

PE2138/E: Make publicly owned buildings accessible for people with colour blindness

Cabinet Secretary for Housing written submission, 25 July 2025

Firstly, thank you for raising the matter of Petition PE2138 with me. I acknowledge that delays in providing responses to petitions, as was the case with PE2138, while an isolated incident, is unacceptable and has had a detrimental impact on the ability of the committee to fully consider the subject matter. I can only apologise for how this has affected the ability of the committee to undertake its important and valued work.

With regard to the initial response, the Scottish Government importantly noted how tonal contrast was used to address accessibility issues relating to colour blindness as well as visual impairments more widely within the built environment. This is established as best practice within British Standard BS 8300 which makes recommendations on the use of light reflective values within buildings and signage to establish tonal contrast between elements as well as use of universally accepted public information symbols and colour coding as set out under international standard ISO 7010 and BS 5499-4 where this relates to health and safety signage.

Where guidance is produced by the Scottish Government, the recommendations of BS 8300 are either cited directly or inform its production. This is demonstrated by examples from building regulations, the requirements of Scottish Government estates projects and sector specific guidance for NHS estates as provided.

The scope of the petition also includes buildings and services operated by wider public authorities and includes the production of displayed materials both internally or via external contracts. As an operational matter, it would be for the relevant public authority to produce its own guidance, reflective of its building estate and needs of its service users. Such guidance is regularly reviewed by relevant in-house teams, in so far as it relates to visual impairments more generally. Where there are specific issues or concerns, these should be raised directly with the relevant public authority who can review and update guidance as appropriate.

With regard to the broader question of whether or not colour blindness is defined as a disability for the purposes of The Equality Act 2010, the committee is reminded that the Act is reserved legislation and therefore a matter for the UK Government. While the Scottish Government already provides guidance in line with best practice, where we have powers to do so, we are unable to offer comment on issues relating to reserved powers or operational matters that form the broader scope of this petition.

In recognising the wide-ranging nature of the petition and focus on operational matters, we must acknowledge that response to such questions require input from across multiple policy areas. Looking forward I have asked Officials in my portfolio area to review procedures so that in future cases, and indeed in respect of the Committee's work, rounded and fulsome responses can be offered.

I trust this assists with the ongoing consideration of the petition.

Yours sincerely,

MÀIRI MCALLAN