certain schools indicated that school uniforms may be purchased from the school directly and others indicated that they may be bought from specific retailers, the Office considered it appropriate to undertake a comparative price analysis of different points of purchase.

	Mean Price of item purchased from school	Mean Price of item purchased from specific retailer	% Mean Price Difference
School Uniform Items	€	€	
Short Trousers	11.46	17.48	52.55%
Polo shirt	9.60	14.73	53.42%
Jogging Suit	37.82	33.98	-10.17%

Table 24: Comparison of mean prices of independent pre-primary school uniform items bought from different points of purchase
(Source: Office calculations)

85. The Office noted that the differences in the mean prices of the short trousers and polo shirt purchased from specific retailers are significant.

86. At pre-primary level, the supply of school uniforms for independent schools continues to underline the conclusions derived when conducting similar price analysis for church schools. Once more, considerable discrepancies were noted between the minimum and maximum prices of the selected school uniform items, with parents having little choice on price, quality and retailer.

5.2 Primary Schools

87. The Office received replies to its questionnaires from all the selected independent primary schools. Similar to independent schools at pre-primary level, all schools are co-educational with the exception of one school which caters for boys only. Schools indicated a number of different options on the manner by which school uniforms are supplied. For two schools, the school uniform is bought from a specific retailer while for one school it was indicated that uniform items are bought directly from the school. For the three other schools, some school uniform items are purchased from a specific retailer while other uniform items are purchased directly from the school.
88. As in the previous educational level, word-of-mouth agreements remain the most popular type of agreement between the school and the suppliers and retailers. There is only one school which has a contract of five years following a tender with a particular supplier. Good quality, availability and reliability were the criteria identified by schools for selecting the respective suppliers/retailers. From the replies received, it was noted that no changes in the manner by which the school uniforms are supplied are envisaged in the near future.
89. The subsequent paragraphs outline the price analysis conducted on school uniform items for independent primary schools. Given that certain school uniform items may not be the same for girls and boys, a separate basket of frequently compulsory school uniform items was chosen for girls and boys, respectively. The table below illustrates the basket of goods chosen.

Complete Uniform - Girls	Complete Uniform - Boys
Skirt	Long Trousers
Shirt Long Sleeve	Short Trousers
Shirt Short Sleeve	Shirt Long Sleeve
Jersey	Shirt Short Sleeve
Blazer	Jersey
P.E. Tracksuit	Blazer
P.E. T-shirt	Tie
P.E. Shorts	P.E. Tracksuit
Cap	P.E. T-shirt
	P.E. Shorts
	Cap

Table 25: List of frequently compulsory school uniform items for complete uniform for independent primary schools
(Source: The Office)

90. The subsequent tables show the minimum, mean and maximum prices together with any resulting percentage price differences for a complete girls' and boys' school uniform at a primary level.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Skirt	16.90	24.10	30.00	77.51%
Shirt Long Sleeve	6.05	10.23	17.70	192.56%
Shirt Short Sleeve	5.87	13.37	17.00	189.61%
Jersey	15.49	17.31	20.00	29.12%
Blazer	68.72	69.68	70.00	1.86%
P.E. Tracksuit	30.00	39.79	69.00	130.00%
P.E. T-shirt	4.54	9.45	17.00	274.45%
P.E. Shorts	6.50	9.63	17.00	161.54%
Cap	5.00	5.67	7.00	40.00%
Total Girls' School Uniform		199.23		

Table 26: Minimum, mean and maximum prices for an independent primary girls' complete school uniform (Source: Office calculations)

