

THE DONALDSON TRUST

Response to the Scottish Government consultation on a law to restrict personal use of mobile phones in schools.

November 2026

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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)**

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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/

Neurodiversity From awareness to action

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

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Overview

The Donaldson Trust welcomes the opportunity to contribute to ongoing discussions around the place of technology, including mobile phones, in schools in Scotland. We are responding in two capacities: as the managers of a Grant-Aided Special School (GASS), and as an advocacy charity working to embed neuro-inclusive practices and the advancement of neurodivergent rights.

This response incorporates the perspectives of educators from Sensational Learning Centre (SLC), our GASS.

SLC delivers a personalised curriculum that puts wellbeing, communication and learner engagement at the centre of educational planning. Through highly individualised approaches, multidisciplinary working and meaningful pupil voice, we support children and young people to develop the knowledge, skills, and confidence required for learning, independence, and participation in their communities.

As part of our commitment to neuro-inclusive education, all learners can access tailored supports – including co-designed environments, sensory regulation strategies, communication tools and technologies – that enable them to engage successfully in learning and achieve their individual outcomes.

Being able to deliver this approach relies on teachers and practitioners having the flexibility to implement individualised support strategies. For some learners, this may include access to electronic devices, including mobile phones, where these support communication, emotional regulation, organisation, independence or engagement in learning and are deemed necessary or beneficial by professional judgement. This approach is taken also in another of our services (our wellbeing service, Vibe) accessed by neurodivergent young people, some of whom attend a mainstream school part of their week.

As the 2026 guidance rightly identifies, exemptions to schools' policies on device use should be done on a case-by-case basis and adequately account for pupils with Additional Support Needs (ASN), where "access to their mobile phone is used as part of an agreed planned approach to managing their learning needs" [1]. We welcome the recognition of the need for nuanced approaches to the issue of mobile phones in schools and recognise the Scottish Government's commitment to considering how policy change will impact on pupils with ASN, including neurodivergent pupils and others with social-communicatory and sensory differences.

Wellbeing needs are of equal importance to learning needs. Pupils cannot learn effectively without a foundation of safety, belonging and emotional wellbeing. For some learners with ASN, access to a mobile phone or other electronic device may form part of their agreed strategy to support emotional regulation and reduce anxiety. Policy and legislation should therefore recognise that wellbeing support can be just as important to educational participation and achievement as traditional learning support.

Q1 –

Extent and scope of restrictions on phone use

We do not believe that a nationally-mandated restriction on the use of mobile phones in schools would be beneficial for learners – neurodivergent or otherwise. We believe that '**restrictions should be left to the discretion of the school**'. It is essential that educators retain the flexibility to deliver according to the context in which they deliver.

We absolutely recognise that the nature of provision at The Donaldson Trust – in terms of class size, the level of support need, teacher to pupil ratio etc. – is not totally reflective of the experiences of those teaching and learning in mainstream schools in Scotland. We recognise, too, that the

[1] Guidance on Mobile Phones in Scotland's Schools, 2026 Update; P.5, Paragraph 18

'spectrum of harms' to which the consultation and guidance refer may not feature on our campus in a way they might at mainstream settings.

While our comments are made primarily in the context of special education, we believe **the Scottish Government, local authorities, and public schools have a responsibility to consider the impact that restrictions, including any widespread ban, may have on neurodivergent pupils**. We know that large numbers of neurodivergent learners are not able to access appropriate provision, including mental health services, and rely on a range of self-directed strategies that enable them to manage anxiety, regulate sensory input, communicate effectively and remain engaged in learning.

Restrictions might produce benefits for some learners and school communities; however, it is important to recognise that the impact will not be experienced equally by all learners. **Policy designed to reduce distraction or harmful online behaviours for the majority may inadvertently remove supports that are important to a minority of learners with ASN, including neurodivergent children and young people**.

Our experience is that the most effective approaches to technology use are individualised, proportionate and co-designed with the learner, their family, and the professionals supporting them.

Q2 –

How phones are being used

In SLC, a mobile phone may be used to:

- Support transition to and from school
- Communicate with family
- Help with accessibility

    - Phones will support communication, regulation, scheduling, reminders, AAC, visual supports, anxiety management and independence
- Listen to music on headphones as a self-regulation and/or sensory support strategy
- Relax during break and lunch times as a legitimate regulation strategy
- Allow pupils to share any worries if they feel unable to do so verbally
- Access calming apps.

Q5 –
Exceptions

If restrictions on mobile phones were to be introduced in law at a national level, we believe that exceptions are a critical part of ensuring the viability of such a policy. There should be exceptions for each of the groups that the consultation paper mentions:

- Exceptions for children and young people who have **medical conditions**
- Exceptions for children and young people who are **young carers**
- Exceptions for children and young people with **Additional Support Needs**
- Exceptions for children and young people with **disabilities**

We welcome the Scottish Government's recognition that some children and young people rely on mobile phones as part of a planned approach to managing their learning, wellbeing, communication or health needs. In practice, these categories may overlap significantly. For example, a neurodivergent learner might use a mobile phone for a range of reasons, including: emotional regulation, communication, organisation, anxiety management, or accessing assistive technologies. They may rely on it as a reasonable adjustment associated with a disability, too.

We would caution against adopting an overly narrow criteria for exemptions. Needs are often complex, individual and subject to change.

It is essential that educators retain the flexibility to deliver according to the context in which they deliver; therefore, we would reiterate that restrictions are best left to the discretion of individual schools. A framework that provides national guidance while preserving local decision-making is more likely to achieve equitable outcomes for all learners, particularly those with Additional Support Needs.

Q7 –

Independent and Grant-Aided Schools

We believe that the **national restrictions should not apply to independent schools**.

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We believe that the **national restrictions should not apply to Grant-Aided schools**. This would be consistent with the long-established practice of operational independence of GASS and ensure that these schools are able to continue to pursue the innovative practice that has demonstrable benefits for those they support. GASS often support children and young people with complex, highly individualised needs and must retain flexibility to make decisions that reflect those circumstances. A nationally prescribed approach risks limiting the professional judgement required for providing appropriate and responsive support.

The Trust continues to collaborate with our partners in the public sector – including local authorities and individual schools and teachers – as they look to embed neuro-inclusive cultures in classrooms with pupil wellbeing at their heart. The diversity of Scotland's educational landscape is a strength. National policy should preserve the flexibility enabling schools to innovate and respond effectively to the learners that they serve.

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