



# Scottish Concerns Scheme Investigation Report

**Postgraduate Concern, Glasgow School of Art,  
October 2020**

## Contents

Introduction .....	2
Background .....	2
The investigation process.....	3
Detail of the concern submitted.....	4
Key issues raised by the concern.....	4
Findings.....	5
Recommendations .....	16
Action plan .....	17

## Introduction

1 This report is an investigation into a concern raised by postgraduate students of Glasgow School of Art (GSA) who made a submission to the Quality Assurance Agency for Higher Education's (QAA) [Scottish Concerns Scheme](#). The report also includes reference to the University of Glasgow (UoG) as the awarding body for degrees from Glasgow School of Art.

2 This report represents findings based review of the evidence made available at the time of the investigation. Following the visit, Glasgow School of Art reported action was in development or underway on some of the recommendations made in this report at the time of the investigation. However, where evidence to support claims of actions being taken by the School was not available to the investigatory team at the time of the visit, this evidence falls out with the scope of this investigation.

## Background

3 This investigation relates to a concern raised by a group of 126 postgraduate taught students, studying on one-year master's courses across all five schools of GSA (Architecture, Design, Fine Art, Innovation, and Simulation and Visualisation). The students had their learning experience affected significantly by industrial action early in the 2019-20 academic year<sup>1</sup> (this was part of a national strike affecting 74 UK institutions and outwith the control of GSA) and again, later in the year, as a result of the COVID-19 lockdown and associated restrictions, beginning in the middle of March 2020. The COVID-19 lockdown and associated restrictions were mandated by Government and applied across the sector.<sup>2</sup>

4 The concern began as an email letter to GSA from the 2019-20 Master of Letters (MLitt) cohort on 30 March 2020. The Head of the School of Fine Art acknowledged the email on 30 March 2020 and on 30 April 2020 arranged a meeting for 4 May 2020 - at which point the students state they were informed that their letter would be treated as a formal complaint and progressed through the Complaints Handling Procedure. On 1 June 2020, the students withdrew their letter, citing the following reasons: they stated they did not wish the letter to be passed to the complaints department; were not asked if they wanted to proceed that way; and had waited a further 23 days for a response. The students stated that, 'following this first attempt to complain to GSA and waiting two months for an investigation to start, the MLitt cohort and other students on one year postgraduate courses decided to write a new, more comprehensive complaint to GSA which expanded on the issues in the first letter, and included a complaint about the mishandling of the first letter'. The students submitted this complaint to GSA, and it was received by the complaint's handler on 24 June 2020, who then began investigation on 6 July 2020. This investigation concluded with an outcome complaint letter to the students on 22 July 2020 in which no element of the complaint was upheld, but which recommended that: 'GSA could learn lessons around communication with students at the early stages of a significant and disruptive event or series of events' and that staff developing digital showcases should engage with graduates and postgraduates in the process.

5 This concern about GSA was sent by the students to the [Scottish Public Services Ombudsman \(SPSO\)](#) in August 2020. In a letter, dated 1 October 2020, the SPSO confirmed that they would not be taking the case forward, stating that, on the basis of the evidence seen, GSA gave a reasonable response to the points raised. The SPSO also stated that, 'we cannot hold GSA responsible for the earlier strike action or COVID-19

---

<sup>1</sup> University and College Union industrial action took place as follows: 25, 26, 27, 28, 29 November 2019; 2, 3, 4 December 2019; 20, 21, 22, 23, 24 February 2020 and 2, 3, 4, 5, 9, 10, 11, 12, 13 March 2020.

<sup>2</sup> Restrictions began on 24 March 2020.

lockdown as neither were under their direct control. In this situation, what we would expect GSA to do would be to put in place alternative arrangements to mitigate the impact of these events, by arranging reasonable alternative methods of learning.'

6 As part of its remit, QAA Scotland is able to investigate concerns about academic standards and quality raised by students, staff and other parties. Where such concerns indicate serious systemic or procedural problems, QAA Scotland will conduct a detailed investigation. The term 'concerns' is used to mean concerns about how higher education institutions (HEIs) manage their academic standards, the quality of learning opportunities, and the information that they make available about their provision. QAA Scotland has no remit for investigating individual complaints against higher education institutions and is unable to provide redress or compensation to any individual, nor recommend the reimbursement of fees. The aim of an investigation by QAA Scotland under the Scottish Concerns Scheme is to safeguard and improve the overall quality of Scottish higher education by exploring potential weaknesses within a particular HEI and taking action to ensure these are addressed. Findings based on submissions to the Scottish Concerns Scheme result in recommendations aimed at improving the institution's arrangements for securing academic standards and enhancing the quality of provision.

7 The students first contacted QAA Scotland on 28 August 2020 with a Scottish Concerns Scheme submission. Following an initial inquiry and case conference, and discussion with the Scottish Funding Council, the decision was taken on 30 September 2020 to proceed to a full Scottish Concerns Scheme investigation to examine the evidence and determine whether the matters raised put quality and/or academic standards at risk currently or would be likely to put them at risk in the future.

8 It should be noted that one option to explore this concern could have been to investigate the issues raised during the [Enhancement-led Institutional Review \(ELIR\)](#) planned for 26-30 October 2020. However, due to the scope of the concern, and taking into consideration that the ELIR was already due to address another student concern submitted to QAA Scotland about GSA, the desire was not to dominate ELIR discussions with matters raised through the Scottish Concerns Scheme and so this option was regarded by QAA Scotland and SFC as not feasible.