91. For a girl's uniform at a primary level, the percentage price differences fluctuate considerably between one uniform item and another. For the blazer, cap and jersey, the differences between the minimum and maximum prices are less than 45%. Conversely, P.E. shorts, short and long sleeve shirts have registered price differences exceeding 160% with the P.E. T-shirt even reaching a price difference of 274%. The fact that the significant percentage price differences pertain to the same uniform items, continues to corroborate the conclusions derived from previous price analysis that purchasers of school uniform items are continually being made worse off. The Office again noted that for two particular school uniform items namely the blazer and the P.E. tracksuit, prices appear to be on the high side.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	13.89	24.07	29.10	109.50%
Short Trousers	10.00	14.75	17.47	74.70%
Shirt Long Sleeve	6.05	10.43	17.70	192.56%
Shirt Short Sleeve	5.87	12.02	16.50	181.09%
Jersey	15.49	18.90	25.25	63.01%
Blazer	68.72	70.19	72.25	5.14%
Tie	6.25	6.58	7.00	12.00%
P.E. Tracksuit	30.00	41.16	69.00	130.00%
P.E. T-shirt	4.54	8.51	17.00	274.45%
P.E. Shorts	6.50	9.60	17.00	161.54%
Cap	5.00	5.50	7.00	40.00%
Total Boys' School Uniform		221.71		

Table 27: Minimum, mean and maximum prices for an independent primary boys' complete school uniform
(Source: Office calculations)

92. Similar to the results observed for girls' uniform at primary level, boys' uniform items also show a series of percentage price fluctuations between one item and another. The tie and the blazer are the two items for which the least percentage price difference was noted. However, for the majority of the other school uniform

items, price differences exceed 100% with the situation continuing to aggravate itself with differences exceeding 160% and reaching 274%.

93. By means of the following tables, the Office sought to determine whether there are any mean percentage price differences for school uniform items purchased from different points of purchase. For a number of school uniform items, both for girls and boys, such exercise could not be undertaken since for certain items, the majority of schools indicated that they may be bought directly from the school. In view of this, there was an insufficient number of schools to compare the prices of the same uniform items purchased from specific retailers to those purchased from the schools.

	Mean Price of item purchased from school	Mean Price of item purchased from specific retailer	% Mean Price Difference
School Uniform Items	€	€	
Shirt Short Sleeve	14.83	11.19	-24.60%

Table 28: Comparison of mean prices of independent primary girls' school uniform item bought from different points of purchase
(Source: Office calculations)

94. As highlighted in the previous paragraph, from a girl's school uniform only the shirt short sleeve could be used in the comparative exercise to determine whether price differences exist between different points of purchase. In such instance, it resulted that short sleeve shirts are bought cheaper from specific retailers. However, it was not considered appropriate to derive any conclusions since such peculiarity was only noted for one item.

	Mean Price of item purchased from school	Mean Price of item purchased from specific retailer	% Mean Price Difference
School Uniform Items	€	€	
Short Trousers	16.50	13.88	-15.88%
Shirt Short Sleeve	13.75	10.87	-20.92%
P.E. Tracksuit	41.00	41.48	1.16%
P.E. T-shirt	11.08	4.65	-58.09%
P.E. Shorts	10.67	8.00	-25.00%

Table 29: Comparison of mean prices of independent primary boys' school uniform items bought from different points of purchase
(Source: Office calculations)

95. In the case of boys' school uniform, given that a number of schools have indicated that certain school uniform items may be purchased from a specific retailer, while other schools indicated that the same uniform items could be bought directly from the school, it was possible to conduct such comparative assessment for a greater number of school uniform items. As illustrated in the table above, all uniform items with the exception of one show that the particular school uniform items bought from the school are more expensive. Only the P.E. tracksuit is cheaper from the school but the price difference is minimal.

5.3 Secondary Schools

96. The Office conducted a similar exercise for independent secondary schools and selected a total of six schools. Five replies to the questionnaire were received corresponding to a response rate of 83.3%. Three out of the replies received indicated that school uniforms are supplied by a specific retailer and one school indicated that certain items may be bought from a specific retailer while other items may be bought from the school. For the other school, all uniform items are available from an exclusive retailer however it is also possible to purchase the material.

97. Contrary to what was noted in previous sections, contracts appear to be the most common type of agreement between the school and the specific retailers. The

duration of the contracts vary between three to five years and again the reasons why such suppliers and retailers were chosen, were reliability, quality and value for money. From the replies received, it may be concluded that none of the schools intend to change the manner by which school uniforms are supplied within the next few years.

