



THE DONALDSON TRUST

Response to His Majesty's Inspectorate of Education in
Scotland's consultation on changes to school
inspection.

November 2025

About Neurodiversity

Neurodiversity describes the diversity of humans' brains and minds. A person who is, for example, autistic is neurodivergent; they are in the neuro-minority, not the neuro-'typical' majority.

Other neurodivergences include: ADHD, dyscalculia, dyspraxia, dyslexia, dysgraphia, misophonia, Tourette's Syndrome, or differences in cognitive function.

About Us

Our work is built on an understanding that neurodiversity is not a medical construct; rather, it lies at the intersection of culture, mind, identity formation, and socio-political action.

The Donaldson Trust envisages a society in which neurodivergent people are understood, accepted, treated fairly, and valued.

Though there is much work to be done, we believe there are genuine opportunities to change society for the better. We aim to be at the forefront of driving that change – and making a difference with and for neurodivergent people and their families.

As the National Body for Neurodiversity, we will seek to lead by example. We exist to strengthen the public's understanding of neurodiversity, develop excellence in practice, and amplify neurodivergent voices.

Alongside neurodivergent people and our partners across the third sector and academia, we write, campaign, and persuade in order to shape the policies being made on the issues most important to neurodivergent people and families.

We improve outcomes and representation via Connect. Our training and consultancy is accessed by organisations looking to build a culture of neuro-inclusion. We continue to develop our free, online information, support, and guidance resources to neurodivergent people, families, and professionals alongside it.

We continue to support children, young people, and adults through a variety of services based at our Linlithgow campus, where we enable every neurodivergent person to realise their goals & aspirations:

- **Sensational Learning Centre (SLC)**

We offer individualised, skills-based learning for young people with Additional Support Needs, including sensory / communication differences, at our Grant-Aided Special School.

- **Vibe**

Our wellbeing service for neurodivergent people ages 12-18, Vibe offers warm, low arousal spaces for neurodivergent young people to thrive and achieve their personal goals. The service focuses on reducing anxiety, developing life skills, literacy, numeracy, and growing self-esteem / resilience.

Vibe's activities mirror the interests and skills of the young people enrolled with a wellbeing framework and personal programme of skills development.

- **Gate**

Donaldson's skills development and training offer for neurodivergent adults, Gate has been co-designed with those who benefit from it and offers a friendly environment where neurodivergent adults can relax and be themselves. Similar to other services, Gate takes an individualised approach to ensure trainees get the most from their time with us and achieve agreed goals and ambitions.

Trainees can learn skills through activities, or enrol in a vocational and accredited course, delivered by specialist staff / tutors. This includes art, cooking, and cybersecurity.

- **Treehouse**

Treehouse is a specialist wellbeing service offering bespoke, low-arousal environments to improve wellbeing and independence. Support is centred around individual studios, with the 'home-style' settings offering individualised spaces tailored to every person's needs. That allows people we support to participate in activities they co-design alongside their Wellbeing Practitioners.

--

Established in the 1850's, The Donaldson Trust (formerly Donaldson's School) has provided supported education and care throughout its history and has now established itself in the neurodivergence space.

The full range of services offered by the Trust is found here:

<https://www.donaldsons.org.uk/>

**Together, we'll
find your *voice*.**

Overview

The Donaldson Trust welcomes the publication of His Majesty's Inspectorate of Education in Scotland's (HMIE) paper on changes to school inspection. We maintain an interest in this area from three perspectives: providers of school education through our Grant-Aided Special School (GASS), SLC; as providers of wellbeing services for neurodivergent young people disengaged with full-time, 'mainstream' education, and as part of our ongoing engagements with political and governmental stakeholders.

