

EXTERNAL MODERATION POLICY

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1. INTRODUCTION

- 1.1 The Quality Council for Trades Occupations (QCTO) has in terms of Section 26I (2) of the Skills Development Act No. 97 of 1998 (SDA) and the Council's delegation policy delegated the quality assurance partner (QAP) functions to the Public Service Sector Education and Training Authority (PSETA).
- 1.2 The delegation was conferred to the PSETA as of 27 September 2012 and it is limited to the Public Service sector. The delegated functions are as follows:
 - Accredit Skills Development Providers (SDPs) for the qualifications or part qualifications listed in the schedule in terms of criteria determined by the QCTO;
 - ii. Monitor the provision by providers of Learning Programmes leading to qualifications or part qualifications in order to ensure that the criteria for accreditation are being complied with;
 - iii. Evaluate learner assessment and the facilitation of moderation of learner assessment by providers;
 - Register assessors and moderators to undertake assessments and moderation for specified qualifications or part qualifications in terms of criteria determined by the QCTO;
 - v. Certify qualified learners in accordance with the policy determined by the Minister in terms of section 26F of the SDA:
 - vi. Maintain a comprehensive learner information management system;
 - vii. Upload learner data to the National Learner Records Database (NLRD) according to the NLRD load specifications; and
 - viii. Perform such other functions consistent with the National Qualifications Framework (NQF) Act and the SDA as the QCTO may from time to time allocate to the SETA in writing.
- 1.3 The delegation expires once the qualifications delegated to the PSETA are reviewed and replaced by qualifications developed and registered on the Occupational Qualifications Sub-Framework (OQSF) or until the qualifications



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reach their registration end date and teach out periods or when the qualifications are withdrawn by the QCTO.

- 1.4 The delegation is subject to the following terms and conditions:
 - The QCTO may review the quality management policies and procedures of the PSETA and examine the activities of the Quality Assurance Partner (QAP) department;
 - ii. The PSETA must ensure the integrity of quality assurance by exercising its delegated functions separately and independently from any provision of education and training; and
 - iii. The performance by the SETA of its delegated functions must advance the objectives of the NQF as contemplated in section 5 of the NQF Act.

2. PURPOSE AND OBJECTIVES

The purpose of this Policy is to:

2.1. Provide policy guidelines to all those involved in the external moderation of assessments and internal moderations conducted by registered ETD Practitioners for specific nationally recognised qualifications and/or part qualifications within the primary focus of the PSETA.

3. ABBREVIATIONS

Abbreviation	Description	
AA	Accounting Authority	
CEO	Chief Executive Officer	
COO	Chief Operating Officer	
ETDP	Education and Development Training Practitioners	
MOU	Memorandum of Understanding	
NQF	National Qualifications Framework	
NLRD	National Learner Records Database	
POPI	Protection of Personal Information	
PSETA	Public Service Sector Education and Training Authority	

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Abbreviation	Description	
PSETA MIS PSETA Management Information System		
QAP	Quality Assurance Partner	
QCTO	Quality Council for Trades and Occupations	
QMS	Quality Management System	
SAQA	South African Qualifications Authority	
SDP	Skills Development Provider	

4. **DEFINITIONS**

Term	Description		
Accreditation	The certification, usually for a particular period, of a person, a body or an institution having the capacity to fulfil a particular function in the quality assurance system.		
Assessment	The process of collecting evidence of learners' work to measure and make judgements about the competence or non-competence of specified NQF registered occupational qualifications and part qualifications.		
Assessor	Means a person registered by the QAP for the purposes of conducting internal and external assessment for registered qualifications and part qualifications		
Code of Conduct	Refers to a set of conventional principles and expectations that are considered binding to organisation/s and/or individuals that are accredited by PSETA.		
Extension of scope	Means the addition of qualification(s) and/or part qualifications following the Learning Programme approval processes by an accredited/programme approval Skills Development Provider to current scope of accreditation as defined above.		



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Term	Description	
ETD Practitioner	Refers to an individual registered as an Assessor and/or Moderator by the QAP.	
External Moderation	Means the process through which internal assessment is monitored to ensure that it meets required standards and through which adjustments to marks are made where required to compensate for any differences in standards that are encountered.	
Historically	These are unit standard based qualifications registered on the	
Registered	OQSF and has the registration end date of 30 June 2023.	
Qualifications		
(HRQs)		
Learner	An individual participating in a training programme with the purpose of achieving a qualification or part qualification.	
Moderator	Means a person, who has achieved competence against moderator standard and is registered with ETDP SETA as a qualified moderator. The PSETA constituent moderator is the latter who is registered to moderate against the PSETA part or full qualifications in line with the PSETA assessment policy	
Occupational	Modular-based Qualifications registered on the Occupational	
Qualification	Qualifications Sub-framework	
Organisation	Refers to legally established entities which may include but not limited to, national and provincial government departments and agencies, institution/organisation, company, centre, collaborative partnership, or consultancy established in line with relevant statutory body requirements and currently in good standing.	



