



# Scottish Concerns Scheme Investigation Report

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

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## Introduction

1 This report is an investigation into a concern raised by undergraduate 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 on review of the evidence made available at the time of the investigation. Following the visit, Glasgow School of Art reported that 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 report relates to issues arising from a complaint made by students in April 2020 who were on the undergraduate BA (Hons) Fashion Design and BA (Hons) Textile Design programmes at GSA. The complaint related to changes to assessment arrangements, and the cessation of face-to-face teaching on 17 March 2020, 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>1</sup>

4 As part of its remit, QAA Scotland (QAAS) 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 (SCS) 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.

5 The students sent a letter of complaint to the Director of GSA, with copies sent to the Governors of GSA and the Scottish Government. It was subsequently investigated by GSA as a Stage 2 complaint. No element of the complaint was upheld by GSA. The concern about GSA was sent to QAA Scotland in May 2020 at the same time as it was going through GSA's Complaints Handling Procedure. Recognising the potential seriousness of the matters raised for those students and their awards, QAA Scotland did engage with GSA - without invoking the formal Scheme - to ask the institution about the status of the case in its internal processes. At around the same time, the Scottish Funding Council Outcome Manager for GSA contacted QAAS to seek advice on GSA's handling of the case.

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<sup>1</sup> Restrictions began on 24 March 2020.

6 Initially, QAAS decided not to explore the case through the formal [Scottish Concerns Scheme](#) for the following reasons:

- GSA's own processes had not concluded
- GSA staff told QAAS (based on what the students had told them) that the case was also being considered by the [Scottish Public Sector Ombudsman \(SPSO\)](#) - the students later informed QAAS that this was incorrect; they had not referred the case to the SPSO.
- The main review visit was due to take place for GSA's [Enhancement-Led Institutional Review \(ELIR\)](#) in October 2020 and that would provide a substantial opportunity to explore any risks to quality and standards with a full team of peer reviewers.

7 GSA provided documentary evidence in response to a series of requests from QAAS; however, that documentation did not in itself resolve the matters raised by the student concern. In particular, questions remained about the approach taken by GSA to teaching and assessment during the pandemic, and the associated potential implications for quality and/or academic standards.

8 Following the receipt of a further concern involving 126 postgraduate students from across the five schools of the institution (see accompanying report - Scottish Concerns Scheme Investigation Report, Postgraduate Concern, Glasgow School of Art, October 2020), and in agreement with the Scottish Funding Council (SFC), the decision was taken on 30 September 2020 to proceed to a full investigation to examine the allegations, and determine whether the matters raised put quality and/or academic standards at risk currently or were likely to put them at risk in the future.

## The investigation process

9 The investigation process comprised a review of documentary evidence provided in the Scottish Concerns Scheme submission, further information requested by 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 undergraduate students representing the BA (Hons) Fashion and BA (Hons) Textiles programmes; the meeting also included the GSA Students' Association President (at the time of the SCS, these students had graduated).<sup>2</sup>

10 The investigation took place over a 14-day period, between 5-19 October 2020 and 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.

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

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<sup>2</sup> Numbers attending these meetings were 2, 4 and 5 respectively.

## Detail of the concern submitted

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

- All academic learning and teaching on their programmes ceased in March 2020 and, given the structure of their degree programme, they were being disproportionately affected and disadvantaged in comparison with peers studying in other institutions, some of whom continued to be taught and assessed online.
- GSA had indicated that it would not consider any further student work for assessment after 13 March 2020. The students were concerned about how their award would be assessed and classified, raising concerns about the reliability of the Teaching Intelligence policy GSA was using for this purpose.
- GSA dealt with the matters raised by the students through the institution's complaints handling procedure, which limited opportunities for two-way communication and consultation and delayed resolution.
- GSA was not allowing assessments to be re-taken.
- Students were disappointed by the lack of opportunity to complete their assessed work, not least because of the importance to their future employment prospects of being able to display that work, for example, in a final degree show or 3D portfolio.