98. The Office conducted similar price analysis to that conducted for other schools at various levels. Given that the majority of the selected schools are co-educational, it was deemed appropriate to separate girls' school uniform items from boys' school uniform items. The Office identified the following frequently compulsory school uniform items for girls and boys.

Complete Uniform - Girls	Complete Uniform - Boys
Skirt	Long Trousers
Shirt Long Sleeve	Short Trousers
Shirt Short Sleeve	Shirt Long Sleeve
Jersey	Shirt Short Sleeve
Blazer	Jersey
Tie/Cravat	Blazer
P.E. Tracksuit	Tie
P.E. T-shirt	P.E. Tracksuit
P.E. Shorts	P.E. T-shirt
	P.E. Shorts

Table 30: List of frequently compulsory school uniform items for complete uniform for independent secondary schools
(Source: The Office)

99. The subsequent tables are intended to portray the minimum, mean and maximum prices and the relevant percentage price differences for the selected school uniform items for girls and boys respectively.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Skirt	24.00	28.79	38.61	60.88%
Shirt Long Sleeve	7.95	13.63	18.50	132.70%
Shirt Short Sleeve	11.00	14.15	17.95	63.18%
Jersey	19.00	22.25	25.23	32.79%
Blazer	48.00	66.98	80.00	66.67%
Tie\Cravat	7.00	10.30	15.95	127.86%
P.E. Tracksuit	42.00	47.18	53.00	26.19%
P.E. T-shirt	7.50	9.98	13.45	79.33%
P.E. Shorts	5.82	10.32	12.95	122.51%
Total Girls' School Uniform		223.58		

Table 31: Minimum, mean and maximum prices for an independent secondary girls' complete school uniform
(Source: Office calculations)

100. For a girls' complete uniform only two items registered a percentage price difference lower than 35%. For the remaining items, significant price differences ranging from 60% to 135% were noted. The shirt long sleeve, tie and P.E. shorts particularly raise concerns since for the relatively same uniform items, parents are made to pay well over twice the minimum price.

	Minimum Price	Mean Price	Maximum Price	% difference between minimum and maximum prices
School Uniform Items	€	€	€	
Long Trousers	23.25	27.60	31.50	35.48%
Short Trousers	10.00	18.54	26.75	167.50%
Shirt Long Sleeve	7.95	13.10	18.50	132.70%
Shirt Short Sleeve	10.25	13.18	17.95	75.12%
Jersey	19.00	22.85	25.25	32.89%
Blazer	48.00	68.03	80.00	66.67%
Tie	3.03	7.09	14.95	393.40%
P.E. Tracksuit	42.00	47.34	53.00	26.19%
P.E. T-shirt	4.75	8.68	13.45	183.16%
P.E. Shorts	5.82	10.15	12.95	122.51%
Total Boys' School Uniform		236.56		

Table 32: Minimum, mean and maximum prices for independent secondary boys' complete school uniform

(Source: Office calculations)

101. The situation observed for a boys' school uniform is very much in line with that observed for a girls' school uniform. However, the tie registered one of the highest percentage price differences when compared to similar price analysis at different educational levels for independent schools.

102. In previous sections, the Office compiled a comparative exercise between the different points of purchase. For independent secondary schools for both girls and boys, such exercise was not considered appropriate due to the fact that only one school sells its school uniform directly from its premises.

103. On the basis of the analysis conducted, it may be concluded that percentage price differences for independent secondary schools, uniform items are also considerably high. Once more, it was demonstrated that parents are forced to pay apparently high prices for relatively similar school uniform items without having any say on the quality, the price and the choice of the retailer of school uniform items.

5.4 Conclusion

104. The dominant trend for independent schools is that schools only offer the option of either purchasing the school uniform directly from the school or from a designated retailer, resulting in lack of choice for parents and competition among retailers. Moreover, very significant percentage price differences were noted across all three educational levels and the mean price of certain uniform items particularly the blazer and the P.E. tracksuit appeared to be rather high.