## The investigation process

9 The investigation process comprised a review of documentary evidence provided in the Scottish Concerns Scheme submission, further information requested from QAA Scotland and a series of online meetings of the investigation team, and the team with relevant staff and students, including the three detailed below (duration 60 minutes each):

- meeting with representatives from the University of Glasgow - the awarding body for degrees from GSA
- meeting with senior staff representatives from GSA
- meeting with postgraduate students representing those submitting the concern from four out of the five GSA schools; the meeting also included the GSA Students' Association President.<sup>3</sup>

The investigation took place over a 14-day period, between 5-19 October 2020, which included the scrutiny of documentary evidence, the meetings and the write-up of the report. The QAA Scottish Concerns Scheme investigation team comprised Professor Mark Hunt and Professor Hilary Grainger.

---

<sup>3</sup> Numbers attending these meetings were 6, 8 and 9 respectively.

10 The investigation team took into account the Government directives regarding lockdown, which formed the backdrop to all the matters under consideration.

## Detail of the concern submitted

11 The concerns raised by the students alleged the following and can be summarised as:

- GSA failed to deliver any academic learning and teaching from 16 March 2020 to 26 May 2020, totalling seven weeks during Stage 2 of their programmes, and did not offer a fee refund or reduction for the lost course time, or the opportunity to return to finish their studies from the beginning of Stage 2.
- GSA's approach to ensuring continuity of learning and teaching for students due to COVID-19 did not ensure parity and fairness for students of different academic disciplines in the continuation of their studies.
- Online provision offered was not equivalent to that outlined by GSA's programme specifications at the commencement of the students' studies.
- Communication and consultation to students from GSA was poor and, as a consequence, added to students' anxieties around their access to teaching and concerns around how they would be assessed.
- GSA did not consult with students when developing a plan for academic continuity, including making changes to the nature of their courses.
- GSA failed to provide adequate guidance and support for students in the delivery of the online learning.
- Arrangements for assessment of online provision were not clear.
- Students missed out on career and development opportunities usually available as part of the programme.
- GSA failed to take account of, and respond appropriately to, the diminished learning experience overall following the COVID-19 lockdown and disruption due to sector-wide industrial action by academic staff at the beginning of the 2019-20 academic year.

## Key issues raised by the concern

12 The material submitted gave rise to a number of questions around the institution's arrangements for the maintenance of academic standards and quality:

- How did GSA agree on and approve the arrangements made in response to the COVID-19 pandemic? (In particular, the 'Teaching Intelligence' policy and approach to adopting existing 'Good Cause' arrangements as part of the Code of Assessment).
- Were the arrangements for online learning and teaching effective?

- Did GSA consult and communicate effectively with students over the changes to teaching, learning and assessment?
- In relation to the awarding institution (University of Glasgow), what discussion and approval processes were undertaken by GSA with respect to GSA's Code of Assessment?
- In relation to Stage 2 of the programmes, what had been assessed and how did GSA arrive at a pass/fail grade of students' performance? To what extent had students met the programme learning outcomes and how were threshold academic standards assured?
- How were the external examiners involved in ratifying the 'Pass/Fail' assessment process at Stage 2?
- Were students given information about the 'GSA Good Cause' policy that should have enabled them to understand it?
- In the move to online learning for Stage 3, what support had been provided by GSA for the students to help them adapt to the digital environment?
- How did GSA ensure that the digital showcase was a reasonable substitute for the physical degree show and how were students engaged in its development?
- Did the students miss out on career and development opportunities that could reasonably have been substituted or otherwise replaced by GSA?
- How did GSA respond to student views of the 2019-20 academic year as a whole, given the range of concerns that the postgraduate students had raised in their complaint over and above those which related to the consequences of the pandemic?

## Findings

13 Findings based on submissions to the Scottish Concerns Scheme result in recommendations aimed to improve future arrangements for the management of academic standards and quality.

### Arrangements in response to COVID-19

14 The allegation made in the concern submission was that students did not understand how GSA agreed on and approved arrangements made in response to the COVID-19 pandemic, and that the arrangements for online learning and teaching were not effective.

15 The investigating team considered the effectiveness of GSA's approach to academic continuity and understood that GSA, in common with all higher education institutions, had to adapt quickly to COVID-19 in response to Scottish Government advice and its instruction to close campuses.

16 On 13 March 2020, GSA established the Academic Continuity Group (ACG) to determine and manage its response to the COVID-19 pandemic, including agreeing an approach to establishing online assessment protocols. GSA reported that ACG was one of

several incident management work-streams established on a short-term basis in response to government instruction. ACG reported directly to the GSA Senior Leadership Group (SLG). On 16 March 2020, the then Director and Senior Leadership Group, on the advice of ACG, took the decision to close its buildings and cease face-to-face teaching on the following day, which was a direct response to government intervention. ACG was chaired by the Head of the Innovation School and met on a regular basis (up to two to three times a week during the initial phases of the pandemic). From 23 March 2020, the ACG subsumed the work of the Learning and Teaching Committee in response to the severity of the crisis and urgency of actions required. There was no formal student representation on the ACG, but the group kept the Student President informed, inviting him to support the engagement with students. However, by this stage, the decisions to cease face-to-face teaching and introduce changes to the assessment protocol had already been made. All other GSA academic and governance committees which operated during this period continued, as normal, including student representation.

