



THE DONALDSON TRUST

Response to the Scottish Government
consultation on proposals to update the School
Premises (General Requirements and
Standards) (Scotland) Regulations 1967.

March 2026

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

The Donaldson Trust envisages a society in which neurodivergent people are understood, accepted, treated fairly and valued. As the National Body for Neurodiversity, we will seek to lead by example. We exist to strengthen understanding of neurodiversity, develop excellence in practice, and help neurodivergent people find their voice.

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 this change – and making a difference with and for neurodivergent people.

Alongside neurodivergent people and our partners, we look to shape the policies being made on issues most important to neurodivergent people and families.

We improve outcomes and representation via Connect; our training and consultancy offer. Connect is accessed by organisations looking to increase their knowledge around neurodivergence, support neurodivergent colleagues, and embed neuro-inclusive cultures.

We support neurodivergent children, young people and adults in services based at our Linlithgow campus, where we offer space and support needed to help them to realise their own goals and aspirations:

- **Sensational Learning Centre (SLC)**

We provide Individualised, skills-based learning (with a focus on laying a foundation of good wellbeing and communication) to young people with Additional Support Needs, including sensory and social-communicatory differences, at our Grant-Aided Special School.

- **Vibe**

Our wellbeing service for neurodivergent people ages 12-18 not in full-time mainstream education, Vibe focuses on reducing anxiety, developing life skills, and growing self-esteem and resilience. The low-arousal spaces enable young people to thrive and achieve personal goals, enabling them to re-engage with learning opportunities. Vibe's activities mirror the interests and skills of the young people enrolled, built within an evidenced wellbeing framework.

- **Gate**

A 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. Like our other services, Gate takes an individualised approach to ensure trainees achieve agreed goals and ambitions, often through a wide range of vocational / accredited courses.

- **Treehouse**

Treehouse has a focus on developing communication skills, offering bespoke, low-arousal environments that enabled improved wellbeing and greater independence. A practitioner works with the supported person to tailor activities to interests and needs.

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Having been founded in the 1850's, The Donaldson Trust has provided education and care throughout its history – and has now established itself in the neurodivergence space.

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



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The Governors of The Donaldson Trust is a registered charity in Scotland, number SC017417.

Overview

Though our responses below do not speak directly to the technical content referred to in the questions set out in the consultation, we believe it is important the Scottish Government have input from organisations directly involved in supporting neurodivergent pupils as part of the review.

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The Donaldson Trust welcomes this opportunity to respond to proposed changes to regulations governing the construction and maintenance of school premises. We are responding in two capacities; as the managers of a Grant-Aided Special School (GASS), and as an advocacy organisation looking to embed neuro-inclusive practice, and drive attitudinal shifts, in education and beyond.

We know that, alongside social-communicatory differences, sensory processing differences – whether hypo- (lessened) or hyper- (heightened) sensitivities – form an integral part of the neurodivergent lived experience. Sensory regulation is a vital component of good wellbeing for everyone; however, it is especially important in enabling neurodivergent people to thrive. Sensory inclusion (though, all too often, exclusion) has a material impact on a learner's opportunities, attainment, and pathways.

Our work with neurodivergent learners in education and our work with employers on imbedding neuro-inclusion has shown us that sensory inclusion and the built environment are inseparable. Shaping a truly neuro-inclusive learning estate for Scotland is central to delivering better outcomes for neurodivergent pupils – and imbedding this in reality should be a core aim of these updated regulations. We know, too, that adjustments and spaces beneficial for neurodivergent learners are beneficial for many of their neurotypical peers.

Recognition of the impact of lighting, space, scent, and (as this consultation paper correctly identifies) sound on a neurodivergent learner

is welcome, especially in the broader context of growing numbers of children & young people recognised as neurodivergent. The Scottish Government's latest Pupil Census highlights that the number of autistic learners, for example, continues to rise substantially – now totalling 41,285. A 12% rise in the past year comes on top of a clear trend in recording of neurodivergence in recent times; for instance, the 87% and 52% rise in autistic and dyslexic pupil numbers, respectively, in the five years following the onset of the pandemic ¹. As these trends persist and awareness of support needs (and a need to make adjustments) grows, calls for more neuro-inclusive policy and practice becomes increasingly urgent.

Grant-Aided Schools

Question 3

Sensational Learning Centre (SLC) is a Grant-Aided Special School managed by The Donaldson Trust. We agree that the new Regulations should apply to all grant-aided schools. We believe that Scotland's GASS have a role to play as incubators of good practice around sensory inclusion. The Trust would be happy to engage further with the Scottish Government on the development of guidance for stakeholders around neuro-inclusive lighting and acoustic considerations, similar to our recent participation in ADS' steering group ahead of the recent publication of guidance on sensory-inclusive learning environments ².

SLC (in common with all of our services) offers low-arousal settings shaped by the sensory needs of pupils. In addition to our regular learning spaces for active and creative group learning, SLC pupils have access to a 'break-out' room, offering spaces for self-regulation.

Outdoor Education and Recreational Areas

¹ 2026 (update), SG, [Pupil Census Supplementary Statistics 2025](#)

² 2026, SG, [Sensory Inclusive Learning Environments _ASL](#)

We believe that children & young people thrive when supported to learn in environments tailored to their needs. For lots of the neurodivergent people we support, that involves personalised, skills-based alternatives to the standard curriculum – often delivered in the outdoors. The positive impact that outdoor learning can have on the development of children & young people cannot be overstated. We believe this is especially true of neurodivergent people, whose social-communicatory differences are such that their ability to learn (or even be present) in a ‘mainstream’ educational setting can be greatly diminished by the lack of reasonable adjustment on offer, or the overwhelming built environment.

Wellbeing Spaces

Question 11

The Regulations should include references to wellbeing spaces, given the significant growth in use of these spaces, the importance of sensory processing and regulation for some neurodivergent learners, and the potential significant impacts on estate design. While many adjustments for neurodivergent learners are simple, not structural, it is correct that wellbeing spaces become a standard element of design with broad minimum standards co-developed with neurodivergent people.



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