Q3. Do you agree with the above preliminary conclusions drawn up by the Office on the supply of school uniforms for independent schools?

6 Conclusions

105. Following the completion of the price analysis on the supply of school uniforms of state, church and independent schools at different educational levels, it may be concluded that there is a general tendency that school uniforms specific to a school bought from specific retailers are bought at a higher price than when such school uniforms are purchased from general retailers.
106. The supply of school uniforms for state schools is currently undergoing a period of transition since it is envisaged that all state colleges will have their own specific uniform, contrary to the system at present where each school has its own school uniform with the majority of them having a generic uniform. The Office conducted comparative price analysis between generic and specific uniform items and also between uniform items pertaining to the old system and the new system. As a general conclusion, it was found that school uniforms consisting of generic items may be purchased at a much cheaper price than school uniforms which are specific to the school and thus need to be bought from a specific retailer. Significant price discrepancies were observed between the minimum and maximum prices of most school uniform items.
107. The situation prevailing for church schools on the supply of school uniforms is rather different than that observed for state schools. All schools with a few exceptions use specific uniform items and therefore, have to be purchased either directly from the school or from a specific retailer indicated by the school. The exceptions relate only to a very few uniform items which may be purchased from any general retailer. Moreover, it was noted that the majority of schools offer the option of purchasing the material. In terms of the price analysis conducted, significant percentage price differences between the minimum and maximum prices were registered for the same uniform item. This was observed for most of the frequently compulsory school uniform items at different educational levels for both boys and girls.
108. Similar restrictions on choice were also observed for independent schools since for nearly all schools, school uniforms have to be purchased from a specific retailer or

from the school itself. Even in this case, significant price discrepancies between the minimum and maximum prices were observed for the majority of frequently compulsory school uniform items and for certain items it was found that parents have to pay more than twice the minimum price for the same uniform item.

109. If one had to factor in differences in quality, it would still be highly unlikely that significant price differences found could be justified.

110. In conclusion, the Office observed that when school uniforms are supplied via a specific retailer, the prices tend to be more inflated than when items are purchased from any general retailer. Lack of competition at the retail level seems to be a common trait for state, church and independent schools. However, it cannot be excluded that a certain degree of competition exists for those using a tendering system, prior to the adjudication of the tender. Nonetheless, the Office has observed that this did not yield lower prices during the period under review. As a general comment, all three types of schools are designing school uniforms specific to the school which severely restricts the possibility for parents to shop around. This increases also the market power of retailers resulting in higher prices.

111. This fact-finding exercise gives rise for further scope for investigation in view of the apparent high prices with respect to school uniform items, the large discrepancies in prices for very similar school uniform items, the lack of choice for parents and the link between these factors and the exclusive arrangements selected by the schools. Moreover, at this stage, the Office considers it appropriate to put forward its recommendations on how to improve competition on the market for school uniforms ensuring better prices for parents.

6.1 Recommendations

112. First of all, schools have to understand that they play a major role in the school uniforms market. The market is highly influenced by the schools' uniform policy. Indeed, this market is very particular because while the schools dictate their school uniform policy, they are neither the sellers nor the purchasers, except in those

cases where the schools themselves sell the uniform. Schools in Malta, in general, tend to be very strict with students on uniform ensuring that all their students turn up at school in their full specific uniform. This in turn puts pressure on the parents to ensure that their children are wearing their full uniform. For parents, the school uniform is an essential requirement and has to be bought according to the exact specifications required by the school. The parents are thus put in a very vulnerable position where they have to buy the uniform from a specific retailer or from the school itself at the prices indicated by that sole retailer/school. This severely restricts their freedom to shop around while increasing the market power of that specific retailer/school. This market power in turn may result in prices above competitive levels and product quality below competitive levels. The Office is also concerned that such exclusive arrangements also lead to the foreclosure of competitors from the market, thus severely hindering and restricting competition. In view of this, it is imperative that schools when setting their uniform policy ensure that they do not hinder the process of competition on the market.