## Key issues raised by the concern

13 The material submitted gave rise to a number of questions around the institution's arrangements for the maintenance of academic standards and quality which could be summarised as follows:

- GSA describes the approach it took as 'Teaching Intelligence' which they indicated is the approach they had developed at the time of the 2014 fire to enable student awards and degree classifications to be made even though the final degree show work submitted (or in the final stages of preparation) by several students had been destroyed in the fire and was not, therefore, available to be assessed in its final form. While there can be benefit in applying a pre-existing approach, the 2020 pandemic occurred at an earlier point in the academic year than the 2014 fire and therefore the volume of student work which had been completed was much smaller in 2020 than would have been the case at the time of the 2014 fire. To what extent did GSA consider this material difference which means the volume of student work available for assessment in 2020 was much lower than would have been the case in 2014? Further information on this is set out in the next point.
- In 2020, in some cases, students had not even begun the pieces they intended to submit for their final awards at the point at which GSA made the decision to stop teaching and stop receiving any further work from students for assessment (albeit that the academic year began in September and that the students' year-long development process was underway). This means academic staff had not had the opportunity to assess their work or were having to base their assessment decisions on a much smaller sample of the students' work than was the case in 2014. This is compounded by the structure of the GSA awards in which the final assessment

(including the final degree classification) depends to a substantial extent on assessment of the final work.

- The students who raised the concern had told GSA they were aware students at other art schools were continuing to submit work. GSA responded that this was because programmes at other art schools are more modular than those at GSA. The structure of the awards and the extent to which GSA students may have been disadvantaged in this case are academic judgements.
- Was the decision to cease teaching and stop accepting submission of work for assessment reasonable/in line with practice among other art and design providers?
- GSA applied a different approach for its Architecture students. To what extent were Architecture students able to continue submitting work for assessment beyond the date at which this was stopped for other GSA students? Applying a different approach to different subject areas might be appropriate, but GSA indicated that its decision not to accept further work from any students on other programmes was to ensure equity of treatment for all students.
- Did GSA consider offering students IT loans/software and/or support grants for wi-fi, for instance, or conduct any survey of the equipment and facilities students had access to? What options were considered that might have enabled students to continue making progress with their work for assessment? Did GSA consider options to accommodate helping students to complete their 3D portfolios (including arrangements for students with possible visa date limitations)?
- Did GSA consult and communicate effectively with students over the changes to teaching, learning and assessment?
- The students were initially told by GSA that they would not be permitted to retake their assessments if they did not accept the grades and/or degree classifications they had been given. However, some students who had 'good cause' applications accepted had the opportunity to submit work for assessment, albeit in a tighter timescale than usual and without any access to studio space at GSA (paragraph 45).
- 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?

## Findings

14 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

15 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 and assistance to complete work (including a 3D portfolio) were not effective.

16 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.

17 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, 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, which was a direct response to government intervention. ACG was chaired by the Head of the Innovation School and met on a very 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, to have student representation.

18 On 18 March 2020, the final-year Fashion and Textiles students were informed that 'special measures' would be introduced to allow classifications to continue being awarded and clarified that there would be no degree show or graduation in May/June 2020. On 19 March 2020, the Programme Leader began to respond to questions raised by final-year students who were raising concerns over the situation. On 25 March 2020, an open letter was sent to all students indicating that engagement with the student body was via the Glasgow School of Art Students' Association (GSASA) President. Students were informed of the 'operating principles' during the COVID-19 pandemic which comprised safeguarding health; parity of experience for all students; ensuring that all students would have the opportunity to submit for academic progression and graduation; and that a 'normal' degree show would be impossible so digital alternatives for 'celebrating' student work would be sought. This letter also stated that:

*'we are using the materials that students have already submitted, both formative and summative, as well as the knowledge that the tutors have of student projects to assess attainment for the year...for graduating students, this means that we can ensure that academic staff can spend as much time as required with student work, and building a clear picture of student progress since Mid-Year/Formative Review. This process has been designed by ACG to maximise opportunities for students to demonstrate achievement and ensure that no Covid-19 related disadvantage impacts upon assessment of degree submissions.'*

19 Students maintain that there was no consultation over changes in the assessment protocol and that GSA did not consider alternatives that would have allowed for the continuation of teaching on their programmes - including offering students IT loans/software and/or support grants for wi-fi; nor did it conduct any survey of the equipment and facilities to which students had access (as undertaken elsewhere in comparable higher education settings). GSA did not consider options to accommodate helping students to complete their 3D portfolios (including arrangements for students with possible visa date and travel limitations) as offered in other institutions. GSA indicated that this decision was based on parity and fairness. Fashion and Textile students found the communication of the new assessment arrangements confusing and emailed the Programme Leader for clarification. In

an email of 20 May 2020 to the SFC, in respect of the student complaint, the Chair of the ACG reflected that GSA had not 'concretised' its approach into a readily identifiable, discrete policy document that was distinct from the GSA Code of Assessment.