17 In response to the situation, GSA outlined the following approach, agreed by ACG, in an email to students on the 13 March 2020:

*'No further teaching will take place on your specific programme until further notice; No further assessment submissions are necessary for this current semester (this safeguards those students unable to access the technologies required to make and demonstrate new creative work); Any on-line activity that we develop during this period of social distancing and self-isolation will be to help you prepare for transition into your next year or stage of study, or graduate from the school. Regrettably there cannot be either a physical Degree Show or Graduation ceremony this summer. We will ensure that graduates completing will be able to receive their degree.'*

In addition, for postgraduate taught students, the email confirmed that progression to Stage 3 would be dependent on the achievement of Stage 1 and all Stage 2 work undertaken up to 13 March 2020 and that no further submissions were required for Stage 2. GSA has stated in communications to students and in meetings with the investigation team that its objective in concluding teaching delivery and moving to assessment, was to ensure parity in that all students should be treated equally, that no student should be disadvantaged by the impact of the COVID-19 global pandemic, and that no student should be advantaged or disadvantaged relative to their peers.

18 GSA's outcome of complaint letter to the postgraduate students (see also paragraph 4) stated that the loss of seven weeks' teaching, lack of access to school facilities, the failure to provide online learning, and the loss of the physical space to hold a degree show was beyond the reasonable control of the school and referred to the GSA Admission Terms and Conditions which state: 'Should industrial action or other circumstance beyond our reasonable control interfere with our ability to deliver our programmes, in accordance with the description set out in our Programme Specifications, we will endeavour to minimise the disruption to our learning and teaching provision'.

19 GSA, on the advice of the ACG, and in their view in order to establish student parity, took the decision to suspend all teaching for taught postgraduate students on one-year programmes for the remainder of Stage 2 (17 March-22 May 2020). GSA did not provide any programme-related online teaching or learning during this period. Progression decisions were based on student achievement in Stage 1 (16 September 2019-17 January 2020) and any elements of Stage 2 work that had been completed at the point of closure (20 January 2020-17 March 2020).

20 In meetings with the investigatory team, staff noted that it was difficult for GSA to pivot quickly to online delivery from its baseline position in March 2020, but had moved with

speed to digitally upskill staff. GSA recognise that the digital capacity of the institution at the point of lockdown was limited, and this was an area that GSA had already outlined in their Learning, Teaching and Enhancement Strategy before the pandemic as a priority area for development. The merging of the teaching and learning and educational technology teams, and the establishment of a digital steering group - to make decisions about infrastructure and software to enable GSA to teach online and ensure that the whole of Stage 3 could be taught online - was viewed by senior staff who met with the investigation team as positive. They also confirmed that postgraduate students were provided with remote access to the use of the Adobe Creative Suite.

21 Postgraduate students who met the investigation team were concerned that they could not access studios, workshops, specialist facilities and guidance from technicians in order to complete practical creative work. As a result, due to the short nature of their programmes, they were concerned that they could not progress or achieve learning outcomes which were intended to be cumulative across the year. Students understood the need to close the campus but expressed the view that GSA should have assessed students' ability to work remotely during the seven-week period of closure, maintained tutor contact, and allowed students to take home equipment (where reasonable) as had originally been offered by some tutors. In their response to GSA's outcome of complaint letter (see also paragraphs 4 and 18), students maintained that GSA's response to the pandemic, including the seven weeks where teaching on their programmes was not provided, did not minimise disruption to learning and teaching provision as GSA outlined, but rather had a negative impact on their education in terms of quality, value and future opportunities.

22 The investigation team recognise that GSA had acted appropriately in the face of government instruction to lockdown the institution. The students that met with the investigation team could not complete their work for Stage 2 of the course online which, in addition, could have been aided by early access to remote software and equipment loans. The team did note in meeting GSA senior staff that the School did not have the technological infrastructure to pivot quickly to online learning, but it was the team's view that some assessment could have continued - for example, submission of written assignments for grading and that some staff/student programme-related online learning and teaching should have been maintained earlier than Stage 3.

23 The investigation team reviewed the ACG paper which was submitted to the May 2020 Academic Council outlining the response to the pandemic, and recommended that for assessment arrangements: 'Academic Council might wish to consider the formulation of a set of emergency regulations...for use in any future emergency situation, as many other HEIs have done' and the team would support this recommendation. The investigation team acknowledge that plans for revisions to the regulations were underway prior to the QAA concerns investigation but, at the time of the investigation, this work had not concluded.

24 It is the investigation team's view that GSA's consideration of options for the continuation of learning, teaching and assessment during the period March to May 2020, was handled swiftly in order to deal with the Government's instruction to lockdown the institution. However, communications from the Chair of ACG to the then Director (dated 15 and 21 March 2020), together with an accompanying Risk Assessment grid, identified mitigation measures that did not include articulation of alternative options. The investigation team was not provided with any evidence that a range of options for Stage 2 had been considered during the early phase of the pandemic. Students who met with the investigation team stated that their views had not been sought by GSA at this time. The investigation team acknowledged that, due to the national emergency, discussion with students at the early phase of the lockdown would have been difficult because of the imperatives of putting emergency procedures into place to meet health and safety requirements. However, it was the view of the investigation team that more could have been done to work with the students

on options for delivery of some Stage 2 programme content. GSA chose to adopt a methodology for Stage 2 which had worked on two previous occasions following serious fires to GSA buildings, and which GSA viewed as having been effective.

25 GSA informed the investigation team that postgraduate staff teams worked with their students in a number of ways to develop an approach to Stage 3 of the course - for example, by holding course and lead representative meetings, departmental/cohort meetings, and information updates and communications from senior staff.

26 The investigation team recognise that GSA has developed its approaches to the delivery of online teaching, learning and assessment methods in the period between March 2020 and the investigation. Nonetheless, the team recommends that GSA continue to develop effective methods and finalise the development of procedures or regulations in order to ensure ongoing, suitable and effective alternative delivery of online teaching, learning and assessment methods which can be deployed with speed. The team advise GSA to seek direct support, expertise, and the sharing of practice from those institutions (including UoG) who have also managed this transition following the impact of COVID-19 during 2020. (See Recommendations 2 - Assessment design, 3 - Assessment policy, and 4 - Academic standards).