113. Schools should constantly consult and engage parents in discussions on their uniform policy. Parents should especially be consulted when the school intends to change its school uniform design. In those rare cases where an exclusive arrangement is considered necessary as explained below, parents should also be informed of the process used for selecting a supplier.

114. Whilst schools may wish to ensure that their uniform confers a particular identity associated with the school, this does not mean that schools should necessarily opt for complicated designs and unusual colours and combinations thereof. Moreover, they have to balance this with the need to ensure that competition is not hampered as explained above. The more the school uniform is specific, the more differentiated it is, reducing elasticity of demand and increasing the possibility to raise prices. The Office, therefore, recommends that school uniform designs should be kept as simple as possible avoiding any unnecessary elaborate designs or unusual colours. Particular characteristics, such as complicated patterns, embroidered school names and piping which make the uniform specific to the school and more expensive should also be avoided. A distinct identity could for instance be conferred by school badges which could be sold separately. Moreover, schools should ensure that school uniform items which need not necessarily be

specific to the school such as shirts, skirts, trousers, P.E. t-shirts and P.E. shorts may be purchased from any general retailer who wishes to offer uniforms for sale. Even blazers may be sold by general retailers where school badges are sold separately and then sewn on by the parents themselves.

115. To encourage the provision of uniforms by general retailers, the schools should be ready to make available on request to retailers the colour codes and the patterns/designs of uniform items. In addition, parents should also be offered the possibility to purchase material, in which case patterns/designs should be made available to parents too.

116. The need for exclusive arrangements with particular retailers, diminishes where the schools opt for non-specific generic uniform items. In those cases where an exclusive arrangement is felt necessary by the school for a few particular school uniform items, which the Office believes should be the exception rather than the norm, the school should ensure that the positive effects of the agreement, like security of supply, should outweigh the negative effects of the agreement, like limited choice for the parents. In such cases, the Office recommends that the schools adopt a more pro-competitive approach when choosing the supplier for those few particular school uniform items. This can be done by an open, transparent and non-discriminatory bidding process which will seek to enhance price competition and possibly quality standards prior to the adjudication of the tender to the benefit of parents and stakeholders involved. In addition, an exclusive arrangement should be of fixed duration, preferably no longer than three years and certainly not exceeding five years, and no obstacles should exist for terminating the agreement at the end of the said duration. The bidding process should result in more competitive prices and better quality securing the supply of those particular school uniform items for a number of years.

117. Moreover, where such an exclusive arrangement is felt necessary as described in the previous paragraph, such arrangement should be restricted to the wholesale level only in order to create competition at the retail level. Thus, different retailers should be in a position to purchase those particular school uniform items for resale to parents from the selected suppliers.

118. When there is a change if any, in the supplier following the expiry of a tender, the pattern/design of those particular school uniform items should remain the same in order to avoid the situation whereby parents would need to purchase those items afresh subsequent to the adjudication of a new tender or change in supplier. In this respect, the school should ensure that the pattern/design is owned by the school and not by the individual supplier.

119. If the above recommendations are observed, there should be a plurality of retailers providing different uniforms of different schools at different locations across the Maltese Islands, rather than having the parents of one school all tied to the same outlet in one location as is mostly the prevalent situation. The market will open up for more suppliers and retailers willing to supply school uniforms, thus becoming more competitive. This in turn would exert a downward pressure on prices and retailers would be keener to offer good quality and a good service. Parents ultimately will have more choice on quality, prices and retailers. At the same time, the schools' interest in having their students turning up with a full complete uniform in line with the specifications required by the school would not be prejudiced.

Q4. Do you agree with the above recommendations drawn up by the Office?

7 Submission of Comments

The Office welcomes written comments and representations on this preliminary report during the national consultation period which shall run from 14 of September, 2011 to the 26 of October, 2011.

The Office appreciates that respondents may provide confidential information in their comments. This information is to be included in a separate annex to the response and should be clearly marked as being confidential.