In March 2025, Sensational Learning Centre (SLC), referred to as Donaldson's School in their report, was inspected as 'Good' across all of the assessed QIs by Education Scotland. They noted that SLC has established an inclusive and nurturing culture with teacher and practitioner teams' strong understanding of the social, emotional, communication and wellbeing needs of the children and young people apparent. SLC's Summarised Inspection Findings (SIF) are available to view on HMIE's website ¹.

Whilst we have spoken to most of the questions raised in the paper, we want to underline five elements of our response; namely, that:

- **Specialist schools be evaluated using a framework distinct from that used with 'mainstream' schools**
 - Existing evaluation prioritises the traditional academic standard over the holistic, inclusive success measures that are central to our wellbeing focused approach to learning.
 - **There must be a reduced reliance on academic achievement as the basis for what constitutes a 'good' school.**
- **Short-form inspection is discontinued, with each school inspection following the full 'long-form' approach**
 - The short model does not offer schools adequate opportunities to demonstrate their experiential, skills-based, and social-

¹ <https://educationinspectorate.gov.scot/media/a5ufvjzw/donaldsons-school-sif-240625.pdf>

emotional learning provision, nor does it ensure their evaluation against wellbeing-focused Quality Indicators; for example, 3.1 – ensuring wellbeing, equality and inclusion.

- **Grading on the six-point scale (or any scales) is arbitrary, counterproductive, and should be discontinued and replaced by a statement on how effective the school is overall**
 - A school's offer, especially specialist schools', cannot be distilled into a grade; and a single grade cannot convey the work being done across QIs.
- **Greater emphasis be placed on the benefits of partnership working and community connections in a future school inspection framework**
 - The Donaldson Trust collaborates with a range of external partners, including in delivery of our curriculum in SLC. We regard these partnerships – ranging from equine therapists and Rotary Club to local cafés, etc. – as essential to the social development of all our pupils.
- **Ascertaining the views of the children / young people enrolled at a school is the most important element of any inspection**
 - Amplifying neurodivergent voices sits at the heart of all that we do at the Trust. Neurodivergent children and young people should be enabled to feedback on their experience of learning and evaluation in a way that suits their communication needs.

People involved in inspection

We **agree strongly** that:

- Inviting senior leaders to join parts of an inspection (such as observation and professional discussion) strengthens the inspections
- Children and young people should have increased opportunities to contribute to inspections

- School staff should have increased opportunities to contribute their views during inspections
- Parents and carers should have increased opportunities to contribute their views during inspections

We **agree** that:

- Having associate assessors in an inspection team strengthens inspections

We are **neutral** about:

- The place of local authority staff and the proprietors of independent schools in respect of sharing information on local context
- Members of the public ('lay' members) being part of inspection teams

--

Each member of the HMIE inspection team should be required (regardless of their education background, or lack thereof) to participate in neurodivergence awareness training. They should demonstrate understanding on:

- Social and communication differences common to many neurodivergent people's lived experience
- The role neurodivergence plays in determining a person's communication preferences
- How these factors can impact a neurodivergent learner's experience of the classroom
- Existing data and trends related to the experiences of and outcomes for neurodivergent learners and others with 'ASN'

In order for children and young people to meaningfully share their opinions, HMIE should engage with the school in advance to ascertain the specific communication preferences of the children and young people with whom they wish to engage. It is important to note that many will not wish to talk

to their experiences; rather, they will prefer to communicate in writing or pictorial formats. This will be particularly true of the growing cohort of pupils in schools who are neurodivergent and whose views are critical in evaluating schools' ASN provision and their equity and inclusion agenda.

It is important, too, that pupils are given an information pack (that is available in easy-read, also) to allay any concerns or anxieties that they could have in respect of their participation.

SLC, as a GASS, is not affiliated with a single local authority, nor does SLC take in pupils from only one authority. The role of local authority employees in the inspection process in the context of GASS needs further consideration.

It is important to note the parents of neurodivergent children and young people are disproportionately likely to be neurodivergent themselves. In that context, appropriate consideration must be given to the communication preferences of parents & guardians, including easy-read formatting and the opportunity to meet in-person to discuss a question.