## **Communication and consultation with students**

27 The allegation made in the concern submission was that GSA did not consult and communicate effectively with students over the changes to teaching, learning and assessment.

28 The investigation team reviewed GSA's COVID-19 communications to staff and students which began on 13 March 2020 and which were communicated via the staff and student intranets and on the COVID-19 specific page on the GSA website. GSA confirmed that emails were sent directly to students from a COVID-19 email address, which also served as a portal for students to send individual queries or requests. The team noted that several further communication channels were in use for students, including e-bulletins and information on the student intranet and virtual learning environment.

29 Postgraduate students who met the investigation team stated that they found the official communications from the generic email address impersonal, overly long and difficult to understand. In addition, they explained that there were variable levels of contact from programme leaders and tutors across schools which, for some who received limited contact, increased their anxiety levels. They indicated that the communication channels were clear, but that the process prohibited them from talking to their programme leaders and lecturers and replaced their trusted points of contact with a generic email address. They unanimously expressed the view that they had not been consulted on options for learning, teaching and assessment and had not been provided with any academic content or academic guidance during the period 16 March to 26 May 2020.

30 GSA maintained that students had access to online provision, but this was not directly related to their degree work. The intention of providing these opportunities was to ensure that students felt that GSA was still open. However, students stated that the experience of participating in some of these activities was poor. One initiative - 'Student Engage' - ran between late April 2020 until mid-June 2020 and was intended to provide an online platform to foster a sense of community across GSA. The sessions were intended for progressing and graduating students and were designed to inform/support preparations for the Digital Showcase, which went live on 29 May 2020. Students told the investigating team that there was little or no engagement with tutors and that, in their view, what was made available represented 'too little, too late'. At the time of the SCS investigation, GSA were

developing their approach in this area, including any ongoing offer to students who graduated in 2020. The team recommend that GSA provides clear written guidelines for 'digital and physical showcases' for past and current students and makes clear the offer of support in place (Recommendation 6 - Guidance for digital and physical showcases). At the time of the investigation, GSA were developing their approach in this area.

31 Senior GSA staff who met the investigation team commented that the situation was fast moving and reflected that the initial response was dealt with as an emergency, and that by the end of April 2020 a more systematic approach to communicating with students was emerging. They acknowledged that they had found it difficult to adapt to the situation and communicate effectively, and thought that the students had too, noting students had also struggled with how best to communicate issues back to GSA.

32 In the complaint outcome letter from GSA to the postgraduate students, it was noted that, by 16 March 2020, using open meetings with students had become unrealistic due to the pandemic lockdown. GSA felt that this reflected a reasonable response to the public health information and government and sectoral guidance available at the time. The investigating team was not able to find any other options that had been explored by GSA in order to engage with students - for example, online meeting forums.

33 The investigation team noted that students had undertaken a number of actions to try and resolve their complaint informally. Communications were sent to GSA including: MLitt Fine Art student letter to the ACG; School of Architecture student letter to the Head of School and Programme Leader; MSc Product Design Engineering student letter to the Programme Leader; student emails from all five schools to the Heads of School, Programme Leaders, Tutors and Director; an online petition from MLitt Fine Art students; MLitt self-organised surveys; meetings with student representatives; communication with the Student President and an online media campaign. It is clear to the investigating team that the students had tried several avenues of communication in order to try and resolve their concerns.

34 Communication issues became further exacerbated when GSA received the students' initial concerns via email on 30 March 2020. The students stated that their original letter was not an official complaint, but an attempt to reach out to GSA in order to discuss their concerns. However, following a meeting of class reps with the Head of Fine Art on 4 May 2020, they were informed that the MLitt letter was being treated as a formal complaint and that they should wait for the complaints team to contact them. It was not clear to the investigation team why GSA moved to treat the letter as a formal complaint without exhausting the informal stage. On 27 May 2020, GSA considered the letter to be a formal complaint and progressed the matters raised through Stage 2 of their complaints handling procedure. The student letter was passed to the Complaint Investigator on 24 June 2020, who then began a review on 6 July 2020 (following return from leave). The outcome of the complaint letter was sent to the lead student by the Internal Investigator on 22 July 2020. As a result of this extended period, open dialogue between staff and students became problematic; the students received no response for six weeks and did not understand why this had happened. Programme leaders and tutors were advised not to engage with the students on the content of the complaint, as it was being dealt with by GSA through the Complaints Handling Procedure. Given that the matters raised by the students were so wide-ranging, this closed down communication further.

35 On 22 April 2020, ACG, which was set up as an academically-focused incident management work-stream on behalf of the SLG, agreed three progression options following Stage 2 which were presented to students: students could complete programmes on the original schedule of September 2020 via online learning; exit at the end of Stage 2 with the award of a postgraduate diploma (if eligible); or complete programmes through an extended

period of study (similar to the first option but with an end date of January 2021). Of the 412 students who had completed Stages 1 and 2, 350 progressed to Stage 3; 45 progressed to the extended Stage 3; and 17 exited with a postgraduate diploma. Students had requested another option of returning to GSA to complete their studies during academic year 2021-22, but were disappointed when they were told they would not be given preferential treatment in the admissions process; they were told they would have to reapply to the course.