20 The investigating team established that a different arrangement was put in place for Bachelor of Architecture (BArch) and Stage 5 Diploma in Architecture (DipArch) students in order to meet the requirements of the professional, statutory and regulatory body (PSRB) - the Architects Registration Board. ACG reported on 26 March 2020 that the PSRB mapping, 'took BArch out of the Undergraduate Board.' GSA reported that the PSRB had required schools of architecture to ensure that any qualifications that lead to professional registration were not materially compromised by COVID-19 and that suitable evidence be retained to ensure that this could be substantiated through their annual monitoring process. GSA carried out a physical mapping for students' academic portfolios to evidence that professional criteria and graduate attributes had been met by all students. At Stage 3 BArch and Stage 5 DipArch, this was an additional component to assessment. In order to carry out this assessment, Stage 5 students were required to upload a digital record of studio work carried out before the end of March 2020. This component was not used to determine assessments but was instituted in order to meet PSRB requirements. The investigatory team acknowledged this approach as responsive to the needs of the PSRB and the best interests of the students. However, it did raise questions for the team about inconsistency across disciplines in ensuring the fairness of assessment outcomes for all GSA students.

21 The investigation team reviewed the ACG paper which was submitted to the May 2020 Academic Council in response to the pandemic, and recommended that for assessment arrangements: 'Academic Council might wish to consider the formulation of a set of emergency regulations, which codifies these measures, for use in any future emergency situation, as many other HEIs have done' and the team would support this recommendation. As a postscript, GSA informed the team that revised regulations were in the process of being developed and would be submitted to the December 2020 Academic Council for approval.

22 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 2020 to May 2020 was handled swiftly, in order to deal with government 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 met by 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 in place to meet health and safety requirements. 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. However, the team considered that applying this approach on previous occasions in May and June, at which point students had largely completed the academic year including the majority of assessment, had significantly different consequences than in 2020 when academic teaching ceased in mid-March (see paragraphs 31-41 'Teaching Intelligence' approach).

23 The investigation team recognise that GSA have developed their 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 University of Glasgow) who have also managed this transition following the impact of COVID-19 during 2020 (Recommendations 2 - Assessment design, 3 - Assessment policy, and 4 - Academic standards).

## Relationship with the awarding body

24 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.

25 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, including 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. 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.

26 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. However, 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 (SPG), which provides strategic oversight of the partnership between the University of Glasgow and the Glasgow School of Art, give no further detail of arrangements for assessment or for formal approval (paragraph 28).

27 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. In his email to the SFC, the ACG Chair reported that the external examiner for Fashion and Textiles 'was fully aware of the assessment arrangements' and had raised no objections but the investigation team was not given access to this confirmation. The Chief External Examiner (Design) had requested formal information from each programme leader to articulate how they managed the detail of assessment, but the team have not had access to GSA's response.



28 The investigating team established that GSA determined the proposed operating principles for assessment as early as 16 March, 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 have 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).

29 Following the meeting with representatives from the University of Glasgow, 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. Following the investigation meeting with UoG, 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 of priority.

30 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).

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

31 The allegation made in the concern submission was that students did not understand how they had been assessed or their awards classified based on the limited amount of summative assessment completed; that they did not understand how the 'Teaching Intelligence' (TI) policy was applied by GSA to determine their final awards, and that it was not a fair process applied consistently across disciplines. 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 assessment process.

32 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 to enable students' awards and degree classifications to be made even though the final degree

show work submitted (or in the final stages of preparation) of several students had been destroyed in the fire and was not, therefore, available to be assessed in its final form. GSA argues that there were benefits in invoking a pre-existing approach, in particular, it provided a tried and tested methodology for assessment in a situation of emergency.

33 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." This was particularly important to clarify for our fourth-year undergraduates (and from the details of the complaint, this period generated significant anxiety amongst the Fashion & Textiles students, who were also having to come to terms with being locked out of their studios).'*

GSA stated that the open letter sent to all students on 25 March 2020 (see paragraph 18) from all the 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.

34 For work not submitted, GSA employed the TI approach, involving what it describes as 'measurement in dynamic fashion' through formative review. GSA argues that: 'the mode and form of learning and teaching at GSA is distinctive in being rooted in studio practice and the "thinking through making" ethos' and that 'in mid-March there was no part of the curriculum (ILOs) left undelivered'. In addition, it states that, 'in normal circumstances, by this point in the academic session students were engaged in the making of artefacts (analogue or digital) and the refinement through dialogue and interaction with academic staff.' However, at the time of the 2014 fire, the amount of student work available for assessment was greater. In the case of BA Fashion and Textiles programmes, at best only 20 credits of a total of 120 were completed by January 2020 (assessed by a written assignment). This situation was compounded by the structure of GSA awards in which the final assessment (including degree classification) depends to a substantial extent on assessment of the final work. The Fashion and Textiles Programme Leader, however, had sought to reassure students in an email of 22 March 2020 that: 'it is important to note that final assessment is never based solely on the last few weeks work, it is an evaluation of the entire year'. The GSA Complaint Investigator's Report reiterated that the strengths of GSA's programmes come from its pedagogic approach stressing, 'accumulating professional proficiency and disciplinary expertise in studio and conceptually over the whole duration of the degree programme' and, 'emphasising the whole of the final year as part of that process'. The Complaint Investigator also stated that GSA should reconsider and enhance the ways in which it communicates to, and supports, students to manage the non-modular nature of the curriculum with a view to identifying ways in which it could ensure that students are reassured in unexpected circumstances which might affect access to studios.