All responses must be submitted to the Office by not later than the 26th October, 2011. After due consideration of the comments received, the Office will draw up a final report on the supply of school uniforms.

All submissions should be made in writing and sent by e-mail to mandy.falzon@gov.mt and marice.c.grech@gov.mt . Hard copies of the submissions may also be posted at the address below.

Director General (Competition)
Malta Competition and Consumer Affairs Authority
Office for Fair Trading
Cannon Road,
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Europe

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Annex 1

College:

Name of School:

1 System Type: Tick 'X' where appropriate

	Old System [^]	New System [*]
Year/Form 1		
Year/Form 2		
Year/Form 3		
Year/Form 4		
Year/Form 5		
Year 6		

[^]Old system refers to the agreements entered into between the head of schools and manufacturers/retailers prior to the introduction of the tendering process by the Education Department

^{*}New System entails agreements awarded through a tendering process issued by the Education Department

2 Information on manufacturers, retailers and contract agreements

	Name of manufacturer	Name of Retailers	Contract Duration		Additional Terms & Conditions of Contract
			Start Date	Finish Date	
Year/Form 1					
Year/Form 2					
Year/Form 3					
Year/Form 4					
Year/Form 5					
Year 6					

3 Prices for each uniform item

	Price €				
	S	M	L	XL	XXL
Long Trousers					
Short Trousers					
Skirt					
Shirt - long sleeve					
Shirt - short sleeve					
Jersey					

or indicate equivalent size

Polo Shirt					
Tie					
Blazer					
P.E. Kit:					
Zip-Up Jacket					
Track-Suit Trousers					
P.E. T-Shirt					
P.E. Shorts					
Cap					

4 Any additional comments deemed necessary for the exercise

**5 Name of person who completed the template:
E-mail and contact details:**

Annex 2

QUESTIONNAIRE

SCHOOL UNIFORM PROCUREMENT

Kindly fill in the following questionnaire.

Section 1: Description of the school

1. Does the school form part of any group of companies/orders/schools which have an organisational/company policy?

- Yes
 No

2. If your reply to question 1 is yes, kindly indicate to which group of companies/orders/schools the school belongs to.

3. For how long has the school been in operation?

4. What is the school's student population?

Total: _____ Males: _____ Females: _____

5. Does the school collect any fees or donations?

- No
 If Yes, tick where applicable;
 Fees
 Donations

Section 2: School Uniform Procurement

6. What is the practice adopted by your school on uniform procurement? Tick where applicable:

- uniform is bought directly from school;
- School dictates to parents a **particular** retailer outlet(s) from where to buy uniform;
- Parents are free to buy uniform from **any** retail outlet;
- Parents may buy material and pattern to sew uniform;
- Other (please specify)

7. Do you envisage that the system currently adopted by your school on uniform procurement will change in the next few years? Please explain.

8. Who is/are the supplier/s of your school uniform?

9. What kind of commercial relationship exists between the school and the supplier/s? (e.g. long term contract, procurement, word-of-mouth agreements)

10. a. What is the duration of the existing contract between the school and the supplier/s?

b. When is the renewal of such contract due?

11. a. On what criteria was/were the particular supplier/s mentioned in question 8 chosen?

b. How was/were the supplier/s in question 8 chosen (example, expression of interest, call for tenders)?

12. Who is/are the retailer/s of your school uniform?

13. What kind of commercial relationship exists between the school and the retailer? (e.g. long term contract, procurement, word-of-mouth agreements)

14. a. What is the duration of the existing contract between the school and the retailer/s?

b. When is the renewal of such contract due?

15. a. On what criteria was/were the particular retailer/s mentioned in question 12 chosen?

b. How was/were the supplier/s in question 12 chosen (example, expression of interest, call for tenders)?

Section 3: Prices of School Uniform

16. Please provide the prices of each uniform item. (Price lists provided may also be any circulars provided by the school).

Other comments:

Thank you for filling out the questionnaire.