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Term	Description	
Part	Means an assessed unit of learning that is registered on the NQF	
qualification	as a part qualification.	
Primary focus	Means that activity or objective within the sector upon which an	
	organisation or body concentrates its efforts.	
	Means secondary accreditation of organisations through a	
	Memorandum of Understanding (MoU) process signed between	
	SETAs. A provider accredited by another QAP can apply for	
Programme	extension of scope on unit standard/s or qualification/s falling	
Approval	within the primary focus of another QAP. The Provider is required	
	to notify the primary QAP of the intention to extend scope. The	
	primary QAP will on behalf of the Provider liaise with the	
	secondary QAP to take the process forward.	
,	Means a body delegated by the QCTO responsible for	
Quality	monitoring and auditing achievements in terms of national	
Assurance	standards or qualifications, and to which specific functions	
Partner	relating to the monitoring and auditing of national standards or	
	qualifications have been assigned in terms of section 5(1) (b) (i)	
	of the SAQA Act.	
Quality	Means the combination of policy, processes and procedures	
Management	used to ensure that the degree of excellence specified is	
System	achieved.	
Registered	Means qualifications registered on the NOE	
Qualifications	Means qualifications registered on the NQF.	
Scope of	Means the list of qualification(s) and/or part qualification(s) for	
Accreditation	which a body is accredited for a defined purpose.	
Scope of	Means the list of registered unit standards and/or qualifications	
Registration	for which an assessor or moderator is registered with the SETA	
	as an assessor or moderator.	



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Term	Description	
Skills	Means a body that delivers learning programmes which	
Development	culminate in specified NQF standards or qualifications and	
Provider	manages the assessment thereof.	

5. SCOPE OF APPLICATION

This policy applies to:

- 5.1. All PSETA Skills Development Providers
- 5.2. Constituent Assessors and Moderators; and
- 5.3. QA staff members.
- 5.4. Historically registered qualifications within the PSETA scope.

6. LEGISLATIVE AND REGULATORY PRESCRIPTS

- 6.1. Skills Development Act, No. 97 of 1998, as amended
- 6.2. South African Qualifications Authority Act
- 6.3. National Qualifications Framework Act, No. 67 of 2008
- 6.4. QCTO Policy on Delegation to Development Quality Partners and Assessment Quality Partners
- 6.5. Protection of Personal Information Act, No.4 of 2013
- 6.6. PSETA Accreditation Policy
- 6.7. PSETA Learning Programmes Evaluation Policy
- 6.8. PSETA Recognition of Prior Learning Policy
- 6.9. PSETA Management of Assessment Policy
- 6.10. PSETA Certification Policy
- 6.11. PSETA Monitoring Policy
- 6.12. PSETA Records Management Policy
- 6.13. PSETA Appeals Policy
- 6.14. PSETA E-learning Policy
- 6.15. PSETA POPI Policy



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7. POLICY PROVISIONS AND CONTENT

- 7.1. In line with the QCTO delegation, the PSETA is responsible for the certification of learners who are deemed competent on registered qualifications within the PSETA scope.
- 7.2. The PSETA will ensure that all assessment and moderation activities conducted by accredited skills development providers leading to learner achievements are verified before certificating or recognising (in relation to the statements of results) the learners.
- 7.3. The PSETA will utilise the services of properly registered ETD Practitioners to verify provider assessments and moderations activities.
- 7.4. SDPs are expected to adhere to PSETA approved policies when conducting assessments and moderations.
- 7.5. The PSETA will ensure that learner achievements are handled confidentially and access to them is carefully controlled.

8. ROLES AND RESPONSIBILITIES

- 8.1. The Accounting Authority (AA) grants approval of this Policy to be implemented and exercises its fiduciary duties of provisions of the Policy and Delegations of Authority.
- 8.2. The Chief Executive Officer (CEO) assisted by the Chief Operations Officer (COO) is accountable for establishing and maintaining systems to manage the External moderation function.
- 8.3. The QA Manager is accountable for implementation and management of this Policy.
- 8.4. SDPs conduct training on programmes that they are accredited for, part of which includes assessment and moderation. SDPs must ensure that assessments and moderations are conducted in line with their PSETA approved policies to secure an endorsement.
- 8.5. PSETA and QAP staff must:
 - i. Ensure that this policy is implemented by skills development providers

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- ii. Conduct external moderation process in a fair and just manner.
- iii. Conduct themselves in accordance with PSETA values.
- 8.6. ETD Practitioners must conduct assessments and moderations processes which are in line with the applicable code of conduct.