35 Across the sector, some students studying in those Art and Design institutions operating either a modular or unitised academic framework, were in a position to offer upwards of 60 credits out of 120 credits for assessment at the point of lockdown, but GSA's structure militated against this. Applying the Teaching Intelligence approach in 2020, meant academic staff were assessing students and arriving at degree classifications, in some

cases, on the basis of a very small sample of submitted work, including work submitted at a much earlier point in the students' development. Students alleged this might have been work relating to as little as 20 credits out of an academic year, attracting 120 credits in total.

36 GSA determined the generic approach to assessment and Schools were instructed to interpret these to accord with local circumstances. The School of Design provided a framework for staff to work within that included the following documentation: Summary, Overview and Programme Level Approaches to Assessment (ACG Guidance). In the case of the Fashion and Textiles programme, this drew on the Record of Attainment (RoA): Guiding principles, Template of Questions, and a undergraduate marking scheme. The RoA documents were developed by the Head of Department with staff, originally for studio examination. The Record of Attainment questions used in 2020 were a distillation of intended learning outcomes (ILOs) and expected outputs acting as a framework to enable consistency in decision-making. The unconfirmed minutes of the undergraduate School of Design moderation meeting (14 May 2020), intended to codify the approach to be adopted across the programmes in the School, noted that record keeping varied from programme to programme but considered that this was 'no more than a cosmetic difference and that all relevant and substantial record keeping was in order for each programme, including Formative Assessment and feedback records.' However, the investigation team did not agree that the differences were purely cosmetic and found inconsistencies in the records supplied by GSA. For example, Silversmithing and Jewellery feedback forms were complete - signed and dated, whereas this was not always the case for Fashion and Textiles.

37 Notes taken by staff were intended to provide a record of the reasoning underpinning decision-making. Staff were guided that they *may refer* to a student's Programme of Study, Project Proposal, Project Statement, Cause for Concern, Action Plan, self-evaluation and general engagement - such as attendance, participation in tutorials and response to feedback. These notes were to be written in such a way as to provide feedback to students when required. Students and staff were advised that assessment teams would not be evaluating 'final refinement of final outcomes.' Assessment teams were asked to draw on evidence most favourable to students in final classification. Students maintained that they did not understand these explanations and were unhappy that attendance was introduced as an indicator, given that records of attendance are not recorded nor were tutorial records kept. Some Fashion and Textiles students requested sight of the recording of the rationale for their classification and received summary text, but others received no information.

38 Students reported to the investigation team that they had not all received feedback on their formative mid-year assessment in January 2020 (which went on to form part of the final assessment for 2020), nor were tutorial records kept as a matter of course. In previous years they had received feedback, but not all students had received feedback in 2020. They also reported that, in the past, they had been encouraged to concentrate on summative, rather than formative, assessment which had led some to not invest time and effort in the formative work, only to find that, this year, formative was replacing summative assessment.

39 There was also confusion about the Design History and Theory (DH&T) written submission. Some students had selected to take a 40-credit DH&T option with 80 credits studio work. The submission date fell after 17 March 2020 and, as a result, students were not allowed to submit electronically. Instead, final drafts submitted in February 2020 were reviewed and sent to the external examiners. In addition, from review of the documentation, it was unclear to the investigation team how grades received for DH&T were aggregated with studio grades to arrive at a final classification.

40 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 awarding of degree classification. 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. It was unclear to the team how the different aspects of formative assessment had been weighted to arrive at final degree classifications or how the summative assessment that some students had achieved (see paragraph 31 above) had been incorporated into grades received. The investigation team was unable to conclude that the '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.

41 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).

## **Arrangements for good cause**

42 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.

43 UoG suspended its normal Good Cause procedures (the term they use 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 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.

44 The GSA Academic Registry issued guidance on 3 March 2020 to students advising them that it was unnecessary to apply for 'Good Cause' for the general impact of COVID-19 as it would be taken into account by the process to assess work. 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.