Inspection frequency and selection

- We are **neutral** on the current sampling model
- We would support the introduction of the **combined approach**, where there is a clear cycle of inspections for all schools supplemented by additional inspections that are based on risk
- We would support inspections being carried out **at least once every five years**

Use of grades in inspection

- We **disagree** that using grades helps to provide a clear overview of how well a school is doing
- We **disagree** that using grades helps schools, parents, local authorities / proprietors to understand what needs to improve

- We **agree strongly** that a grade can oversimplify what is happening in a school
- We **do not** think school inspections should continue to use grades on the six-point scale, or any scale, to summarise performances
 - If grades are to be kept, the existing scale would be the least-worst approach
- Inspection reports should show the quality of education in the school via **a statement about how effective the school is overall**

--

Inspection reports should include a statement that summarises the HMIE evaluation of what a school is doing to raise wellbeing amongst its pupils.

Notification of inspection

- A school should receive **3 to 4 weeks' notice** of inspections

--

This would provide sufficient additional time for HMIE to engage with schools on pupil communication needs in respect of pre-inspection engagement mentioned elsewhere in this consultation.

There is an argument to extend notice to 6 weeks for specialist schools on that basis; however, we appreciate that HMIE might wish to have a greater degree of consistency across school types.

Pre-inspection

- We would **agree** that the self-evaluation summary helps make sure that inspection starts with the school's own view of its strengths and development areas
- We are **neutral** on whether a school should be able to use existing documents instead of a separate self-evaluation summary for an inspection

- It is **very important** to gather views from each of the groups listed: children & young people, school staff, parents, and partners

Design & content of a school framework

- We believe there should be **different frameworks for different types of schools**
 - At the very least, there should be a distinction between 'mainstream' and specialist schools, with a different framework for each type

In respect of Q 6.2:

- We **agree** that it is helpful to use the same framework for both inspection and in self-evaluations
- We **agree** that annual, or more regular updates, to the framework would help schools use it more effectively
- We **agree** that including examples of effective practice will make the framework more useful

In respect of Q 6.3, all of the key areas listed are of importance; however, from our perspective supporting neurodivergent pupils with ASN, we wish to draw attention to these areas in particular:

- Children's rights
- Health and wellbeing
- Inclusion, equity, equality and diversity
- Learner progress
- Learner transitions and planning
- Learning environment
- Learner, staff and parent voice in shaping and evaluating school improvement
- Outdoor education
- Partnerships with communities, other services and organisations
- Safeguarding and promoting welfare

- Senior phase pathway planning and vocational learning
- Skills development

--

Overall, there is a pressing need for HMIE to recognise the individualised needs and goals of children and young people; and for the framework(s) that are informed by this consultation to account for this. While elements of this would be addressed in the creation of a distinct framework for specialist schools, it is important that the individualised needs of neurodivergent pupils with a lower level of support need in mainstream schools are accommodated. Schools should not be punished at inspection time if they meet the diverse needs of pupils in a way that is not adequately addressed by a rigid framework.

Reporting on the outcome of inspections

- Inspection findings should be presented in **two inspection reports**

In respect of Q 7.2, it is important that inspection findings are made available for pupils with a higher level of support needs in an **easy-read format**.

In respect of Q 7.3, we believe all of the suggested elements in inspection reporting are important.

In respect of Q 7.4, we wish to draw attention to three areas especially:

- **Language and content which reflects the context of the school**
- **Examples of effective practice**
- **Clear summary of strengths and areas for development**

Inspection follow-up

- **All schools should receive some form of follow-up** by HM Inspectors following inspection



THE
DONALDSON
TRUST

Contact:

Address: The Donaldson Trust, Preston Road, Linlithgow, West Lothian,
EH49 6HZ

Phone: 01506 841900

Email: info@donaldsons.org.uk