9. CRITERIA TO BE FOLLOWED

The PSETA QA assigned staff members will conduct External Moderation as follows:

- 9.1. Verify that the approved systems required for training provision of learning programmes are utilised appropriately and effectively;
- 9.2. Verify that all ETD practitioners involved in assessments are qualified, experienced and registered;
- 9.3. Verify that training was conducted within the approved scope of the SDP;
- 9.4. Verify that ETD practitioners have assessed and moderated with in the relevant scope;
- 9.5. Check the reliability and credibility of assessment methods and instruments respectively;
- 9.6. Verify the existence and efficiency of the provider assessment and moderation policies;
- 9.7. Sample at least 25% of the assessed and moderated learners' Portfolios of Evidence (POE) to verify consistency across assessments/moderation conducted. The sample size may increase / decrease depending on the findings during the external moderation visit.
- 9.8. Check and confirm the ETD Practitioner's decisions;
- 9.9. Provide advice and guidance to accredited SDP's on assessments systems and tools:
- 9.10. Recommend decisions to uphold or not uphold learner endorsement;
- 9.11. Report to PSETA QA Manager by submitting the following documents: External moderation report; with Detailed Database of Learners generated from the PSETA Management Information System (PSETA MIS);
- 9.12. Endorse or overturn assessment and moderation decisions by ETD Practitioners;

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9.13. From time to time, PSETA may also utilise the services of External ETD Practitioners to alleviate the backlog on the number of requests received in a particular period.

10. PROCESS FLOW

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- 10.1. External Moderation shall be conducted after assessments are completed and uploaded to the PSETA MIS;
- 10.2. An External Moderation request must be completed and sent to PSETA via the PSETA MIS (or any other mode stipulated by PSETA) for a moderation visit to be scheduled. This must be accompanied by the internal moderation report and detailed database of learners indicating whether learners are competent or not yet competent;
- 10.3. PSETA will verify external moderation requests received and schedule the external moderation site visit accordingly once the request has met all the requirements
- 10.4. External Moderation will be conducted after internal moderation has been concluded and assessment results are uploaded on the PSETA MIS noting that a minimum of 25% of the POE's must be internally moderated.
- 10.5. External Moderation shall either be conducted at the SDP offices or by SDPs submitting the sampled information to PSETA as specified.

11. REQUIREMENTS FOR EXTERNAL MODERATION

- 11.1 External moderation will only be conducted once the learners' assessments have been moderated internally by the SDP.
- 11.2 The SDP must ensure that the following requirements have been met prior to requesting external moderation from PSETA:
 - 11.2.1 Learners are uploaded and linked to the correct programme on the PSETA MIS
 - 11.2.2 Learner registration has been authorised by Learning Programmes department);

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- 11.2.3 Learner assessments results are loaded on the PSETA MIS;
- 11.2.4 Details of the ETD Practitioners are linked to each learner on the PSETA MIS
- 11.2.5 Dates of assessments and moderation are loaded for each learner on the PSETA MIS; and
- 11.2.6 Credits that the learner has obtained are loaded on the system and are in line with the South African Qualifications Authority (SAQA) qualification requirements.
- 11.3 The PSETA may also conduct external moderation twice as follows:
 - i. Mid-Term External Moderation on PSETA funded programmes, and
 - ii. Final exit moderation for certification of learners.

12. NON-COMPLIANCE

- 13.1 Non-compliance with this Policy or any applicable regulatory requirements through any deliberate or negligent act or omission, including allowing any staff, either expressly or impliedly, not to comply with this Policy or any applicable regulatory requirements, will be considered serious and be dealt with in terms of PSETA's disciplinary policies and procedures.
- 13.2 Non-compliance of this policy by SDP's will lead into the following:
 - i. non approval / acceptance of the External Moderation request;
 - ii. non-endorsement of the learner assessments by the QAP staff; and
 - iii. non-issuing of Statement of Results as well as the Certificates.

13. POLICY IMPLEMENTATION

This Policy comes into effect on the date of signature and the relevant owner shall ensure that it is communicated to staff using various modes, not limited to email, intranet, workshops etc. However, this shall not have any bearing on the effective date for implementation.



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14. MONITORING, REVIEW AND UPDATING OF THE POLICY

This Policy has to be reviewed and the outcome of such process may either require the author to maintain the status quo or update/amend it.

15. APPROVAL OF THE POLICY

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The Policy shall be approved by the AA and signed by the Chairperson subsequent to the Resolution taken.