45 Students were told initially that they would not be permitted to retake their assessments if they did not accept the grades and/or degree classifications they had been given. However, some students (including Fashion and Textiles) were subsequently offered the opportunity to submit work for assessment having had Good Cause applications upheld, albeit within a tighter timescale than usual and without access to studio space at GSA. This could be regarded as counter to GSA's stated position of seeking fairness for all students. It was not clear at that point whether students would have risked receiving a lower classification as a result of submitting work for assessment at this point, although it was later confirmed that students would not be given a lower classification.

46 Students who met the investigating team maintained that Good Cause arrangements were not communicated well, leaving them confused, anxious and unsure of whether to apply. GSA acknowledged that it could have reassured students on the difference between 'no disadvantage', but stressed that at every stage the emphasis was on ensuring the best outcomes for students. GSA conceded that a stronger message could have been given out about the difference between 'predicted grades and the assessment protocol via the Record of Achievement that was to be used'. The protocol was designed to ensure achievement of learning outcomes at an appropriate level for staff to make an academic judgement and did not constitute prediction or estimation. It was evident to the investigating team that the students were clearly confused by the Good Cause process and recommends that GSA reviews the approach to, and communication of, the Good Cause process in view of the recent experience during the pandemic (Recommendation 3 - Assessment policy).

47 The students who met the investigation team were confused by the differing approach to 'Good Cause' and 'No Detriment' between GSA and the 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 QAAS 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 as 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).

## **Degree show and online (non-programme-related provision)**

48 GSA stated that educational activity did not cease after March 2020, but instead ACG worked on four workstreams designed to continue - even if staff absence through sickness within an individual programme became a problem. Once the timescales for lockdown became clearer, the offer was clarified with finalists. These included what GSA called an 'Academic Engagement Programme' delivered via online meetings and the GSA virtual learning environment (VLE). It should be noted that this programme was not directly related to students' programmes of study which had ceased following lockdown. Students maintained that this provision was not put in place until after the spring break because the assessment of progressing students was prioritised. GSA conceded that this had taken time to establish, which resulted in a period after the spring break of 'about two weeks'. The students' understanding was that student representatives would be offered meetings with Heads of School, but the process was hampered by 'variable attendance, complicated language and complicated communication'.

49 A further 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 and support preparations for the Digital Showcase which went live on 29 May 2020. Students told the investigating team that they were given the impression that there would be lecture or tutorial support in the lead-up to the Digital Showcase but, in practice, 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 was developing its approach in this area, including any ongoing offer to students who graduated in 2020. The team recommends 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).

## **Communications and consultation**

50 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.

51 GSA acknowledged that students would have benefitted from 'more reassuring communications from GSA's leadership in addition to the communications that were taking place between students and their programme teams'. Students who met the investigating team confirmed that the COVID-19 generic inbox set up to receive student queries was not helpful and offered only generic responses. GSA also acknowledges that it could have 'stressed the importance of professional proficiency and disciplinary expertise in studio over the whole duration of the degree programme and by emphasising the whole of the final year as part of that process.' Students indicated that the communication channels were made 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 March 16 to May 26 2020. Communication issues became particularly problematic for final-year students following 16 March 2020 as they were told that they could not discuss their work with tutors as they had now entered into the assessment period. This situation deteriorated further when the students' complaint was received as staff were told that the students concerns were being handled through the Complaints Handling Procedure and that they should not discuss matters raised directly with students.

52 Students also reported that the communications relating to changes to existing policies were complicated and unclear, and that they made no provision for dyslexic students. GSA acknowledges that it might have communicated with students more effectively, particularly in terms of addenda or amendments to pre-existing policies. The investigatory team consider that some communications with students were rather perfunctory and the information provided on the website could have been clearer.

53 GSA also acknowledged that the 'initial messaging' regarding the suspension of physical teaching in studios and no further submission of work was perceived by some students as cessation of all educational activity. The investigating team consider this to have been a reasonable assumption on the part of students, given the communication announcing the immediate withdrawal of access to 'all GSA teaching resources, human, technical and spatial' and the students' confusion over the academic engagement and Student Engage offers.

54 It is the investigation team's view that arrangements for communication and consultation with students were not wholly effective. GSA state that a review of communications is set out in the GSA 2020/2021 Operational Plan and was under development over summer 2020. The team recommends that GSA takes action to develop and approve a comprehensive communications strategy for use in emergency situations which addresses the needs of all key stakeholders (Recommendation 1 - Communication and consultation).

## Recommendations

55 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.

56 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.

57 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.

58 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

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.



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