36 The investigation team learned, through the complaint submitted by the 126 students and from their representatives in the investigation meeting, that the students were unclear about the detail of the three options presented by GSA. Students stated that communications had been confusing - they had not received any direct advice from GSA staff, and it had become difficult to meet with the people making the decisions to discuss the options. Students indicated that, at the point where they were required to make a decision about continuing into Stage 3, they had no idea of what the content of the programme would be as it was still in development. A forum to discuss Stage 3 only took place two to three weeks prior to the start of Stage 3. Students expressed the view that the options presented for academic continuity did not fairly allow some, who were unable to make work due to a range of circumstances brought about by the pandemic, to complete Stage 3. These students could not return to study easily at a later date without risk of failure to gain re-entry to GSA, or without facing funding or visa difficulties.

37 The complaint outcome letter stated that: 'GSA could learn lessons from this experience around communication with students at the early stages of a significant and disruptive event or series of events; the need for reassurance not just about practical issues but reflecting and responding to student concerns; and ensuring a more robust mechanism to quickly and systematically gather student views and feedback'. It is the investigation team's view that arrangements for communication and consultation with students were not wholly effective, but the team acknowledge that GSA had included a review of communications within the GSA 2020-21 Operational Plan which was under development during the summer of 2020. The team recommends that GSA review (as planned), develop and implement a comprehensive and effective communications strategy, which includes all key stakeholders. In particular, in partnership with students, establish and embed effective and accessible communication channels which are responsive to student comment and engagement, and which foster a culture of mutual respect, openness and information sharing (Recommendation 1 - Communication and consultation).

## **Arrangements for good cause**

38 The allegation made in the concern submission was that students were not given sufficient information about the 'GSA Good Cause' policy that would have enabled them to understand its application and impact on their assessment.

39 UoG suspended its normal Good Cause procedures (the term they used to refer to regulations for making appropriate allowance for unforeseen or unavoidable circumstances which may affect student assessments) with the introduction of its 'No Detriment' policy (also adopted by some other Art and Design institutions). Under the University's 'No Detriment' Policy, students were instructed to continue with assessments after lockdown wherever possible. However, recognising the potential disruption of COVID-19 to assessments taken after 15 March 2020, any assessments that were not taken, or those where the performance was out of line with previous performance, did not reduce a student's grade point average. The minimum amount of assessment that the University required to be completed for the calculation of final awards was lowered from 75% to 65%. GSA adopted a different approach of 'no student disadvantaged', predicated on maintaining the existing Good Cause arrangements, and no further submissions of student work were accepted for assessment. There was no minimum amount of assessment required at GSA for the calculation of final

awards (see also paragraphs 46-48) and, given the structure of the programmes at GSA where the majority of summative assessment is completed towards the end of the academic year, the arrangement adopted by UoG would not have been possible.

40 The investigation team can confirm that the GSA Academic Registry issued guidance on 3 March 2020 to students advising them that it was unnecessary to apply for 'Good Cause' in relation to the general impact of COVID-19 as that would be taken into account by the process to assess their work. In discussion with students, it was clear that they were confused by the 'Good Cause' process and were unclear of what they had to do. Students expressed the view during the investigation that issuing numerous pieces of complex documentation did not mean that the information had been absorbed by students at a time when there was high anxiety and concern and little opportunity to discuss matters with academic staff.

41 GSA's approach to 'Good Cause' was shaped by its previous experience of serious disruptive events that had affected students. GSA maintained its existing 'Good Cause' policy and set a deadline of 8 April 2020 for students to make a submission on the basis of circumstances outwith the general impact of COVID-19. The deadline date reflected the early conclusion of Stage 2. In the investigation meeting with GSA senior staff, it was confirmed that the 'normal' process where a student had 'Good Cause' accepted meant that students had six weeks to resubmit for assessment and receive support to do so.

42 The students who met the investigation team were confused by the differing approach to 'Good Cause' and 'No Detriment' between GSA and UoG - the awarding institution. This confusion was compounded by the fact that the University of Glasgow, since lockdown, provided online learning and had mechanisms for students to submit coursework electronically. The students were unclear why GSA was not following the same approach, particularly as the degree was validated by the University. In addition, students on the Product Design Engineering programme, run jointly by GSA and UoG, were subject to UoG policies and procedures, including continuing assessment and 'no detriment'. It was evident to the investigating team that the students were clearly confused by the 'Good Cause' process and that the procedures in place at GSA were not well communicated to students. The investigation team acknowledge that clarification of the 'Good Cause' process was being taken forward prior to the QAA concerns investigation and that revised regulations would be scheduled for approval at the December 2020 Academic Council, but at the time of the investigation this work had not concluded. The team recommends that GSA ensure that the planned changes are clearly outlined in addenda to the GSA Code of Assessment and communicated to students in consultation with student representatives. In particular, in view of recent experience, GSA should review and reconsider the 'Good Cause' process. Particular attention should be paid to how to communicate arrangements to students to ensure that they fully understand what they are required to do and by when (Recommendation 3 - Assessment policy).

### **Assessment and feedback and 'Teaching Intelligence' policy**

43 The allegation made in the concern submission was that students did not understand how the 'Teaching Intelligence' policy was applied by GSA to determine their final awards and, in relation to Stage 2 of the programmes, how they had been assessed and how GSA had arrived at a pass/fail grade. The material submitted raised questions about how GSA determined to what extent students met the programme learning outcomes, how threshold academic standards were assured and how external examiners were involved in ratifying the 'pass/fail' assessment process at Stage 2.

44 The GSA approach to the COVID-19 pandemic was based upon finding an equitable solution to assessment and progression across the institution. GSA stated that the

decision to conclude all course-related teaching was intended to deliver three outcomes: parity - a uniform position of no access to academic and technical resources; fairness - all students assessed under uniform institution-level protocols; and student advantage - that student attainment would be at the heart of all assessment procedures and judgements.

45 The institutional assessment protocol introduced by GSA in early March 2020, described as 'Teaching Intelligence' (TI), had been adopted at the time of the 2014 fire. GSA provided documentation to the investigation team that outlined their approach:

*'GSA initiated an approach to using Teaching Intelligence during the week 16-20th March 2020, with specific discussions about how this could be achieved taking place on: 17, 18, 19th March amongst members of the Academic Continuity Group. Over the course of the following week members of ACG worked to craft student communications designed to reassure students of what Teaching Intelligence was: "Your tutors will base their judgments on previously submitted and assessed summative work (grades already generated), the indicative grade you received at formative review and the application of teaching intelligence, which is the recognition of the progress that you have made during project work this semester, and subsequent to formative review."*

GSA stated that an open letter sent to all students on 25 March 2020 from all Heads of Schools effectively acted as a policy document. However, the phrase 'Teaching Intelligence' was not used within the letter and GSA do not have a written policy document on these arrangements.

46 GSA senior staff confirmed that academic staff were asked to determine the extent of work students had submitted up to the point of lockdown and to analyse formative performance. Subsequently, programme leaders were asked to make an assessment on a pass/fail basis. This approach was communicated to programme leaders on 28 April 2020, having previously been shared with UoG, GSA's Academic Council and GSA external examiners, before the details were communicated back to students. A communication was sent to all external examiners inviting them to contact programme leaders who would inform them of examination board arrangements. Examination Boards were held online to the original schedule.

47 In order to ensure academic progression into Stage 3, ACG (an academically-focused incident management work-stream that reported directly to SLG for approval of recommendations) agreed on an assessment regime composed of three elements, which they explained as: the use of summative grades based on work submitted for assessment during Stage 1; the use of formative assessment and performance during Stage 2 up to 16 March 2020; and 'extrapolation of evidence' and the use of the 'teaching intelligence' process based on creating an attainment trajectory founded on the prior engagement between student and academic.

48 Students who met the investigation team indicated that they were unclear about how they would be assessed. They said that they were not aware of a mid-year grade or of any tutorial records or formal feedback from Stage 1 and were confused about how academic staff were to make an assessment judgement for Stage 2 of the course, particularly on the basis that the postgraduate course builds progressively in order to meet programme-level intended learning outcomes, and given that they had submitted no work for assessment during that stage. GSA senior staff were surprised by this view as staff were required to complete an 'Academic Record of Attainment' for each student. The students confirmed that they asked tutors about the online content for Stage 3 and how it would be assessed. Information was only received after Stage 3 had started. The investigating team's view is that the students were unclear about how Stage 2 of their course would be assessed, and how summative assessments would be completed and, therefore, the implications for

progression and final awards.

49 GSA confirmed that the arrangements for assessing the programmes were shared with the University of Glasgow via its representatives at GSA's Academic Council. The investigation team was unable to confirm that the GSA approach had been formally approved by UoG as recorded in GSA's Code of Assessment (see also paragraphs 51-56).

50 The investigation team requested access to documentation that would provide an audit trail to demonstrate how external examiners had been involved in validating the Teaching Intelligence model for the progression of postgraduate students to Stage 3. GSA did not provide external examiners' reports or access to Examination Board minutes that would allow the team to confirm that threshold academic standards had been met. The investigating team did receive a sample of documents for Stage 3 - for example, 'Academic Record of Attainment' - but nothing for Stage 2. The investigation team was unable to conclude that 'Teaching Intelligence' policy was applied fairly and consistently based on the limited volume of summative assessment achieved by students and limited access to the detail of external examiners reports and Examination Board minutes.

51 The investigation team acknowledges that changes to assessment regulations were planned prior to the QAA concerns investigation and that revised regulations would be scheduled for approval at the December 2020 Academic Council but, at the time of the investigation, this work had not concluded. As a result, the investigation team recommend that GSA continue to develop an approach to delivering alternative assessments, in particular for studio-based courses, that can be used online if necessary, and ensure students are able to demonstrate attainment of intended learning outcomes and achieve minimum threshold academic standards for their programmes. GSA should also consider its programme structure, including whether the distribution of formative and summative assessment allows adequate flexibility to assess student attainment fairly. Feedback on formative assessment - for example, at Mid-Year Review - should be shared with students on all programmes of study (Recommendation 2 - Assessment design). The team also recommend that planned changes are clearly outlined in addenda to the GSA Code of Assessment and communicated to students in consultation with student representatives (Recommendation 3 - Assessment policy). In addition, the team recommend that GSA, implement the plan to establish acceptable minimum threshold standards for progression between stages, up to and including the final stage of GSA programmes. GSA should be clear about the amount of credit being assessed for progression between stages and the minimum acceptable level of credit needed for the successful completion of each programme. The procedures developed should also demonstrate how external examiners will be involved in endorsing any future use of the 'Teaching Intelligence' model to ensure that assessment decisions are robust, valid and reliable. GSA should also ensure that external examiners are consulted in sufficient detail on any changes (Recommendation 4 - Academic standards).

## **Relationship with the awarding body**

52 The material submitted in the concern raised the question, in relation to the awarding institution (University of Glasgow), of what discussion and approval processes were undertaken by GSA with respect to GSA's Code of Assessment. Since 2016, GSA has had a Code of Assessment which it states is based on the University of Glasgow's Code and which adheres to the principles of the former UK Quality Code for Higher Education (2013-18) - Part B: Assuring and Enhancing Academic Quality and, specifically, *Chapter B6: Assessment of Students and Recognition of Prior Learning*. The stated purpose of the Code of Assessment is to assure parity of standards and degree awards across programmes at GSA and across the degree awards of the University of Glasgow.

53 The investigation team considered the relationship between GSA and the University of Glasgow (UoG) - its awarding body. UoG awards degrees in three Scottish institutions, two of which are accredited and accorded a higher level of devolved academic decision-making - this includes GSA. The investigation team noted that GSA's Code of Assessment confirms that, 'any change to the scheme will be subject to the approval of the Convener of Academic Council (GSA) and the Clerk of Senate (Glasgow). An Equality Impact Assessment of any changes proposed must be submitted when seeking approval'. UoG staff reported a high level of trust in GSA and said that it had confidence in GSA's Teaching Intelligence model (see above paragraph 45). UoG reported that 'informal consultation' occurred between UoG and GSA representatives on the GSA Academic Council. GSA also reported that there had been dialogue between the Academic Registrar at GSA and the Collaborations Office at UoG.

54 During the meeting with senior representatives from UoG, the investigating team was unable to confirm that UoG was aware, or had oversight of the details of the changes to teaching provision or assessment arrangements for GSA awards, or that formal approval of the proposed arrangements (cessation of programme-related teaching, learning and assessment) had been received by GSA from UoG, although reference was made to the 'force majeure' clause in the Memorandum of Agreement which allows for mutual reassurance by informal means. Minutes from the Strategic Partnership Group, which provides strategic oversight of the partnership between UoG and GSA, give no further detail of arrangements for assessment or for formal approval (paragraph 56).

55 UoG confirmed that monitoring of GSA was by means of receipt of documentation from the GSA's Academic Council and confirmed that it was satisfied with the arrangements put in place at GSA for external examining in 2020. The approach to assessment and examination was explained by GSA to external examiners in an email dated 14 April 2020.

56 The investigating team established that GSA determined the proposed operating principles for assessment as early as 16 March 2020, but UoG/GSA Strategic Partnership Group (SPG) did not meet until 15 April 2020 when GSA was 'working through how to maintain academic standards through its ACG. No decisions had yet been made on the future academic term: the focus was on the current academic term.' The UoG/GSA notes from the SPG cite GSA reporting 'a high level of consistency across the institution' in relation to its decision-making and that the GSA Academic Registrar was liaising with colleagues at UoG to ensure alignment with UoG regulations where possible. The notes from that meeting simply report the approach adopted by GSA, with no record of discussion other than UoG asking GSA about governance and oversight, which was confirmed as being ACG. To date the investigation team has not received an approved copy of the minutes of the meeting held on 15 April 2020 (although a draft extract of the minute was provided by UoG).

57 Following the meeting with representatives from UoG, QAA Scotland on behalf of the investigation team, asked the University if they could confirm they were content with the changes made by GSA to the assessment of the awards. In an email of 22 October 2020, the University representative stated:

*'The University has not formally approved the measures adopted by GSA in response to the pandemic. GSA has a high degree of delegated responsibility for managing academic standards and quality within a framework of quality assurance and enhancement processes that is considered by the University on an ongoing basis. Retrospective consideration of the adequacy of GSA's actions necessarily requires extensive reflection, including dialogue with GSA, which cannot be completed before the conclusion of the team investigation. We will be very interested in the outcome and any recommendations emerging from the investigation and ELIR exercises'.*

The University's response raised a number of questions for the investigation team about the security of the awards made in the University's name to GSA students in 2020 and the University's oversight of its arrangements with GSA. It is the team's view that the University should investigate the matters raised by this concern, or if it is already doing so, progress with this as a matter or priority.

58 The investigating team recommends that any significant changes to assessment, especially where these impact on student progression and/or degree awards and classification, are implemented following the agreed approval processes with the awarding institution and as detailed in GSA's Code of Assessment (Recommendation 5 - Awarding body oversight and approval).

## **Postgraduate degree show and career development opportunities**

59 The allegation made in the concern submission was that: GSA did not provide enough support to help students with the move to online learning for Stage 3; that the digital showcase was not a reasonable substitute for a physical degree show and that students were not sufficiently engaged in its development; and that students missed out on career and development opportunities that could reasonably have been substituted or otherwise replaced by online activity.

60 Due to the COVID-19 pandemic GSA advised students on 17 March 2020 that it was likely the August 2020 postgraduate degree show would be cancelled. On 6 April 2020, proposals to mitigate this situation were shared with student representatives. These included what GSA called an 'Academic Engagement Programme' delivered via online meetings through the GSA virtual learning environment. (It should be noted that this programme was not directly related to students' programmes of study, which had ceased following lockdown.) The proposals also involved a digital showcase plus a physical show when safe to do so. In addition, on 10 April, 'Student Engage' was launched with the intention of providing an online platform to foster a sense of community across GSA and support creative practice and professional development. On 9 July 2020, GSA communicated to students the arrangements for the postgraduate showcase which had been based upon the version developed for undergraduate students.

61 In the outcome of the complaint report (paragraphs 18, 21, 34 and 62), GSA recognised that the above mitigations were not the same as having a final degree show but were viewed to be a reasonable response to providing an alternative. Postgraduate students who met the investigation team recognised and understood the limitations GSA faced in developing an alternative to an in-person degree show. However, students commented on poor communication and consultation about Student Engage and arrangements for the degree show. Students felt they had been offered minimal support and suggested that extra tutorials on how to adapt work for an online environment would have been helpful. The students believed that they had not been afforded or allowed to participate in the decisions being made.

62 The investigation team would support the view contained within the outcome of complaint report, 'recommending that the groups developing the postgraduate digital and physical showcases learn from the prior experiences and are mindful of the need to engage with postgraduates around the development, in particular, of the physical showcases'. The investigation team acknowledge that a considerable amount of work had been undertaken by GSA on the showcases prior to the investigation and, at the time of the investigation, were developing their approach in this area, including any ongoing offer to students who graduated in 2020. However, the team recommend that GSA provide clear, written guidelines for 'digital and physical showcases' and make explicit the offer of support in place for past and current students (Recommendation 6 - Guidance for digital and physical

showcases).

## **GSA response to student concerns on the availability of teaching and resources**

63 The allegation made in the concern submission was that GSA did not respond to student complaints about the 2019-20 academic year as a whole, given the range of concerns that the postgraduate students had raised in their complaint, over and above those which related to the consequences of the pandemic.

64 The investigation team heard from students that several issues had affected postgraduate year-one students from the start of the 2019-20 academic year. These issues included: loss of formal teaching time due to 21 days of University and College Union strikes; inadequate provision of studio spaces, technical facilities and lack of specialist tutors; closure of the Stow building metal workshop for 13 days; and lack of access to project and social space on the closure of the Assembly Building.

65 The outcome of the complaint report acknowledged that the students' academic year had already been disrupted before matters had been further exacerbated by COVID-19. However, the report did not provide any practical solutions to the students' concerns and, instead, pointed to previous statements relating to the UCU strike and to section 10.5 of the Admissions Terms and Conditions.

66 The investigation team was concerned about the apparent disparity in provision between the student experience compared to expected provision, as noted in paragraph 64, which had been a theme since the start of the 2019-20 academic year and had been exacerbated by the pandemic. The lack of any apparent practical solutions in working with the postgraduate cohort has only served to make the relationship between GSA and the students more difficult.

## **Recommendations**

67 In respect of the recommendations noted below, the investigation team acknowledge that GSA had been developing its approaches to these areas prior to the investigation in October 2020. This work had been initiated at the start of the COVID-19 lockdown and continued through the summer and autumn terms of 2020.

68 GSA's ACG had been continuing to explore the challenges presented by COVID-19 in preparation for the 2020-21 academic session. This included reviewing semester start dates, modes of delivery, the use of campus buildings and workspaces. In addition, a cross-GSA Digital Capacities Group was formed to identify, evaluate and share best practice in the use of digital technologies, in order to inform both academic and professional studies departments on how these technologies might be developed to improve the student and staff experience.

69 The team also acknowledge GSA had scheduled a December 2020 Academic Council meeting in order to consider and approve revised regulations/policies in respect of a number of the recommendations which follow.

70 In light of the findings of the investigation GSA should address the areas summarised below:

1. **Communication and consultation** - review (as planned), develop and implement a comprehensive and effective communications strategy, which includes all key stakeholders. In particular, in partnership with students, establish and embed

effective and accessible communication channels which are responsive to student comment and engagement, and which foster a culture of mutual respect, openness and information sharing.

2. **Assessment design** - in view of the ongoing pandemic, continue to develop an approach to delivering alternative assessments, in particular for studio-based courses, that can be used online if necessary, and ensure students are able to demonstrate attainment of intended learning outcomes and achieve minimum threshold academic standards for their programmes. GSA should also consider its programme structure, including whether the distribution of formative and summative assessment allows adequate flexibility to assess student attainment fairly. Feedback on formative assessment - for example at Mid-Year Review - should be shared with students on all programmes of study.
3. **Assessment policy** - ensure that the planned changes are clearly outlined in addenda to the GSA Code of Assessment and communicated to students in consultation with student representatives. In particular, in view of recent experience, GSA should review and reconsider the 'Good Cause' process. Particular attention should be paid to how to communicate arrangements to staff and students to ensure that they fully understand what they are required to do and by when.
4. **Academic standards** - in view of the continuing pandemic, implement the plan to establish acceptable minimum threshold standards for progression between stages, up to and including the final stage of GSA programmes. GSA should be clear about the amount of credit being assessed for progression between stages and the minimum acceptable level of credit needed for the successful completion of each programme. The procedures developed should also demonstrate how external examiners will be involved in endorsing any future use of the 'Teaching Intelligence' model to ensure that assessment decisions are robust, valid and reliable. GSA should also ensure that external examiners are consulted in sufficient detail on any changes.
5. **Awarding body oversight and approval** - complete the work undertaken to date on the revisions to the Memorandum of Agreement with the University of Glasgow and ensure that the respective responsibilities of both parties are clear and well understood by key GSA staff. In addition, ensure that any significant changes to assessment, especially where these impact on student progression and/or degree awards and classification, are communicated and implemented following the agreed approval processes as detailed in GSA's Code of Assessment.
6. **Guidance for digital and physical showcases** - provide clear written guidelines for 'digital and physical showcases' and make explicit the offer of support in place for past and current students.

## Action plan

71 An action plan should be agreed with QAA Scotland which should fully address the recommendations and identify timescales for completing action. QAA Scotland will monitor progress towards completing the action plan and will need evidence of its completion. QAA Scotland will report on progress to SFC. (See [Scottish Concerns Scheme](#) paragraph 32). The action plan should be submitted to QAA within six weeks of the publication of this report.

**QAA2579 - R13097 - Feb 21**

© The Quality Assurance Agency for Higher Education 2021  
18 Bothwell Street, Glasgow G2 6NU  
Registered charity numbers 1062746 and SC037786

Tel: 0141 572 3420  
Web: [www.qaa.ac.uk/scotland](http://www.qaa.ac.uk/scotland)